

MF:BR:PW:TM
F.#2004R01550

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

ARTHUR COFFEY and
HAROLD DAGGETT,

Defendants.

Cr. No. _____
(T. 18, U.S.C., §§ 1951(a),
981(a)(1)(C) and 3551 et
seq.; T. 21, U.S.C., §
853(p); T. 28, U.S.C., §
2461(c))

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THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

1. The Genovese organized crime family of La Cosa Nostra (the "Genovese family") was an organized criminal group that operated in the Eastern District of New York, the Southern District of Florida and other parts of the United States.

2. The Genovese family operated through groups of individuals headed by "captains." These groups, which were referred to generally as "crews," consisted of "made" members of the Genovese family, who were generally referred to as "soldiers," and associates of the Genovese family.

3. Above the captains were the three highest-ranking members of the Genovese family. The head of the Genovese family was known as the "boss." He was assisted by an "underboss" and a

counselor, who was known as the "consigliere." From time to time, members of the Genovese family were temporarily appointed to boss, underboss, consigliere or captain positions, and functioned in an "acting" capacity in the stead of an incarcerated or temporarily incapacitated Genovese family member who continued to hold the "official," as opposed to acting, position within the family.

4. The defendants ARTHUR COFFEY and HAROLD DAGGETT were associates of the Genovese family in a crew whose geographic center historically was Harlem and the Bronx, and which was known as "Uptown" or the "Uptown Crew."

5. In addition, the defendants ARTHUR COFFEY and HAROLD DAGGETT were or became members of the Executive Council of the International Longshoremen's Association ("ILA"). COFFEY was a Vice-President of the ILA; DAGGETT became the Assistant General Organizer of the ILA in approximately July 2000.

EXTORTION CONSPIRACY

6. The allegations contained in paragraphs one through five are hereby realleged and incorporated as if fully set forth in this paragraph.

7. In or about and between 1997 and July 2004, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ARTHUR COFFEY and HAROLD DAGGETT, together with others, knowingly and

intentionally conspired to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that the defendants and their coconspirators agreed (a) to obtain property, to wit: money and the right to pursue lawful business, from owners, officers, employees and agents of businesses operating at the piers in the New York metropolitan area, northern New Jersey and Miami, Florida, with their consent, which consent was to be induced by wrongful use of actual and threatened force, violence and fear, and (b) to obtain property, to wit: ILA labor union positions and money, including wages and employee benefits paid in regard to those labor union positions, from the ILA's members and officers, agents, delegates, employees and other representatives, with their consent, which consent was to be induced by wrongful use of actual and threatened force, violence and fear.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

8. The United States hereby gives notice to the defendants charged above that, upon their conviction of the charged extortion conspiracy, 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 offense to forfeit any

property constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

9. 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 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), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendants up to the value of the

forfeitable property described in sub-paragraphs 9(a) through 9(e) above.

(Title 28, United States Code, Section 2461(c); Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p))

A TRUE BILL

FOREPERSON

ROSLYNN R. MAUSKOPF
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK