

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

BRANDON FIELDS, :
a/k/a "Beast," :

HAKIM LOWERY, :
a/k/a "Hak," :

LARRY GREEN, :
a/k/a "Mafia," :
a/k/a "Maf," :

DEWAYNE STRATFORD, :
a/k/a "Duquan Stratford," :
a/k/a "Du," :

SEALED

EUGENE GREEN, :
a/k/a "Eugene Huntington," :
a/k/a "Universe," :
a/k/a "Uni," :

SUPERSEDING INDICTMENT

S3 13 Cr. 271 (LTS)

BURCHANTI SCOTT, :
a/k/a "Napp," :

JAMAR EDWARDS, :
a/k/a "Point Guard," :
a/k/a "Point," :

JAQUAN WALKER, :
a/k/a "Jump," :

RASHIN LINDSEY, :
a/k/a "Rashon Lindsay," :
a/k/a "Master," :
a/k/a "I-Mas," :
a/k/a "Mas," :

DERRON RANDOLPH, :
a/k/a "D-Nice," :

ABDUL MOORE, :
a/k/a "Ab," :

HERBERT ODOM, :
a/k/a "Nut," :

ALSHAQUEN NERO, :
a/k/a "Sha Brim," :

BURNELL SCOTT, :
a/k/a "B.U.," :

COUNT ONE

The Grand Jury charges:

1. From at least in or about February 2012, up to and including in or about February 2014, in the Southern District of New York and elsewhere, BRANDON FIELDS, a/k/a "Beast," HAKIM LOWERY, a/k/a "Hak," LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," DEWAYNE STRATFORD, a/k/a "Duquan Stratford," a/k/a "Du," EUGENE GREEN, a/k/a "Eugene Huntington," a/k/a "Universe," a/k/a "Uni," BURCHANTI SCOTT, a/k/a "Napp," JAMAR EDWARDS, a/k/a "Point Guard," a/k/a "Point," JAQUAN WALKER, a/k/a "Jump," RASHIN LINDSEY, a/k/a "Rashon Lindsay," a/k/a "Master," a/k/a "I-Mas," a/k/a "Mas," DERRON RANDOLPH, a/k/a "D-Nice," ABDUL MOORE, a/k/a "Ab," HERBERT ODOM, a/k/a "Nut," ALSHAQUEN NERO, a/k/a "Sha Brim," BURNELL SCOTT, a/k/a "B.U.," MYRON WILBERLY, a/k/a "Brim Law," a/k/a "B-Loved," RACHAUN PARKER, a/k/a "Neph," a/k/a "Ray Ray," TYSHAWN COX, a/k/a "Ty Black," a/k/a "Black," a/k/a "Loyal Brim," DONTRELL BRIGGS, a/k/a "Buster," a/k/a "Bus," RAHEEM STEWART, a/k/a "Ruger," a/k/a "Born-Ru," RAHJOHN LEARY, a/k/a "Rajohn Leary," a/k/a "Raji," ALTERRELL WILLIAMS, a/k/a "T-Burn," RASHON EDWARDS, a/k/a "Scuss," SABRINA MCNEAL, a/k/a "Bri," a/k/a "Brina," WESLEY FRAME, a/k/a "Jus-U," DESHAWN STEWART, a/k/a "Tony Red," a/k/a "Flip," JAMAR MASON, a/k/a "Jay," LINCOLN RIVAS PENA, a/k/a "Shorty," and ANTHONY ROSARIO GARCIA, the defendants, and others known and unknown, intentionally and

knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that BRANDON FIELDS, a/k/a "Beast," HAKIM LOWERY, a/k/a "Hak," LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," DEWAYNE STRATFORD, a/k/a "Duquan Stratford," a/k/a "Du," EUGENE GREEN, a/k/a "Eugene Huntington," a/k/a "Universe," a/k/a "Uni," BURCHANTI SCOTT, a/k/a "Napp," JAMAR EDWARDS, a/k/a "Point Guard," a/k/a "Point," JAQUAN WALKER, a/k/a "Jump," RASHIN LINDSEY, a/k/a "Rashon Lindsay," a/k/a "Master," a/k/a "I-Mas," a/k/a "Mas," DERRON RANDOLPH, a/k/a "D-Nice," ABDUL MOORE, a/k/a "Ab," HERBERT ODOM, a/k/a "Nut," ALSHAQUEN NERO, a/k/a "Sha Brim," BURNELL SCOTT, a/k/a "B.U.," MYRON WILBERLY, a/k/a "Brim Law," a/k/a "B-Loved," RACHAUN PARKER, a/k/a "Neph," a/k/a "Ray Ray," TYSHAWN COX, a/k/a "Ty Black," a/k/a "Black," a/k/a "Loyal Brim," DONTRELL BRIGGS, a/k/a "Buster," a/k/a "Bus," RAHEEM STEWART, a/k/a "Ruger," a/k/a "Born-Ru," RAHJOHN LEARY, a/k/a "Rajohn Leary," a/k/a "Raji," ALTERRELL WILLIAMS, a/k/a "T-Burn," RASHON EDWARDS, a/k/a "Scuss," SABRINA MCNEAL, a/k/a "Bri," a/k/a "Brina," WESLEY FRAME, a/k/a "Jus-U," DESHAWN STEWART, a/k/a "Tony Red," a/k/a "Flip," JAMAR MASON, a/k/a "Jay," LINCOLN RIVAS PENA, a/k/a "Shorty," and ANTHONY ROSARIO GARCIA, the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code,

Section 841(a)(1).

3. The controlled substances that BRANDON FIELDS, a/k/a "Beast," HAKIM LOWERY, a/k/a "Hak," LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," DEWAYNE STRATFORD, a/k/a "Duquan Stratford," a/k/a "Du," EUGENE GREEN, a/k/a "Eugene Huntington," a/k/a "Universe," a/k/a "Uni," BURCHANTI SCOTT, a/k/a "Napp," JAMAR EDWARDS, a/k/a "Point Guard," a/k/a "Point," JAQUAN WALKER, a/k/a "Jump," RASHIN LINDSEY, a/k/a "Rashon Lindsay," a/k/a "Master," a/k/a "I-Mas," a/k/a "Mas," DERRON RANDOLPH, a/k/a "D-Nice," ABDUL MOORE, a/k/a "Ab," HERBERT ODOM, a/k/a "Nut," ALSHAQUEN NERO, a/k/a "Sha Brim," BURNELL SCOTT, a/k/a "B.U.," MYRON WILBERLY, a/k/a "Brim Law," a/k/a "B-Loved," RACHAUN PARKER, a/k/a "Neph," a/k/a "Ray Ray," TYSHAWN COX, a/k/a "Ty Black," a/k/a "Black," a/k/a "Loyal Brim," DONTRELL BRIGGS, a/k/a "Buster," a/k/a "Bus," RAHEEM STEWART, a/k/a "Ruger," a/k/a "Born-Ru," RAHJOHN LEARY, a/k/a "Rajohn Leary," a/k/a "Raji," ALTERRELL WILLIAMS, a/k/a "T-Burn," RASHON EDWARDS, a/k/a "Scuss," SABRINA MCNEAL, a/k/a "Bri," a/k/a "Brina," WESLEY FRAME, a/k/a "Jus-U," DESHAWN STEWART, a/k/a "Tony Red," a/k/a "Flip," JAMAR MASON, a/k/a "Jay," LINCOLN RIVAS PENA, a/k/a "Shorty," and ANTHONY ROSARIO GARCIA, the defendants, conspired to distribute and possess with the intent to distribute were: (a) 1 kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A);

(b) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A); and (c) 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

MEANS AND METHODS OF THE CONSPIRACY

4. At all times relevant to the Superseding Indictment, a criminal organization known as the "Bloods" was operating in Passaic County, New Jersey, principally in the town of Paterson. The Bloods is a nationwide criminal organization that is organized into subgroups, or "sets." Among the sets operating in Paterson, New Jersey (the "Paterson Bloods") were: "Sex Money Murder" ("SMM"), "Fruit Town Brims" ("FTB"), "G-Shine," and "Nine Three" ("9-3"). Although members of the Paterson Bloods belonged to different sets, these individuals and sets often coordinated, collaborated, and worked together and with each other as a single organization.

