

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA
:
- v. -
:
RICHARD OCHETAL,
:
Defendant.
:
----- X

SEALED INFORMATION

S1 16 Cr. 342 (SHS)

COUNT ONE

The United States Attorney charges:

1. From in or about 2013, up through and including in or about 2016, in the Southern District of New York and elsewhere, RICHARD OCHETAL, the defendant, being an agent of a State and local government, and an agency thereof, to wit, a New York City Police Department ("NYPD") officer in the Licensing Division of the NYPD, willfully, knowingly, and corruptly did solicit, demand for the benefit of any person, accept, and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of the NYPD involving a thing of value of \$5,000 and more, such government and agency having received, in a one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, to wit, OCHETAL accepted cash and benefits from individuals in exchange for expediting and

approving gun licenses issued by the Licensing Division of the NYPD, as such opportunities arose.

(Title 18, United States Code, Sections 666 and 2.)

COUNT TWO

The United States Attorney further charges:

2. From in or about 2013, up to and including in or about 2016, in the Southern District of New York and elsewhere, RICHARD OCHETAL, the defendant, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to commit bribery, in violation of Title 18, United States Code, Section 666.

3. It was a part and an object of the conspiracy that RICHARD OCHETAL, the defendant, being an agent of State and local government, and an agency thereof, to wit, an NYPD officer in the Licensing Division of the NYPD, willfully, knowingly, and corruptly would and did solicit, demand for the benefit of any person, accept, and agree to accept a thing of value from a person, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of the NYPD involving a thing of value of \$5,000 and more, such government and agency having received, in a one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract,

subsidy, loan, guarantee, insurance, and other form of federal assistance, to wit, OCHETAL agreed with others to accept and accepted cash and benefits from individuals in exchange for expediting and approving gun licenses issued by the Licensing Division of the NYPD, as such opportunities arose.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York:

a. In or about May 2015, RICHARD OCHETAL, the defendant, approved the gun license application of a client of a co-conspirator not named herein ("CC-1"), at NYPD Police Headquarters, in New York, New York.

b. In or about December 2015, RICHARD OCHETAL, the defendant, approved the gun license application of a client of a co-conspirator not named herein ("CC-2"), at NYPD Police Headquarters, in New York, New York.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

5. As a result of committing the offenses alleged in Counts One and Two of this Information, RICHARD OCHETAL, the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and

personal, which constitutes or is derived from proceeds traceable to the offenses alleged in Counts One and Two of the Information, including \$3,371 in United States currency (the "Money Judgment"), constituting the proceeds obtained by OCHETAL as a result of the offenses.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of RICHARD OCHETAL, the defendant:

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

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

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

(4) has been substantially diminished in value; or

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

it is the intent of the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981,
Title 21, United States Code, Section 853, and
Title 28, United States Code, Section 2461.)

Preet Bharara

PREET BHARARA *ADG*
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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666, 371 and 2.)

PREET BHARARA

United States Attorney.
