

COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- v. -

SEALED
INDICTMENT

12 Cr. III

QUIANE WILLIAMS, :
a/k/a "Splash," :
a/k/a "S-dot," :
CURTIS MACK, :
a/k/a "KB," :
a/k/a "K," :
a/k/a "Meech," :
a/k/a "Meeks," :
STEPHONE HERRING, :
a/k/a "Esco," :
a/k/a "Frank," :
WILFREDO GONZALEZ, :
a/k/a "Will," :
MICHAEL GILES, :
a/k/a "Slick," :
ANTHONY WEBB, :
a/k/a "Ant," :
ANTOINE WEBB, :
a/k/a "Twan," :
a/k/a "Capo," :
a/k/a "Tall," :
KEVIN WILLIAMS, :
a/k/a "Fats," :
HENRY BRINSON, :
a/k/a "Hen Roc," :
MAURICE COLON, :
a/k/a "Flirt," :
RASUN KING, :
a/k/a "Green Eyes," :
HECTOR BATISTA, :
a/k/a "Hec," :
JEREMY SCOTT ALLEN, :
a/k/a "Tampa," :
CHRISTOPHER ANDERSON, :
a/k/a "B.O." :
a/k/a "Bobby," :
a/k/a "Bobby Drama," :
VICTOR BURNS, :
a/k/a "V-12," :
LOREN DWYER, :
a/k/a "L Burna," :
TAYSHAWN FIELDS, :
a/k/a "Breeze," :

RAVEN FUENTES,	:
MATTHEW GARCIA,	:
a/k/a "Pink,"	:
a/k/a "Pinky,"	:
VICTOR GONZALEZ,	:
a/k/a "Vex,"	:
ZAKIYYAH HOULKER,	:
a/k/a "Z,"	:
BRUCE JACKSON,	:
a/k/a "Finesse,"	:
a/k/a "Ness,"	:
JEROME JACKSON,	:
a/k/a "Rome,"	:
DUANE KIRBY,	:
a/k/a "Montana,"	:
a/k/a "Tana,"	:
a/k/a "Ace,"	:
a/k/a "Eddie,"	:
LUIS LIMA,	:
a/k/a "Ghost,"	:
JOSHUA MARTIN,	:
a/k/a "Jizzy,"	:
DANIEL MISCHIYEV,	:
a/k/a "Russia,"	:
KENNETH ORTIZ,	:
a/k/a "Kenny,"	:
a/k/a "KO,"	:
JACQUELINE RICCI,	:
a/k/a "Jackie,"	:
JORGE SERRANO,	:
a/k/a "Bahno,"	:
JEFFREY SPANGENBURG,	:
a/k/a "Spongebob,"	:
a/k/a "Spongy,"	:
CLAUDIS WILSON,	:
a/k/a "Dip," and	:
MICHAEL WRIGHT,"	:
	:
Defendants.	:
-----	: X

COUNT ONE

The Grand Jury charges:

BACKGROUND

1. At all times relevant to this Indictment, a drug trafficking organization (the "Middletown Organization") was operating in and around Middletown, New York, and elsewhere. The Middletown Organization obtained heroin, crack cocaine, cocaine and marijuana from suppliers and distributed those drugs in the vicinity of Middletown.

2. The drug-trafficking activities of the Middletown Organization were coordinated by certain core members, including, among others known and unknown, QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," and STEPHONE HERRING, a/k/a "Esco," a/k/a "Frank," (together, the "Core Members").

3. The Core Members and many of their associates were members of a nationwide criminal organization known as the Bloods. The Bloods are organized into sub-groups known as "sets." The Core Members and many of their associates are members of a Bloods' set known as "9 Trey."

