

AL:TH/DGR  
F. # 2014R00908

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

UNITED STATES OF AMERICA

INDICTMENT

- against -

Cr. No. **CR 17 612**  
(T. 18, U.S.C., §§ 892(a), 981(a)(1)(C),  
2 and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

PAUL SEMPLICE,

Defendant.

**CHEN, J.**

**BULSARA, M.J.**

THE GRAND JURY CHARGES:

COUNT ONE

(Extortionate Extension of Credit Conspiracy)

1. In or about and between October 2016 and March 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant PAUL SEMPLICE, 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 TWO

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

2. In or about and between October 2016 and March 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant PAUL SEMPLICE, together with others, did knowingly and intentionally conspire

to make one or more extortionate extensions of credit to John Doe #1, an individual whose identity is known to the grand jury.

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

COUNT THREE

(Extortionate Extension of Credit – John Doe #1)

3. In or about and between October 2016 and March 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant PAUL SEMPLICE, together with others, did knowingly and intentionally make one or more extortionate extensions of credit to John Doe #1.

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

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts One through Three, 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 the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to such offenses.

5. 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 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

~~FOREPERSON~~

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BRIDGET M. ROHDE  
ACTING UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

*PAUL SEMPLICE,*

Defendant.

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**INDICTMENT**

( T. 18, U.S.C., §§ 892(a), 981(a)(1)(C), 2 and 3551 et seq.; T. 21,  
U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

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*A true bill.*

\_\_\_\_\_  
*Foreperson*

*Filed in open court this* \_\_\_\_\_ *day,*

*of* \_\_\_\_\_ *A.D. 20* \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

*Bail, \$* \_\_\_\_\_

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*Tanya Hajjar and Drew Rolle, Assistant U.S. Attorneys*  
*(718) 254-7000*