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U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

AL:MJJ/AS
F. #2016R02063
NY-NYE-0798

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

SUPERSEDING
INDICTMENT

- against -

VIKTOR ZELINGER,
also known as "Vitya" and
"Vityok,"
LEONID GERSHMAN,
also known as "Lenny," "Lenny
G.," "Lyonchik" and "Lyonya,"
and
ALEKSEY TSVETKOV,
also known as "Pelmin," "Pulya,"
"Lesha" and "Lyosha,"

Cr. No. 16-553 (S-4) (BMC)
(T. 18, U.S.C., §§ 371, 844(i), 844(n),
892(a), 894(a), 922(a)(1)(A),
924(a)(1)(D), 924(c)(1)(A)(i),
924(c)(1)(A)(ii), 924(d)(1), 981(a)(1)(C),
1349, 1951(a), 1955(a), 1955(d), 1962(c),
1962(d), 1963, 1963(a), 1963(m), 2 and
3551 et seq.; T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(B)(vii), 841(b)(1)(D), 846,
853(a) and 853(p); T. 28, U.S.C.,
§ 2461(c))

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Superseding Indictment, unless otherwise
indicated:

The Enterprise

1. The syndicate (hereinafter the "syndicate" or the "enterprise") was a
criminal organization, operating in, among other places, the Brighton Beach and Coney
Island neighborhoods of Brooklyn, New York. Members of the syndicate have engaged in

arson, extortion, narcotics trafficking, loansharking, illegal gambling and extortionate collection of credit, among other criminal activities.

2. The syndicate, including its leadership, membership and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Sections 1961(4) and 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The syndicate constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

3. The principal purpose of the syndicate was to generate money for its members. This purpose was implemented by members of the syndicate through their commission of various criminal activities, including arson, extortion, narcotics trafficking, loansharking, illegal gambling and extortionate collection of credit. The members of the syndicate furthered the syndicate’s criminal activities by using, and threatening to use, economic injury and physical violence. The members of the syndicate engaged in conduct designed to prevent government detection of their illegal activity and the location and proceeds of those activities.

Means and Methods of the Enterprise

4. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the syndicate were the following:

- a. Members of the syndicate and their associates committed and conspired to commit arson.
- b. Members of the syndicate and their associates used, attempted to use and conspired to use extortion, which affected interstate and foreign commerce.
- c. Members of the syndicate and their associates conspired to make extortionate extensions of credit and used extortionate means to collect extensions of credit.
- d. Members of the syndicate and their associates ran unlawful gambling operations and used extortionate means to collect debts owed therefrom.
- e. Members of the syndicate used high-ranking members of Eastern European criminal organizations, referred to as Vory, Vory v Zakone, Thieves or Thieves-in-Law, to collect debts on their behalf.
- f. Members of the syndicate and their associates distributed and possessed with intent to distribute and conspired to distribute and possess with intent to distribute narcotics.
- g. Members of the syndicate and their associates committed assaults to protect and promote their illegal activities.

The Defendants

5. The defendants VIKTOR ZELINGER, also known as “Vitya” and “Vityok,” LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” were members of the syndicate.

COUNT ONE
(Racketeering)

6. The allegations contained in paragraphs one through five are realleged and incorporated as if fully set forth in this paragraph.

7. In or about and between 2011 and May 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, also known as “Vitya” and “Vityok,” LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, being persons employed by and associated with the syndicate, an enterprise that engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of the racketeering acts set forth below.

RACKETEERING ACT ONE

(Extortionate Collection of Credit Conspiracy/Extortion Conspiracy)

8. The defendants named below committed the following acts, either of which alone constitutes Racketeering Act One.

A. Extortionate Collection of Credit Conspiracy

9. In or about and between 2015 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, did knowingly and intentionally conspire to participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit, from one or more individuals, and to punish the nonrepayment thereof, in violation of Title 18, United States Code, Section 894(a).