4. The Core Members obtained heroin, crack cocaine, and cocaine from suppliers in the Bronx, New York, and elsewhere, including WILFREDO GONZALEZ, a/k/a "Will," MICHAEL GILES, a/k/a "Slick," ANTHONY WEBB, a/k/a "Ant," ANTOINE WEBB, a/k/a "Twan,"

a/k/a "Capo," a/k/a "Tall," KEVIN WILLIAMS, a/k/a "Fats," and RASUN KING, a/k/a "Green Eyes." The Core Members supplied heroin, crack cocaine, and cocaine to a network of associates for further distribution in and around Middletown, New York, and elsewhere, and collected proceeds from the sale of those narcotics from those associates, including, among others known and unknown, JEREMY SCOTT ALLEN, a/k/a "Tampa," CHRISTOPHER ANDERSON, a/k/a "B.O.," a/k/a "Bobby," a/k/a "Bobby Drama," VICTOR BURNS, a/k/a "V-12," LOREN DWYER, a/k/a "L Burna," TAYSHAWN FIELDS, a/k/a "Breeze," RAVEN FUENTES, MATTHEW GARCIA, a/k/a "Pink," a/k/a "Pinky," VICTOR GONZALEZ, a/k/a "Vex," ZAKIYYAH HOULKER, a/k/a "Z," BRUCE JACKSON, a/k/a "Finesse," a/k/a "Ness," JEROME JACKSON, a/k/a "Rome," DUANE KIRBY, a/k/a "Montana," a/k/a "Tana," a/k/a "Ace," a/k/a "Eddie," LUIS LIMA, a/k/a "Ghost," JOSHUA MARTIN, a/k/a "Jizzy," DANIEL MISCHIYEV, a/k/a "Russia," KENNETH ORTIZ, a/k/a "Kenny," a/k/a "KO," JACQUELINE RICCI, a/k/a "Jackie," JORGE SERRANO, a/k/a "Bahno," JEFFREY SPANGENBURG, a/k/a "Spongebob," a/k/a "Spongy," CLAUDIS WILSON, a/k/a "Dip," and MICHAEL WRIGHT (together, the "Distribution Network").

5. In order to effectuate the drug trafficking activities of the Middletown Organization, Core Members routinely brought narcotics to a location that members of the Middletown Organization referred to as the "Sneaker Store." At the Sneaker

Store, the Core Members distributed narcotics to members of the Distribution Network. After receiving narcotics from the Core Members, members of the Distribution Network routinely brought narcotics to a location designated as the "Studio," for further distribution to customers. The location of the Sneaker Store and the Studio changed periodically in order to avoid detection by law enforcement, among other reasons. Members of the Middletown Organization maintained firearms for use by members of the Middletown Organization at both the Sneaker Store and the Studio in order to protect the operation's narcotics and drug proceeds. In addition, members of the Middletown Organization obtained firearms for each other.

6. In addition to obtaining heroin, crack cocaine, and other drugs from the Core Members, certain members of the Distribution Network also obtained narcotics from additional sources of supply, including HENRY BRINSON, a/k/a "Hen Roc," MAURICE COLON, a/k/a "Flirt," and HECTOR BATISTA, a/k/a "Hec," the defendants.

STATUTORY ALLEGATION

7. From at least in or about January 2010 through in or about February 2012, in the Southern District of New York and elsewhere, QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," STEPHONE HERRING, a/k/a "Esco," a/k/a "Frank," WILFREDO GONZALEZ,

