

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b> <u>07-75</u>
	:	
v.	:	<b>DATE FILED:</b> _____
	:	
<b>JOHN NAPOLI,</b>	:	<b>VIOLATIONS:</b>
a/k/a "Junior,"	:	<b>21 U.S.C. § 846 (conspiracy to distribute</b>
<b>WILLIAM JOHNSON,</b>	:	<b>and to possess with intent to distribute</b>
a/k/a "Tattoo Billy,"	:	<b>methamphetamine - 1 count)</b>
<b>CHRISTOPHER QUATTROCCHI,</b>	:	<b>18 U.S.C. § 1959(a)(3) (violent crimes in</b>
a/k/a "Slam,"	:	<b>aid of racketeering - 3 counts)</b>
<b>THOMAS HEILMAN,</b>	:	<b>18 U.S.C. § 894 (collection of credit by</b>
a/k/a "Fuzzy,	:	<b>extortionate means - 1 count)</b>
<b>FREDERICK FREEHOFF,</b>	:	<b>18 U.S.C. § 922(g)(1) (possession of a</b>
a/k/a "Pan Head Fred,"	:	<b>firearm and ammunition by a convicted</b>
<b>ERIC LOEBSACK,</b>	:	<b>felon - 5 counts)</b>
a/k/a "Kicker"	:	<b>18 U.S.C. § 922(o) (unlawful possession of</b>
	:	<b>a machine gun - 1 count)</b>
	:	<b>18 U.S.C. § 924(c) (possession of a firearm</b>
	:	<b>in relation to a drug trafficking offense</b>
	:	<b>- 1 count)</b>
	:	<b>Notice of forfeiture</b>

**SECOND SUPERSEDING INDICTMENT**

**COUNT ONE**

**21 U.S.C. § 846**

**(Conspiracy to distribute and to possess  
with intent to distribute methamphetamine)**

**THE GRAND JURY CHARGES THAT:**

During the period of the indictment:

**INTRODUCTION**

1. The PA Breed Motorcycle Club, Inc. ("PA Breed") was incorporated in the Commonwealth of Pennsylvania on or about March 14, 1994. The PA Breed was part of a multi-state organization, known as "The Breed," with chapters in New Jersey and Ohio. The PA

Breed, in fact, operated as an outlaw motorcycle gang whose members held PA Breed laws, rules and directives determined by its officers superior to the public laws governing the community.

2. The PA Breed was structured as a hierarchy. The PA Breed president reported to the president of the New Jersey Breed “mother chapter.” The remaining PA Breed officers generally were selected by the incumbent PA Breed president. PA Breed officers had authority over other PA Breed members (known as “regular members,” “R.M.s” and “flag holders”) and prospective members (known as “prospects” and “hang-arounds”). PA Breed members had authority over the prospective members.

3. PA Breed members identified themselves by patch insignias, which included “rockers” and a center flag, known as “colors.” Colors were worn on the back of a denim vest without sleeves or collar to designate their full or prospective membership status.

4. Defendant JOHN NAPOLI (NAPOLI) was vice president of the PA Breed until approximately January 2004, when he became the PA Breed president. Defendant NAPOLI appointed defendant WILLIAM JOHNSON (JOHNSON) as an executive board member of the PA Breed and defendant CHRISTOPHER QUATTROCCHI (QUATTROCCHI) as sergeant-at-arms. Defendant THOMAS HEILMAN (HEILMAN) was a PA Breed member for approximately 25 years and defendant FREDERICK FREEHOFF (FREEHOFF) was a PA Breed member for approximately five years. Defendant ERIC LOEBSACK (LOEBSACK) was a hang-around and prospect for approximately two years, until approximately February 2006, when he became a regular member of the PA Breed.

**THE CONSPIRACY**

5. From in or about January 2003 to in or about July 2006, in Bucks County, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JOHN NAPOLI,  
a/k/a “Junior,”  
WILLIAM JOHNSON,  
a/k/a “Tattoo Billy,”  
CHRISTOPHER QUATTROCCHI,  
a/k/a “Slam,”  
THOMAS HEILMAN,  
a/k/a “Fuzzy,”  
FREDERICK FREEHOFF,  
a/k/a “Pan Head Fred,” and  
ERIC LOEBSACK,  
a/k/a “Kicker,”**

conspired and agreed, together and with other persons known and unknown to the grand jury, to knowingly and intentionally distribute and to possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

**MANNER AND MEANS**

It was part of the conspiracy that:

6. During his tenure as an officer of the PA Breed, defendant NAPOLI organized, led, controlled and managed a crystal methamphetamine distribution organization operated by PA Breed members, prospects, hang- arounds, and associates (“Breed Drug Organization”) that distributed approximately 125 pounds of crystal methamphetamine in the Eastern District of Pennsylvania, New Jersey, and elsewhere. NAPOLI acquired pound and multi-pound quantities of crystal methamphetamine from defendant JOHNSON and other

sources known and unknown to the grand jury.