5. Within sets of the Paterson Bloods, certain individuals had "rank," which meant that they were among the leaders of their sets. For example, BRANDON FIELDS, a/k/a "Beast," HAKIM LOWERY, a/k/a "Hak," and BURCHANTI SCOTT, a/k/a "Napp," the defendants, each had rank in FTB; and DEWAYNE STRATFORD, a/k/a "Duquan Stratford," a/k/a "Du," the defendant, had rank in SMM.

Members of the Paterson Bloods with rank garnered the respect and recognition of other members of the Paterson Bloods, regardless of set. Ranking members of the Paterson Bloods would often meet to resolve disputes between their respective "soldier" members of the sets, and could direct punishment against non-members. Among these punishments were that individuals were to be assaulted or killed by members of the Paterson Bloods. The Paterson Bloods - who communicated, in part, in code - referred to a person who had been targeted for an assault or murder as "food," or "on a plate." Additionally, Paterson Bloods with rank were permitted to induct other individuals into the Paterson Bloods, in a process known as "bringing them home," or "blessing them in."

6. The Paterson Bloods had multiple criminal objectives, one of which was the operation of drug markets in certain locations in Paterson, New Jersey, which distributed primarily heroin and cocaine base, or "crack." In particular, the Paterson Bloods controlled drug markets in the vicinity of the following locations, among others, in Paterson: North Main Street from East Main Street to Jefferson Street (an area known as "The Main"); Graham Avenue/Rosa Parks Boulevard from Lyon Street to Franklin Street ("The Boulevard"); Graham Avenue/Rosa Parks Boulevard from 12th Avenue to Hamilton Avenue; 12th Avenue from East 22nd Street to East 24th Street; 10th Avenue from East 26th Street to East 30th Street; Governor Street

from Graham Avenue to Summer Street ("Up the Hill"); and Park Avenue from Madison Avenue to East 16th Street. All of these locations are within approximately fifteen blocks of one another in Paterson.

7. The Paterson Bloods allowed other members of the Paterson Bloods, of whatever set, to sell heroin and "crack" cocaine in areas of Paterson, New Jersey that were controlled by the Paterson Bloods. This was especially true of FTB and SMM members, who coordinated narcotics sales in the same areas, including the areas described above, and especially in the area of 12th Avenue from East 22nd Street to East 24th Street. Generally, non-members, outsiders, and rival narcotics dealers were prohibited or prevented from distributing narcotics in areas controlled by the Paterson Bloods. Certain individuals - such as people who had grown up in areas controlled by the Paterson Bloods, people of neutral gang or neighborhood group affiliation (such as "God Bodies" or "Five Percenters," "Main Event Gangsters," and "1-2 Live"), or marijuana dealers who often sold to members of the Paterson Bloods - were permitted to distribute narcotics in areas controlled by the Paterson Bloods, but did so at the risk of being robbed by members of the Paterson Bloods, and without the protection of the members of the Paterson Bloods. For example, on or about June 17, 2013, a drug dispute broke out in the area of 12th Avenue and 22nd Street, during which RACHAUN PARKER, a/k/a "Neph," a/k/a "Ray Ray," the defendant,

a member of FTB, assisted an individual who was considered a "neutral" from his neighborhood. Members of FTB, including HAKIM LOWERY, a/k/a "Hak," and JAMAR EDWARDS, a/k/a "Point Guard," a/k/a "Point," the defendants, violently beat PARKER for violating the rules of the set.