B. State Law Extortion Conspiracy

10. In or about and between 2015 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, did knowingly and intentionally conspire to steal property by extortion, in that the defendants and others agreed to obtain property, from one or more persons, by compelling and inducing one or more persons to deliver property by instilling in one or more persons a fear that, if the property were not so delivered, the defendants and others would (1) cause physical injury to some person in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 105.10.

RACKETEERING ACT TWO
(Extortionate Collection of Credit/Extortion – John Doe #1)

11. The defendant named below committed the following acts, either of which alone constitutes Racketeering Act Two.

A. Extortionate Collection of Credit

12. In or about and between May 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #1, an individual whose identity is known to the Grand Jury, and to punish the nonrepayment thereof, in violation of Title 18, United States Code, Sections 894(a) and 2.

B. State Law Extortion

13. In or about and between May 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, did knowingly and intentionally steal property by extortion, in that the defendants and others obtained property, to wit: money, by compelling and inducing John Doe #1 to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendants and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 20.00.

RACKETEERING ACT THREE

(Extortionate Collection of Credit/Extortion – John Doe #2)

14. The defendant named below committed the following acts, either of which alone constitutes Racketeering Act Three.

A. Extortionate Collection of Credit

15. In or about and between June 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #2, an individual whose identity is known to the Grand Jury, and to punish the nonrepayment thereof, in violation of Title 18, United States Code, Sections 894(a) and 2.

B. State Law Extortion

16. In or about and between June 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally steal property by extortion, in that the defendant and others obtained property, to wit: money, by compelling and inducing John Doe #2 to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendant and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 20.00.

RACKETEERING ACT FOUR
(Extortionate Collection of Credit/Extortion – John Doe #3)

17. The defendant named below committed the following acts, either of which alone constitutes Racketeering Act Four.

A. Extortionate Collection of Credit

18. In or about 2016, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #3, an individual whose identity is known to the Grand Jury, and to punish the nonrepayment thereof, in violation of Title 18, United States Code, Sections 894(a) and 2.

B. State Law Extortion

19. In or about 2016, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally steal property by extortion, in that the defendant and others obtained property, to wit: money, by compelling and inducing John Doe #3 to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendant and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 20.00.

RACKETEERING ACT FIVE

(Extortionate Collection of Credit/Extortion – John Doe #4)

20. The defendant named below committed the following acts, either of which alone constitutes Racketeering Act Five.

A. Extortionate Collection of Credit

21. In or about and between July 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #4, an individual whose identity is known to the Grand Jury, and to punish the nonrepayment thereof, in violation of Title 18, United States Code, Sections 894(a) and 2.

B. State Law Extortion

22. In or about and between July 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally steal property by extortion, in that the defendant and others obtained property, to wit: money, by compelling and inducing John Doe #4 to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendant and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 20.00.

RACKETEERING ACT SIX

(Extortionate Collection of Credit/Extortion – John Doe #5)

23. The defendant named below committed the following acts, either of which alone constitutes Racketeering Act Six.

A. Extortionate Collection of Credit

24. In or about and between July 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #5, an individual whose identity is known to the Grand Jury, and to punish the nonrepayment thereof, in violation of Title 18, United States Code, Sections 894(a) and 2.

B. State Law Extortion

25. In or about and between July 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally steal property by extortion, in that the defendant and others obtained property, to wit: money, by compelling and inducing John Doe #5, to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendant and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 20.00.

RACKETEERING ACT SEVEN

(Extortion – John Doe #6)

26. In or about and between March 2016 and July 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant VIKTOR ZELINGER, together with others, did knowingly and intentionally steal property by extortion, in that the defendant and others obtained property, to wit: money, by compelling and inducing John Doe #6, an individual whose identity is known to the Grand Jury, to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendant and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 20.00.