a/k/a "Will," MICHAEL GILES, a/k/a "Slick," HENRY BRINSON, a/k/a "Hen Roc," MAURICE COLON, a/k/a "Flirt," ANTHONY WEBB, a/k/a "Ant," ANTOINE WEBB, a/k/a "Twan," a/k/a "Capo, a/k/a "Tall," KEVIN WILLIAMS, a/k/a "Fats," JEREMY SCOTT ALLEN, a/k/a "Tampa," CHRISTOPHER ANDERSON, a/k/a "B.O.," a/k/a "Bobby," a/k/a "Bobby Drama," VICTOR BURNS, a/k/a "V-12," LOREN DWYER, a/k/a "L Burna," TAYSHAWN FIELDS, a/k/a "Breeze," RAVEN FUENTES, MATTHEW GARCIA, a/k/a "Pink," a/k/a "Pinky," VICTOR GONZALEZ, a/k/a "Vex," ZAKIYYAH HOULKER, a/k/a "Z," BRUCE JACKSON, a/k/a "Finesse," a/k/a "Ness," JEROME JACKSON, a/k/a "Rome," RASUN KING, a/k/a "Green Eyes," DUANE KIRBY, a/k/a "Montana," a/k/a "Tana," a/k/a "Ace," a/k/a "Eddie," LUIS LIMA, a/k/a "Ghost," JOSHUA MARTIN, a/k/a "Jizzy," DANIEL MISCHIYEV, a/k/a "Russia," KENNETH ORTIZ, a/k/a "Kenny," a/k/a "KO," JACQUELINE RICCI, a/k/a "Jackie," JORGE SERRANO, a/k/a "Bahno," JEFFREY SPANGENBURG, a/k/a "Spongebob," a/k/a "Spongy," CLAUDIS WILSON, a/k/a "Dip," and MICHAEL WRIGHT, 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.

8. It was a part and an object of the conspiracy that QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," STEPHONE HERRING, a/k/a "Esco," a/k/a "Frank," WILFREDO GONZALEZ, a/k/a

"Will," MICHAEL GILES, a/k/a "Slick," HENRY BRINSON, a/k/a "Hen Roc," MAURICE COLON, a/k/a "Flirt," ANTHONY WEBB, a/k/a "Ant," ANTOINE WEBB, a/k/a "Twan," a/k/a "Capo, a/k/a "Tall," KEVIN WILLIAMS, a/k/a "Fats," JEREMY SCOTT ALLEN, a/k/a "Tampa," CHRISTOPHER ANDERSON, a/k/a "B.O.," a/k/a "Bobby," a/k/a "Bobby Drama," VICTOR BURNS, a/k/a "V-12," LOREN DWYER, a/k/a "L Burna," TAYSHAWN FIELDS, a/k/a "Breeze," RAVEN FUENTES, MATTHEW GARCIA, a/k/a "Pink," a/k/a "Pinky," VICTOR GONZALEZ, a/k/a "Vex," ZAKIYYAH HOULKER, a/k/a "Z," BRUCE JACKSON, a/k/a "Finesse," a/k/a "Ness," JEROME JACKSON, a/k/a "Rome," RASUN KING, a/k/a "Green Eyes," DUANE KIRBY, a/k/a "Montana," a/k/a "Tana," a/k/a "Ace," a/k/a "Eddie," LUIS LIMA, a/k/a "Ghost," JOSHUA MARTIN, a/k/a "Jizzy," DANIEL MISCHIYEV, a/k/a "Russia," KENNETH ORTIZ, a/k/a "Kenny," a/k/a "KO," JACQUELINE RICCI, JORGE SERRANO, a/k/a "Bahno," JEFFREY SPANGENBURG, a/k/a "Spongebob," a/k/a "Spongy," CLAUDIS WILSON, a/k/a "Dip," and MICHAEL WRIGHT, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

9. The controlled substances involved in the offense were: (1) 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); (2) 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); (3) mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (4) marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

OVERT ACTS

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

a. On or about January 7, 2010, QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," the defendant, possessed heroin, a scale, ammunition and a folding knife, in Middletown, New York.

b. On or about December 28, 2010, JACQUELINE RICCI, a/k/a "Jackie," the defendant, and CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," the defendant, were in a car in Middletown, New York with a quantity of heroin.

c. On or about January 25, 2011, CLAUDIS WILSON, a/k/a "Dip," the defendant, possessed a quantity of heroin in Wallkill, New York.

d. On or about March 25, 2011, KEVIN WILLIAMS, a/k/a "Fats," the defendant, met with CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," the defendant, in connection with a sale of crack cocaine in Wallkill, New York.

