

AL:TH  
F. #2014R00908

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

PAUL RAGUSA,

Defendant.

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THE GRAND JURY CHARGES:

COUNT ONE

(Felon in Possession of Firearms)

1. On or about November 2, 2017, within the Eastern District of New York, the defendant PAUL RAGUSA, having previously been convicted in courts of three crimes, each punishable by a term of imprisonment exceeding one year and each constituting a violent felony, committed on occasions different from one another, did knowingly and intentionally possess in and affecting commerce one or more firearms, to wit: one Norinco automatic AK-47 assault rifle bearing serial number 2823242; one China-made automatic AK-47 assault rifle bearing serial number 20028155; one Colt M16A1 automatic rifle bearing serial number 5131974; one Bushmaster XM-15 semi-automatic rifle bearing serial number L053821; one Glock Model 19 semi-automatic pistol bearing serial number NLV119; one Smith & Wesson M&P 9 semi-automatic pistol bearing serial number DSV8734; one Smith & Wesson Model 49 revolver bearing serial number AEM9453; one Smith & Wesson Model 38 revolver bearing serial number CUZ4975; one SIGARMS Model

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U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

INDICTMENT

**CR 17**

**613**

C. No. (T. 18, U.S.C., §§ 922(g)(1), 922(o)(1), 924(a)(2), 924(d)(1), 924(e)(1) and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

**CHEN, J.**

**SCANLON, M.J.**

P225 semi-automatic pistol bearing serial number M624402; and one Knight's Armament Company suppressor bearing serial number T5969.

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

COUNT TWO  
(Possession of Machineguns)

2. On or about November 2, 2017, within the Eastern District of New York, the defendant PAUL RAGUSA did knowingly and intentionally transfer and possess one or more machineguns, to wit: one Norinco automatic AK-47 assault rifle bearing serial number 2823242; one China-made automatic AK-47 assault rifle bearing serial number 20028155; and one Colt M16A1 automatic rifle bearing serial number 5131974.

(Title 18, United States Code, Sections 922(o)(1), 924(a)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged in Counts One and Two, 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, including but not limited to one Norinco automatic AK-47 assault rifle bearing serial number 2823242; one China-made automatic AK-47 assault rifle bearing serial number 20028155; one Colt M16A1 automatic rifle bearing serial number 5131974; one Bushmaster XM-15 semi-automatic rifle bearing serial number L053821; one Glock Model 19 semi-automatic pistol bearing serial number NLV119; one Smith & Wesson M&P 9 semi-automatic pistol bearing serial number DSV8734; one Smith & Wesson Model 49

revolver bearing serial number AEM9453; one Smith & Wesson Model 38 revolver bearing serial number CUZ4975; one SIGARMS Model P225 semi-automatic pistol bearing serial number M624402; and one Knight's Armament Company suppressor bearing serial number T5969.

4. 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~~

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BRIDGET M. RÖHDE  
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 RAGUSA,*

Defendant.

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**INDICTMENT**

(T. 18, U.S.C., §§ 922(g)(1), 922(o)(1), 924(a)(2), 924(d)(1), 924(e)(1)  
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.* p

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*Foreperson*

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Filed in open court this ----- day,

of ----- A.D. 20 -----

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*Clerk*

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Bail, \$ -----  
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*Tanya Hajjar, Assistant U.S. Attorney (718) 254-6109*