

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

SEALED SUPERSEDING INDICTMENT

S4 15 Cr. 491 (LTS)

ROBERT DEBELLO,  
a/k/a "Old Man,"  
a/k/a "Bobby,"  
a/k/a "Grandpa,"  
STEVEN PASTORE,  
RYAN ELLIS,  
a/k/a "Joseph Princi,"  
a/k/a "Baldy,"  
a/k/a "Lazy Eye,"  
a/k/a "Zeus,"  
SALVATORE DELLIGATTI,  
a/k/a "Jay,"  
a/k/a "Fat Sal,"  
LUIGI ROMANO,  
a/k/a "Louie Sunoco,"  
BERTRAM DUKE,  
a/k/a "Birdy,"  
TYRONE MCCULLUM,  
a/k/a "Ty,"  
MARCUS GRANT,  
SHARIF BROWN,  
a/k/a "QB,"  
LUIGI CAMINITI,  
SCOTT JACOBSON,  
FRANK CELSO,  
JOSEPH TEDESCO,  
MICHAEL VIGORITO,  
MICK SOKOL,  
SPYRO ANTONAKOPOULOS,  
MICHAEL KARNBACH,  
a/k/a "Combat," and  
JONATHAN DESIMONE,  
  
Defendants.

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RACKETEERING VIOLATIONS

COUNT ONE

(Racketeering Conspiracy)

The Grand Jury charges:

1. At all times relevant to this Indictment, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," STEVEN PASTORE, RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," and SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," the defendants, and others known and unknown, were members and associates of the Genovese Organized Crime Family of La Cosa Nostra (the "Genovese Organized Crime Family"). The Genovese Organized Crime Family was a criminal organization whose members and associates engaged in numerous acts of violence and other crimes, including conspiracy to commit murder; attempted murder; extortion; and the operation of illegal gambling businesses.

2. The Genovese Organized Crime Family, including its leadership, membership, and associates, constituted an "enterprise" as that term is defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity (the "Enterprise"). This Enterprise was engaged in, and its activities affected, interstate and foreign commerce. The Genovese Organized Crime Family was an organized criminal group based in New York City that operated in the Southern District of New York and elsewhere and constituted an ongoing

organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

3. The Genovese Organized Crime Family was part of a nationwide criminal organization known by various names, including the "Mafia" and "La Cosa Nostra," which operated through entities known as "Families." The Genovese Organized Crime Family took its name from one of its early leaders, Vito Genovese. In addition to the Genovese Organized Crime Family, five other Families operated in the New York City and New Jersey area, namely, the Gambino Organized Crime Family of La Cosa Nostra, the Luchese Organized Crime Family of La Cosa Nostra, the Colombo Organized Crime Family of La Cosa Nostra, the Bonanno Organized Crime Family of La Cosa Nostra, and the DeCavalcante Organized Crime Family of La Cosa Nostra.

4. The Genovese Organized Crime Family operated through groups of individuals known as "crews" and "regimes," most of which were based in New York City. Each "crew" had as its leader a person known as a "Caporegime," "Capo," "Captain," or "Skipper," and consisted of "made" members, sometimes known as "Soldiers," "wiseguys," "friends of ours," and "good fellows." Soldiers were aided in their criminal endeavors by other trusted individuals, known as "associates," who sometimes were referred to as "connected," "on record," or identified as "with" a Soldier. Associates participated in the various activities of the crew and

its members. In order for an associate to become a made member of the Family, the associate must first be of Italian descent and typically needed to demonstrate the ability to generate income for the Family and/or the willingness to commit acts of violence. Each Capo was responsible for supervising the criminal activities of his crew and provided Soldiers and associates with support and protection. In return, the Capo typically received a share of the illegal earnings of each of his crew's Soldiers and associates, which was sometimes referred to as a "tribute."