7. From in or about January 2006, through in or about June 2006, defendant JOHNSON supplied and distributed approximately 25 pounds of crystal methamphetamine to the Breed Drug Organization.

a. JOHNSON met regularly with defendant NAPOLI to obtain NAPOLI's approval and money to purchase multiple-pound quantities of crystal methamphetamine from JOHNSON's drug sources. At NAPOLI's direction, the drugs obtained by JOHNSON were apportioned between NAPOLI and JOHNSON for further distribution to mid-level distributors, including defendants QUATTROCCHI, HEILMAN and FREEHOFF, to other distributors and to retail customers, known and unknown to the grand jury, of the Breed Drug Organization.

b. JOHNSON possessed firearms and ammunition to protect pound and multiple-pound quantities of crystal methamphetamine and drug proceeds.

8. Defendants QUATTROCCHI, HEILMAN, FREEHOFF, and others known and unknown to the grand jury, were mid-level distributors for the Breed Drug Organization, to whom defendants NAPOLI and JOHNSON "fronted" approximately one-pound and lesser quantities of crystal methamphetamine; that is, payment was deferred until the drugs were sold by the mid-level distributors to retail customers.

9. Defendant NAPOLI ordered and instructed PA Breed members, prospects and hang-arounds, including defendant LOEBSACK and other co-conspirators known and unknown to the grand jury, to: (a) break down pound and multi-pound quantities of crystal methamphetamine belonging to NAPOLI into smaller distribution amounts; (b) make drug

deliveries to NAPOLI's other distributors; (c) collect drug payments from NAPOLI's other distributors; and (d) store and hide NAPOLI's supply of crystal methamphetamine, cash proceeds, firearms and ammunition in their residences and in storage lockers, all to insulate NAPOLI from law enforcement scrutiny.

10. Defendant NAPOLI determined who was permitted to sell, and from which distributor a drug customer could purchase, crystal methamphetamine from the Breed Drug Organization. NAPOLI directed certain retail customers to defendants QUATTROCCHI and JOHNSON when a previously-approved Breed Drug Organization distributor for the drug customer was no longer approved by NAPOLI.

11. Defendants NAPOLI and JOHNSON collected money and authorized defendant LOEBSACK and other co-conspirators known and unknown to the grand jury, to collect money from mid-level distributors, including defendants HEILMAN and FREEHOFF, whose payments for fronted crystal methamphetamine were owed to NAPOLI.

12. Defendants NAPOLI and JOHNSON obtained and attempted to obtain ingredients, including ammonium nitrate, ephedrine, and drain cleaner, tubing equipment, and a recipe, in an unsuccessful effort to manufacture crystal methamphetamine.

13. To enforce discipline in the Breed Drug Organization, defendants NAPOLI, QUATTROCCHI, JOHNSON, and others known and unknown to the grand jury, threatened and engaged in severe beatings and assaults and caused the unlawful taking of personal property of certain PA Breed members, prospects and hang-arounds who did not comply with directives from NAPOLI.

14. To protect the Breed Drug Organization's territory, defendant NAPOLI sought information about rival drug traffickers and threatened physical harm to rivals who operated in PA Breed territory.

15. To protect the secrecy of the Breed Drug Organization, defendants NAPOLI, JOHNSON, QUATTROCCHI, HEILMAN, FREEHOFF, LOEBSACK, and other co-conspirators known and unknown to the grand jury, used cryptic and coded language when referring to drug trafficking activity on the telephone, conducted drug discussions and activities in face-to-face meetings at secure locations, and used other counter-surveillance strategies to deter law-enforcement observation of their illegal activities.

16. To further protect the secrecy of the Breed Drug Organization, defendant NAPOLI engaged in physical assaults and psychological threats to intimidate and deter potential witnesses, PA Breed members and associates from cooperating with law enforcement, including overt threats to kill PA Breed members and associates and their families if they cooperated with law enforcement.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania and elsewhere:

1. In or about January 2003, defendant NAPOLI caused approximately one-half pound of crystal methamphetamine to be hidden in building materials in the truck of a Breed prospect and transported from NAPOLI's residence at 268 Appletree Drive, Levittown, Pennsylvania, to a New Jersey drug customer unknown to the grand jury.

