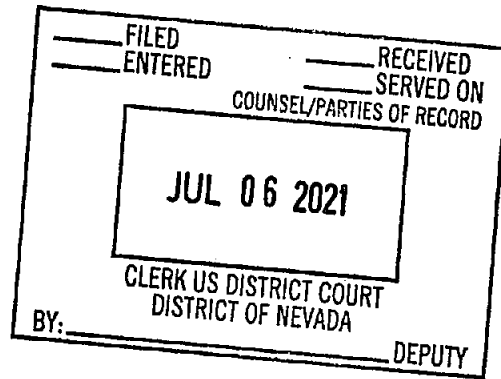


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9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 PAUL ENGSTROM,
 VINCENT CUOMO,
 15 ABRAHAM ELLIOTT, and
 JOSEPH KRIEGER,

16 Defendants.

CRIMINAL INDICTMENT

Case No.: 2:21-cr- 190

VIOLATIONS:

21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A)(ii)
 – Conspiracy to Distribute a Controlled
 Substance;

21 U.S.C. §§ 841(a)(1) and (b)(1)(C) –
 Distribution of a Controlled Substance;

21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(ii) –
 Possession with Intent to Distribute a
 Controlled Substance;

18 U.S.C. § 1956(a)(1)(A)(i), and (h) –
 Money Laundering Conspiracy

18 U.S.C. § 2 – Aiding and Abetting

22 **THE GRAND JURY CHARGES THAT:**
 23
 24

COUNT ONE

Conspiracy to Distribute a Controlled Substance
(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A)(ii))

From a time unknown but no later than August 2019, and continuing to and including on or about June 21, 2021, in the State and Federal District of Nevada and elsewhere,

**PAUL ENGSTROM,
VINCENT CUOMO,
ABRAHAM ELLIOT and
JOSEPH KRIEGER,**

defendants herein, and others known and unknown to the Grand Jury, knowingly combined, conspired, confederated, and agreed with each other to distribute 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, all in violation of 21 United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A)(ii).

COUNT TWO

Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C))

On or about August 6, 2019, in the State and Federal District of Nevada,

PAUL ENGSTROM,

defendant herein, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THREE

Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C. § 2)

On or about December 29, 2020, in the State and Federal District of Nevada,

1 **PAUL ENGSTROM,**
2 **VINCENT CUOMO,**
3 **ABRAHAM ELLIOT and**
4 **JOSEPH KRIEGER,**

5 defendants herein, aiding and abetting one another, knowingly and intentionally
6 distributed a mixture and substance containing a detectable amount of cocaine, a Schedule
7 II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1)
8 and 841(b)(1)(C) and Title 18, United States Code, Section 2.

9 **COUNT FOUR**

10 Distribution of a Controlled Substance
11 (21 U.S.C. §§ 841(a)(1), 841(b)(1)(C) and 18 U.S.C § 2)

12 On or about March 29, 2021, in the State and Federal District of Nevada,

13 **PAUL ENGSTROM,**
14 **VINCENT CUOMO,**
15 **ABRAHAM ELLIOT and**
16 **JOSEPH KRIEGER,**

17 defendants herein, aiding and abetting one another, knowingly and intentionally
18 distributed a mixture and substance containing a detectable amount of cocaine, a Schedule
19 II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1)
20 and 841(b)(1)(C) and Title 18, United States Code, Section 2.

21 **COUNT FIVE**

22 Distribution of a Controlled Substance
23 (21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 18 U.S.C. § 2)

24 On or about May 10, 2021, in the State and Federal District of Nevada,

PAUL ENGSTROM,
 VINCENT CUOMO,
 ABRAHAM ELLIOT and
 JOSEPH KRIEGER,

defendants herein, aiding and abetting one another, knowingly and intentionally
distributed a mixture and substance containing a detectable amount of cocaine, a Schedule

1 II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1)
2 and 841(b)(1)(C) and Title 18, United States Code, Section 2.

3 **COUNT SIX**

4 Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), and 18 U.S.C. § 2)

5 On or about June 7, 2021, in the State and Federal District of Nevada,

6 **PAUL ENGSTROM,**
7 **VINCENT CUOMO,**
8 **ABRAHAM ELLIOT and**
9 **JOSEPH KRIEGER,**

10 defendants herein, aiding and abetting one another, knowingly and intentionally distributed
11 a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled
12 substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and
13 841(b)(1)(C) and Title 18, United States Code, Section 2.

