

COUNT ONE

The Grand Jury charges:

1. From at least in or about November 2011, up to and including in or about October 2012, in the Southern District of New York and elsewhere, KAREEM LANIER, a/k/a "Black," ROBERT FIELDS, a/k/a "Tone," a/k/a "T," DONOVAN REYNOLDS, a/k/a "Fats," JOSEPH ANDERSON, a/k/a "J," JAMES WARD, a/k/a "Man Man," KOUDRIS POUNDER, a/k/a "Cory," DANIEL RICHARDSON, a/k/a "D," GERARD POUNDER, JASON MOYE, RANDY MARTINEZ, MICHAEL FERRER, a/k/a "Spanish Mike," JOHN GRAVES, a/k/a "Ross," KYLE HEARNS, a/k/a "Forty," and TOMMY FIGUEROA, a/k/a "Gordo," 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 KAREEM LANIER, a/k/a "Black," ROBERT FIELDS, a/k/a "Tone," a/k/a "T," DONOVAN REYNOLDS, a/k/a "Fats," JOSEPH ANDERSON, a/k/a "J," JAMES WARD, a/k/a "Man Man," KOUDRIS POUNDER, a/k/a "Cory," DANIEL RICHARDSON, a/k/a "D," GERARD POUNDER, JASON MOYE, RANDY MARTINEZ, MICHAEL FERRER, a/k/a "Spanish Mike," JOHN GRAVES, a/k/a "Ross," KYLE HEARNS, a/k/a "Forty," and TOMMY FIGUEROA, a/k/a "Gordo," 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 substance involved in the offense was 28 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)(B).

OVERT ACTS

4. 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 November 2, 2011, in the vicinity of the intersection of Morris Avenue and East 151st Street, Bronx, New York, ROBERT FIELDS, a/k/a "Tone," a/k/a "T," the defendant, sold a quantity of crack cocaine to an undercover law enforcement officer ("UC-1") in exchange for United States currency.

b. On or about November 8, 2011, in the vicinity of the intersection of Morris Avenue and East 151st Street, Bronx,

New York, FIELDS sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

c. On or about November 15, 2011, UC-1 called FIELDS and told FIELDS, in sum and substance, that UC-1 wanted to purchase crack cocaine. FIELDS directed UC-1 to DONOVAN REYNOLDS, a/k/a "Fats," who sold a quantity of crack cocaine to UC-1 in exchange for United States currency in the vicinity of the intersection of Morris Avenue and East 151st Street, Bronx, New York.

d. On or about November 18, 2011, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, REYNOLDS sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

e. On or about December 2, 2011, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, JOSEPH ANDERSON, a/k/a "J," sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

f. On or about December 6, 2011, in the vicinity of the intersection of Morris Avenue and East 151st Street, Bronx, New York, FIELDS sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

g. On or about December 6, 2011, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, ANDERSON sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

h. On or about January 10, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, ANDERSON sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

i. On or about January 13, 2012, in the vicinity of the intersection of Morris Avenue and East 151st Street, Bronx, New York, KAREEM LANIER, a/k/a "Black," sold a quantity of crack cocaine to an undercover law enforcement officer ("UC-2") in exchange for United States currency.

j. On or about January 17, 2012, in the vicinity of the intersection of Morris Avenue and East 151st Street, Bronx, New York, REYNOLDS sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

k. On or about January 20, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, UC-1 told FIELDS, in sum and substance, that UC-1 wanted to purchase crack cocaine. FIELDS directed UC-1 to a co-conspirator not named as a defendant herein ("CC-1"). CC-1 then

sold a quantity of crack cocaine to UC-1 in exchange for United States currency in the vicinity of the intersection of Morris Avenue and East 149th Street.

l. On or about February 1, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

m. On or about February 2, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

n. On or about February 2, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, ANDERSON sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

o. On or about February 3, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, UC-1 told ANDERSON, in sum and substance, that UC-1 wanted to purchase crack cocaine. ANDERSON directed UC-1 to LANIER, who sold a quantity of crack cocaine to UC-1 in exchange for United States currency in the vicinity of the intersection of Park Avenue and East 149th Street, Bronx, New York.