2. On or about March 8, 2003, at 268 Appletree Drive, Levittown, Pennsylvania, defendant NAPOLI severely beat, and assaulted with an electric drill, a Breed prospect known to the grand jury as "T.B.," who had refused to deliver crystal methamphetamine for NAPOLI to a New Jersey drug customer unknown to the grand jury.

3. In or about the summer of 2003, defendant NAPOLI sold approximately one gram of crystal methamphetamine for approximately \$200 at his residence at 268 Appletree Drive, Levittown, Pennsylvania, to a Pennsylvania drug customer known to the grand jury.

4. On or about January 1, 2004, defendant NAPOLI directed a Breed hang-around, known to the grand jury as co-conspirator #1, to transport approximately one ounce of crystal methamphetamine from Levittown, Pennsylvania, to NAPOLI at the residence of a New Jersey Breed member known to the grand jury.

5. In or about September 2004, defendant NAPOLI caused co-conspirator #1 to store approximately one pound of crystal methamphetamine for NAPOLI.

6. In or about November 2004, defendant NAPOLI directed defendant LOEBSACK to deliver approximately one ounce of crystal methamphetamine to a mid-level distributor known to the grand jury as co-conspirator #2.

7. In or about January 2005, defendant NAPOLI caused defendant LOEBSACK to deliver approximately one ounce of crystal methamphetamine to co-conspirator #2 and to pick up payment of approximately \$2,400 for a previously-fronted ounce of crystal methamphetamine.

8. On or about July 4, 2005, at 268 Appletree Drive, Levittown, Pennsylvania, defendant NAPOLI sold approximately 3.5 grams of crystal methamphetamine to

a mid-level distributor, known to the grand jury as co-conspirator #3, for approximately \$400.

9. In or about early August 2005, co-conspirator #1 delivered to defendant HEILMAN approximately two ounces of crystal methamphetamine, which was being stored for defendant NAPOLI in the residence of a Breed hang-around known to the grand jury as co-conspirator #4.

10. In or about early August 2005, co-conspirator #1 delivered to defendant FREEHOFF approximately one ounce of crystal methamphetamine, which was being stored for defendant NAPOLI in the residence of co-conspirator #4.

11. In or about October 2005, to enforce discipline, defendants NAPOLI, QUATTROCCHI and JOHNSON assaulted and whipped a Breed member, known to the grand jury as co-conspirator #5, who owed NAPOLI money for crystal methamphetamine previously-fronted to him, and NAPOLI unlawfully took certain personal possessions of co-conspirator #5, including numerous firearms.

12. In or about November 2005, defendant NAPOLI caused approximately two pounds of crystal methamphetamine to be delivered to a Breed member, known to the grand jury as co-conspirator #6, to store for NAPOLI.

13. In or about November 2005, defendant NAPOLI instructed co-conspirator #4 to turn over to defendant LOEBSACK approximately three pounds of crystal methamphetamine, which was being stored by co-conspirator #4 for NAPOLI.

14. On or about November 8, 2005, defendant FREEHOFF possessed approximately six grams of crystal methamphetamine, a digital scale, numerous clear baggies, and a copy book containing a drug "owe list" with weights, names and monetary values.



15. In or about Fall of 2005, defendant NAPOLI directed a New Jersey Breed member, known to the grand jury as co-conspirator #7, to obtain future distributions of crystal methamphetamine from defendant QUATTROCCHI for approximately \$3,400 per ounce.

16. In or about December 2005, at defendant NAPOLI's direction, defendant LOEBSACK picked up approximately a pound of crystal methamphetamine from co-conspirator #6, which was being stored for NAPOLI.

17. In or around December 2005, at 268 Appletree Drive, Levittown, Pennsylvania, defendant NAPOLI fronted approximately four ounces of crystal methamphetamine to co-conspirator #3.

18. On or about January 25, 2006, defendant NAPOLI met with an undercover cooperating witness ("CW") known to the grand jury, at 268 Appletree Drive, Levittown, Pennsylvania, and NAPOLI directed CW to contact defendant JOHNSON for future purchases of crystal methamphetamine.

19. In or about January 2006, defendant NAPOLI directed defendant LOEBSACK to deliver approximately one pound of crystal methamphetamine to defendant HEILMAN at 813 Pine Street, Bristol, Pennsylvania.

20. In or about February 2006, to enforce discipline, defendants NAPOLI, JOHNSON and QUATTROCCHI beat and assaulted a Breed prospect, known to the grand jury as co-conspirator #8, who had failed to deliver approximately fourteen grams (1/2 ounce) of crystal methamphetamine for which co-conspirator #8 was paid in part by CW on or about January 23, 2006.

