

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: PART 1

CYRUS R. VANCE, JR.,  
DISTRICT ATTORNEY of the  
COUNTY OF NEW YORK, in his capacity as

Plaintiff-Claiming Authority,

-against-

DANIEL STEININGER,  
DOMINICK GENISE,  
KAREN STEININGER,  
JAIME BAUTISTA,  
DAVID CONTI,  
D&D'S IMPRESSIVE AUTO COLLISION, INC.,  
BROADWAY CAR SALON, INC.,  
TOW-ARRIFIC, INC.,  
AUTHORIZED AUTO BODY INC.  
SOUTHSIDE COLLISION, INC.,  
SOUTHSIDE COLLISION AND TOWING, INC.,  
CARL FAVA,  
GEORGE COPPOLINO,  
NORMAN TEITLER,  
RJN FAMILY ENTERPRISE INC. d/b/a TABS  
CONSULTING GROUP,

Defendants.

SUMMONS

Index No.

TO THE ABOVE-NAMED DEFENDANTS:

You are hereby summoned to appear in this action by serving a notice of appearance upon Plaintiff's attorney within twenty (20) days after the service of this summons, exclusive of the day of service, or within thirty (30) days after service is complete if this summons is not personally delivered to you within the State of New York.


PLEASE TAKE NOTICE THAT this action is brought pursuant to Article 13-A of the New York Civil Practice Law and Rules (“CPLR”). The relief sought is for the forfeiture of \$19,188,774.56 (Nineteen Million, One Hundred and Eighty-Eight Thousand, Seven Hundred and Seventy-Four Dollars and Fifty-Six Cents) from the defendants which is an amount equal to the proceeds, substituted proceeds, and/or instrumentalities of the felony crimes of Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; Scheme to Defraud in the First Degree (P.L. § 190.65[1][b]), a class “E” felony; Conspiracy in the Fourth Degree (P.L. § 105.10[1]), a class “E” felony; Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class “E” felony; Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class “E” felony; Criminal Possession of a Forged Instrument in the Second Degree (P.L. § 170.25), a class “D” felony; and Money Laundering in the Second Degree (P.L. § 470.15[1][b][ii][A][iii]), a class “C” felony; and/or criminal activity arising from a common scheme or plan of which these felony crimes form a part, or a money judgment in an equivalent amount.

PLEASE TAKE FURTHER NOTICE THAT in case of your failure to appear, judgment will be taken against you by default for the aforementioned relief, plus the costs and disbursements of this action. Venue in this action is based, pursuant to CPLR Section 1311(10)(b), upon the fact that a criminal prosecution has been or will be commenced against the defendants for the aforementioned felony crimes, and/or of any criminal activity arising from a common scheme or plan of which these crimes form a part.

February 20, 2018  
New York, NY

CYRUS R. VANCE, JR.  
District Attorney of the County of New York  
Plaintiff-Claiming Authority  
New York County District Attorney's Office  
One Hogan Place  
New York, New York 10013

By:

  
Katarina Braafladt  
Assistant District Attorney  
Asset Forfeiture Unit  
1 Hogan Place  
New York, New York 10013  
212-335-3330 (direct)  
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Attorney for Plaintiff-Claiming Authority

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK: PART 1

CYRUS R. VANCE, JR.,  
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AUTHORIZED AUTO BODY INC.  
SOUTHSIDE COLLISION, INC.,  
SOUTHSIDE COLLISION AND TOWING, INC.,  
CARL FAVA,  
GEORGE COPPOLINO,  
NORMAN TEITLER,  
RJN FAMILY ENTERPRISE INC. d/b/a TABS  
CONSULTING GROUP,

Defendants.

VERIFIED COMPLAINT

Index No.

Plaintiff, Cyrus R. Vance, Jr., District Attorney of the County of New York, by his undersigned attorney, alleges, upon information and belief, for his verified complaint against the above-named defendants, the following:

### **NATURE OF THE ACTION**

1. This is a civil forfeiture action brought pursuant to Article 13-A of the Civil Practice Law and Rules (“CPLR”) to recover the proceeds of the Defendants’ illegal business practices in the New York City towing industry.