5. Above the Capos were the highest-ranking members of the Genovese Organized Crime Family, commonly referred to as the "Administration." The head of the Genovese Organized Crime Family was known as the "Boss," who was ordinarily assisted by an "Underboss" and a "Consigliere," or counselor. The Boss, Underboss, and Consigliere were responsible for, among other things, setting policy, resolving disputes between and among members of the Genovese Organized Crime Family, and resolving disputes between members of the Genovese Organized Crime Family and members of other criminal organizations. The Administration of the Genovese Organized Crime Family was also responsible for overseeing the criminal activities of the Family's Capos, Soldiers, and associates, and was at times called upon to make decisions regarding those criminal endeavors.

6. The Boss, Underboss, and Consigliere supervised, supported, protected, and disciplined the Capos, Soldiers, and associates, and regularly received reports regarding their various activities. In return for their supervision and protection, the Boss, Underboss, and Consigliere typically received part of the illegal earnings of each crew.

7. The Genovese Organized Crime Family has taken significant steps to protect and insulate its Administration members from detection and scrutiny by law enforcement. These steps include appointing multi-member committees, and/or "panels," to perform the function of Administration positions, including the Boss, and to oversee the daily affairs of the Genovese Organized Crime Family; and naming temporary, or "Acting" Bosses and other Administration positions.

8. While the overall structure of the Genovese Organized Crime Family remained constant, the structure of the Family's Administration was sometimes adjusted to meet situations — including particularly the incarceration of the Boss, Acting Boss, and other high-ranking members of the Family — that threatened to impede the orderly operation and criminal activities of the Genovese Organized Crime Family.

THE RACKETEERING DEFENDANTS

9. At all times relevant to this Indictment, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," STEVEN PASTORE, RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," and SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," the defendants, were members and associates of the Enterprise, the Genovese Organized Crime Family. DEBELLO, PASTORE, ELLIS, and DELLIGATTI participated in the operation and management of the enterprise as follows:

a. DEBELLO was, at times relevant to this Indictment, a Soldier of the Genovese Organized Crime Family. DEBELLO reported directly to a Captain ("Captain-1") in the Genovese Organized Crime Family, often at a social club in lower Manhattan. In or about 2001, DEBELLO was arrested on federal criminal racketeering charges filed in the United States District Court for the Eastern District of New York arising out of his involvement with the Genovese Organized Crime Family, and, in or about 2002, pleaded guilty to conspiracy to commit assault in aid of racketeering in that case. As relevant to this Indictment, in his capacity as a Soldier in the Genovese Organized Crime Family, DEBELLO was involved in a murder conspiracy, an attempted murder, an extortion conspiracy, and an illegal gambling operation.

b. PASTORE was, at times relevant to this Indictment, a Soldier of the Genovese Organized Crime Family. In or about 2005, PASTORE was arrested on federal criminal racketeering charges filed in the United States District Court for the District of New Jersey arising out of his involvement with the Genovese Organized Crime Family, and, in or about 2005, pleaded guilty to participating in an illegal gambling business run by the Genovese Organized Crime Family. As relevant to this Indictment, in his capacity as a Soldier of the Genovese Organized Crime Family, among other things, PASTORE was involved in an illegal gambling operation.

c. ELLIS was, at times relevant to this Indictment, an associate of the Genovese Organized Crime Family who was "on record" with Genovese Organized Crime Family Soldier DEBELLO. In or about 2012, ELLIS was arrested on federal criminal charges filed in the United States District Court for the Eastern District of New York on charges (among other things) of racketeering conspiracy, extortion conspiracy, and illegal gambling arising from his involvement in the Genovese Organized Crime Family, and, in or about 2013, pleaded guilty to conspiracy to commit extortion. As relevant to this Indictment, in his capacity as an associate in the Genovese Organized Crime Family, ELLIS was involved in a murder conspiracy, an attempted

murder, an extortion conspiracy, and an illegal gambling operation.

d. DELLIGATTI was, at times relevant to this Indictment, an associate of the Genovese Organized Crime Family who was "on record" with Genovese Organized Crime Family Soldier DEBELLO. As relevant to this Indictment, DELLIGATTI, among other things, was involved in a murder conspiracy, an attempted murder, an extortion conspiracy, and an illegal gambling operation.

