

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
ALLEN WILLIAMS, :
a/k/a "KB," :
ROBERTO GRANT, :
a/k/a "Roberto Cross," :
a/k/a "Berto," :
TERRELL RATLIFF, :
TYRONE DEHOYOS, :
a/k/a "Tyrone Cross," :
RALIK HANSEN, :
a/k/a "Ralik Taylor," :
a/k/a "Rahlik," :
a/k/a "Rah," :
a/k/a "Ratchet," :
RONALD MCINTYRE, :
a/k/a "Ronde," :
KENDAL THOMPSON, and :
SEAN ROBINSON, :
a/k/a, "Sean Vicks," :
a/k/a, "Luca," :
a/k/a, "Luca Brasi," :
:
Defendants. :
- - - - - X

SEALED INDICTMENT

S3 14 Cr. 130 (RPP)

COUNT ONE

(Hobbs Act Robbery Conspiracy)

The Grand Jury charges:

1. From at least on or about July 1, 2013, up through and including on or about January 30, 2014, in the Southern District of New York and elsewhere, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," TERRELL RATLIFF, TYRONE DEHOYOS, and a/k/a "Tyrone Cross," RALIK HANSEN,

a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," RONALD MCINTYRE, a/k/a "Ronde," KENDAL THOMPSON, SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WILLIAMS, GRANT, RATLIFF, DEHOYOS, HANSEN, MCINTYRE, THOMPSON, ROBINSON and others agreed to commit, and committed, robberies of jewelry and watch stores, in the Southern District of New York and elsewhere, which sell goods that had been manufactured and shipped in interstate commerce.

Overt Acts

2. 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 July 1, 2013, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," TERRELL RATLIFF, and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, and others

participated in the robbery of a jewelry store located in Atlantic City, New Jersey and stole merchandise.

b. On or about August 3, 2013, ALLEN WILLIAMS, a/k/a "KB," and ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," the defendants, and others participated in the robbery of a jewelry store located in Richmond, Virginia and stole merchandise.

c. On or about September 23, 2013, KENDAL THOMPSON, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, and others participated in the gunpoint robbery of a jewelry store located in Brooklyn, New York, in which a store employee was shot with a firearm, and stole merchandise.

d. On or about November 6, 2013, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," RONALD MCINTYRE, a/k/a "Ronde," and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, and others participated in the robbery of a jewelry store located in New Canaan, Connecticut and stole merchandise.

e. On or about January 9, 2014, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto,"

TYRONE DEHOYOS, a/k/a "Tyrone Cross," RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, and others participated in the robbery of a jewelry store located in Cranford, New Jersey and stole merchandise.

f. On or about January 30, 2014, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," and RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," the defendants, and others participated in the robbery of a jewelry store located in New York, New York and stole merchandise.

(Title 18, United States Code, Section 1951.)

COUNT TWO

(Use of a Firearm in Furtherance of Robberies)

The Grand Jury further charges:

3. From at least on or about July 1, 2013, up through and including on or about January 30, 2014, in the Southern District of New York and elsewhere, KENDAL THOMPSON, RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the robbery conspiracy charged in Count One of this 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, one and more of which was discharged during one of the robberies.

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

COUNT THREE
(Atlantic City Robbery)

The Grand Jury further charges:

4. On or about July 1, 2013, in the Southern District of New York and elsewhere, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," TERRELL RATLIFF, and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WILLIAMS, GRANT, RATLIFF, ROBINSON, and others committed a robbery of a jewelry store located in Atlantic City, New Jersey, which was engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 & 2.)

COUNT FOUR

(Richmond, VA Robbery)

The Grand Jury further charges:

5. On or about August 3, 2013, in the Southern District of New York and elsewhere, ALLEN WILLIAMS, a/k/a "KB," and ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WILLIAMS, GRANT, and others committed a robbery of a jewelry store located in Richmond, Virginia, which was engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 & 2.)

COUNT FIVE

(New Canaan, CT Robbery)

The Grand Jury further charges:

6. On or about November 6, 2013, in the Southern District of New York and elsewhere, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," RONALD MCINTYRE, a/k/a "Ronde," and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, and

others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WILLIAMS, GRANT, HANSEN, MCINTYRE, ROBINSON and others committed a robbery of a jewelry store located in New Canaan, Connecticut which was engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 & 2.)

