

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

UNITED STATES OF AMERICA

- v. -

ALEX LICHTENSTEIN,  
a/k/a "Shaya,"

Defendant.

INDICTMENT

16 CRIM 342

COUNT ONE

(Bribery)

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: MAY 16 2016

The Grand Jury charges:

1. In or about April 2016, in the Southern District of New York and elsewhere, ALEX LICHTENSTEIN, a/k/a "Shaya," the defendant, willfully and knowingly did corruptly give, offer, and agree to give a thing of value to a person, with intent to influence an agent of a State and local government, and an agency thereof, such government and agency having received, in a one year period, benefits in excess of \$10,000 under a Federal program involving a grand, contract, subsidy, loan, guarantee, insurance, and other federal of Federal assistance, in connection with business, transactions, and series of transactions of such organization, government, and agency involving a thing of value of \$5,000 and more, to wit, LICHTENSTEIN offered bribes to members of the New York City

JUDGE STEIN

Police Department ("NYPD") in order to obtain gun licenses from the NYPD's License Division for individuals who had paid LICHTENSTEIN thousands of dollars for his assistance in obtaining such gun licenses.

(Title 18, United States Code, Sections 666 and 2.)

COUNT TWO

(Conspiracy)

The Grand Jury further charges:

2. From in or about 2013, up to and including in or about February 2016, ALEX LICHTENSTEIN, a/k/a "Shaya," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Section 666.

3. It was a part and an object of the conspiracy that ALEX LICHTENSTEIN, a/k/a "Shaya," the defendant, and others known and unknown, willfully and knowingly would and did corruptly give, offer, and agree to give a thing of value to a person, with intent to influence an agent of an organization of a State government, and an agency thereof, such government and agency having received, in a one year period, benefits in excess of \$10,000 under a Federal program involving a grant, contract,

subsidy, loan, guarantee, insurance, and other form of federal assistance, in connection with business, transactions, and series of transactions of such government and agency involving a thing of value of \$5,000 and more.

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York:

a. From at least in or about June 2015 to in or about December 2015, ALEX LICHTENSTEIN, a/k/a "Shaya," the defendant, traveled to One Police Plaza in Manhattan, New York, approximately two times per week to meet with an officer of the NYPD's License Division.

(Title 18, United States Code, Section 371.)

Forfeiture Allegation.

5. As a result of committing the offenses charged in Counts One and Two of this Indictment, in violation of Title 18, United States Code, Sections 666 and 371, ALEX LICHTENSTEIN, a/k/a "Shaya," the defendant, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, shall forfeit all property, real and personal, that constitutes or is derived from proceeds traceable to the offenses charged in Counts One and Two.

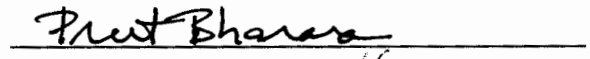
6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- 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 subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461, to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

  
FOREPERSON

  
PREET BHARARA <sup>16</sup>  
United States Attorney

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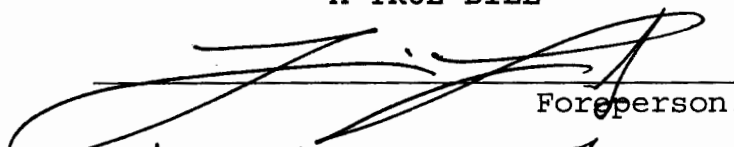
16 Cr.

(18 U.S.C. §§ 371, 666, 2)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

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*11*

*Pls Ind. part 11-1-07 This case  
is assigned to Judge Stein for all  
purposes.*

*Mag Judge M...*