e. On or about April 5, 2011, MICHAEL WRIGHT,

the defendant, possessed a quantity of heroin in Wallkill, New York.

f. On or about April 9, 2011, CHRISTOPHER ANDERSON, a/k/a "B.O.," a/k/a "Bobby" a/k/a "Bobby Drama," the defendant, possessed a quantity of heroin in Middletown, New York.

g. On or about June 22, 2011, ANTOINE WEBB, a/k/a "Twan," a/k/a "Capo," a/k/a "Tall," the defendant, spoke to CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," the defendant, over the telephone, during which conversation WEBB and MACK discussed a quantity of crack cocaine.

h. On or about June 23, 2011, JEFFREY SPANGENBURG, a/k/a "Spongebob," a/k/a "Spongy," the defendant, spoke to CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," the defendant, over the telephone, during which conversation SPANGENBURG and MACK discussed a quantity of heroin.

i. On or about June 29, 2011, ANTHONY WEBB, a/k/a "Ant," the defendant, spoke to CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," the defendant, over the telephone, during which conversation WEBB and MACK discussed cocaine.

j. On or about June 30, 2011, RASUN KING, a/k/a "Green Eyes," the defendant, spoke to CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," the defendant, over the telephone, during which conversation KING and MACK discussed crack cocaine.

k. On or about June 30, 2011, MATTHEW GARCIA, a/k/a "Pink," a/k/a "Pinky," the defendant, possessed a quantity of heroin in the vicinity of Clarkstown, New York.

l. On or about July 12, 2011, DANIEL MISCHIYEV, a/k/a "Russia," the defendant, spoke to CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," the defendant, over the telephone, during which conversation MISCHIYEV and MACK discussed a quantity of crack cocaine.

m. On or about July 13, 2011, HECTOR BATISTA, a/k/a "Hec," the defendant, possessed heroin in Middletown, New York.

n. On or about July 14, 2011, VICTOR BURNS, a/k/a "V-12," the defendant, possessed heroin in Wallkill, New York.

o. On or about July 19, 2011, TAYSHAWN FIELDS, a/k/a "Breeze," the defendant, spoke to CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," the defendant, over the telephone, during which conversation FIELDS and MACK discussed quantities of crack cocaine and cocaine.

p. On or about July 23, 2011 STEPHONE HERRING, a/k/a Esco," a/k/a "Frank," DUANE KIRBY, a/k/a "Montana," a/k/a "Tana," a/k/a "Ace," a/k/a "Eddie," and BRUCE JACKSON, a/k/a "Finesse," a/k/a "Ness," the defendants, assaulted RASUN KING, a/k/a "Green Eyes," the defendant, by repeatedly punching KING outside a diner in Middletown, New York, before CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," the

defendant, stabbed RASUN KING, a/k/a "Green Eyes," multiple times with a knife.

q. On or about July 25, 2011, CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," the defendant, spoke to LUIS LIMA, a/k/a "Ghost," the defendant, over the telephone, during which conversation MACK and LIMA discussed a quantity of crack cocaine.

r. On or about September 17, 2011, JEROME JACKSON, a/k/a "Rome," the defendant, spoke to JEREMY SCOTT ALLEN, a/k/a "Tampa," the defendant, over the telephone, during which conversation JACKSON and ALLEN discussed a quantity of heroin.

s. On or about September 18, 2011, HENRY BRINSON, a/k/a "Hen Roc," the defendant, spoke to a co-conspirator not named herein ("CC-1") over the telephone, during which conversation BRINSON and CC-1, discussed a heroin sale.

t. On or about September 19, 2011, ZAKIYYAH HOULKER, a/k/a "Z," the defendant, spoke to JEROME JACKSON, a/k/a "Rome," the defendant, over the telephone, during which conversation HOULKER and JACKSON discussed the sale of heroin.

u. On or about September 19, 2011, RAVEN FUENTES, the defendant, spoke to QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," the defendant, over the telephone, during which conversation FUENTES and WILLIAMS discussed the sale of heroin.