21. In or about February 2006, defendant NAPOLI directed defendant LOEBSACK to stop making weekly deliveries of approximately one ounce of crystal methamphetamine to defendant FREEHOFF, and NAPOLI designated defendant JOHNSON to make such future drug deliveries to FREEHOFF.

22. On or about February 14, 2006, defendant JOHNSON sold approximately 3.5 grams of crystal methamphetamine to CW at the House of 1000 Tattoos, 965 Bristol Pike, Bensalem, Pennsylvania, after meeting with defendant NAPOLI.

23. On or about February 16, 2006, defendant QUATTROCCHI told CW that the problem with co-conspirator #8 had been handled; that is, referring to the failure of co-conspirator #8 to deliver approximately fourteen grams (½ ounce) of crystal methamphetamine to CW on or about January 23, 2006.

24. On or about February 27, 2006, defendant JOHNSON sold approximately seven grams of crystal methamphetamine to CW in exchange for approximately \$1,000, at 3632 Morrell Street, Philadelphia, Pennsylvania.

25. In or about February 2006, defendant NAPOLI directed defendant LOEBSACK to weigh all crystal methamphetamine fronted to defendant QUATTROCCHI in QUATTROCCHI's presence because he had complained to NAPOLI that prior distributions had been short.

26. In or about March 2006, defendant NAPOLI instructed defendant LOEBSACK to deliver approximately one pound of crystal methamphetamine to defendant HEILMAN at 813 Pine Street, Bristol, Pennsylvania.

27. On or about March 17, 2006, defendant JOHNSON sold approximately seven grams of crystal methamphetamine to CW in exchange for approximately \$1,100, at 3632 Morrell Street, Philadelphia, Pennsylvania.

28. In or about April 2006, defendant QUATTROCCHI caused approximately two ounces of crystal methamphetamine to be delivered to co-conspirator #7.

29. On or about May 5, 2006, defendant JOHNSON purchased for defendant NAPOLI approximately five pounds of crystal methamphetamine from JOHNSON's drug supplier known to the grand jury as co-conspirator #9.

30. On or about May 7, 2006, defendant NAPOLI ordered defendant QUATTROCCHI to remove from the Breed Clubhouse at 3707 Spruce Street, Bristol, Pennsylvania, approximately two ounces of crystal methamphetamine which had been hidden in the basement by QUATTROCCHI.

31. On or about May 11, 2006, defendant JOHNSON sold approximately 3.5 grams of crystal methamphetamine to CW in exchange for approximately \$600, at 3632 Morrell Street, Philadelphia, Pennsylvania.

32. On or about May 12, 2006, defendant JOHNSON handed a bag containing crystal methamphetamine to defendant FREEHOFF at the Breed Clubhouse at 3707 Spruce Street, Bristol, Pennsylvania, and JOHNSON discussed with FREEHOFF an outstanding drug debt which FREEHOFF owed to JOHNSON.

33. On or about May 19, 2006, defendant FREEHOFF told defendant JOHNSON that FREEHOFF was trying to collect money from his drug customers to pay JOHNSON for previously-fronted crystal methamphetamine.

34. On or about May 23, 2006, at defendant NAPOLI's direction, defendant LOEBSACK obtained a storage locker at U-Store It, Locker No. N-21, Levittown, Pennsylvania, to hide crystal methamphetamine and firearms for NAPOLI.

35. On or about June 3, 2006, defendant HEILMAN sold approximately 3.5 grams of crystal methamphetamine to CW in exchange for approximately \$500, at 813 Pine Street, Bristol, Pennsylvania.

36. On or about June 5, 2006, defendant JOHNSON purchased approximately five pounds of crystal methamphetamine from co-conspirator #9 in exchange for approximately \$99,900.

37. On or about June 6, 2006, at 3632 Morrell Street, Philadelphia, Pennsylvania, defendant JOHNSON possessed approximately 4.9 pounds (2,254 grams) of crystal methamphetamine in a box on a dining room shelf, in close proximity to a loaded Kel-Tec 9mm handgun, and an additional two ounces of crystal methamphetamine, ammunition, and a digital scale in lock boxes at the entrance to the residence.

38. On or about June 9, 2006, defendant NAPOLI possessed and controlled approximately 434 grams of crystal methamphetamine, at U-Store It Locker No. N-21, Levittown, Pennsylvania.

39. In or about June 2006, defendant JOHNSON discussed with defendant HEILMAN a debt of approximately \$16,000 that HEILMAN owed defendant NAPOLI for crystal methamphetamine previously fronted to HEILMAN.

40. In or about June 2006, defendant JOHNSON discussed with defendant FREEHOFF a debt of approximately \$11,000 that FREEHOFF owed defendant NAPOLI for crystal methamphetamine previously fronted to FREEHOFF.