### **JURISDICTION AND VENUE**

2. This Court has subject matter jurisdiction over this action pursuant Article VI of the New York Constitution and Article 13-A of the CPLR.

3. Venue is proper in the County of New York, pursuant to CPLR § 1311(10)(b), because a related criminal prosecution could be commenced in said county under Article 20 of the Criminal Procedure Law against the Defendants.

4. The Defendants have been or will be charged with felony crimes pursuant to one or more indictments filed in New York County.

### **PARTIES**

5. Plaintiff Cyrus R. Vance, Jr. is and at all relevant times was the District Attorney of the County of New York. Plaintiff’s principal place of business is 1 Hogan Place in Manhattan. Plaintiff brings this action in his capacity as an appropriate Claiming Authority within the meaning of CPLR § 1310(11).

6. Defendant DANIEL STEININGER is an individual whose last known place of residence is in Nassau County, New York. He has been charged with Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; Conspiracy in the Fourth Degree (P.L. § 105.10[1]), a class “E” felony; Scheme to Defraud in the First Degree (P.L. § 190.65[1][b]), a class “E” felony; four counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L.

§ 340), a class “E” felony; thirty-six counts of Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class “E” felony; four counts of Criminal Possession of a Forged Instrument in the Second Degree (P.L. § 170.25), a class “D” felony; Money Laundering in the Second Degree (P.L. § 470.15[1][b][ii][A][iii]), a class “C” felony; and four counts of Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class “A” misdemeanor.

7. Defendant DOMENICK GENISE (“GENISE”) is an individual whose last known place of residence is in Nassau County, New York. He has been charged with Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; Conspiracy in the Fourth Degree (P.L. § 105.10[1]), a class “E” felony; Scheme to Defraud in the First Degree (P.L. § 190.65[1][b]), a class “E” felony; two counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class “E” felony; Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class “E” felony; Money Laundering in the Second Degree (P.L. § 470.15[1][b][ii][A][iii]), a class “C” felony; and two counts of Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class “A” misdemeanor.

8. Defendant KAREN STEININGER is an individual whose last known place of residence is in Queens County, New York. She has been charged with Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; two counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class “E” felony; sixteen counts of Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class “E” felony; and Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class “A” misdemeanor.

9. Defendant JAIME BAUTISTA (“BAUTISTA”) is an individual whose last known place of residence is in Bronx County, New York. He has been charged with Enterprise

Corruption (P.L. § 460.20[1][a]), a class “B” felony; Conspiracy in the Fourth Degree (P.L. § 105.10[1]), a class “E” felony; Scheme to Defraud in the First Degree (P.L. § 190.65[1][b]), a class “E” felony; two counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class “E” felony; two counts of Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class “E” felony; Money Laundering in the Second Degree (P.L. § 470.15[1][b][ii][A][iii]), a class “C” felony; and Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class “A” misdemeanor.

10. Defendant DAVID CONTI (“CONTI”) is an individual whose last known place of residence is in Nassau County, New York. He has been charged with Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; Scheme to Defraud in the First Degree (P.L. § 190.65[1][b]), a class “E” felony; three counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class “E” felony; five counts of Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class “E” felony; Money Laundering in the Second Degree (P.L. § 470.15[1][b][ii][A][iii]), a class “C” felony; and two counts of Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class “A” misdemeanor.

11. Defendant D&D’S IMPRESSIVE AUTO COLLISION, INC. (“D&D AUTO”) is a domestic business corporation authorized to do business in New York State. DANIEL STIENINGER and GENISE own D&D AUTO. It has been charged with Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; Conspiracy in the Fourth Degree (P.L. § 105.10[1]), a class “E” felony; Scheme to Defraud in the First Degree (P.L. § 190.65[1][b]), a class “E” felony; four counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class “E” felony; Money Laundering in the Second Degree (P.L. §

470.15[1][b][ii][A][iii]), a class “C” felony; and two counts of Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class “A” misdemeanor.

12. Defendant BROADWAY CAR SALON, INC. (“BROADWAY”) is a domestic business corporation authorized to do business in New York State. GENISE is the owner of record of D&D AUTO. It has been charged with Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; Conspiracy in the Fourth Degree (P.L. § 105.10[1]), a class “E” felony; Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class “E” felony; and Money Laundering in the Second Degree (P.L. § 470.15[1][b][ii][A][iii]), a class “C” felony.