8. Other individuals who were not members of the Bloods conspired with the Paterson Bloods to operate the drug markets in Paterson, New Jersey. Among other things, these associates of the Paterson Bloods helped supply them with heroin, "crack" cocaine, and powder cocaine, and otherwise aided the criminal activities of the Paterson Bloods, including narcotics distribution.

9. Members of the Paterson Bloods and their associates committed and conspired, attempted, and threatened to commit acts of violence to protect and expand their drug trafficking operations, and to protect fellow members of the Paterson Bloods. These acts included beatings, stabbings, and shootings intended to prevent people not affiliated with the Paterson Bloods from distributing narcotics in areas controlled by the Paterson Bloods, or to dissuade members of rival gangs, such as the Latin Kings, from encroaching on territory controlled by the Paterson Bloods.

10. The Paterson Bloods obtained heroin, "crack" cocaine, and powder cocaine from a number of different suppliers, not all of whom were members of the Paterson Bloods. These suppliers

often obtained the narcotics from Manhattan or the Bronx, New York, and transported it to Paterson, New Jersey, where the narcotics were distributed to the Paterson Bloods for resale.

OVERT ACTS

11. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about May 23, 2012, ALSHAQUEN NERO, a/k/a "Sha Brim," the defendant, sold approximately 25 grams of heroin for \$1,700 to a confidential informant working at the direction of law enforcement ("CI-1"), which was delivered to CI-1 by a co-conspirator not named herein ("CC-1"), in the vicinity of Governor and Carroll Streets, Paterson, New Jersey.

b. On or about May 23, 2012, BURCHANTI SCOTT, a/k/a "Napp," the defendant, sold approximately 25 grams of heroin to CI-1 for \$1,700, in the vicinity of East 16th Street between Third and Fourth Avenues, Paterson, New Jersey.

c. On or about July 18, 2012, BRANDON FIELDS, a/k/a "Beast," and DERRON RANDOLPH, a/k/a "D-Nice," the defendants, sold approximately 50 grams of heroin to CI-1 for \$2,800, in the vicinity of Tyler Street, Paterson, New Jersey.

d. On or about September 4, 2012, WESLEY FRAME, a/k/a "Jus-U," the defendant, sold approximately 12.5 grams of heroin

for \$750 to a confidential informant working at the direction of law enforcement ("CI-2"), in the vicinity of Hamilton Avenue and Summer Street, Paterson, New Jersey.

e. On or about September 19, 2012, RAHJOHN LEARY, a/k/a "Rajohn Leary," a/k/a "Raji," and ALTERRELL WILLIAMS, a/k/a "T-Burn," the defendants, sold approximately 25 grams of heroin to CI-1 for \$1,400, in the vicinity of 12th Avenue between Carroll Street and Graham Avenue, Paterson, New Jersey, and WILLIAMS discussed with CI-1 the sale of firearms.

f. On or about September 20, 2012, DESHAWN STEWART, a/k/a "Tony Red," a/k/a "Flip," the defendant, attempted to sell approximately 50 grams of heroin to CI-1, but CI-1 purchased this heroin from FIELDS instead, who was able to obtain it faster, in the vicinity of Madison Avenue and 17th Avenue, Paterson, New Jersey.

g. On or about November 13, 2012, DEWAYNE STRATFORD, a/k/a "Duquan Stratford," a/k/a "Du," and RASHIN LINDSEY, a/k/a "Rashon Lindsay," a/k/a "Master," a/k/a "I-Mas," a/k/a "Mas," the defendants, had a telephone conversation in which LINDSEY told STRATFORD, in substance, that he needed 5 grams of heroin, and arranged to meet STRATFORD near his house in Paterson, New Jersey.

h. On or about November 14, 2012, ABDUL MOORE, a/k/a "Ab," the defendant, sold approximately 20 grams of "crack" cocaine for \$800 to a confidential informant working at the direction

of law enforcement ("CI-3"), in the vicinity of Broadway and East 25th Street, Paterson New Jersey.