41. In or about June 2006, at 268 Appletree Drive, Levittown, Pennsylvania, defendant NAPOLI collected approximately \$12,000 from co-conspirator #3 for a previously fronted one-quarter pound of crystal methamphetamine.

42. In or about June 2006, defendant NAPOLI threatened defendant LOEBSACK that if he cooperated with law enforcement, NAPOLI would kill each of LOEBSACK's children and then the rest of LOEBSACK's family.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**  
**18 U.S.C. § 1959**  
**(Violent crimes in aid of racketeering:  
assault resulting in serious bodily injury)**

**THE GRAND JURY FURTHER CHARGES:**

**THE ENTERPRISE**

During the period of the indictment:

1. Paragraphs 1 through 4 (Introduction) of Count One are realleged and incorporated by reference as though fully set forth here.

2. The PA Breed, including its leaders, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for the common purpose of achieving the objectives of the enterprise.

**PURPOSES OF THE ENTERPRISE**

3. It was a purpose of the enterprise to earn money for its members through the felonious receiving, buying, selling, or otherwise dealing in controlled substances, namely, methamphetamine.

4. It was a further purpose of the enterprise that, to ensure obedience to the leadership of the enterprise, its members and associates kept the enterprise's own members and associates, and the victims of their crimes, in fear of the enterprise and in fear of its members and associates through threats and acts of violence, and through the taking of personal property from members and associates by threat of violence.

5. It was a further purpose of the enterprise that its members and associates maintained, protected and attempted to expand the power, territory and profits of the enterprise through the use of intimidation and violence.

**MANNER AND MEANS OF THE ENTERPRISE**

6. The above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely acts involving the felonious receiving, buying, selling, or otherwise dealing in controlled substances, namely, methamphetamine, in violation of Title 21, United States Code, Sections 841 and 846. Paragraphs 6 through 16 (Manner and Means) of Count One are realleged and incorporated by reference as though fully set forth here.

7. Members and associates of the enterprise used intimidation, violence and threats of violence to: (a) promote and protect the enterprise's drug trafficking business; (b) discipline enterprise members and associates who had violated enterprise rules; (c) punish enterprise members and associates who had fallen into disfavor; (d) punish enterprise members and associates who had been disloyal; and, (e) promote and enhance its prestige, reputation and position in the community.

8. On or about March 8, 2003, in Bucks County, in the Eastern District of Pennsylvania, as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value from the PA Breed, and for the purpose of maintaining and increasing position in the PA Breed, an enterprise engaged in racketeering activity, defendant

**JOHN NAPOLI,  
a/k/a “Junior,”**

unlawfully and knowingly assaulted, and aided and abetted an assault resulting in serious bodily injury upon a person known to the grand jury as “T.B.,” in violation of Title 18, PA Cons. Stat. Ann., Section 2702.

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.



**COUNT THREE**  
**18 U.S.C. § 1959**  
**(Violent crimes in aid of racketeering:  
assault with a dangerous weapon)**

**THE GRAND JURY FURTHER CHARGES:**

1. Paragraphs 1 through 7 of Count Two of this indictment are realleged here.
2. In or about October 5, 2003, at 920 Trenton Road, Levittown, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the PA Breed, an enterprise engaged in racketeering activity, defendant

**JOHN NAPOLI,**  
**a/k/a “Junior,”**

unlawfully and knowingly assaulted, and aided and abetted an assault, with a dangerous weapon upon a person known to the grand jury as “J.M.,” in violation of Title 18, PA Cons. Stat. Ann., Section 2702.

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

**COUNT FOUR**  
**18 U.S.C. § 1959**  
**(Violent crimes in aid of racketeering:  
assault resulting in serious bodily injury)**

**THE GRAND JURY FURTHER CHARGES:**

1. Paragraphs 1 through 7 of Count Two of this indictment are realleged here.
2. In or about November 24, 2005, at 3707 Spruce Street, Bristol, in the Eastern District of Pennsylvania, as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value from the PA Breed, and for the purpose of maintaining and increasing position in the PA Breed, an enterprise engaged in racketeering activity, defendants

**JOHN NAPOLI,  
a/k/a “Junior,”  
WILLIAM JOHNSON,  
a/k/a “Tattoo Billy,” and  
CHRISTOPHER QUATTROCCHI,  
a/k/a “Slam,”**

unlawfully and knowingly assaulted, and aided and abetted an assault resulting in serious bodily injury upon a person known to the grand jury as “J.G. #1,” in violation of Title 18, PA Cons. Stat. Ann., Section 2702.