RACKETEERING ACT EIGHT

(Extortion – John Doe #7)

27. The defendant named below committed the following acts, either of which alone constitutes Racketeering Act Eight.

A. Federal Extortion

28. In or about and between 2013 and 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and others obtained property, to wit: proceeds from an illegal narcotics trafficking business, from John Doe #7, an individual whose identity is known to the Grand Jury, with his consent, which consent was induced through wrongful use of actual

and threatened force, violence and fear, in violation of Title 18, United States Code, Sections 1951(a) and 2.

B. State Law Extortion

29. In or about and between 2013 and 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally steal property by extortion, in that the defendant and others obtained property, to wit: proceeds from an illegal narcotics trafficking business, by compelling and inducing John Doe #7 to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendant and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 20.00.

RACKETEERING ACT NINE
(Extortion – John Doe #7)

30. The defendant named below committed the following acts, either of which alone constitutes Racketeering Act Nine.

A. Federal Extortion

31. In or about 2015, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendant and others obtained property, to wit: proceeds from an illegal narcotics trafficking business, from John Doe #7, with his

consent, which consent was induced through wrongful use of actual and threatened force, violence and fear, in violation of Title 18, United States Code, Sections 1951(a) and 2.

B. State Law Extortion

32. In or about 2015, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally steal property by extortion, in that the defendant and others obtained property, to wit: money, by compelling and inducing John Doe #7 to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendant and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 20.00.

RACKETEERING ACT TEN
(Extortion – John Doe #8)

33. In or about 2013, within the Eastern District of New York and elsewhere, the defendants LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, did knowingly and intentionally steal property by extortion, in that the defendants and others obtained property, to wit: money, by compelling and inducing John Doe #8, an individual whose identity is known to the Grand Jury, to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendants and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 20.00.

RACKETEERING ACT ELEVEN

(Extortion – John Doe #9)

34. In or about 2013, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally steal property by extortion, in that the defendant and others obtained property, to wit: money, by compelling and inducing John Doe #9, an individual whose identity is known to the Grand Jury, to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendant and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii) and 20.00.

RACKETEERING ACT TWELVE

(Attempted Extortion – John Doe #10)

35. In or about and between 2015 and 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALEKSEY TSVETKOV, together with others, did knowingly and intentionally attempt to steal property by extortion, in that the defendant and others attempted to obtain property, to wit: money, by compelling and inducing John Doe #10, an individual whose identity is known to the Grand Jury, to deliver such property by instilling in him a fear that, if the property were not so delivered, the defendant and others would (1) cause physical injury to one or more persons in the future and (2) cause damage to property, in violation of New York Penal Law Sections 155.40(2), 155.05(2)(e)(i), 155.05(2)(e)(ii), 110.00 and 20.00.

RACKETEERING ACT THIRTEEN
(Arson Conspiracy/Arson)

36. The defendants named below committed the following acts, either of which alone constitutes Racketeering Act Thirteen.

A. State Law Arson Conspiracy

37. In or about and between April 2016 and May 2, 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, did knowingly and intentionally conspire to damage a building, to wit: the building located at 2220 Voorhies Avenue, Brooklyn, New York, by starting a fire and causing an explosion, in violation of New York Penal Law Sections 150.10 and 105.10.

B. State Law Arson

38. On or about May 2, 2016, within the Eastern District of New York, the defendants VIKTOR ZELINGER, LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, did knowingly and intentionally damage a building, to wit: the building located at 2220 Voorhies Avenue, Brooklyn, New York, by starting a fire and causing an explosion, in violation of New York Penal Law Sections 150.10 and 20.00.

RACKETEERING ACT FOURTEEN
(Extortionate Extension of Credit Conspiracy/Extortionate Extension of Credit)

39. The defendant named below committed the following acts, either of which alone constitutes Racketeering Act Fourteen.

A. Extortionate Extension of Credit Conspiracy

40. In or about and between 2013 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally conspire to make one or more extortionate extensions of credit, to one or more individuals, in violation of Title 18, United States Code, Section 892(a).