i. On or about November 16, 2012, STRATFORD and TYSHAWN COX, a/k/a "Ty Black," a/k/a "Black," a/k/a "Loyal Brim," the defendants, had a telephone conversation in which BLACK told STRATFORD, in substance, that he had recently sold 25 grams of heroin to an individual.

j. On or about November 29, 2012, in the vicinity of West 177th Street, New York, New York, MOORE and HERBERT ODOM, a/k/a "Nut," the defendants, met with a co-conspirator not named herein ("CC-2") to purchase narcotics intended for distribution in Paterson, New Jersey.

k. On or about November 29, 2012, FIELDS met with a law enforcement officer acting in an undercover capacity ("UC-1") in the vicinity of Washington Square Park, New York, New York. During this meeting, FIELDS sold approximately 17.5 grams of heroin and approximately 7 "Mollies" to UC-1 for \$1,070. FIELDS also discussed, in substance, the prospect of distributing cocaine with UC-1 in the future.

l. On or about December 7, 2012, STRATFORD and COX had a telephone conversation in which COX asked STRATFORD, in substance, for 100 "Mollies" for FIELDS.

m. On or about December 28, 2012, STRATFORD and

BURNELL SCOTT, a/k/a "B.U.," the defendants, had a telephone conversation in which BURNELL SCOTT asked STRATFORD, in substance, for 7.5 grams of heroin, and STRATFORD responded, in substance, that he only had "crack" cocaine at that time.

n. On or about January 2, 2013, STRATFORD and EUGENE GREEN, a/k/a "Eugene Huntington," a/k/a "Universe," a/k/a "Uni," the defendants, had a telephone conversation in which they discussed, in substance, how much heroin was left, and when EUGENE GREEN indicated that there were 2.5 grams left, STRATFORD instructed EUGENE GREEN to take that heroin to BURNELL SCOTT.

o. On or about January 5, 2013, STRATFORD and SABRINA MCNEAL, a/k/a "Bri," a/k/a "Brina," the defendants, had a telephone conversation in which MCNEAL told STRATFORD, in substance, that she needed 5 grams of heroin and 400 grams of "crack" cocaine, and STRATFORD asked for MCNEAL's location.

p. On or about January 7, 2013, STRATFORD, COX, and EUGENE GREEN sold approximately 12.5 grams of heroin to CI-3 for \$700, in the vicinity of East 25th Street and Broadway, Paterson, New Jersey.

q. On or about January 31, 2013, JAMAR EDWARDS, a/k/a "Point Guard," a/k/a "Point," and JAQUAN WALKER, a/k/a "Jump," the defendants, sold approximately 45 grams of heroin to CI-1 for \$2,900, in the vicinity of East 22nd Avenue and 33rd Street, Paterson,

New Jersey.

r. On or about February 28, 2013, UC-1 met with FIELDS and MYRON WILBERLY, a/k/a "Brim Law," a/k/a "B-Loved," the defendants, in the vicinity of Washington Square Park, New York, New York. During this meeting, FIELDS sold approximately 25 grams of heroin to UC-1 for \$1,900, and WILBERLY sold approximately 50 grams of cocaine and approximately 10 "Mollies" to UC-1 for \$2,500.

s. On or about February 28, 2013, RACHAUN PARKER, a/k/a "Neph," the defendant, sold approximately 57 grams of heroin for \$600 to a law enforcement officer acting in an undercover capacity ("UC-2"), in the vicinity of East 31st Street, between 11th and 12th Avenues, Paterson, New Jersey.

t. On or about March 24, 2013, STRATFORD and RASHON EDWARDS, a/k/a "Scuss," the defendants, had a telephone conversation in which STRATFORD and RASHON EDWARDS discussed, in substance, the possible miscounting of the heroin sold to certain individuals, or the miscounting of the proceeds from the sale of this heroin.

