

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

SEALED
INDICTMENT

- v. -

S1 12 Cr. 214 (ER)

MARK DAVID,
 a/k/a "Tone,"
 CALVIN BAILEY,
 a/k/a "Tank,"
 LAQUAY COKLEY,
 a/k/a "Quay,"
 JOSE CRUZ,
 a/k/a "Chili,"
 WAYNE CUSTIS,
 a/k/a "Weezy,"
 MELVIN DIAS,
 a/k/a "Flint,"
 TREMAINE GARRISON,
 a/k/a "Triggermain,"
 DAIQUAN HENDERSON,
 a/k/a "Wee Wee,"
 MICHAEL HENDERSON,
 a/k/a "Beanz,"
 a/k/a "Supa,"
 LEANELL HINES,
 a/k/a "Kip,"
 DAWONE HODGES,
 a/k/a "Killat,"
 ERIC LOCKHART,
 a/k/a "Sleazy,"
 DARRYL MCFADDEN,
 a/k/a "Squeeze,"
 HARRY QUINTANA-CRUZ,
 a/k/a "Little Gotti,"
 JOHN SLADE,
 a/k/a "Slide Off,"
 AKEEM SMITH,
 a/k/a "P.C.,"
 PAUL STINSON,
 a/k/a "Salute,"
 a/k/a "Gotti,"
 JOEL URENA,
 a/k/a "Boss,"
 JOSHUA VILIAN,

a/k/a "Ross," and :
GREGORY WILLIAMS, :
a/k/a "G-Dubb," :
 :
Defendants. :
----- X

COUNT ONE

The Grand Jury charges:

BACKGROUND

1. At all times relevant to this Indictment, a drug trafficking organization known as the Strip Boyz (the "Organization") was operating in and around Yonkers, New York. The principal objective of the Strip Boyz - which was also known at various times as the Slum Crew, the Small-Time Gangsters ("STG") and, more recently, "Chris Coke Entertainment or "CCE" - was the enrichment of the members and associates of the Organization through the distribution of cocaine base, commonly known as "crack," and marijuana. Certain members of the Organization also sold heroin, cocaine and phencyclidine, also known as "PCP."

2. Members of the Strip Boyz sold crack cocaine and marijuana primarily in the Schlobohm Housing Project on Schroeder Street in Yonkers, New York, and on a "strip" of Palisade Avenue, which runs alongside the housing project. Members and affiliates of the Organization also sold narcotics on various streets within a several-block radius of Schroeder Street, including Walsh Road, Lafayette Place, Elm Street,

Locust Hill Avenue, St. Casimir Avenue, New School Street, and Ravine Avenue. The Strip Boyz prohibited and prevented outsiders and rival narcotics dealers from distributing narcotics in the area controlled by the Organization. Certain people associated with the Strip Boyz, such as individuals who had grown up in the Schlobohm Housing Project, or members of the Grimy Motherfuckers ("GMF"), another gang that hailed from the Schlobohm Housing Project, were also permitted to sell crack cocaine and marijuana within the area controlled by the Organization.

3. Though it did not have a rigid hierarchy, at times relevant to this Indictment, the Strip Boyz were led by, among others, MARK DAVID, a/k/a "Tone," LEANELL HINES, a/k/a "Kip," the defendants, and Kasheem Little, a/k/a "Kash," Christopher Cokley, a/k/a "Bracks." Little and Cokley were killed by rival gang members in 2010 and 2009, respectively. Currently, DAVID and HINES, who both sell crack cocaine, are the Organization's leaders and chief enforcers based, in part, on their commission of multiple shootings against rival gang members and other individuals who challenged the members of the Organization.

MEANS AND METHODS OF THE CONSPIRACY

4. Members and associates of the Strip Boyz worked together to ensure that all members of the Organization profited from the Organization's crack cocaine and marijuana sales.

Generally, multiple members and associates of the Strip Boyz sold quantities of crack cocaine and marijuana at the same time in and around the buildings that comprise the Schlobohm Housing Project, as well as on the surrounding streets. The Organization's members and associates stored the bags of crack, which they referred to as "twists," in their mouths, undergarments, or in nearby stash locations.