All in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

**COUNT FIVE**  
**18 U.S.C. § 894**  
**(Collection of credit by extortionate means)**

**THE GRAND JURY FURTHER CHARGES:**

From in or about December 2005, to on or about March 23, 2006, in Bucks County, in the Eastern District of Pennsylvania, defendants

**JOHN NAPOLI,**  
**a/k/a “Junior,”**  
**CHRISTOPHER QUATTROCCHI,**  
**a/k/a “Slam,”**

knowingly participated, and aided and abetted, in the use of extortionate means within the meaning of Title 18, United States Code, Section 891(7), to collect and attempt to collect from an individual known to the grand jury as “J.G. #2,” an extension of credit, approximately \$25,000, and to punish J.G. #2 for the non-repayment of this extension of credit; that is, defendants JOHN NAPOLI, CHRISTOPHER QUATTROCCHI and others unknown to the grand jury, unlawfully and knowingly, expressly and implicitly threatened the use of violence and other criminal means to cause harm to the person and property of J.G. #2 in order to collect and attempt to collect from him an extension of credit, approximately \$25,000, and to punish J.G. #2 for the non-repayment of this extension of credit.

In violation of Title 18, United States Code, Sections 894 and 2.

**COUNT SIX**  
**18 U.S.C. § 924(c)(1)**  
**(Possession of a firearm in furtherance**  
**of a drug trafficking offense)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 6, 2006, at 3632 Morrell Street, Philadelphia, in the Eastern District of Pennsylvania, defendant

**WILLIAM JOHNSON,**  
**a/k/a “Tattoo Billy,”**

knowingly possessed a firearm, that is, a Kel-Tec 9mm handgun, Model P-11, serial no. 130710, loaded with approximately 13 rounds of ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute and to possess with the intent to distribute methamphetamine, in violation of Title 21, United States Code, Section 846.

In violation of Title 18, United States Code, Section 924(c)(1).

**COUNT SEVEN**  
**18 U.S.C. § 922(g)(1)**  
**(Possession of a firearm**  
**and ammunition by a convicted felon)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 6, 2006, at 3632 Morrell Street, Philadelphia, in the Eastern District of Pennsylvania, defendant

**WILLIAM JOHNSON,**  
**a/k/a “Tattoo Billy,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm and ammunition, that is, a Kel-Tec 9mm handgun, Model P-11, serial no. 130710, loaded with approximately 13 rounds of ammunition, and a plastic bag containing numerous rounds of 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT EIGHT**  
**18 U.S.C. § 922(g)(1)**  
**(Possession of a firearm**  
**and ammunition by a convicted felon)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 6, 2006, at 4648 Bergen Street, Philadelphia, in the Eastern District of Pennsylvania, defendant

**WILLIAM JOHNSON,**  
**a/k/a “Tattoo Billy,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm and ammunition, that is:

- (1) a .44 cal. Charter Arms revolver, model Bulldog Pug, serial no. 19386, loaded with approximately 5 rounds of .44 cal. ammunition; a box of .44 cal. Blazer ammunition, and
- (2) a 12-gauge pump-action shotgun, O.F. Mossberg & Sons, model 835, serial no. UM465069.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT NINE**  
**18 U.S.C. § 922(g)(1)**  
**(Possession of a firearm**  
**and ammunition by a convicted felon)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 6, 2006, at 268 Appletree Drive, Levittown, in the Eastern District of Pennsylvania, defendant

**JOHN NAPOLI,**  
**a/k/a “Junior,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm and ammunition, that is:

- (1) a 9mm Ruger semi-automatic handgun, model P-89, serial no. 316-47976, loaded with approximately 14 rounds of ammunition, a separate magazine loaded with approximately 13 rounds of 9mm ammunition;
- (2) a 9mm Kel-Tec semi-automatic handgun, model P-11, serial no. A4569, loaded with approximately 11 rounds of 9mm ammunition; a box containing approximately 11 rounds of 9mm ammunition; and,
- (3) approximately 50 rounds of (7.62x39mm Russian) AK-47 cartridges.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TEN**  
**18 U.S.C. § 922(g)(1)**  
**(Possession of a firearm**  
**by a convicted felon)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 9, 2006, at U-Store It, 3895 New Rodgers Road, Levittown, in the Eastern District of Pennsylvania, defendant

