

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 21-
	:	
NICHOLAS BUCCIARELLI,	:	18 U.S.C. § 1959(a)(3)
a/k/a “Booch”	:	18 U.S.C. § 924(c)(1)(A)(ii)
	:	18 U.S.C. § 922(g)(1)
	:	18 U.S.C. § 2

**INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

**COUNT ONE**

(Violent Crime in Aid of Racketeering—Assault with Dangerous Weapons)

**The Racketeering Enterprise**

1. At all times relevant to this Indictment, NICHOLAS BUCCIARELLI, a/k/a “Booch,” and others known and unknown were members of the Pagan’s Motorcycle Club (the “Pagans” or the “Enterprise”). Specifically, BUCCIARELLI served as the Sergeant at Arms for the Pagans’ Camden County membership chapter.

2. The Pagan’s Motorcycle Club has been classified as an outlaw motorcycle gang by multiple law enforcement agencies. The Department of Justice has designated multiple outlaw motorcycle gangs, including the Pagans, as violent gangs. Members of the Pagans are known to engage in criminal activities such as violent crimes, weapons trafficking, and drug trafficking. The Pagans maintain established membership chapters in

numerous U.S. States and territories, including multiple active chapters in New Jersey.

3. The organization was established in the late 1950s and continues to employ a hierarchal rank structure and formal by-laws. Each chapter has its own organizational structure. Each is managed by a President, a Vice President, a Sergeant at Arms, and a Secretary/Treasurer. On a national level, the Pagans report to a leadership council that is generally comprised of former chapter leaders known as the "Mother Club." The Pagans also appoint a national President, Vice President, Sergeant at Arms, and Secretary/Treasurer, all of whom are part of the Mother Club.

4. Members of the Pagans generally take orders only from their membership chapter's leadership figures, who in turn report to and take orders from the Mother Club. If a member of one chapter has a grievance against a member of another chapter, he is forbidden to act on it unless he has obtained permission from the leadership of the other chapter.

5. The Pagans, including their 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, which was engaged in, and the actions of which affected, interstate 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.

6. At all times relevant to this Indictment, the Pagans, through their respective leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1)—namely, the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance punishable under the laws of the United States, in violation of Title 21, United States Code, Section 846 (conspiracy to distribute and possess with intent to distribute controlled substances), Section 841 (distribution and possession with intent to distribute controlled substances), and Section 843(b) (use of a communication facility to violate the Controlled Substances Act).

**Purposes of the Enterprise**

7. The purposes of the Enterprise included, but were not limited to, the following:

- a. Enriching the members and associates of the Enterprise through criminal activity, including drug trafficking;
- b. Promoting and enhancing the prestige, reputation, and position of the Enterprise with respect to rival criminal organizations;
- c. Preserving and protecting the power, reputation, territory, and criminal ventures of the Enterprise through the use of acts that involved intimidation, threats of violence, and acts of violence, including assault against, among others, members of rival organizations and members of the Pagans who violated the rules of the Enterprise;

- d. Keeping victims and rivals in fear of the Enterprise and its members and associates; and
- e. Concealing the activities of the Enterprise from law enforcement.

**The Assault**

8. On or about August 19, 2020, in Gloucester County, in the District of New Jersey and elsewhere, the defendant,

**NICHOLAS BUCCIARELLI,  
a/k/a "Booch,"**

for the purpose of gaining entrance to, and maintaining and increasing position in, the Pagan's Motorcycle Club, an enterprise engaged in racketeering activity, did knowingly and purposely assault Victim-1 with dangerous weapons, specifically a firearm and an axe handle, contrary to N.J.S.A. 2C:12-1(b)(2).

In violation of Title 18, United States Code, Section 1959(a)(3).

**COUNT TWO**

(Brandishing of a Firearm During a Crime of Violence)

On or about August 19, 2020, in Gloucester County, in the District of New Jersey and elsewhere, the defendant,

**NICHOLAS BUCCIARELLI,  
a/k/a “Booch,”**

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States—specifically, the assault in aid of racketeering activity charged in Count One of this Indictment—did knowingly use and carry a firearm, which was brandished.

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

**COUNT THREE**

(Possession of Firearms by a Convicted Felon)

In or around June and July 2020, in Camden County, in the District of New Jersey and elsewhere, the defendant,

**NICHOLAS BUCCIARELLI,  
a/k/a “Booch,”**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce four (4) firearms—namely one Ruger Red Hawk, .44 Magnum revolver, bearing serial number 501-18340; one Savage Arms, 69RXL, 12 Gauge “Weapon made from a shotgun,” bearing serial number E244699; one Sig Sauer P320 .45 caliber pistol with no serial number present; and one Ruger Mark II Target .22 caliber pistol, bearing serial number 221-48377.

In violation of Title 18, United States Code, Section 922(g)(1) and Title 18, United States Code, Section 2.

**COUNT FOUR**

(Possession of a Firearm by a Convicted Felon)

On or about September 1, 2020, in Camden County, in the District of New Jersey and elsewhere, the defendant,

**NICHOLAS BUCCIARELLI,  
a/k/a "Booch,"**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely one Kimber Micro 9 Raptor 9 millimeter handgun, bearing serial number PB0262318.

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

**FORFEITURE ALLEGATION**

1. As a result of committing the firearms offenses in violation of 18 U.S.C. § 922(g)(1) and 18 U.S.C. § 924(c)(1)(A)(i), charged in Counts Two, Three, and Four of this Indictment, the defendant,

**NICHOLAS BUCCIARELLI,  
a/k/a “Booch,”**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offenses, including: one Ruger Red Hawk, .44 Magnum revolver, bearing serial number 501-18340; one Savage Arms, 69RXL, 12 Gauge “Weapon made from a shotgun,” bearing serial number E244699; one Sig Sauer P320 .45 caliber pistol with no serial number present; one Ruger Mark II Target .22 caliber pistol, bearing serial number 221-48377; and one Kimber Micro 9 Raptor 9 millimeter handgun, bearing serial number PB0262318.

**Substitute Assets Provision**

2. If any of the property described above, 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



divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL



FOREPERSON

  
RACHAEL A. HONIG  
Acting United States Attorney

CASE NUMBER: 21-\_\_\_\_\_

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**NICHOLAS BUCCIARELLI,  
a/k/a "Booch"**

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**INDICTMENT FOR**

**18 U.S.C. § 1959(a)(3)  
18 U.S.C. § 924(c)(1)(A)(ii)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 2**

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**A True Bill,**

  
**Foreperson**

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**RACHAEL A. HONIG**  
*ACTING UNITED STATES ATTORNEY  
FOR THE DISTRICT OF NEW JERSEY*

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SAMANTHA C. FASANELLO  
ASSISTANT U.S. ATTORNEYS  
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