5. Often, several members and associates of the Organization shared a single customer's sale if the customer requested multiple bags of crack or marijuana; that is, more than one member or associate provided crack or marijuana to the customer to complete the customer's order in order to ensure that multiple members of the Organization profited from a single customer. The members and associates of the Organization referred to the sharing of sales in this fashion as "busting down" or "breaking down." Members and associates of the Strip Boyz also worked together by packaging and storing crack cocaine and marijuana in and around the buildings that comprise the Schlobohm Housing Project.

6. Members and associates of the Strip Boyz routinely purchased their crack, which they then resold to crack customers, from common suppliers. The Strip Boyz who supplied crack to other members and associates of the Organization included JOSE CRUZ, a/k/a "Chili," ERIC LOCKHART, a/k/a

"Sleazy," HARRY QUINTANA-CRUZ, a/k/a "Little Gotti," JOHN SLADE, a/k/a "Slide Off," PAUL STINSON, a/k/a "Salute," a/k/a "Gotti," and JOSHUA VILIAN, a/k/a "Ross," the defendants.

7. Certain members and associates of the Strip Boyz also maintained and shared firearms in order to protect their drug territory and, specifically, to protect themselves against rival gang members. When a firearm was needed to protect their territory from encroachment by a rival gang, the members or associates of the Organization known as "shooters" - including DAVID, HINES, TREMAINE GARRISON, a/k/a "Triggermain," and WAYNE CUSTIS, a/k/a "Weezy," the defendants - could utilize the firearms acquired by other members of the Organization.

8. Certain members of the Strip Boyz, including MARK DAVID, a/k/a "Tone," and MICHAEL HENDERSON, a/k/a "Beanz," a/k/a "Supa," the defendants, created, performed, recorded and distributed rap music that celebrated the illegal activities of the Organization. Specifically, songs performed by DAVID and HENDERSON which contain lyrics about the Organization's crack sales and acts of violence against rival gang members were recorded and distributed on audio CDs and shared on social media websites such as Facebook and Youtube.

9. Certain members of the Strip Boyz and their associates committed and agreed, attempted, and threatened to commit acts of violence to protect and expand their drug trafficking

operation and to protect fellow members and associates of the Organization. These acts of violence included beatings, stabbings and shootings intended either to protect the Organization's drug territory, or to retaliate against members of rival gangs who had encroached on the territory controlled by the Strip Boyz.

10. From at least in or about 2005 up to and including in or about August 2011, the Strip Boyz engaged in violent disputes with other Yonkers gangs hailing from Elm Street, known as the "Elm Street Wolves," Cliff Street, known as the "Cliff Street Gangsters," and Riverdale Avenue, known as "Two Guns Up." During these disputes, members of the Strip Boyz, Elm Street Wolves, Cliff Street Gangsters and Two Guns Up committed multiple shootings, beatings, stabbings, and assaults against one another.

11. At times relevant to this Indictment, the Strip Boyz were aligned with other Yonkers gang members, including both the GMF and individuals from Locust Hill Avenue. Members of the Strip Boyz often joined forces with the Grimy Motherfuckers and individuals from Locust Hill Avenue when engaging in acts of violence against the Elm Street Wolves, Cliff Street Gangsters, and Two Guns Up.

STATUTORY ALLEGATION

12. From at least in or about 2001 up to and including in or about June 2012, in the Southern District of New York and elsewhere, MARK DAVID, a/k/a "Tone," CALVIN BAILEY, a/k/a "Tank," LAQUAY COKLEY, a/k/a "Quay," JOSE CRUZ, a/k/a "Chili," WAYNE CUSTIS, a/k/a "Weezy," MELVIN DIAS, a/k/a "Flint," TREMAINE GARRISON, a/k/a "Triggermain," DAIQUAN HENDERSON, a/k/a "Wee Wee," MICHAEL HENDERSON, a/k/a "Beanz," a/k/a "Supa," LEANELL HINES, a/k/a "Kip," DAWONE HODGES, a/k/a "Killat," ERIC LOCKHART, a/k/a "Sleazy," DARRYL McFADDEN, a/k/a "Squeeze," HARRY QUINTANA-CRUZ, a/k/a "Little Gotti," JOHN SLADE, a/k/a "Slide Off," AKEEM SMITH, a/k/a "P.C.," PAUL STINSON, a/k/a "Salute," a/k/a "Gotti," JOEL URENA, a/k/a "Boss," JOSHUA VILIAN, a/k/a "Ross," GREGORY WILLIAMS, a/k/a "G-Dubb," 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.