B. Extortionate Extension of Credit

41. In or about and between 2013 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, together with others, did knowingly and intentionally make one or more extortionate extensions of credit to one or more individuals, in violation of Title 18, United States Code, Sections 892(a) and 2.

RACKETEERING ACT FIFTEEN
(Illegal Gambling)

42. In or about and between 2015 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, did knowingly and intentionally conduct, finance, manage, supervise, direct and own all and part of an illegal gambling business, to wit: a gambling business involving poker games, which operated in violation of the laws of New York State, to wit: New York Penal Law Sections 225.05 and 225.20, which involved five or more persons who conducted, financed, managed, supervised, directed and owned all and part of such business and which remained in substantially continuous operation for a period in excess of 30 days

and had gross revenues of \$2,000 or more in a single day, in violation of Title 18, United States Code, Sections 1955 and 2.

RACKETEERING ACT SIXTEEN
(Conspiracy to Distribute Marijuana/Distribution of Marijuana)

43. The defendants named below committed the following acts, either of which alone constitutes Racketeering Act Sixteen.

A. Conspiracy to Distribute Marijuana

44. In or about and between 2011 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1), in violation of Title 21, United States Code, Section 846.

B. Distribution of Marijuana

45. In or about and between 2011 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

(Title 18, United States Code, Sections 1962(c), 1963, 2 and 3551 et seq.)

COUNT TWO

(Collection of Unlawful Debt Racketeering Conspiracy)

46. The allegations contained in paragraphs one through five are realleged and incorporated as if fully set forth in this paragraph.

47. In or about and between 2015 and 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, also known as “Vitya” and “Vityok,” LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, being persons employed by and associated with the syndicate, an enterprise which engaged in, and the activities of which affected interstate and foreign commerce, did knowingly and intentionally conspire to conduct and participate directly and indirectly in the conduct of the affairs of the enterprise through the collection of unlawful debt, incurred and contracted in gambling activity in violation of Federal law, to wit: Title 18, United States Code, Section 1955, and State law, to wit: New York Penal Law Sections 225.05 and 225.20, and incurred in connection with the business of gambling in violation of Federal and State law.

(Title 18, United States Code, Sections 1962(d), 1963 and 3551 et seq.)

COUNT THREE

(Extortionate Collection of Credit Conspiracy)

48. In or about and between 2015 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, also known as “Vitya” and “Vityok,” LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and

ALEKSEY TSVETKOV, also known as, “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, did knowingly and intentionally conspire to participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from one or more persons, and to punish the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a) and 3551 et seq.)

COUNT FOUR

(Extortionate Collection of Credit Conspiracy – John Doe #1)

49. In or about and between May 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, also known as “Vitya” and “Vityok,” LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as, “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, did knowingly and intentionally conspire to participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #1, and to punish the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a) and 3551 et seq.)

COUNT FIVE

(Extortionate Collection of Credit – John Doe #1)

50. In or about and between May 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, also known as “Vitya” and “Vityok,” LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as, “Pelmin,” “Pulya,” “Lesha” and “Lyosha,”

together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #1, and to punish the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a), 2 and 3551 et seq.)

COUNT SIX

(Extortionate Collection of Credit Conspiracy – John Doe #2)

51. In or about and between June 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, did knowingly and intentionally conspire to participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #2, and to punish the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a) and 3551 et seq.)

COUNT SEVEN

(Extortionate Collection of Credit – John Doe #2)

52. In or about and between June 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #2, and to punish the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a), 2 and 3551 et seq.)

COUNT EIGHT

(Extortionate Collection of Credit Conspiracy – John Doe #3)

53. In or about 2016, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, did knowingly and intentionally conspire to participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #3, and to punish the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a) and 3551 et seq.)

COUNT NINE

(Extortionate Collection of Credit – John Doe #3)

54. In or about 2016, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #3, and to punish the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a), 2 and 3551 et seq.)