13. Defendant TOW-ARRIFIC, INC. (“TOW-ARRIFIC”) is a domestic business corporation authorized to do business in New York State. KAREN STEININGER and DANIEL STEININGER’s wife Amy Steinger are the owners of record of TOW-ARRIFIC. It has been charged with Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; two counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class “E” felony; eleven counts of Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class “E” felony; and Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class “A” misdemeanor.

14. Defendant AUTHORIZED AUTO BODY, INC. (“AUTHORIZED”) is a domestic business corporation authorized to do business in New York State. BAUTISTA is the owner of record of AUTHORIZED. It has been charged with Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; Conspiracy in the Fourth Degree (P.L. § 105.10[1]), a class “E” felony; Scheme to Defraud in the First Degree (P.L. § 190.65[1][b]), a class “E” felony; and Money Laundering in the Second Degree (P.L. § 470.15[1][b][ii][A][iii]), a class “C” felony.



15. Defendant SOUTHSIDE COLLISION, INC. (“SOUTHSIDE COLLISION”) is a domestic business corporation authorized to do business in New York State. CONTI is the owner of record of SOUTHSIDE COLLISION. It has been charged with Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; and Money Laundering in the Second Degree (P.L. § 470.15[1][b][ii][A][iii]), a class “C” felony.

16. Defendant SOUTHSIDE COLLISION AND TOWING, INC. (“SOUTHSIDE COLLISION AND TOWING”) is a domestic business corporation authorized to do business in New York State. CONTI is the owner of record of SOUTHSIDE COLLISION AND TOWING. It has been charged with Enterprise Corruption (P.L. § 460.20[1][a]), a class “B” felony; three counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class “E” felony; five counts of Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class “E” felony; and two counts of Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class “A” misdemeanor.

17. Defendant CARL FAVA (“FAVA”) is an individual whose last known place of residence is in Ocean County, New Jersey. He has been charged with three counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class “E” felony; two counts of Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class “E” felony; and three counts of Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class “A” misdemeanor.

18. Defendant GEORGE COPPOLINO (“COPPOLINO”) is an individual whose last known place of residence is in Queens County, New York. He has been charged with three counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340),

a class "E" felony; and three counts of Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class "A" misdemeanor.

19. Defendant NORMAN TEITLER ("TEITLER") is an individual whose last known place of residence is in New York County, New York. He has been charged with two counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class "E" felony; eighteen counts of Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class "E" felony; and two counts of Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class "A" misdemeanor.

20. Defendant RJN FAMILY ENTERPRISE INC. d/b/a TABS CONSULTING GROUP ("TABS CONSULTING") is a domestic business corporation authorized to do business in New York State. It has been charged with two counts of Contract or Agreement for Monopoly or in Restraint of Trade (G.B.L. § 340), a class "E" felony; eighteen counts of Offering a False Instrument for Filing in the First Degree (P.L. § 175.35[1]), a class "E" felony; and two counts of Conspiracy in the Fifth Degree (P.L. § 105.05[1]), a class "A" misdemeanor.

21. DANIEL STEININGER, GENISE, KAREN STEININGER, BAUTISTA, CONTI, D&D AUTO, BROADWAY, TOW-ARRIFIC, AUTHORIZED, SOUTHSIDE COLLISION, SOUTHSIDE COLLISION AND TOWING, FAVA, COPPOLINO, TEITLER, and TABS CONSULTING, hereinafter collectively referred to as "the Defendants" or "the Steininger Enterprise," are each being sued herein as Criminal Defendants, and D&D AUTO, BROADWAY, TOW-ARRIFIC, AUTHORIZED, SOUTHSIDE COLLISION, SOUTHSIDE COLLISION AND TOWING, and FACTORY

PLUS are also being sued as Non-Criminal Defendants, as those terms are defined in CPLR § 1310.