13. It was a part and an object of the conspiracy that MARK DAVID, a/k/a "Tone," CALVIN BAILEY, a/k/a "Tank," LAQUAY COKLEY, a/k/a "Quay," JOSE CRUZ, a/k/a "Chili," WAYNE CUSTIS, a/k/a "Weezy," MELVIN DIAS, a/k/a "Flint," TREMAINE GARRISON, a/k/a "Triggermain," DAIQUAN HENDERSON, a/k/a "Wee Wee," MICHAEL HENDERSON, a/k/a "Beanz," a/k/a "Supa," LEANELL HINES, a/k/a

"Kip," DAWONE HODGES, a/k/a "Killat," ERIC LOCKHART, a/k/a "Sleazy," DARRYL McFADDEN, a/k/a "Squeeze," HARRY QUINTANA-CRUZ, a/k/a "Little Gotti," JOHN SLADE, a/k/a "Slide Off," AKEEM SMITH, a/k/a "P.C.," PAUL STINSON, a/k/a "Salute," a/k/a "Gotti," JOEL URENA, a/k/a "Boss," JOSHUA VILIAN, a/k/a "Ross," GREGORY WILLIAMS, a/k/a "G-Dubb," 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).

14. The controlled substances involved in the offense were: (1) 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 (2) 50 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(C).

OVERT ACTS

15. 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:

a. On or about February 20, 2006, ERIC LOCKHART, a/k/a "Sleazy," the defendant, sold approximately one bag of crack cocaine and possessed approximately 8 additional bags of

crack cocaine in the vicinity of Schroeder Street in Yonkers, New York.

b. On or about October 25, 2006, MELVIN DIAS, a/k/a "Flint," the defendant, possessed approximately 22 bags of crack cocaine and marijuana in the vicinity of Schroeder Street in Yonkers, New York.

c. On or about May 15, 2007, JOHN SLADE, a/k/a "Slide Off," the defendant, possessed approximately 12 bags of crack cocaine in the vicinity of Schroeder Street in Yonkers, New York.

d. On or about May 30, 2007, DAWONE HODGES, a/k/a "Killat," the defendant, possessed approximately 39 bags of crack cocaine in the vicinity of Palisade Avenue and Elm Street in Yonkers, New York.

e. In or about 2008, MICHAEL HENDERSON, a/k/a "Beanz," a/k/a "Supa," the defendant, sold quantities of crack cocaine in the vicinity of Schroeder Street in Yonkers, New York.

f. In or about 2008, GREGORY WILLIAMS, a/k/a "G-Dubb," the defendant, sold bags of crack cocaine in the vicinity of Schroeder Street in Yonkers, New York.

g. On or about May 3, 2008, MARK DAVID, a/k/a "Tone," the defendant, possessed two loaded firearms in a

vehicle in the vicinity of Palisade Avenue and Elm Street in Yonkers, New York.

h. On or about June 13, 2008, PAUL STINSON, a/k/a "Salute," a/k/a "Gotti," possessed approximately 128 small bags of crack cocaine, larger bags of crack cocaine, and marijuana in the vicinity of Schroeder Street in Yonkers, New York.

i. On or about October 22, 2009, DARRYL McFADDEN, a/k/a "Squeeze," the defendant, discharged a firearm in the vicinity of John Street and New School Street in Yonkers, New York.

j. On or about September 30, 2010, LEANELL HINES, a/k/a "Kip," the defendant, possessed approximately 86 bags of crack cocaine and marijuana in the vicinity of Riverdale Avenue in Yonkers, New York.