COUNT TEN

(Extortionate Collection of Credit Conspiracy – John Doe #4)

55. In or about and between July 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, did knowingly and intentionally conspire to participate in the

use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #4, and to punish the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a) and 3551 et seq.)

COUNT ELEVEN

(Extortionate Collection of Credit – John Doe #4)

56. In or about and between July 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, did knowingly and intentionally participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #4, and to punish the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a), 2 and 3551 et seq.)

COUNT TWELVE

(Extortionate Collection of Credit Conspiracy – John Doe #5)

57. In or about and between July 2016 and August 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, did knowingly and intentionally conspire to participate in the use of extortionate means to collect and attempt to collect one or more extensions of credit from John Doe #5, and to punish the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a) and 3551 et seq.)

COUNT THIRTEEN
(Extortion – John Doe #7)

58. In or about and between 2013 and 2014, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempt to do so, by extortion, in that the defendant and others obtained and attempted to obtain property, to wit: proceeds from a narcotics trafficking business, from John Doe #7, with his consent, which consent was induced through wrongful use of actual and threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT FOURTEEN
(Extortion – John Doe #7)

59. In or about 2015, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempt to do so, by extortion, in that the defendant and others obtained and attempted to obtain property, to wit: proceeds from a narcotics trafficking business, from John Doe #7, with his consent, which consent was induced through wrongful use of actual and threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT FIFTEEN
(Illegal Gambling)

60. In or about and between 2015 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, also known as “Vitya” and “Vityok,” LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, did knowingly and intentionally conduct, finance, manage, supervise, direct and own all and part of an illegal gambling business, to wit: a gambling business involving poker games, which operated in violation of the laws of New York State, to wit: New York Penal Law Sections 225.05 and 225.20, which involved five or more persons who conducted, financed, managed, supervised, directed and owned all and part of such business and which remained in substantially continuous operation for a period in excess of 30 days and had gross revenues of \$2,000 or more in a single day

(Title 18, United States Code, Sections 1955(a), 2 and 3551 et seq.)

COUNT SIXTEEN
(Illegal Gambling Conspiracy)

61. In or about and between 2015 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, also known as “Vitya” and “Vityok,” LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, did knowingly and willfully conspire to conduct, finance, manage, supervise,

direct and own all and part of an illegal gambling business, to wit: a gambling business involving poker games, which would operate in violation of the laws of New York State, to wit: New York Penal Law Sections 225.05 and 225.20, which would involve five or more persons who would conduct, finance, manage, supervise, direct and own all and part of such business and which would remain in substantially continuous operation for a period in excess of 30 days and have gross revenues of \$2,000 or more in a single day, contrary to Title 18, United States Code, Section 1955(a).

62. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, LEONID GERSHMAN and ALEKSEY TSVETKOV together with others, did commit and cause to be committed, among others, the following:

OVERT ACTS

a. In or about and between March 2016 and April 2016, both dates being approximate and inclusive, the defendants VIKTOR ZELINGER, LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, began operating an illegal gambling establishment at 2663 Coney Island Avenue, Brooklyn, New York.

b. In or about April 2016, the defendants VIKTOR ZELINGER, LEONID GERSHMAN and ALEKSEY TSVETKOV, together with others, discussed how to address a rival illegal gambling establishment located at 2200 Voorhies Avenue, Brooklyn, New York.

c. On or about May 2, 2016, Co-Conspirator #1 and Co-Conspirator #2, individuals whose identities are known to the Grand Jury, set fire to the building at 2220 Voorhies Avenue in Brooklyn, New York.

d. On or about May 29, 2016, the defendant ALEKSEY TSVETKOV placed a telephone call to the defendant VIKTOR ZELINGER, which call concerned the operation of an illegal gambling business.