u. On or about March 26, 2013, STRATFORD and LINCOLN RIVAS PENA, a/k/a "Shorty," the defendants, had a telephone conversation in which STRATFORD asked PENA, in substance, to sell him 125 to 250 grams of heroin.

v. On or about March 28, 2013, EUGENE GREEN

purchased heroin from STRATFORD, which EUGENE GREEN then sold to CI-1 in the vicinity of Montgomery Street, Paterson, New Jersey.

w. On or about March 30, 2013, STRATFORD and JAMAR MASON, a/k/a "Jay," the defendants, had a telephone conversation in which they discussed, in substance, whether STRATFORD had heroin for sale at that time, and MASON indicated that he wanted to purchase approximately 2.5 grams of heroin, and then return to purchase approximately an additional 7.5 grams of heroin later.

x. On or about April 23, 2013, ANTHONY ROSARIO GARCIA, the defendant, attempted to deliver approximately 100 grams of cocaine to STRATFORD in the vicinity of 11th Avenue and East 25th Street, Paterson, New Jersey, which GARCIA had received from PENA.

y. On or about June 29, 2013, FIELDS and LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," the defendants, armed with loaded guns, delivered what they believed to be approximately 1 kilogram of cocaine to an address in the Bronx, New York, for a delivery fee of \$1,500.

z. On or about July 16, 2013, FIELDS, LARRY GREEN, and RAHEEM STEWART, a/k/a "Ruger," a/k/a "Born-Ru," the defendants, armed with loaded guns, delivered what they believed to be approximately 1 kilogram of cocaine to an address in the Bronx, New York, for a delivery fee of \$2,200.

aa. On or about August 1, 2013, HAKIM LOWERY, a/k/a "Hak," and DONTRELL BRIGGS, a/k/a "Buster," a/k/a "Bus," the defendants, sold approximately 70 grams of heroin to CI-1 for \$4,000, in the vicinity of Rosa Parks Boulevard between Keen and Warren Streets, Paterson, New Jersey.

bb. On or about August 15, 2013, UC-2 met with LARRY GREEN in the vicinity of Riverside Park, New York, New York. During this meeting, LARRY GREEN sold approximately 25 grams of heroin to UC-2 for \$2,000.

(Title 21, United States Code, Section 846.)

COUNT TWO

The Grand Jury further charges:

12. On or about June 29, 2013, in the Southern District of New York and elsewhere, BRANDON FIELDS, a/k/a "Beast," and LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," the defendants, intentionally and knowingly attempted to distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

13. The controlled substance involved in the offense was 500 grams and more of mixtures and substances containing a detectable

amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Section 846; and Title 18, United States Code, Section 2.)

COUNT THREE

The Grand Jury further charges:

14. On or about June 29, 2013, in the Southern District of New York and elsewhere, BRANDON FIELDS, a/k/a "Beast," and LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics offense charged in Count Two of this Superseding Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying and possession of firearms, which were brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.)

COUNT FOUR

The Grand Jury further charges:

15. On or about July 16, 2013, in the Southern District of New York and elsewhere, BRANDON FIELDS, a/k/a "Beast," LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," and RAHEEM STEWART, a/k/a "Ruger," a/k/a "Born-Ru," the defendants, intentionally and knowingly attempted to distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code,

Section 841(a)(1).

16. The controlled substance involved in the offense was 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Section 846; and Title 18, United States Code, Section 2.)

COUNT FIVE

The Grand Jury further charges:

17. On or about July 16, 2013, in the Southern District of New York and elsewhere, BRANDON FIELDS, a/k/a "Beast," LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," and RAHEEM STEWART, a/k/a "Ruger," a/k/a "Born-Ru," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics offense charged in Count Four of this Superseding Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying and possession of firearms, which were brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(C), and 2.)