k. On or about October 18, 2010, TREMAINE GARRISON, a/k/a "Triggermain," the defendant, possessed a loaded firearm in the vicinity of Schroeder Street in Yonkers, New York.

l. On or about October 30, 2010, WAYNE CUSTIS, a/k/a "Weezy," the defendant, possessed approximately 2 bags of crack cocaine in the vicinity of Schroeder Street in Yonkers, New York.

m. On or about January 2, 2011, DAIQUAN HENDERSON, a/k/a "Wee Wee," the defendant, possessed approximately 19 bags

of phencyclidine, or PCP, and marijuana in the vicinity of Schroeder Street in Yonkers, New York.

n. On or about February 16, 2011, LAQUAY COKLEY, a/k/a "Quay," the defendant, possessed approximately 13 bags of crack cocaine in the vicinity of Schroeder Street in Yonkers, New York.

o. On or about February 16, 2011, HARRY QUINTANA-CRUZ, a/k/a "Little Gotti," the defendant, possessed approximately 75 bags of crack cocaine in the vicinity of Schroeder Street in Yonkers, New York.

p. On or about February 16, 2011, JOEL URENA, a/k/a "Boss," the defendant, possessed approximately 17 bags of crack cocaine in the vicinity of Schroeder Street in Yonkers, New York.

q. On or about November 25, 2011, JOSHUA VILIAN, a/k/a "Ross," the defendant, arranged over the telephone for the sale of approximately 5 grams of crack cocaine to a confidential source of information working at the direction of law enforcement officers (the "CS") in the vicinity of Schroeder Street in Yonkers, New York.

r. On or about January 31, 2012, CALVIN BAILEY, a/k/a "Tank," the defendant, sold approximately 10 grams of crack cocaine to the CS in the vicinity of Ravine Avenue in Yonkers, New York.

s. On or about May 15, 2012, JOSE CRUZ, a/k/a "Chili," the defendant, sold approximately 10 grams of crack cocaine to the CS in the vicinity of Locust Hill Avenue in Yonkers, New York.

t. On or about June 15, 2012, AKEEM SMITH, a/k/a "P.C.," the defendant, sold approximately 35 grams of crack cocaine to the CS in the vicinity of Locust Hill Avenue in Yonkers, New York.

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

COUNT TWO

The Grand Jury further charges:

16. From at least in or about 2004 up to and including in or about June 2012, in the Southern District of New York, MARK DAVID, a/k/a "Tone," CALVIN BAILEY, a/k/a "Tank," LAQUAY COKLEY, a/k/a "Quay," JOSE CRUZ, a/k/a "Chili," WAYNE CUSTIS, a/k/a "Weezy," TREMAINE GARRISON, a/k/a "Triggermain," DAIQUAN HENDERSON, a/k/a "Wee Wee," MICHAEL HENDERSON, a/k/a "Beanz," a/k/a "Supa," LEANELL HINES, a/k/a "Kip," DAWONE HODGES, a/k/a "Killat," ERIC LOCKHART, a/k/a "Sleazy," DARRYL McFADDEN, a/k/a "Squeeze," 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 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, which firearms were discharged.

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

FORFEITURE ALLEGATION

17. As a result of committing the controlled substance offense alleged in Count One of this Indictment, MARK DAVID, a/k/a "Tone," CALVIN BAILEY, a/k/a "Tank," LAQUAY COKLEY, a/k/a "Quay," JOSE CRUZ, a/k/a "Chili," WAYNE CUSTIS, a/k/a "Weezy," MELVIN DIAS, a/k/a "Flint," TREMAINE GARRISON, a/k/a "Triggermain," DAIQUAN HENDERSON, a/k/a "Wee Wee," MICHAEL HENDERSON, a/k/a "Beanz," a/k/a "Supa," LEANELL HINES, a/k/a "Kip," DAWONE HODGES, a/k/a "Killat," ERIC LOCKHART, a/k/a "Sleazy," DARRYL McFADDEN, a/k/a "Squeeze," HARRY QUINTANA-CRUZ, a/k/a "Little Gotti," JOHN SLADE, a/k/a "Slide Off," AKEEM SMITH, a/k/a "P.C.," PAUL STINSON, a/k/a "Salute," a/k/a "Gotti," JOEL URENA, a/k/a "Boss," JOSHUA VILIAN, a/k/a "Ross," GREGORY WILLIAMS, a/k/a "G-Dubb," 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 said defendants obtained directly or indirectly as a result of the 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 proceeds obtained as a result of one or more of the offense.

