

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 18-
	:	
MICHAEL A. PAPAGNI and	:	18 U.S.C. § 111(a)(1)
PARMENIO I. PEREZ	:	18 U.S.C. § 2

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting in Newark, charges:

COUNT 1

(Forcibly Assaulting, Impeding, Intimidating and Interfering with a Federal Officer)

1. At all times relevant to Count 1 of this Indictment:

a. Defendant MICHAEL A. PAPAGNI was employed by the United States Department of Homeland Security (“DHS”) as a Customs and Border Protection Officer (“CBPO”) at Newark Liberty International Airport (“NLIA”).

b. Defendant PARMENIO I. PEREZ was employed by DHS as a CBPO at NLIA.

c. “Individual 1” was employed by DHS as a CBPO at NLIA.

d. “Victim One” was employed by DHS as a CBPO at NLIA.

2. On or about January 10, 2017, in Essex County, in the District of New Jersey, and elsewhere, defendants

**MICHAEL A. PAPAGNI,
PARMENIO I. PEREZ,**

and others, including Individual 1, did forcibly assault, resist, oppose, impede, intimidate, and interfere with Victim One, a person designated in Title 18, United States Code, Section 1114,

namely a CBPO employed by the United States Department of Homeland Security, while Victim One was engaged in and on account of the performance of Victim One's official duties, where such acts involved physical contact with Victim One.

In violation of Title 18, United States Code, Section 111(a)(1) and Section 2.

COUNT 2

(Forcibly Assaulting, Impeding, Intimidating and Interfering with a Federal Officer)

1. The allegations set forth in paragraphs 1(a)-(c) of Count 1 of this Indictment are re-alleged and incorporated as if set forth herein.

2. "Victim Two" was employed by DHS as a CBPO at NLIA.

3. On or about November 30, 2016, in Essex County, in the District of New Jersey, and elsewhere, defendants

**MICHAEL A. PAPAGNI,
PARMENIO I. PEREZ,**

and others, including Individual 1, did forcibly assault, resist, oppose, impede, intimidate, and interfere with Victim Two, a person designated in Title 18, United States Code, Section 1114, namely a CBPO employed by the United States Department of Homeland Security, while Victim Two was engaged in and on account of the performance of Victim Two's official duties, where such acts involved physical contact with Victim Two.

In violation of Title 18, United States Code, Section 111(a)(1) and Section 2.

A TRUE BILL

FOREPERSON

Craig Carpenito

CRAIG CARPENITO
United States Attorney