p. On or about February 8, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, ANDERSON sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

q. On or about February 21, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, JAMES WARD, a/k/a "Man Man," the defendant, sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

r. On or about March 14, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, KOUDRIS POUNDER, a/k/a "Cory," the defendant, sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

s. On or about April 3, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

t. On or about April 4, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, DANIEL RICHARDSON, a/k/a "D," sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

u. On or about April 5, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

v. On or about April 5, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

w. On or about April 10, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

x. On or about April 10, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, GERARD POUNDER, the defendant, sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

y. On or about April 11, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, GERARD POUNDER sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

z. On or about April 24, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx,

New York, JASON MOYE, the defendant, sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

aa. On or about April 25, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

bb. On or about May 1, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, RICHARDSON sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

cc. On or about May 1, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, RICHARDSON sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

dd. On or about May 8, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, WARD sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

ee. On or about May 15, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, RANDY MARTINEZ, the defendant, sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

ff. On or about May 16, 2012, in the vicinity of the intersection of Park Avenue and East 149th Street, Bronx, New York, MARTINEZ sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

gg. On or about May 22, 2012, in the vicinity of Morris Avenue and East 151st Street, Bronx, New York, UC-2 told MICHAEL FERRER, a/k/a "Spanish Mike," the defendant, in sum and substance, that UC-2 wanted to purchase crack cocaine. FERRER directed UC-2 to WARD, who sold a quantity of crack cocaine to UC-2 in exchange for United States currency in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York.

hh. On or about May 22, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, JOHN GRAVES, a/k/a "Ross," the defendant, sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

ii. On or about May 23, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, FERRER and co-conspirator not named as a defendant herein ("CC-2") sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

jj. On or about May 24, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, REYNOLDS sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

kk. On or about June 5, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, KOUDRIS POUNDER sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

ll. On or about June 7, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, KOUDRIS POUNDER sold a quantity of crack cocaine to an undercover law enforcement officer ("UC-3") in exchange for United States currency.

mm. On or about June 12, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

nn. On or about June 12, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, KOUDRIS POUNDER sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

oo. On or about June 13, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, FERRER sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

pp. On or about June 14, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

qq. On or about June 19, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, WARD sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

rr. On or about June 19, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, WARD sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

ss. On or about July 3, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

tt. On or about July 3, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New

York, LANIER sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

uu. On or about July 5, 2012, in the vicinity of the intersection of Morris Avenue and East 140th Street, Bronx, New York, MARTINEZ sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

vv. On or about July 5, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, WARD sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

ww. On or about July 13, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, KYLE HEARNS, a/k/a "Forty," the defendant, sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

xx. On or about July 13, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, GERARD POUNDER sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

yy. On or about July 17, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, HEARNS sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

zz. On or about July 17, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, MARTINEZ sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

aaa. On or about July 19, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, RICHARDSON sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

bbb. On or about July 19, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, HEARNS sold a quantity of crack cocaine to UC-2 in exchange for United States currency.

ccc. On or about August 1, 2012, UC-1 called WARD and told WARD, in sum and substance, that UC-1 wanted to purchase crack cocaine. Shortly thereafter, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, WARD sold a quantity of crack cocaine to UC-1 in return for United States currency.