COUNT SIX

The Grand Jury further charges:

18. On or about June 29, 2013, in the Southern District of New York, BRANDON FIELDS, a/k/a "Beast," the defendant, after

having been convicted in a court of crimes punishable by imprisonment for a term exceeding one year, knowingly did possess in and affecting commerce, a firearm, to wit, a loaded .40 caliber Glock Model 22 pistol, and ammunition, to wit, 10 rounds of Winchester hollow-point bullets, which had been shipped and transported in interstate and foreign commerce.

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

COUNT SEVEN

The Grand Jury further charges:

19. On or about June 29, 2013, in the Southern District of New York, LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," the defendant, after having been convicted in a court of crimes punishable by imprisonment for a term exceeding one year, knowingly did possess in and affecting commerce, a firearm, to wit, a loaded .9mm Glock Model 26 pistol, and ammunition, to wit, 9 rounds of Winchester hollow-point bullets, which had been shipped and transported in interstate and foreign commerce.

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

COUNT EIGHT

The Grand Jury further charges:

20. On or about July 16, 2013, in the Southern District of New York, BRANDON FIELDS, a/k/a "Beast," the defendant, after having been convicted in a court of crimes punishable by imprisonment for a term exceeding one year, knowingly did possess in and affecting

commerce, a firearm, to wit, a loaded .40 caliber Glock Model 22 pistol, and ammunition, to wit, 10 rounds of Winchester hollow-point bullets, which had been shipped and transported in interstate and foreign commerce.

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

COUNT NINE

The Grand Jury further charges:

21. On or about July 16, 2013, in the Southern District of New York, LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," the defendant, after having been convicted in a court of crimes punishable by imprisonment for a term exceeding one year, knowingly did possess in and affecting commerce, a firearm, to wit, a loaded .9mm Glock Model 26 pistol, and ammunition, to wit, 9 rounds of Winchester hollow-point bullets, which had been shipped and transported in interstate and foreign commerce.

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

COUNT TEN

The Grand Jury further charges:

22. On or about July 16, 2013, in the Southern District of New York, RAHEEM STEWART, a/k/a "Ruger," a/k/a "Born-Ru," the defendant, after having been convicted in a court of crimes punishable by imprisonment for a term exceeding one year, knowingly did possess in and affecting commerce, a firearm, to wit, a loaded .40 caliber Glock Model 27 pistol, and ammunition, to wit, 9 rounds

of Winchester hollow-point bullets, which had been shipped and transported in interstate and foreign commerce.

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

FORFEITURE ALLEGATION

23. As a result of committing the controlled substance offenses alleged in Counts One, Two and Four of this Superseding Indictment, BRANDON FIELDS, a/k/a "Beast," HAKIM LOWERY, a/k/a "Hak," LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," DEWAYNE STRATFORD, a/k/a "Duquan Stratford," a/k/a "Du," EUGENE GREEN, a/k/a "Eugene Huntington," a/k/a "Universe," a/k/a "Uni," BURCHANTI SCOTT, a/k/a "Napp," JAMAR EDWARDS, a/k/a "Point Guard," a/k/a "Point," JAQUAN WALKER, a/k/a "Jump," RASHIN LINDSEY, a/k/a "Rashon Lindsay," a/k/a "Master," a/k/a "I-Mas," a/k/a "Mas," DERRON RANDOLPH, a/k/a "D-Nice," ABDUL MOORE, a/k/a "Ab," HERBERT ODOM, a/k/a "Nut," ALSHAQUEN NERO, a/k/a "Sha Brim," BURNELL SCOTT, a/k/a "B.U.," MYRON WILBERLY, a/k/a "Brim Law," a/k/a "B-Loved," RACHAUN PARKER, a/k/a "Neph," a/k/a "Ray Ray," TYSHAWN COX, a/k/a "Ty Black," a/k/a "Black," a/k/a "Loyal Brim," DONTRELL BRIGGS, a/k/a "Buster," a/k/a "Bus," RAHEEM STEWART, a/k/a "Ruger," a/k/a "Born-Ru," RAHJOHN LEARY, a/k/a "Rajohn Leary," a/k/a "Raji," ALTERRELL WILLIAMS, a/k/a "T-Burn," RASHON EDWARDS, a/k/a "Scuss," SABRINA MCNEAL, a/k/a "Bri," a/k/a "Brina," WESLEY FRAME, a/k/a "Jus-U," DESHAWN STEWART, a/k/a "Tony Red," a/k/a "Flip," JAMAR MASON, a/k/a "Jay," LINCOLN RIVAS PENA, a/k/a "Shorty," and ANTHONY ROSARIO GARCIA, the

defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the narcotics violation alleged in Counts One, Two and Four of this Superseding Indictment.