**JOHN NAPOLI,**  
**a/k/a “Junior,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is:

- (1) a .45 cal. Colt semi-automatic pistol, model Gov't MK IV, serial no. 70G94276;
- (2) a 9mm Luger, Sturm-Ruger Co. semi-automatic pistol, model P85 MKII, serial no. 300-84715;
- (3) a 9mm Luger, D.W.M. semi-automatic pistol, model P08 (1920), serial no. 2849;
- (4) a 9mm Luger, Leinad, Ducktown, TN, semi-automatic pistol, model PM-11, serial no. (obliterated);
- (5) a .38 cal. Smith & Wesson revolver, model 10, serial no. 96835;
- (6) a .38 cal. Smith & Wesson revolver, model TOP-BREAK, serial no. 434704;
- (7) a .380 cal. Beretta, semi-automatic pistol, model 1934, serial no. 765047;
- (8) a .22 cal. Llama\Gabilondo revolver, model Comanche 1, serial no. S839891;
- (9) a .22 cal. R.G. Industries revolver, model RG 14, serial no. L635654;



- (10) a 12-gauge pump-action shotgun, O.F. Mossberg & Sons, model 88, serial no. MV96201H;
- (11) a 12-gauge pump-action shotgun, Marlin Firearms Co., model 778, serial no. 20623496, with barrel length cut to 16" with stock removed and replaced with pistol-grip handle;
- (12) a 7.62x39mm Russian semi-automatic Romanian rifle, S.N. Romarm S.A., model AK 47 type, serial no. S1-14850-99;
- (13) a 9mm Luger semi-automatic rifle, Feather Industries, model AT-9, serial no. A92464, with collapsible stock and 26-round magazine;
- (14) a .308 Winchester cal. semi-automatic rifle, Armalite, model AR-10A4, serial no. US564965;
- (15) a .303 British cal. bolt-action rifle with scope, United Kingdom (British), model #4 MKI (sporter), serial no. PF70893, with 10-round magazine;
- (16) a .223 Remington cal. semi-automatic rifle, Sturm, Ruger & Co., model Mini-14, serial no. 185-66253; and,
- (17) a .22 cal. semi-automatic rifle, Savage Arms Corp., model (Stevens) 62, serial no. 0477938.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT ELEVEN**  
**18 U.S.C. § 922(g)(1)**  
**(Possession of a firearm**  
**by a convicted felon)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 9, 2006, at United Stor-All, 830 Wheeler Way, Langhorne, in the Eastern District of Pennsylvania, defendant

**JOHN NAPOLI,**  
**a/k/a “Junior,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a 9mm Luger automatic submachine gun, Sten, model MARK 5, serial no. 73488, with three black metal magazine assemblies.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWELVE**  
**18 U.S.C. § 922(o)**  
**(Unlawful possession of a machine gun)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 9, 2006, at United Stor-All, 830 Wheeler Way, Langhorne, in the Eastern District of Pennsylvania, defendant

**JOHN NAPOLI,**  
**a/k/a “Junior,”**

knowingly possessed a machinegun, that is, a 9mm Luger automatic submachine gun, Sten, model MARK 5, serial no. 73488, with three black metal magazine assemblies.

In violation of Title 18, United States Code, Section 922(o).

**NOTICE OF FORFEITURE ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 21, United States Code, Section 846 set forth in this indictment, defendants

**JOHN NAPOLI,  
a/k/a “Junior,”  
WILLIAM JOHNSON,  
a/k/a “Tattoo Billy,”  
CHRISTOPHER QUATTROCCHI,  
a/k/a “Slam,”  
THOMAS HEILMAN,  
a/k/a “Fuzzy,”  
FREDERICK FREEHOFF,  
a/k/a “Pan Head Fred,”  
ERIC LOEBSACK,  
a/k/a “Kicker”**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses, including, but not limited to:

- (1) 268 Appletree Drive, Levittown, Pennsylvania;
- (2) 234 Walnut Street, Bristol, Pennsylvania;
- (3) Kel-Tec 9mm handgun, Model P-11, serial no. 130710, loaded with approximately 13 rounds of ammunition, and a plastic bag containing numerous rounds of 9mm ammunition;
- (4) 2002 Ford pickup truck, VIN #1FTRF17242NA09566.

(b) any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of \$6,000,000.00, and:

- (1) \$120,000.00 U.S. Currency seized from safe deposit boxes located at Bank of America on or about June 7, 2006;
- (2) \$103,500.00 U.S. Currency seized from 30 Myrtle Lane, Levittown, Pennsylvania on or about June 6, 2006;
- (3) \$2,685.00 U.S. Currency seized from 234 Walnut Street, Bristol, Pennsylvania on or about July 21, 2006;
- (4) \$99,900.00 U.S. Currency seized by Plymouth Township Police Department on or about June 5, 2006;
- (5) Harley Davidson FLHX Motorcycle, VIN #1HD1AEK20EY063474;
- (6) 2003 Mitsubishi Montero, VIN #JA4MT31R83J022716;
- (7) Special construction Harley Davidson Motorcycle, VIN #SW118221;
- (8) 2002 Ford pickup truck, VIN #1FTRF17242NA09566;
- (9) 1999 Dodge Ram dump truck, VIN #3B6MC366XXM559508;
- (10) 1990 Chevrolet Corvette, VIN #1G1443388L5114245;
- (11) 2005 Volvo, VIN #YV1M5682752085414;
- (12) Harley Davidson, VIN #3A14218H9;

