

FJN/PP:AA
F. #2024R00143

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

MICHAEL KUILAN and
ANTONIO VENTI,

Defendants.
----- X

I N D I C T M E N T

Cr. No. 24-CR-130
(T. 18, U.S.C., §§ 922(g)(1), 924(a)(8),
924(d)(1), 2 and 3551 et seq.;
T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(C), 846, 853(a) and 853(p);
T. 28, U.S.C., § 2461(c))

Judge Brian M. Cogan
Magistrate Judge Marcia M. Henry

THE GRAND JURY CHARGES:

COUNT ONE

(Distribution of Heroin and Fentanyl Causing Death)

1. In or about and between January 2024 and February 2024, both dates being approximate and inclusive, within the Eastern District of New York, the defendants MICHAEL KUILAN and ANTONIO VENTI, together with others, did knowingly and intentionally distribute a controlled substance, which offense involved a substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II controlled substance, and heroin, a Schedule I controlled substance, and the use of which resulted in the death of Cecilia Gentili.

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

COUNT TWO

(Conspiracy to Distribute and Possess with Intent to Distribute Heroin and Fentanyl)

2. In or about and between January 2024 and March 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants MICHAEL KUILAN and ANTONIO VENTI, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) a substance containing fentanyl, a Schedule II controlled substance; and (b) a substance containing heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

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

COUNT THREE

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

3. In or about and between January 2024 and March 2024, both dates being approximate and inclusive, within the Eastern District of New York, the defendants MICHAEL KUILAN and ANTONIO VENTI, together with others, did knowingly and intentionally distribute and possess with intent to distribute one or more controlled substances, which offense involved (a) fentanyl, a Schedule II controlled substance; and (b) heroin, a Schedule I controlled substance.

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

COUNT FOUR
(Felon in Possession of a Firearm)

4. On or about March 12, 2024, within the Eastern District of New York and elsewhere, the defendant MICHAEL KUILAN, knowing that he had previously been convicted in a court of one or more crimes punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting interstate and foreign commerce a firearm, to wit: a Cimarron Model 1911 .45 caliber handgun bearing serial number C002638.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(8) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE THROUGH THREE

5. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged in Counts One through Three, 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 including, but not limited to, one Cimarron Model 1911 .45 caliber handgun bearing serial number C002638, seized by law enforcement on or about March 12, 2024, in Brooklyn, New York.

6. 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 COUNT FOUR

7. The United States hereby gives notice to the defendant charged in Count Four that, upon his conviction of such offense, 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, including, but not limited to, one Cimarron Model 1911 .45 caliber handgun bearing serial number C002638, seized by law enforcement on or about March 12, 2024, in Brooklyn, New York.

8. 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 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


BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.# 2024R00143
FORM DBD-34
JUN. 85

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

MICHAEL KUILAN and
ANTONIO VENTI

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 922(g)(1), 924(a)(8), 924(d)(1), 2 and 3551 et seq.;
T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C), 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, \$ _____

Adam Amir, Assistant U.S. Attorney (718) 254-6116