24. As a result of committing the firearms offenses alleged in Counts Three, Five, Six, Seven, Eight, Nine and Ten of this Superseding Indictment, BRANDON FIELDS, a/k/a "Beast," LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," and RAHEEM STEWART, a/k/a "Ruger," a/k/a "Born-Ru," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offenses.

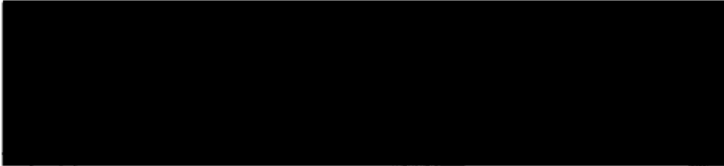
25. If any of the forfeitable property described above in Paragraphs 23 and 24, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 924; Title 21, United States Code, Sections 841(a)(1) and 853; Title 28, United States Code, Section 2461.)



Preet Bharara

FOREPERSON

PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

BRANDON FIELDS, a/k/a "Beast," HAKIM LOWERY, a/k/a "Hak," LARRY GREEN, a/k/a "Mafia," a/k/a "Maf," DEWAYNE STRATFORD, a/k/a "Duquan Stratford," a/k/a "Du," EUGENE GREEN, a/k/a "Eugene Huntington," a/k/a "Universe," a/k/a "Uni," BURCHANTI SCOTT, a/k/a "Napp," JAMAR EDWARDS, a/k/a "Point Guard," a/k/a "Point," JAQUAN WALKER, a/k/a "Jump," RASHIN LINDSEY, a/k/a "Rashon Lindsay," a/k/a "Master," a/k/a "I-Mas," a/k/a "Mas," DERRON RANDOLPH, a/k/a "D-Nice," ABDUL MOORE, a/k/a "Ab," HERBERT ODOM, a/k/a "Nut," ALSHAQUEN NERO, a/k/a "Sha Brim," BURNELL SCOTT, a/k/a "B.U.," MYRON WILBERLY, a/k/a "Brim Law," a/k/a "B-Loved," RACHAUN PARKER, a/k/a "Neph," a/k/a "Ray Ray," TYSHAWN COX, a/k/a "Ty Black," a/k/a "Black," a/k/a "Loyal Brim," DONTRELL BRIGGS, a/k/a "Buster," a/k/a "Bus," RAHEEM STEWART, a/k/a "Ruger," a/k/a "Born-Ru," RAHJOHN LEARY, a/k/a "Rajohn Leary," a/k/a "Raji," ALTERRELL WILLIAMS, a/k/a "T-Burn," RASHON EDWARDS, a/k/a "Scuss," SABRINA MCNEAL, a/k/a "Bri," a/k/a "Brina," WESLEY FRAME, a/k/a "Jus-U," DESHAWN STEWART, a/k/a "Tony Red," a/k/a "Flip," JAMAR MASON, a/k/a "Jay," LINCOLN RIVAS PENA, a/k/a "Shorty," and ANTHONY ROSARIO GARCIA,

Defendants.

SEALED SUPERSEDING INDICTMENT

S3 13 Cr. 271 (LTS)

(21 U.S.C. § 846; 18 U.S.C. §§ 922(g)(1),
924(c)(1)(A)(ii), 924(c)(1)(C), 2.)

PREET BHARARA
United States Attorney.

A TRUE BILL