v. On or about September 26, 2011, MAURICE COLON, a/k/a "Flirt," the defendant, spoke to CC-1 over the

telephone, during which conversation COLON and CC-1 discussed the timing of a delivery of heroin.

w. On or about October 13, 2011, JOSHUA MARTIN, a/k/a "Jizzy," the defendant, spoke to CC-1 over the telephone, during which conversation MARTIN and CC-1 discussed delivering money to another person.

x. On or about October 15, 2011, JORGE SERRANO, a/k/a "Bahno," the defendant, spoke to QUIANE WILLIAMS, a/k/a "Splash" a/k/a "S-dot," the defendant, over the telephone, during which conversation SERRANO told WILLIAMS that he told KENNETH ORTIZ, a/k/a "Kenny," a/k/a "KO," the defendant, to pick up a quantity of heroin.

y. On or about October 15, 2011, QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," the defendant, spoke to WILFREDO GONZALEZ, a/k/a "Will," the defendant, over the telephone, during which conversation WILLIAMS and GONZALEZ discussed a delivery of heroin.

z. On or about October 15, 2011, LOREN DWYER, a/k/a "L Burna," the defendant, spoke to QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," the defendant, over the telephone, during which conversation DWYER and WILLIAMS discussed the purchase and sale of heroin.

aa. On or about October 15, 2011, BRUCE JACKSON, a/k/a "Finesse," a/k/a "Ness," the defendant, spoke to QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," the defendant, over the telephone, during which conversation JACKSON and WILLIAMS

discussed a payment for heroin.

bb. On or about October 16, 2011, VICTOR GONZALEZ, a/k/a "Vex," the defendant, spoke to QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," the defendant, over the telephone, during which conversation GONZALEZ and WILLIAMS discussed a quantity of heroin.

cc. On or about October 17, 2011, QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," the defendant, spoke to DUANE KIRBY, a/k/a "Montana," a/k/a "Tana," a/k/a "Ace," a/k/a "Eddie," the defendant, over the telephone, during which conversation WILLIAMS and KIRBY discussed the sale of heroin.

dd. On or about October 25, 2011, STEPHONE HERRING, a/k/a "Esco," a/k/a "Frank," the defendant, spoke to QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," the defendant, during which conversation HERRING and WILLIAMS discussed heroin.

ee. On or about January 16, 2012, KENNETH ORTIZ, a/k/a "Kenny," a/k/a "KO," the defendant, sold heroin in Middletown, New York.

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

COUNT TWO

The Grand Jury further charges:

11. On or about January 7, 2010, in the Southern District of New York, QUIANE WILLIAMS, a/k/a "Splash," a/k/a "S-dot," the defendant, having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess in and affecting commerce ammunition, to

wit, 2 boxes of Lawman nine millimeter Lugar ammunition, which had previously been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Sections 922(g)(1) and (924(a)2)).

COUNT THREE

The Grand Jury further charges:

12. On or about November 29, 2011, in the Southern District of New York, JOSHUA MARTIN, a/k/a "Jizzy," the defendant, having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess in and affecting commerce a firearm, to wit, a .38 caliber Amadeo Rossi revolver, which had previously been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Sections 922(g)(1) and (924(a)2)).

FORFEITURE ALLEGATION

13. As a result of committing the controlled substance offense alleged in Count One of this Indictment, QUIANE WILLIAMS, a/k/a "Splash," CURTIS MACK, a/k/a "KB," a/k/a "K," a/k/a "Meech," a/k/a "Meeks," STEPHONE HERRING, a/k/a "Esco," a/k/a "Frank," WILFREDO GONZALEZ, a/k/a "Will," MICHAEL GILES, a/k/a "Slick," HENRY BRINSON, a/k/a "Hen Roc," MAURICE COLON, a/k/a "Flirt," ANTHONY WEBB, a/k/a "Ant," ANTOINE WEBB, a/k/a "Twan," a/k/a "Capo," a/k/a "Tall," KEVIN WILLIAMS, a/k/a "Fats," JEREMY SCOTT ALLEN, a/k/a "Tampa," CHRISTOPHER ANDERSON, a/k/a "B.O.," a/k/a "Bobby," a/k/a "Bobby Drama," VICTOR BURNS, a/k/a "V-12," LOREN DWYER, a/k/a "L Burna," TAYSHAWN FIELDS, a/k/a "Breeze,"