e. On or about August 30, 2016, the defendant LEONID GERSHMAN, together with others, conducted poker games at 2663 Coney Island Avenue, Brooklyn, New York.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT SEVENTEEN
(Arson Conspiracy)

63. In or about and between April 2016 and May 2016, both dates being approximate and inclusive, with the Eastern District of New York and elsewhere, the defendants VIKTOR ZELINGER, also known as “Vitya” and “Vityok,” LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, did knowingly and intentionally conspire to maliciously damage and destroy, by means of fire and an explosive, a building and other real and personal property used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, to wit: a building located at 2220 Voorhies Avenue, Brooklyn, New York, that contained a gambling business, contrary to Title 18, United States Code, Section 844(i), and as a result of such conduct, did cause personal injury to one or more persons, to wit: one or more residents

of the building located at 2220 Voorhies Avenue, Brooklyn, New York, and one or more New York City Fire Department firefighters performing duties as a direct and proximate result of such conduct.

(Title 18, United States Code, Sections 844(n) and 3551 et seq.)

COUNT EIGHTEEN
(Arson)

64. On or about May 2, 2016, the defendants VIKTOR ZELINGER, also known as “Vitya” and “Vityok,” LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, did knowingly, intentionally and maliciously damage and destroy, and attempt to damage and destroy, by means of fire and an explosive, a building and other real and personal property used in interstate and foreign commerce and in an activity affecting interstate and foreign commerce, to wit: a building located at 2220 Voorhies Avenue, Brooklyn, New York, that contained a gambling business, and as a result of such conduct, did cause personal injury to one or more persons, to wit: one or more residents of the building located at 2220 Voorhies Avenue, Brooklyn, New York, and one or more New York City Fire Department firefighters performing duties as a direct and proximate result of such conduct.

(Title 18, United States Code, Sections 844(i), 2 and 3551 et seq.)

COUNT NINETEEN
(Conspiracy to Distribute Marijuana)

65. In or about and between 2011 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the

defendants LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of marijuana involved in the conspiracy attributable to the defendant LEONID GERSHMAN as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, was 100 kilograms or more of a substance containing marijuana.

(Title 21, United States Code, Sections 846, 841(b)(1)(B)(vii) and 841(b)(1)(D); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWENTY
(Distribution of Marijuana)

66. In or about and between 2011 and May 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT TWENTY-ONE
(Using, Carrying and Possessing a Firearm)

67. In or about 2012, within the Eastern District of New York and elsewhere, the defendants LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” and ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence and narcotics trafficking crimes, to wit: the crimes charged in Counts One and Nineteen, and did knowingly and intentionally possess such firearms in furtherance of said crime of violence and narcotics trafficking crime, one or more of which firearms was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 2 and 3551 et seq.)

COUNT TWENTY-TWO
(Conspiracy to Unlawfully Deal in Firearms)

68. In or about and between 2008 and 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, not being a licensed importer, licensed manufacturer or licensed dealer in firearms, did knowingly and willfully conspire to engage in the business of dealing in firearms, contrary to Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

69. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York, the defendant LEONID GERSHMAN, together with others, did commit and cause to be committed, among others, the following:

OVERT ACTS

a. In or about and between 2008 and 2009, both dates being approximate and inclusive, the defendant LEONID GERSHMAN sold one or more firearms to Co-Conspirator #1.

b. In or about and between September 2012 and 2013, both dates being approximate and inclusive, the defendant LEONID GERSHMAN sold one or more firearms to Co-Conspirator #1 and Co-Conspirator #2.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWENTY-THREE
(Unlawful Dealing in Firearms)

70. In or about and between 2008 and 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, not being a licensed importer, licensed manufacturer or licensed dealer in firearms, did knowingly and intentionally engage in the business of dealing in firearms.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), 2 and 3551 et seq.)

COUNT TWENTY-FOUR
(Extortionate Extension of Credit Conspiracy)

71. In or about and between 2013 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and

“Lyonya,” together with others, did knowingly and intentionally conspire to make one or more extortionate extensions of credit.