14 **COUNT SEVEN**

15 Distribution of a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(C) and 18 U.S.C. § 2)

16 On or about June 18, 2021, in the State and Federal District of Nevada,

17 **PAUL ENGSTROM,**
18 **VINCENT CUOMO,**
19 **ABRAHAM ELLIOT and**
20 **JOSEPH KRIEGER,**

21 defendants herein, aiding and abetting one another, knowingly and intentionally
22 distributed a mixture and substance containing a detectable amount of cocaine, a Schedule
23 II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1)
24 and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT EIGHT

Possession with Intent to Distribute of a Controlled Substance
(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(ii), and 18 U.S.C. § 2)

On or about June 21, 2021, in the State and Federal District of Nevada,

1 **PAUL ENGSTROM,**
2 **VINCENT CUOMO, and**
3 **ABRAHAM ELLIOT,**

4 defendants herein, aiding and abetting one another, knowingly and intentionally possessed
5 with intent to distribute 5 kilograms or more of a mixture and substance containing a
6 detectable amount of cocaine, a Schedule II controlled substance, all in violation of Title
7 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii) and Title 18, United States
8 Code, Section 2.

9 **COUNT NINE**
10 (**Money Laundering Conspiracy**)
11 (**18 U.S.C. § 1956(h)**)

12 Beginning from a time unknown, and continuing to on or about June 21, 2021, in the
13 State and Federal District of Nevada and elsewhere,

14 **PAUL ENGSTROM,**

15 defendant herein, together with others known and unknown to the Grand Jury, knowingly
16 combined, conspired, and agreed with each other to commit the following offense against
17 the United States:

18 To knowingly move by wire and other means, in and affecting interstate commerce,
19 funds constituting criminally derived property and derived from specified unlawful activity,
20 namely conspiracy to distribute a controlled substance as charged in Count One of this
21 Indictment, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), and
22 (b)(1)(A)(ii), with the intent to conceal and disguise the nature, location, source, ownership,
23 and control of the proceeds of that specific unlawful activity, in violation of Title 18, United
24 States Code, Section 1956(a)(1)(B)(i), in violation of Title 18, United States Code, Section
1956(h).

///

FORFEITURE ALLEGATION ONE

Conspiracy to Distribute a Controlled Substance; Distribution of a Controlled Substance;
and Possession with Intent to Distribute of a Controlled Substance

1. The allegations of Counts One through Eight of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1), 21 U.S.C. § 853(a)(2), 21 U.S.C. § 881(a)(4) with 28 U.S.C. § 2461(c), 21 U.S.C. § 881(a)(6) with 28 U.S.C. § 2461(c), and 21 U.S.C. § 881(a)(7) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts One through Eight of this Criminal Indictment,

**PAUL ENGSTROM,
VINCENT CUOMO,
ABRAHAM ELLIOT and
JOSEPH KRIEGER,**

defendants herein, shall forfeit to the United States of America, any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 21 U.S.C. § 841(a)(1), a specified unlawful activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and 1961(1)(D), or 21 U.S.C. § 846, conspiracy to commit such offense:

defendants herein, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of violations of 21 U.S.C. §§ 841(a)(1) and 846:

defendants herein, shall forfeit to the United States of America, any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of a violation of 21 U.S.C. §§ 841(a)(1) and 846:

defendants herein, shall forfeit to the United States of America, all conveyances, including aircraft, vehicles, or vessels, which are used, or are intended for use, to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of

1 property described in 21 U.S.C. § 881(a)(1), (2), and (9), in violation of 21 U.S.C. §§
2 841(a)(1) and 846:

3 defendants herein, shall forfeit to the United States of America, all moneys,
4 negotiable instruments, securities, or other things of value furnished or intended to be
5 furnished in exchange for a controlled substance or listed chemical in violation of 21 U.S.C.
6 §§ 841(a)(1) and 846, all proceeds traceable to such an exchange, and all moneys, negotiable
7 instruments, and securities used or intended to be used to facilitate any violation of 21
8 U.S.C. §§ 841(a)(1) and 846:

9 defendants herein, shall forfeit to the United States of America, all real property,
10 including any right, title, and interest (including leasehold interest) in the whole of any lot or
11 tract of land and any appurtenances or improvements, which is used, or intended to be used,
12 in any manner or part, to commit, or to facilitate the commission of, a violation of 21
13 U.S.C. §§ 841(a)(1) and 846:

14 1. any and all property with the requisite nexus to violations of 21 U.S.C. §§ 841(a)(1)
15 and 846 pursuant to the forfeiture statutes in this forfeiture allegation and Fed. R.
16 Crim. P. 32.2(b)(2)(C); and

17 2. an in personam criminal forfeiture money judgment including, but not limited to, at
18 least \$2,000,000

19 (all of which constitutes property).

