Upstate Citizens for Equality
Niagara Frontier Chapter
836 Indian Church Road
West Seneca, NY 14224-1235
http://www.upstate–citizens.org

March 28, 2005

Glenn T. Suddaby, Esq. VIA Fax: (518)431-0249
United States Attorney for the Northern District of New York
445 Broadway, Room 218
Albany, NY 12207-2924

Dear Mr. Suddaby:

I am writing to you on behalf of the membership of Upstate Citizens for Equality regarding a racketeering enterprise that exists and is operating within your jurisdiction. I am requesting that you take immediate enforcement action to eliminate this illegal and harmful enterprise.

The racketeering enterprise consists of an association in fact of various officers of the Oneida Indian Nation of New York, cigarette wholesalers who provide them with contraband cigarettes, wholesalers who provide them with illegal gambling devices and providers who service the illegal gambling devices. The goal of this racketeering enterprise is profiting from these illegal enterprise activities and to fund what would appear as honest business ventures such as hotels and golf course through which their unlawful gains can be laundered and used for other purposes.

The racketeering enterprise affects interstate and/or international commerce in that it receives contraband from outside the State of New York and uses or causes to be used wire and/or mail in the placement of said orders and to transmit its unlawful gains.

The pattern of racketeering activity includes, but is not limited to, the shipping, transporting, receiving, possessing, selling, distributing, or purchasing contraband cigarettes in violation of 18 USC § 2342 through the Savon Stores in and around Verona, New York; operating an illegal gambling operation called the Turning Stone Casino in violation of 18 USC § 1955; and the engaging in monetary transaction and the laundry of monetary instruments in violation of 18 USC §§ 1956, 1957.

Last year you were quoted as saying “We have been monitoring the situation," and "It is not our intention to take any action, provided things are moving forward and there is some resolution.” This is troublesome since it has been nearly a year since your statements and there is still no action against this patently illegal enterprise and no sign that it will voluntarily cease.

I urge you to take enforcement action immediately to rid our society of this racketeering enterprise and its unlawful and detrimental effects on the law abiding citizens that is affected by it.

Sincerely,

Daniel T. Warren
Chair
Niagara Frontier Chapter of Upstate Citizens for Equality