Substitute Assets Provision

18. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

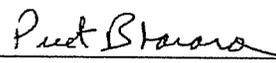
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot 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) and 853.)



FOREPERSON



PREET BHARARA
United States Attorney

COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TYRONE HALL,
a/k/a "T-Bone,"

Defendant.

SEALED INDICTMENT

12 Cr.

12 CRIM 00481

COUNT ONE

The Grand Jury charges:

1. From at least on or about January 6, 2012, up to and including on or about June 6, 2012, in the Southern District of New York and elsewhere, TYRONE HALL, a/k/a "T-Bone," the defendant, 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 TYRONE HALL, a/k/a "T-Bone," the defendant, 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).

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:

a. On or about January 6, 2012, TYRONE HALL, a/k/a "T-Bone," the defendant, sold approximately 10 grams of crack cocaine in the vicinity of Nepperhan Avenue in Yonkers, New York.

b. On or about January 17, 2012, HALL sold approximately 20 grams of crack cocaine in the vicinity of Radford Street in Yonkers, New York.

c. On or about January 20, 2012, HALL sold approximately 10 grams of crack cocaine in the vicinity of Radford Street in Yonkers, New York.

d. On or about June 6, 2012, HALL sold approximately 26 grams of crack cocaine in the vicinity of Radford Street in Yonkers, New York.

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

COUNT TWO

The Grand Jury further charges:

5. On or about January 6, 2012, in the Southern District of New York, TYRONE HALL, a/k/a "T-Bone," the defendant,

intentionally and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(C); Title 18, United States Code, Section 2.)

COUNT THREE

The Grand Jury further charges:

6. On or about January 17, 2012, in the Southern District of New York, TYRONE HALL, a/k/a "T-Bone," the defendant, intentionally and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(C); Title 18, United States Code, Section 2.)

COUNT FOUR

The Grand Jury further charges:

7. On or about January 20, 2012, in the Southern District of New York, TYRONE HALL, a/k/a "T-Bone," the defendant, intentionally and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(C); Title 18, United States Code, Section 2.)

COUNT FIVE

The Grand Jury further charges:

8. On or about June 6, 2012, in the Southern District of New York, TYRONE HALL, a/k/a "T-Bone," the defendant, intentionally and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(C); Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

9. As a result of committing the controlled substance offenses alleged in Counts One through Five of this Indictment, TYRONE HALL, a/k/a "T-Bone," the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of the violations 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 violations alleged in Counts One through Five 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.

Substitute Assets Provision

10. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

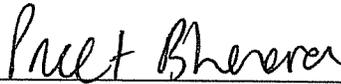
c. has been placed beyond the jurisdiction of the Court;

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 the defendant up to the value of the forfeitable property.

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



PREET BHARARA

United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
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- v. - :
:
JONATHAN MILES, :
a/k/a "Millz," :
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Defendant. :
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SEALED INDICTMENT

12 Cr.

12 CRIM 00 482

COUNT ONE

The Grand Jury charges:

1. On or about April 18, 2012, in the Southern District of New York, JONATHAN MILES, a/k/a "Millz," the defendant, intentionally and knowingly did distribute and possess with intent to distribute a controlled substance, to wit, mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack."

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(C); Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATION

2. As a result of committing the controlled substance offense alleged in Count One of this Indictment, JONATHAN MILES, a/k/a "Millz," the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said defendant obtained directly or indirectly as a result of the 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 proceeds obtained as a result of the offense.

Substitute Assets Provision

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- 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 the defendant up to the value of the forfeitable property.

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



PREET BHARARA

United States Attorney