20 3. If any property being subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) with
21 28 U.S.C. § 2461(c), 21 U.S.C. § 853(a)(1), 21 U.S.C. § 853(a)(2), 21 U.S.C. §
22 881(a)(4) with 28 U.S.C. § 2461(c), 21 U.S.C. § 881(a)(6) with 28 U.S.C. § 2461(c),
23 and 21 U.S.C. § 881(a)(7) with 28 U.S.C. § 2461(c), as a result of any act or omission
24 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 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 of America, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants for the property listed above.

All pursuant to 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c), 21 U.S.C. §§ 841(a)(1), 846, and 853(a)(1), 853(a)(2), and 853(p), 21 U.S.C. § 881(a)(4) with 28 U.S.C. § 2461(c), 21 U.S.C. § 881(a)(6) with 28 U.S.C. § 2461(c), and 21 U.S.C. § 881(a)(7) with 28 U.S.C. § 2461(c).

FORFEITURE ALLEGATION TWO

Conspiracy to Distribute a Controlled Substance; Distribution of a Controlled Substance;
and Possession with Intent to Distribute of a Controlled Substance

1. The allegations of Counts One through Eight of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c) and 21 U.S.C. § 881(a)(11) with 28 U.S.C. § 2461(c).

2. Upon conviction of any of the felony offenses charged in Counts One through Eight of this Criminal Indictment,

**PAUL ENGSTROM,
VINCENT CUOMO,
ABRAHAM ELLIOT and
JOSEPH KRIEGER,**

1 defendants herein, shall forfeit to the United States of America, any firearm or
2 ammunition involved in or used in any violation of any other criminal law of the United
3 States, 21 U.S.C. §§ 841(a)(1) and 846:

4 defendants herein, shall forfeit to the United States of America, any firearm used or
5 intended to be used to facilitate the transportation, sale, receipt, possession, or concealment
6 of property described in 21 U.S.C. § 881(a)(1) and 881(a)(2), in violation of 21 U.S.C. §§
7 841(a)(1) and 846 and any proceeds traceable to such property:

- 8 1. Freedom arms revolver S/N A45471 and 9 rounds .22LR;
- 9 2. Sig Sauer P365 S/N 66A766963 with magazine and ammunition;
- 10 3. Sig P232 S/N S294501;
- 11 4. Smith & Wesson revolver S/N J242872;
- 12 5. Taurus Int'l Revolver S/N ACB558557;
- 13 6. Springfield Armory XD40 pistol S/N US243348;
- 14 7. Ruger LCR revolver S/N 541-18881;
- 15 8. Diamondback AR-15 5.56 NATO S/N DB2450094;
- 16 9. M1 Garand with Scope S/N 451989;
- 17 10. HK AR-15 .22 LR HV S/N HB027724;
- 18 11. Remington 1100 Shotgun S/N R238133W;
- 19 12. Mossberg International 715P .22 cal AR pistol S/N euf4483633;
- 20 13. CD Defense 12GA semi-automatic Shotgun S/N 20SA12P7522;
- 21 14. Savage Model 116 S/N J303376;
- 22 15. Diamondback AR-15 5.56 NATO S/N DB2472231;
- 23 16. Diamondback AR-15 5.56 NATO S/N db2022845; and
- 24 17. any and all compatible ammunition.

1 All pursuant to 18 U.S.C. § 924(d)(1) with 28 U.S.C. § 2461(c), 21 U.S.C. §§
2 841(a)(1) and 846, and 21 U.S.C. § 881(a)(11) with 28 U.S.C. § 2461(c).

3 **FORFEITURE ALLEGATION THREE**

4 Conspiracy to Distribute a Controlled Substance; Distribution of a Controlled Substance;
5 and Possession with Intent to Distribute of a Controlled Substance

6 1. The allegations of Counts One through Eight of this Criminal Indictment are
7 hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture
8 pursuant to 18 U.S.C. § 924(d)(1), (2)(C), and (3)(B) with 28 U.S.C. § 2461(c).