(Title 18, United States Code, Sections 892(a) and 3551 et seq.)

COUNT TWENTY-FIVE
(Extortionate Extension of Credit)

72. In or about and between 2013 and November 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LEONID GERSHMAN, also known as “Lenny,” “Lenny G.,” “Lyonchik” and “Lyonya,” together with others, did knowingly and intentionally make one or more extortionate extensions of credit.

(Title 18, United States Code, Sections 892(a), 2 and 3551 et seq.)

COUNT TWENTY-SIX
(Conspiracy to Commit Wire Fraud)

73. In or about and between June 2015 and August 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ALEKSEY TSVETKOV, also known as “Pelmin,” “Pulya,” “Lesha” and “Lyosha,” together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud Progressive Auto Insurance (“Progressive”), and to obtain money and property from Progressive by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds, to wit: one or more

telephone calls from New York to Progressive in Texas, Florida and Ohio in or about and between July 2015 and August 2015, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND TWO

74. The United States hereby gives notice to the defendants charged in Counts One and Two that, upon their conviction of either offense, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1963(a), which requires any person convicted of such offenses to forfeit: (a) any interest the person acquired or maintained in violation of Title 18, United States Code, Section 1962; (b) any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over any enterprise which the person has established, operated, controlled, conducted or participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and (c) any property constituting, or derived from, any proceeds which the person obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of Title 18, United States Code, Section 1962.

75. 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 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 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 1963(a) and 1963(m))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS THREE THROUGH FOURTEEN
AND TWENTY-FOUR THROUGH TWENTY-SIX

76. The United States hereby gives notice to the defendants charged in Counts Three through Fourteen and Twenty-Four through Twenty-Six that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

77. 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 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 defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT FIFTEEN

78. The United States hereby gives notice to the defendants charged in Count Fifteen that, upon their conviction of such offense, the government will seek forfeiture in accordance with (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense; and (b) Title 18, United States Code, Section 1955(d), which provides for the forfeiture of any property, including money, used in violation of Title 18, United States Code, Section 1955.

79. 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 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 defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 981(a)(1)(C) and 1955(d); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS NINETEEN AND TWENTY**

80. The United States hereby gives notice to the defendants charged in Counts Nineteen and Twenty that, upon their conviction of either such offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires 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.

81. 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 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 defendants up to the value of the forfeitable property described in this forfeiture allegation.

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

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS TWENTY-ONE THROUGH TWENTY-THREE**

82. The United States hereby gives notice to the defendants charged in Counts Twenty-One through Twenty-Three that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922 or Section 924.

83. 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 party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value;
- 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 defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON



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

F. #2016R02063
FORM DBD-34
Jun 85

No. 16-CR-553

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

VIKTOR ZELINGER, a "Vitya" and "Vityok," LEONID GERSHMAN, also known as "Lenny," "Lenny G.," "Lyonchik" and "Lyonya," and ALEKSEY TSVETKOV, also known as "Pelmin," "Pulya," "Lesha" and "Lyosha,"

Defendants.

SUPERSEDING INDICTMENT

(T.18, U.S.C., §§ 371, 844(i), 844(n), 892(a), 894(a)(1), 922(a)(1)(A), 922(o)(1), 924(a)(1)(D), 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(d)(1), 981(a)(1)(C), 1951(a), 1955(a), 1955(d), 1962(c), 1962(d), 1963, 1963(a), 1963(m), 2 and 3551 *et seq.*; T. 21, U.S.C. §§ 841(a)(1), 841(b)(1)(B)(vii), 841(b)(1)(D), 846, 853(a) and 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Foreperson



Filed in open court this ----- *day, of* ----- *A.D. 20* -----

Clerk

Bail, \$ -----

*Matthew Jacobs, Andrey Spektor,
Assistant U.S. Attorneys (718) 254-7000*