PURPOSES OF THE ENTERPRISE

10. The purposes of the Enterprise included the following:

a. Enriching the members and associates of the Enterprise through, among other things, (i) the extortionate control of businesses, persons, and property through threats of physical and economic harm; and (ii) the operation of illegal gambling businesses.

b. Preserving and protecting the power, territory, and financial profits of the Enterprise through intimidation, violence, and threats of physical and economic harm;

c. Promoting and enhancing the Enterprise and the activities of its members and associates; and



d. Keeping victims and citizens in fear of the Enterprise and associates by: (i) identifying the Enterprise, its members, and its associates with La Cosa Nostra or the "Mafia"; (ii) causing and threatening to cause economic harm; and (iii) committing and threatening to commit physical violence.

MEANS AND METHODS OF THE ENTERPRISE

11. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Enterprise were the following:

a. To protect and expand the Enterprise's business and criminal operations, members and associates of the Enterprise conspired to commit murder, and they threatened, assaulted, and intimidated persons who engage in activity that jeopardized (i) the power and criminal activities of the Enterprise; (ii) the power of leaders of the Enterprise; and (iii) the flow of criminal proceeds to the leaders of the Enterprise.

b. Members and associates of the Enterprise promoted a climate of fear in their community through threats of economic harm and violence.

c. Members and associates of the Enterprise generated income for the Enterprise through, among other things (i) extortion; and (ii) the operation of illegal gambling

businesses.

d. Members and associates of the Enterprise at times engaged in criminal conduct or coordinated their criminal activities with leaders, members, and associates of other La Cosa Nostra Families. At other times, members and associates of the Enterprise met with leaders, members, and associates of other La Cosa Nostra Families to resolve disputes over their criminal activities.

e. Members and associates of the Enterprise used various techniques to avoid law enforcement scrutiny of the Enterprise's criminal activities. Members and associates of the Enterprise typically used coded language to make arrangements for meetings and to refer to other members and associates of the Enterprise, and took other steps to frustrate law enforcement's attempts to overhear their discussions. Members and associates of the Enterprise also engaged in other evasive conduct, such as whispering and speaking in hushed tones, in an effort to obstruct potential law enforcement eavesdropping, and not specifying the names of those about whom they were speaking. Members and associates of the Enterprise also attempted to obstruct potential law enforcement eavesdropping by engaging in "walk and talks" and by stating — including on conversations intercepted pursuant to judicially authorized wiretaps — that certain conversations should be conducted in person, and not by

telephone.

f. Members and associates of the Enterprise attempted to identify and did identify individuals suspected of providing, or deemed likely to provide, information to law enforcement about the Enterprise, its members and activities, and about other La Cosa Nostra Families.

THE RACKETEERING CONSPIRACY

12. From at least in or about 2008, up to and including in or about May 2016, in the Southern District of New York and elsewhere, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," STEVEN PASTORE, RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," and SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," the defendants, and others known and unknown, being persons employed by and associated with the Enterprise described above, namely, the Genovese Organized Crime Family, which was engaged in, and the activities of which affected, interstate and foreign commerce, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Genovese Organized Crime Family through a pattern of racketeering activity, as that term is defined in Title 18,

United States Code, Sections 1961(1) and 1961(5), consisting of multiple:

a. Acts and threats involving murder, in violation of New York State Penal Law, Sections 105.15, 20.00, 110.00, and 125.25;

b. Acts and threats involving extortion, in violation of New York State Penal Law, Sections 155.40, 105.10, and 110.00;

c. Acts indictable under Title 18, United States Code, Section 1951 (relating to extortion);

d. Acts involving gambling, in violation of New York State Penal Law, Section 225.10; and

e. Acts indictable under Title 18, United States Code, Section 1955 (relating to the prohibition of illegal gambling businesses).

f. Acts indictable under Title 18, United States Code, Section 1084 (relating to the transmission of gambling information).

13. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the Enterprise.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO

**(Conspiracy to Murder in Aid of Racketeering)**

The Grand Jury further charges:

14. At all times relevant to this Indictment, the Genovese Organized Crime Family, as described in paragraphs 1 through 11 of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

15. At all times relevant to this Indictment, the Genovese Organized Crime Family, through its members and associates, knowingly engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and extortion in violation of the New York Penal Law, acts involving the operation of an illegal gambling business in violation of New York Penal Law Section 225.10, and acts indictable under Title 18, United States Code, Section 1951 (relating to

extortion), Title 18, United States Code, Section 1955 (relating to the prohibition of illegal gambling businesses), and Title 18, United States Code, Section 1084 (relating to the transmission of gambling information).

16. From at least in or about May 2014, up to and including in or about June 2014, in the Southern District of New York and elsewhere, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," and SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Genovese Organized Crime Family, and for the purpose of gaining entrance to and maintaining and increasing position in the Genovese Organized Crime Family, an enterprise engaged in racketeering activity, as described above, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to murder an individual ("Victim-1"), to wit, DEBELLO, ELLIS, DELLIGATTI, and others known and unknown, agreed to murder Victim-1, in violation of New York State Penal Law, Sections 105.15 and 125.25.

(Title 18, United States Code, Section 1959(a)-(5).)

COUNT THREE

(Attempted Murder in Aid of Racketeering)

The Grand Jury further charges:

17. Paragraphs 1 through 11 and 14 through 15 of this Indictment are repeated and incorporated by reference as though fully set forth herein.

18. From at least in or about May 2014, up to and including in or about June 2014, in the Southern District of New York and elsewhere, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," and SALVATORE DELLAGATTI, a/k/a "Jay," a/k/a "Fat Sal," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Genovese Organized Crime Family, and for the purpose of gaining entrance to and maintaining and increasing position in the Genovese Organized Crime Family, an enterprise engaged in racketeering activity, as described above, knowingly attempted to murder Victim-1, to wit, DEBELLO, ELLIS, DELLAGATTI, and others known and unknown, attempted to murder ~~Victim-1, in violation of New York State Penal Law, Sections~~ 20.00, 110.00, and 125.25.

(Title 18, United States Code, Section 1959(a)(5).)

COUNT FOUR

(Conspiracy to Commit Murder for Hire)

The Grand Jury further charges:

19. From at least in or about May 2014, up to and including in or about June 2014, in the Southern District of New York and elsewhere, SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," LUIGI ROMANO, a/k/a "Louie Sunoco," BERTRAM DUKE, a/k/a "Birdy," TYRONE MCCULLUM, a/k/a "Ty," MARCUS GRANT, and SHARIF BROWN, a/k/a "QB," the defendants, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to travel in and cause another to travel in interstate commerce, and to use and cause another to use the mail and a facility of interstate commerce, with intent that a murder be committed in violation of the laws of a State and of the United States as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, to wit, DELLIGATTI, ROMANO, DUKE, MCCULLUM, GRANT, BROWN, and others, known and unknown, agreed to murder Victim-1 in exchange for money, which arrangements depended in part upon communications by cellular telephones operating on interstate networks.

(Title 18, United States Code, Section 1958.)



COUNT FIVE

(Illegal Gambling)

The Grand Jury further charges:

20. From at least in or about 2013, up to and including in or about May 2016, in the Southern District of New York and elsewhere, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," STEVEN PASTORE, RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," LUIGI CAMINITI, SCOTT JACOBSON, FRANK CELSO, JOSEPH TEDESCO, MICHAEL VIGORITO, MICK SOKOL, SPYRO ANTONAKOPOULOS, MICHAEL KARNBACH, a/k/a "Combat," and JONATHAN DESIMONE, the defendants, and others known and unknown, unlawfully, willfully, and knowingly conducted, financed, managed, supervised, directed, and owned all and part of an illegal gambling business, namely a large-scale bookmaking and sports betting operation, in violation of New York Penal Law Section 225.10, and which business involved five and more persons who conducted, financed, managed, supervised, directed, and owned all and part of it, and which business had been and remained in substantially continuous operation for a period in excess of thirty days and had gross revenues of \$2,000 in a single day.

(Title 18, United States Code, Sections 1955 and 2.)