RAVEN FUENTES, MATTHEW GARCIA, a/k/a "Pink," a/k/a "Pinky," VICTOR GONZALEZ, a/k/a "Vex," ZAKIYYAH HOULKER, a/k/a "Z," BRUCE JACKSON, a/k/a "Finesse," a/k/a "Ness," JEROME JACKSON, a/k/a "Rome," RASUN KING, a/k/a "Green Eyes," DUANE KIRBY, a/k/a "Montana," a/k/a "Tana," a/k/a "Ace," a/k/a "Eddie," LUIS LIMA, a/k/a "Ghost," JOSHUA MARTIN, a/k/a "Jizzy," DANIEL MISCHIYEV, a/k/a "Russia," KENNETH ORTIZ, a/k/a "Kenny," a/k/a "KO," JACQUELINE RICCI, JORGE SERRANO, a/k/a "Bahno," JEFFREY SPANGENBURG, a/k/a "Spongebob," a/k/a "Spongy," CLAUDIS WILSON, a/k/a "Dip," and MICHAEL WRIGHT, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the said defendants 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 or to facilitate the commission of the violation 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 controlled substance offense alleged in Count One of this Indictment .

Substitute Asset Provision

14. 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;

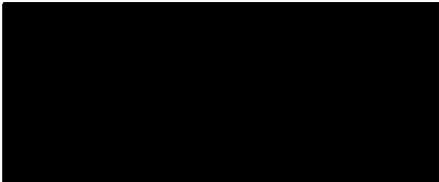
c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