### ALLEGATIONS OF FACT

22. From in or around May 14, 2015 through 2017, the Defendants and others participated in a criminal enterprise through which they engaged in monopolistic and illegal business practices in the New York City towing industry. As a result of their crimes they obtained proceeds of no less than \$19 million.

23. DANIEL STEININGER was the owner of record of D&D AUTO with GENISE. However, by various means DANIEL STEININGER assumed control over numerous other towing and auto body companies. He induced others, including GENISE, KAREN STEININGER, BAUTISTA, and CONTI, to act as owners of record and thereby conceal his control. He then operated the companies as one enterprise, using funds from one to pay another, directions tow truck drivers to bring vehicles to one shop or another for repair, using the same people to file permits and business applications for various shops, and sharing resources in other ways.

24. KAREN STEININGER and other members of the Steinger Enterprise, at DANIEL STEININGER's direction, worked to conceal the true extent of DANIEL STEININGER's control over these companies and evade government regulations by, for example, filing false documents and committing acts of forgery.

25. With the help of FAVA and COPPOLINO, the Steinger Enterprise entered into unlawful agreements with other towing company owners to restrain trade in the heavy duty and highway towing markets.

26. FAVA and COPPOLINO facilitated the Steinger Enterprise's deals with other tow company owners and mediated between DANIEL STEININGER and other tow company owners when disputes arose. They received payments for doing so.

27. TEITLER is a disbarred attorney. He worked with the Steinger Enterprise to provide legal services and consultation regarding their illegal business practices. He worked with FAVA, COPPOLINO, and others, including DANIEL STEININGER, to "fix" the 2017 highway towing bid process. TEITLER did so using his company, TABS CONSULTING.

28. The Steinger Enterprise, including GENISE, engaged in widespread fraudulent billing of automobile insurance carriers in connection with the auto body work that took place in auto body shops owned or controlled by DANIEL STEININGER, including D&D AUTO, BROADWAY, AUTHORIZED, SOUTHSIDE COLLISION/SOUTHSIDE COLLISION AND TOWING, Factory Plus, Metropolitan Auto Body & Towing, Inc., and Automotion Collision, Inc.

29. GENISE, BAUTISTA, and CONTI cashed checks on behalf of companies controlled by the Steinger Enterprise.

#### PROCEEDS

30. The Steinger Enterprise received payments from automobile insurance carriers for repairs allegedly performed on vehicles brought to the shops DANIEL STEININGER controlled. These payments constitute the proceeds of the crimes of the Steinger Enterprise.

31. In some instances, the Steininger Enterprise billed for repairs not performed or not necessary, or for parts represented as new when in fact they were used, or for labor at a higher rate than actually applicable, or for unrelated prior damage.

32. D&D AUTO, BROADWAY, AUTHORIZED, SOUTHSIDE COLLISION, and SOUTHSIDE COLLISION AND TOWING were each corporate instrumentalities used by the Steininger Enterprise to maximize its profits by servicing as many vehicles as possible and charging insurance carriers for the repairs.

33. D&D AUTO obtained at least \$8,960,170.60 via payments from automobile insurance carriers.

34. BROADWAY obtained at least \$932,798.39 via payments from automobile insurance carriers.

35. AUTHORIZED obtained at least \$1,097,083.73 via payments from automobile insurance carriers.

36. SOUTHSIDE COLLISION/SOUTHSIDE COLLISION AND TOWING obtained at least \$4,346,580.62 via payments from automobile insurance carriers.

37. Factory Plus obtained at least \$1,345,113.01 via payments from automobile insurance carriers.

38. Metropolitan Auto Body & Towing, Inc. obtained at least \$934,878.76 via payments from automobile insurance carriers.

39. Automotion Collision, Inc. obtained at least \$1,572,149.45 via payments from automobile insurance carriers.

40. In total, from May 14, 2015 through 2017, the Steininger Enterprise obtained at least \$19,188,774.56 in criminal proceeds as a result of the Defendants' criminal scheme. This amount constitutes the proceeds, substituted proceeds, and/or instrumentalities of their felony crimes.

41. The Defendants are jointly and severally liable for \$19,188,774.56, the proceeds, substituted proceeds, and/or instrumentalities of their felony crimes.