FIREARMS VIOLATIONS

COUNT SIX

(Use of Firearms for Crimes of Violence)

The Grand Jury further charges:

21. From at least in or about 2008, up to and including in or about May 2016, in the Southern District of New York and elsewhere, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," and RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," the defendants, and others known and unknown, during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, the racketeering conspiracy charged in Count One of this Indictment, the conspiracy to commit murder in aid of racketeering charged in Count Two of this Indictment, and the attempted murder in aid of racketeering charged in Count Three of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crimes of violence, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT SEVEN

(Use of Firearms for Crimes of Violence)

The Grand Jury further charges:

22. From at least in or about 2008, up to and including in or about June 2014, in the Southern District of New York and elsewhere, SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," the defendant, and others known and unknown, during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, the racketeering conspiracy charged in Count One of this Indictment, the conspiracy to commit murder in aid of racketeering charged in Count Two of this Indictment, the attempted murder in aid of racketeering charged in Count Three of this Indictment, and the murder-for-hire conspiracy charged in Count Four of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crimes of violence, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT EIGHT

(Use of a Firearm for Murder-for-Hire Conspiracy)

The Grand Jury further charges:

23. In or about June 2014, in the Southern District of New York and elsewhere, LUIGI ROMANO, a/k/a "Louie Sunoco," BERTRAM DUKE, a/k/a "Birdy," TYRONE MCCULLUM, a/k/a "Ty," MARCUS GRANT, and SHARIF BROWN, a/k/a "QB," the defendants, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the murder-for-hire conspiracy charged in Count Four of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATIONS AND SUBSTITUTE ASSET PROVISION

FORFEITURE ALLEGATION AS TO COUNT ONE

24. As a result of committing the offense alleged in Count One of this Indictment, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," STEVEN PASTORE, RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963,

a. any interest acquired or maintained as a

result of the racketeering activity charged in Count One;

b. any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise established, operated, controlled, conducted, or participated in the conduct of as a result of the racketeering activity charged in Count One; and

c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from the racketeering activity charged in Count One.

FORFEITURE ALLEGATION AS TO COUNT FOUR

25. As a result of committing the offense charged in Count Three of this Indictment, SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," LUIGI ROMANO, a/k/a "Louie Sunoco," BERTRAM DUKE, a/k/a "Birdy," TYRONE McCULLUM, a/k/a "Ty," MARCUS GRANT, and SHARIF BROWN, a/k/a "QB," the defendants, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the offense charged in Count Four of this Indictment.

FORFEITURE ALLEGATION AS TO COUNT FIVE

26. As a result of committing the offense charged in Count Four of this Indictment, ROBERT DEBELLO, a/k/a "Old Man,"

a/k/a "Bobby," a/k/a "Grandpa," STEVEN PASTORE, RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," LUIGI CAMINITI, SCOTT JACOBSON, FRANK CELSO, JOSEPH TEDESCO, MICHAEL VIGORITO, MICK SOKOL, SPYRO ANTONAKOPOULOS, MICHAEL KARNBACH, a/k/a "Combat," and JONATHAN DESIMONE, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the offense charged in Count Five of this Indictment.

Substitute Asset Provision

27. 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 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 18, United States Code, Section 1963(m) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 492, 981(a)(1)(C), 982(a)(2)(B), and 1963, and Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461.)

[REDACTED]

FOREPERSON



PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

ROBERT DEBELLO, a/k/a "Old Man," a/k/a  
"Bobby," a/k/a "Grandpa," STEVEN PASTORE,  
RYAN ELLIS, a/k/a "Joseph Princi," a/k/a  
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SHARIF BROWN, a/k/a "QB," LUIGI CAMINITI,  
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TEDESCO, MICHAEL VIGORITO, MICK SOKOL,  
SPYRO ANTONAKOPOULOS, MICHAEL KARNBACH,  
a/k/a "Combat," and JONATHAN DESIMONE,

Defendants.

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SEALED SUPERSEDING INDICTMENT

S4 15 Cr. 491 (LTS)

(18 U.S.C. §§ 1962, 1959, 1958,  
1955, 924(c), and 2.)

PREET BHARARA

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United States Attorney.

A TRUE BILL

  
Foreperson.

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