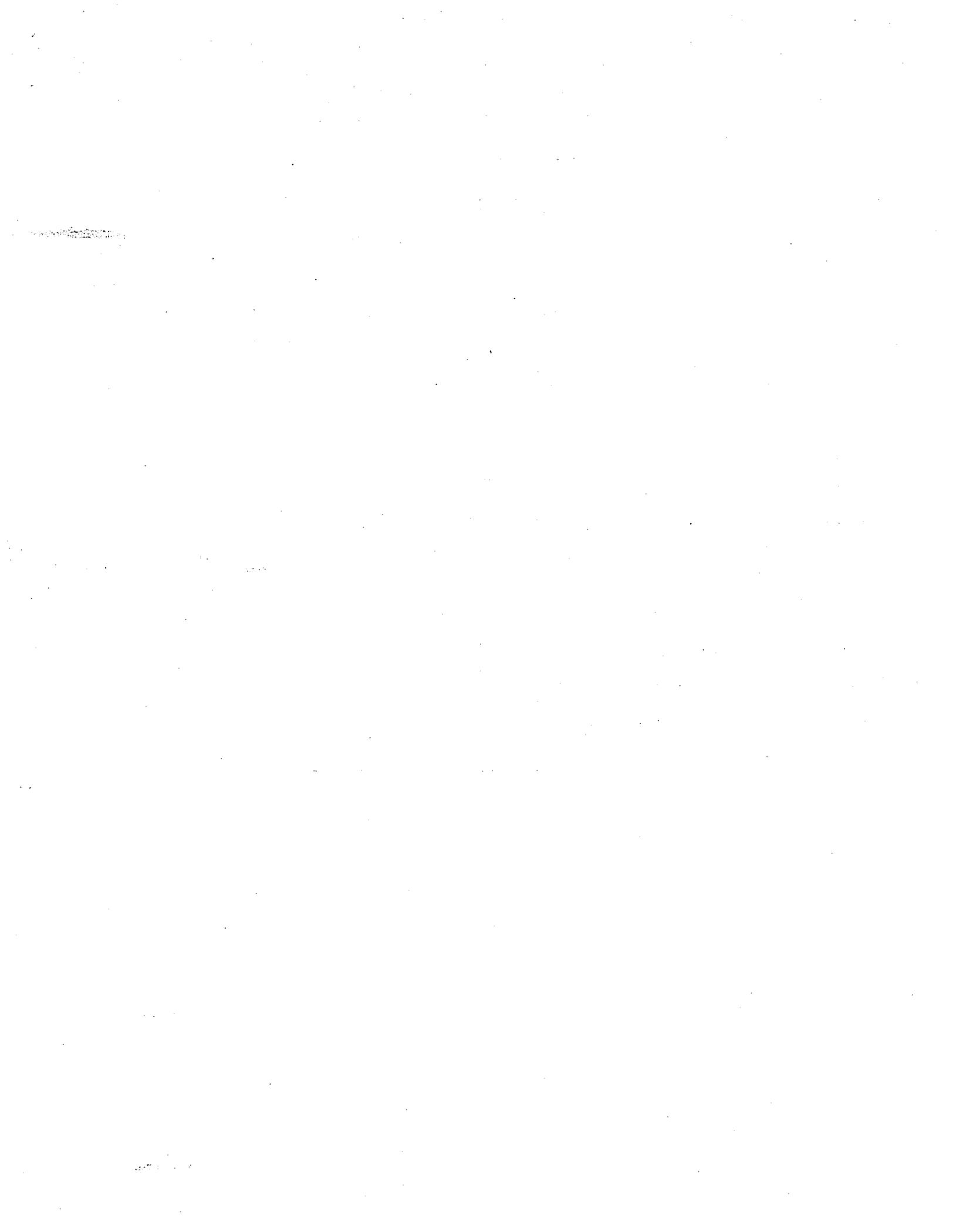
e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the 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

THE UNITED STATES OF AMERICA

vs.

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a/k/a "Flirt,"
RASUN KING,
a/k/a "Green Eyes,"
HECTOR BATISTA,
a/k/a "Hec,"
JEREMY SCOTT ALLEN,
a/k/a "Tampa,"
CHRISTOPHER ANDERSON,
a/k/a "B.O,"
a/k/a "Bobby,"
a/k/a "Bobby Drama,"
VICTOR BURNS,
a/k/a "V-12,"
LOREN DWYER,
a/k/a "L Burna,"
TAYSHAWN FIELDS,
a/k/a "Breeze,"
RAVEN FUENTES,
MATTHEW GARCIA,
a/k/a "Pink,"
a/k/a "Pinky,"
VICTOR GONZALEZ,
a/k/a "Vex,"
ZAKIYYAH HOULKER,
a/k/a "Z,"
BRUCE JACKSON,
a/k/a "Finesse,"
a/k/a "Ness,"
JEROME JACKSON,
a/k/a "Rome,"
DUANE KIRBY,
a/k/a "Montana,"
a/k/a "Tana,"
a/k/a "Ace,"
a/k/a "Eddie,"
LUIS LIMA,
a/k/a "Ghost,"
JOSHUA MARTIN,
a/k/a "Jizzy,"
DANIEL MISCHIEV,
a/k/a "Russia,"
KENNETH ORTIZ,
a/k/a "Kenny,"
a/k/a "KO,"
JACQUELINE RICCI,
a/k/a "Jackie,"
JORGE SERRANO,
a/k/a "Bahno,"
JEFFREY SPANGENBURG,
a/k/a "Spongebob,"
a/k/a "Spongy,"
CLAUDIS WILSON,
a/k/a "Dip," and
MICHAEL WRIGHT,"

Defendants.

INDICTMENT

12 Cr.

(In Violation of 21 U.S.C. § 846 and 18 U.S.C. § 922(g)(1))

PREET BHARARA

United States Attorney.