**AS AND FOR A FIRST CAUSE OF ACTION AGAINST THE  
DEFENDANTS AS CRIMINAL DEFENDANTS FOR THE FORFEITURE  
OF THE PROCEEDS OF THEIR CRIMINAL SCHEME**

42. Plaintiff repeats and realleges the allegations contained in paragraphs 1 through 41 as if set forth herein.

43. DANIEL STEININGER, DOMENICK GENISE, KAREN STEININGER, JAIME BAUTISTA, DAVID CONTI, D&D'S IMPRESSIVE AUTO COLLISION, INC., BROADWAY CAR SALON, INC., TOW-ARRIFIC, INC., AUTHORIZED AUTO BODY, INC., SOUTHSIDE COLLISION, INC., SOUTHSIDE COLLISION AND TOWING, INC., CARL FAVA, GEORGE COPPOLINO, NORMAN TEITLER, and RJN FAMILY ENTERPRISE INC. D/B/A TABS CONSULTING GROUP have engaged in a common plan and scheme to monopolize the New York City towing industry and defraud government officials, insurance carriers, and others in the industry. In connection therewith, they have committed various felony crimes as identified in paragraphs 6 through 20 above.

44. The Defendants are Criminal Defendants as that term is defined in CPLR Section 1310(9).

45. During the course of their scheme the Defendants obtained proceeds from the above-mentioned crimes in an amount not less than \$19,188,774.56.

**AS AND FOR A SECOND CAUSE OF ACTION AGAINST THE  
DEFENDANTS AS CRIMINAL DEFENDANTS FOR A JUDGMENT  
EQUAL TO THE PROCEEDS OF THEIR CRIMINAL SCHEME**

46. Plaintiff repeats and repeats and realleges the allegations contained in paragraphs 1 through 45 as if set forth herein.

47. The Defendants are jointly and severally liable to Plaintiff for a money judgment in an amount of \$19,188,774.56, equal to the proceeds of their criminal scheme.

**AS AND FOR A THIRD CAUSE OF ACTION AGAINST THE  
DEFENDANTS AS NON-CRIMINAL DEFENDANTS FOR THE  
FORFEITURE OF THE PROCEEDS OF THEIR CRIMINAL SCHEME**

48. Plaintiff repeats and realleges the allegations contained in paragraphs 1 through 47 as if set forth herein.

49. The Defendants have each obtained property which constitutes the proceeds and/or substituted proceeds of the criminal activity described herein.

50. The Defendants are also Non-Criminal Defendants as that term is defined in CPLR Section 1310(10).

51. The Defendants are liable to Plaintiff as Non-Criminal Defendants for the forfeiture of their interest in the proceeds and/or substituted proceeds of the criminal activity described herein up to a value of \$19,188,774.56.

**AS AND FOR A THIRD CAUSE OF ACTION AGAINST DEFENDANTS  
D&D'S IMPRESSIVE AUTO COLLISION, INC., BROADWAY CAR SALON,  
INC., TOW-ARRIFIC, INC., AUTHORIZED AUTO BODY, INC.,  
SOUTHSIDE COLLISION, INC., SOUTHSIDE COLLISION AND  
TOWING, INC., AND RJN FAMILY ENTERPRISE INC. D/B/A TABS  
CONSULTING GROUP, AS INSTRUMENTALITIES OF CRIME**

52. Plaintiff repeats and realleges the allegations contained in paragraphs 1 through 51 as if set forth herein.

53. D&D'S IMPRESSIVE AUTO COLLISION, INC., BROADWAY CAR SALON, INC., TOW-ARRIFIC, INC., AUTHORIZED AUTO BODY, INC., SOUTHSIDE COLLISION, INC., SOUTHSIDE COLLISION AND TOWING, INC., and RJN FAMILY ENTERPRISE INC. d/b/a TABS CONSULTING GROUP are instrumentalities of crime as that term is defined in CPLR Section 1310(4).

54. The assets of D&D IMPRESSIVE AUTO COLLISION, INC., BROADWAY CAR SALON, INC., TOW-ARRIFIC, INC., AUTHORIZED AUTO BODY, INC., SOUTHSIDE COLLISION, INC., SOUTHSIDE COLLISION AND TOWING, INC., and RJN FAMILY ENTERPRISE INC. d/b/a TABS CONSULTING GROUP are forfeitable to Plaintiff as instrumentalities of crime.