ddd. On or about August 7, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, MARTINEZ sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

eee. On or about August 14, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, TOMMY FIGUEROA, a/k/a "Gordo," the defendant, sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

fff. On or about August 16, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, LANIER sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

ggg. On or about August 17, 2012, in the vicinity of the intersection of Morris Avenue and East 149th Street, Bronx, New York, HEARNS sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

hhh. On or about August 21, 2012, in the vicinity of the intersection of Park Avenue and East 149th Street, Bronx, New York, HEARNS sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

iii. On or about August 21, 2012, in the vicinity of the intersection of Park Avenue and East 149th Street, Bronx, New York, FIGUEROA sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

jjj. On or about August 30, 2012, in the vicinity of the intersection of Park Avenue and East 149th Street, Bronx, New York, FIGUEROA sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

kkk. On or about September 4, 2012, in the vicinity of the intersection of Park Avenue and East 149th Street, Bronx, New York, FIGUEROA sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

lll. On or about September 11, 2012, in the vicinity of the intersection of Park Avenue and East 149th Street, Bronx, New York, HEARNS sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

mmm. On or about September 13, 2012, in the vicinity of the intersection of Park Avenue and East 149th Street, Bronx, New York, FIGUEROA sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

nnn. On or about September 26, 2012, in the vicinity of the intersection of Morris Avenue and East 151st Street, Bronx, New York, FERRER sold a quantity of crack cocaine to UC-3 in exchange for United States currency.

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

COUNT TWO

5. On or about May 1, 2012, in the Southern District of New York, KAREEM LANIER, a/k/a "Black," the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics offense charged in Count One of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crimes, did possess a firearm, which was brandished.

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

FORFEITURE ALLEGATION

6. As a result of committing the controlled substance offense alleged in Count One of this Indictment, KAREEM LANIER, a/k/a "Black," ROBERT FIELDS, a/k/a "Tone," a/k/a "T," DONOVAN REYNOLDS, a/k/a "Fats," JOSEPH ANDERSON, a/k/a "J," JAMES WARD, a/k/a "Man Man," KOUDRIS POUNDER, a/k/a "Cory," DANIEL RICHARDSON, a/k/a "D," GERARD POUNDER, JASON MOYE, RANDY MARTINEZ, MICHAEL FERRER, a/k/a "Spanish Mike," JOHN GRAVES, a/k/a "Ross," KYLE HEARNS, a/k/a "Forty," and TOMMY FIGUEROA, a/k/a "Gordo," the defendants, shall forfeit to the United States, pursuant to Title 21 United States Code § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the

said offense 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 offense alleged in Count One of this Indictment, including but not limited to, a sum in United States currency representing the amount of all proceeds obtained as a result of the offense alleged in Count One of this Indictment.

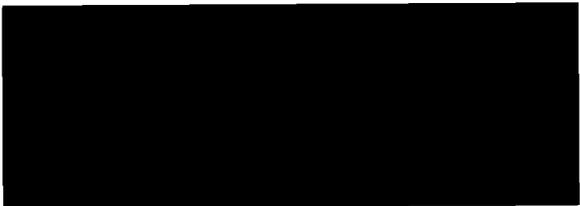
Substitute Asset Provision

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

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)



Preet Bharara
PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

KAREEM LANIER, a/k/a "Black," ROBERT
FIELDS, a/k/a "Tone," a/k/a "T," DONOVAN
REYNOLDS, a/k/a "Fats," JOSEPH ANDERSON,
a/k/a "J," JAMES WARD, a/k/a "Man Man,"
KOUDRIS POUNDER, a/k/a "Cory," DANIEL
RICHARDSON, a/k/a "D," GERARD POUNDER,
JASON MOYE, RANDY MARTINEZ, MICHAEL
FERRER, a/k/a "Spanish Mike," JOHN
GRAVES, a/k/a "Ross," KYLE HEARNS, a/k/a
"Forty," and TOMMY FIGUEROA, a/k/a
"Gordo,"

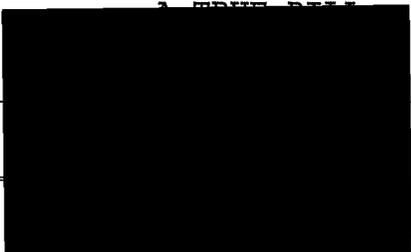
Defendants.

SEALED
INDICTMENT

S3 12 Cr. 862 (AJN)

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

PREET BHARARA
United States Attorney.



Foreperson.

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