

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : SEALED SUPERSEDING
: INDICTMENT
:
-v.- : S1 17 Cr. 315 (RMB)
:
FRANKIE BEQIRAJ, :
:
Defendant. :
:
- - - - - x

COUNT ONE

The Grand Jury charges:

1. From at least in or about July 2016 through and including January 2017, in the Southern District of New York and elsewhere, FRANKIE BEQIRAJ, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that FRANKIE BEQIRAJ, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that the defendant conspired to distribute and possess with the intent to distribute were (a) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in

violation of Title 21, United States Code, Section 841(b) (1) (A); (b) mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b) (1) (C); (c) mixtures and substances containing a detectable amount of oxycodone, in violation of Title 21, United States Code, Section 841(b) (1) (C); and (d) mixtures and substances containing a detectable amount of alprazolam, in violation of Title 21, United States Code, Section 841(b) (2).

4. The use of one such controlled substance, specifically heroin, resulted in the death of Robert Vivolo, in the Bronx, New York, on or about October 21, 2016.

5. The use of one such controlled substance, specifically heroin, resulted in the death of Leonides Madrid, in New Rochelle, New York, on or about January 8, 2017.

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

6. As a result of committing the offense alleged in Count One of this Indictment, FRANKIE BEQIRAJ, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the offenses 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 offenses alleged in Count One of this Indictment.

Substitute Assets Provision

7. 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;

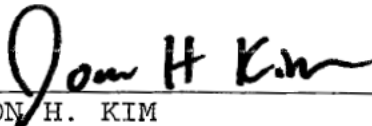
d) has been substantially diminished in value; or

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

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

(Title 21, United States Code, Section 853.)


FOREPERSON


JOON H. KIM
Acting United States Attorney

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UNITED STATES OF AMERICA

v.

FRANKIE BEQIRAJ,

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SEALED SUPERSEDING INDICTMENT

S1 17 Cr. ____ (RMB)

(21 U.S.C. §§ 812, 841(a)(1),
841(b)(1)(A), 841(b)(1)(C), 841(b)(2),
846)

JOON H. KIM

Acting United States Attorney

 5/23/17