**WHEREFORE**, Plaintiff demands judgment against the Defendants for:

a) As to the First Cause of Action, seeking the forfeiture from the Defendants, as criminal defendants, of \$19,188,774.56 as the proceeds, substituted proceeds, and instrumentalities of their crimes;

b) As to the Second Cause of Action, seeking from the Defendants, as criminal defendants, a money judgment in the amount of \$19,188,774.56, an amount equivalent to the proceeds of their crimes;

c) As to the Third Cause of Action, seeking the forfeiture from the Defendants, as non-criminal defendants, of up to \$19,188,774.56 as the proceeds and substituted proceeds of their crimes;

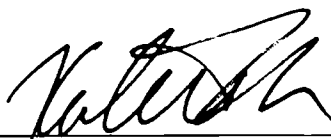
d) As to the Fourth Cause of Action, seeking the forfeiture of D&D'S IMPRESSIVE AUTO COLLISION, INC., BROADWAY CAR SALON, INC., TOW-ARRIFIC, INC., AUTHORIZED AUTO BODY, INC., SOUTHSIDE COLLISION, INC., SOUTHSIDE COLLISION AND TOWING, INC., and RJN FAMILY ENTERPRISE INC. d/b/a TABS CONSULTING GROUP as instrumentalities of crime; and

e) As to each cause of action, for such other and further relief as this Court deems just and proper.

Dated: New York, New York  
February 20, 2018

CYRUS R. VANCE, JR.  
District Attorney of the County of New York  
Plaintiff-Claiming Authority  
New York County District Attorney's Office  
One Hogan Place  
New York, New York 10013

By:



Katarina Braafladt  
Assistant District Attorney  
Asset Forfeiture Unit  
80 Centre Street  
New York, New York 10013  
212-335-3330 (direct)  
212-335-9251 (facsimile)  
braafladtk@dany.nyc.gov

Attorney for Plaintiff-Claiming Authority

VERIFICATION

STATE OF NEW YORK )
) ss:
COUNTY OF NEW YORK )

Jaime Garcia, being duly sworn, deposes and says:

I am a Detective (Shield # 2242) with the New York City Police Department ("NYPD") assigned to the Criminal Enterprise Investigation Division. I have read the foregoing complaint and know the contents thereof and the factual matters therein are true to my knowledge, except as matters therein stated to be alleged upon information and belief, and as to those matters, I believe them to be true. My belief as to all matters not stated upon my knowledge is based upon my participation in the investigation related to this matter, including but not limited to: my overall personal participation in the investigation of felony crimes described herein, my observations during direct surveillance, review of investigators' reports, interviews of witnesses, and conversations with members of the investigation team including members of the NYPD and the New York County District Attorney's Office. The reason the verification is not made by Plaintiff-Claiming Authority is that he is a public officer and a representative of a governmental agency.

Handwritten signature of Jaime Garcia
Det. Jaime Garcia

Sworn to before me this
20th day of February, 2018

KATARINA ELIZABETH BRAAFLADT
Notary Public, State of New York
No. 02BR6334521
Qualified in New York County
Commission Expires Dec. 21, 2019

NOTARY PUBLIC

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**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK**

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**CYRUS R. VANCE, JR.,  
DISTRICT ATTORNEY of the  
COUNTY OF NEW YORK, in his capacity as**

**Plaintiff-Claiming Authority,**

**-against-**

**DANIEL STEININGER,  
DOMINICK GENISE,  
KAREN STEININGER,  
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D&D'S IMPRESSIVE AUTO COLLISION, INC.,  
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RJN FAMILY ENTERPRISE INC. d/b/a TABS CONSULTING GROUP,**

**Defendants.**

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**SUMMONS & VERIFIED COMPLAINT**

Index No.

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**Cyrus R. Vance, Jr.  
District Attorney of the County of New York  
Plaintiff-Claiming Authority  
One Hogan Place  
New York, New York 10013  
(212) 335-9000**