COUNT SIX

(Cranford, NJ Robbery)

The Grand Jury further charges:

7. On or about January 9, 2014, in the Southern District of New York and elsewhere, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," TYRONE DEHOYOS, a/k/a "Tyrone Cross," RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18,

United States Code, Section 1951(b)(3), to wit, WILLIAMS, GRANT, DEHOYOS, HANSEN, ROBINSON and others committed a robbery of a jewelry store located in Cranford, New Jersey which was engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT SEVEN

(New York, NY Robbery)

The Grand Jury further charges:

8. On or about January 30, 2014, in the Southern District of New York, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," and RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," the defendants, and others known and unknown, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, WILLIAMS, GRANT, HANSEN and others committed a robbery of a jewelry store located in Manhattan, New York, which was engaged in the sale of watches and other items in interstate commerce.

(Title 18, United States Code, Sections 1951 and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

9. As the result of committing the offense charged in Count One of this Indictment, in violation of Title 18, United States Code, Section 1951, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," TERRELL RATLIFF, TYRONE DEHOYOS, and a/k/a "Tyrone Cross," RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," RONALD MCINTYRE, a/k/a "Ronde," KENDALL THOMPSON, and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses alleged in Counts One through Seven of this Indictment, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offenses.

FORFEITURE ALLEGATION AS TO COUNT THREE

10. As the result of committing the offense charged in Count Three of this Indictment, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," TERRELL RATLIFF, and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is

derived from proceeds traceable to the commission of such offense.

FORFEITURE ALLEGATION AS TO COUNT FOUR

11. As the result of committing the offense charged in Count Four of this Indictment, ALLEN WILLIAMS, a/k/a "KB," and ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

FORFEITURE ALLEGATION AS TO COUNT FIVE

12. As the result of committing the offense charged in Count Four of this Indictment, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," RONALD MCINTYRE, a/k/a "Ronde," and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

FORFEITURE ALLEGATION AS TO COUNT SIX

13. As the result of committing the offense charged in Count Six of this Indictment, ALLEN WILLIAMS, a/k/a "KB,"

ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," TYRONE DEHOYOS, a/k/a "Tyrone Cross," RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," and SEAN ROBINSON, a/k/a "Sean Vicks," a/k/a "Luca," a/k/a "Luca Brasi," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

FORFEITURE ALLEGATION AS TO COUNT SEVEN

14. As the result of committing the offense charged in Count Seven of this Indictment, ALLEN WILLIAMS, a/k/a "KB," ROBERTO GRANT, a/k/a "Roberto Cross," a/k/a "Berto," and RALIK HANSEN, a/k/a "Ralik Taylor," a/k/a "Rahlik," a/k/a "Rah," a/k/a "Ratchet," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of such offense.

Substitute Assets Provision

15. If any of the property described above as being subject to forfeiture, 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;

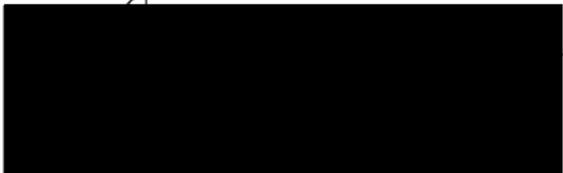
c. has been placed beyond the jurisdiction of the Court;

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 18 U.S.C. § 981, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461, to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981 and 1951;
Title 28, United States Code, Section 2461; and
Title 21, United States Code, Sections 841(a)(1) and 853.)


FOREPERSON

Preet Bharara
PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

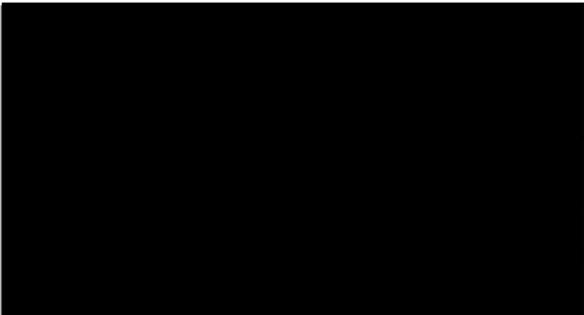
ALLEN WILLIAMS, et al.,

Defendants.

SEALED SUPERSEDING INDICTMENT

S3 14 Cr. 130 (RPP)

(18 U.S.C. §§ 1951 and 2,
924(c) (1) (A) (iii) and 2.)



PREET BHARARA
es Attorney.