9 2. Upon conviction of any of the felony offenses charged in Counts One through
10 Eight of this Criminal Indictment,

11 **PAUL ENGSTROM,
12 VINCENT CUOMO,
13 ABRAHAM ELLIOT and
14 JOSEPH KRIEGER,**

15 defendants herein, shall forfeit to the United States of America, any firearm or
16 ammunition intended to be used in any offense punishable under the Controlled Substances
17 Act, 21 U.S.C. §§ 841(a)(1) and 846:

- 18 1. Freedom arms revolver S/N A45471 and 9 rounds .22LR;
- 19 2. Sig Sauer P365 S/N 66A766963 with magazine and ammunition;
- 20 3. Sig P232 S/N S294501;
- 21 4. Smith & Wesson revolver S/N J242872;
- 22 5. Taurus Int'l Revolver S/N ACB558557;
- 23 6. Springfield Armory XD40 pistol S/N US243348;
- 24 7. Ruger LCR revolver S/N 541-18881;
8. Diamondback AR-15 5.56 NATO S/N DB2450094;
9. M1 Garand with Scope S/N 451989;
10. HK AR-15 .22 LR HV S/N HB027724;

- 1 11. Remington 1100 Shotgun S/N R238133W;
- 2 12. Mossberg International 715P .22 cal AR pistol S/N euf4483633;
- 3 13. CD Defense 12GA semi-automatic Shotgun S/N 20SA12P7522;
- 4 14. Savage Model 116 S/N J303376;
- 5 15. Diamondback AR-15 5.56 NATO S/N DB2472231;
- 6 16. Diamondback AR-15 5.56 NATO S/N db2022845; and
- 7 17. any and all compatible ammunition.

8 All pursuant to 18 U.S.C. § 924(d)(1), (2)(C), and (3)(B) with 28 U.S.C. § 2461(c)
9 and 21 U.S.C. §§ 841(a)(1) and 846.

10 **FORFEITURE ALLEGATION FOUR**

11 **Money Laundering Conspiracy**

12 1. The allegations contained in Count Nine of this Criminal Indictment are hereby
13 realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant
14 to 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c), 18 U.S.C. § 981(a)(1)(C) with 28
15 U.S.C. § 2461(c), and 18 U.S.C. § 982(a)(1).

16 2. Upon conviction of the felony offense charged in Count Nine of this Criminal
17 Indictment,

18 **PAUL ENGSTROM,**

19 defendant herein, shall forfeit to the United States of America, any property, real or
20 personal, involved in transactions or attempted transactions in violation of 18 U.S.C. §
21 1956(a)(1)(B)(i) and 18 U.S.C. § 1956(h), or any property traceable to such property:

22 defendant herein, shall forfeit to the United States of America, any property, real or
23 personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C.
24 § 1956(a)(1)(B)(i), a specified unlawful activity as defined in 18 U.S.C. §§ 1956(c)(7)(A) and
1961(1)(B), or 18 U.S.C. § 1956(h), conspiracy to commit such offense:

1 defendant herein, shall forfeit to the United States of America, any property, real or
2 personal, involved in a violation of 18 U.S.C. § 1956(a)(1)(B)(i) and 18 U.S.C. § 1956(h), or
3 any property traceable to such property:

4 1. any and all property with the requisite nexus to violations of 18 U.S.C. §
5 1956(a)(1)(B)(i) and 18 U.S.C. § 1956(h) pursuant to the forfeiture statutes in this
6 forfeiture allegation and Fed. R. Crim. P. 32.2(b)(2)(C); and

7 2. an in personam criminal forfeiture money judgment including, but not limited to, at
8 least \$2,000,000

9 (all of which constitutes property).

10 3. If any property subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) with 28
11 U.S.C. § 2461(c), 18 U.S.C. § 981(a)(1)(C) with 28 U.S.C. § 2461(c), and 18 U.S.C. §
12 982(a)(1), as a result of any act or omission of the defendant-

- 13 a. cannot be located upon the exercise of due diligence;
14 b. has been transferred or sold to, or deposited with, a third party;
15 c. has been placed beyond the jurisdiction of the court;
16 d. has been substantially diminished in value; or
17 e. has been commingled with other property which cannot be divided without
18 difficulty;

19 it is the intent of the United States of America, pursuant to 21 U.S.C. § 853(p), to seek
20 forfeiture of any other property of the defendant for the property listed above.


1 All pursuant to 18 U.S.C. § 981(a)(1)(A) with 28 U.S.C. § 2461(c), 18 U.S.C. §
2 981(a)(1)(C) with 28 U.S.C. § 2461(c), 18 U.S.C. § 982(a)(1), 18 U.S.C. § 1956(a)(1)(B)(i),
3 18 U.S.C. § 1956(h), and 21 U.S.C. § 853(p).

4
5 **DATED:** this 6th day of July, 2021.

6 **A TRUE BILL:**

7
8 /S/
FOREPERSON OF THE GRAND JURY

9
10 CHRISTOPHER CHIOU
Acting United States Attorney

11
12 By 
13 SUSAN CUSHMAN
14 CHRISTOPHER BURTON
DANIEL CLARKSON
Assistant United States Attorneys
15 Attorneys for Plaintiff
UNITED STATES OF AMERICA