- (13) Harley Davidson, VIN #1HD1GCL22N4308809;
- (14) 1991 Harley Davidson Motorcycle, VIN  
#1HD1BJL40MY010245
- (15) 1987 Buick Grand National, VIN #1G4GJ1176HP41578;  
and
- (16) 1992 Chevrolet pickup truck, VIN  
#1GBDC14K2NZ192250.

2. If any of the property subject to forfeiture, 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 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 defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**NOTICE OF FORFEITURE TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 922 and 924, set forth in this indictment, defendants

**JOHN NAPOLI,  
a/k/a “Junior,”  
WILLIAM JOHNSON,  
a/k/a “Tattoo Billy,”**

shall forfeit to the United States of America all firearms and ammunition involved in the commission of such offenses, including, but not limited to:

- (1) Kel-Tec 9mm handgun, Model P-11, serial no. 130710, loaded with approximately 13 rounds of ammunition, and a plastic bag containing numerous rounds of 9mm ammunition,
- (2) .44 cal. Charter Arms revolver, model Bulldog Pug, serial no. 19386, loaded with approximately 5 rounds of .44 cal. ammunition, a box of .44 cal. Blazer ammunition,
- (3) 12-gauge pump-action shotgun, O.F. Mossberg & Sons, model 835, serial no. UM465069,
- (4) 9mm Ruger semi-automatic handgun, model P-89, serial no. 316-47976, loaded with approximately 14 rounds of ammunition, a separate magazine loaded with approximately 13 rounds of 9mm ammunition,

- (5) Kel-Tec 9mm semi-automatic handgun, model P-11, serial no. A4569, loaded with approximately 11 rounds of 9mm ammunition, a box containing approximately 11 rounds of 9mm ammunition,
- (6) approximately 50 rounds of (7.62x39mm Russian) AK-47 cartridges.
- (7) .45 cal. Colt semi-automatic pistol, model Gov't MK IV, serial no. 70G94276,
- (8) 9mm Luger, Sturm-Ruger Co. semi-automatic pistol, model P85 MKII, serial no. 300-84715,
- (9) 9mm Luger, D.W.M. semi-automatic pistol, model P08 (1920), serial no. 2849,
- (10) 9mm Luger, Leinad, Ducktown, TN, semi-automatic pistol, model PM-11, serial no. (obliterated),
- (11) .38 cal. Smith & Wesson revolver, model 10, serial no. 96835,
- (12) .38 cal. Smith and Wesson revolver, model TOP-BREAK, serial no. 434704,
- (13) .380 cal. Beretta, semi-automatic pistol, model 1934, serial no. 765047,
- (14) .22 cal. Llama/Gabilondo revolver, model Comanche 1, serial no. S839891,
- (15) .22 cal. R.G. Industries revolver, model RG 14, serial no. L635654,



- (16) 12-gauge pump-action shotgun, O.F. Mossberg & Sons, model 88, serial no. MV96201H,
- (17) 12-gauge pump-action shotgun, Marlin Firearms Co., model 778, serial no. 20623496, with barrel length cut to 16" with stock removed and replaced with pistol-grip handle,
- (18) 7.62x39mm Russian semi-automatic Romanian rifle, S.N. Romarm S.A., model AK 47 type, serial no. S1-14850-99,
- (19) 9mm Luger semi-automatic rifle, Feather Industries, model AT-9, serial no. A92464, with collapsible stock and 26-round magazine,
- (20) .308 Winchester cal. semi-automatic rifle, Armalite, model AR-10A4, serial no. US564965,
- (21) .303 British cal. bolt-action rifle with scope, United Kingdom (British), model #4 MKI (sporter), serial no. PF70893, with 10 round magazine,
- (22) .223 Remington cal. semi-automatic rifle, Sturm, Ruger & Co., model Mini-14, serial no. 185-66253,
- (23) .22 cal. semi-automatic rifle, Savage Arms Corp., model (Stevens) 62, serial no. 0477938
- (24) 9mm Luger automatic submachine gun, Sten, model MARK 5, serial no. 73488, with three black metal magazine assemblies.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

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**FOREPERSON**

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**PATRICK L. MEEHAN**  
**United States Attorney**