

★ DEC 04 2019 ★

BROOKLYN OFFICE

NS:KDE/KCB
F.#2019R01558

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

UNITED STATES OF AMERICA

- against -

MARK KOCAJ,
also known as "Chippy,"

Defendant.

-----X

THE GRAND JURY CHARGES:

INDICTMENT

CR 19-577

Cr. No. (T. 18, U.S.C., §§ 894(a), 981(a)(1)(C),
2 and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

BLOCK, J.

GOLD, M.J.

COUNT ONE

(Extortionate Collection of Credit Conspiracy)

1. In or about May 2019, within the Eastern District of New York and elsewhere, the defendant MARK KOCAJ, also known as "Chippy," together with others, did knowingly and intentionally conspire to participate in the use of extortionate means to collect one or more extensions of credit from John Doe, an individual whose identity is known to the Grand Jury, and to punish John Doe for the nonrepayment thereof.

(Title 18, United States Code, Sections 894(a) and 3551 et seq.)

COUNT TWO

(Extortionate Collection of Credit)

2. In or about May 2019, within the Eastern District of New York and elsewhere, the defendant MARK KOCAJ, also known as "Chippy," together with others, did knowingly and intentionally participate in the use of extortionate means to collect and

attempt to collect one or more extensions of credit from John Doe, and to punish John Doe for the nonrepayment thereof.

(Title 18, United States Code, Sections 894(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 herein, 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 any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

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

A TRUE BILL

[Redacted signature]

FOREPERSON

[Redacted signature]

RICHARD P. DONOGHUE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

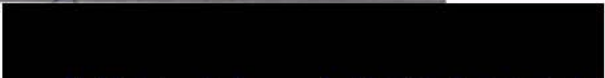
MARK KOCAJ,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 894(a), 981(a)(1)(C), 2 and 3551 et seq.; T. 21,
U.S.C., § 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, \$ _____

Keith D. Edelman, Assistant U.S. Attorney (718) 254-6328
Kayla C. Bensing, Assistant U.S. Attorney (718) 254-6279