

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

PAUL JOHNSON,
a/k/a "PJ Glizzy,"

Defendant.

SEALED INDICTMENT

24 Cr.

24 CRIM 706

COUNT ONE

(The OGz Enterprise Racketeering Conspiracy)

The Grand Jury charges:

THE OGz ENTERPRISE

1. From at least in or about 2019, up to and including in or about December 2024, PAUL JOHNSON, a/k/a "PJ Glizzy," the defendant, and others known and unknown, were members and associates of the Original Goons ("OGz"), a criminal organization whose members and associates engaged in, among other things, acts involving murder and the distribution of controlled substances, and who operated principally in the Bronx, New York.

2. The OGz, including its leadership, membership, and associates, constituted an "enterprise" (the "OGz Enterprise") as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The OGz Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the OGz Enterprise. At all times relevant to this Indictment, the OGz Enterprise was engaged in, and its activities affected, interstate and foreign commerce.

3. PAUL JOHNSON, a/k/a "PJ Glizzy," the defendant, participated in unlawful and other activities in furtherance of the conduct of the OGz Enterprise's affairs.

PURPOSES OF THE OGz ENTERPRISE

4. The purposes of the OGz Enterprise included the following:
 - a. Preserving and protecting the power of the OGz Enterprise and its members and associates through acts involving murder, other acts of violence, and threats of violence.
 - b. Enriching the members and associates of the OGz Enterprise through, among other things, the distribution of controlled substances, including cocaine, codeine, and marijuana.
 - c. Promoting and enhancing the OGz Enterprise and the reputation and activities of its members and associates.

MEANS AND METHODS OF THE OGz ENTERPRISE

5. Among the means and methods by which the members and associates of the OGz Enterprise conducted and participated in the conduct of the affairs of the OGz Enterprise were the following:
 - a. Members and associates of the OGz Enterprise committed, conspired to commit, and attempted to commit acts of violence, including acts involving murder, to protect and expand the Enterprise's criminal operations, and in connection with rivalries with members of other street gangs.
 - b. Members and associates of the OGz Enterprise sold controlled substances, including cocaine, codeine, and marijuana.
 - c. Members and associates of the OGz Enterprise obtained, possessed, and used firearms and ammunition.

THE RACKETEERING CONSPIRACY

6. From in or about 2019, up to and including in or about December 2024, in the Southern District of New York and elsewhere, PAUL JOHNSON, a/k/a "PJ Glizzy," the

defendant, and others known and unknown, being persons employed by and associated with the OGz Enterprise described in Paragraphs 1 through 5 of this Indictment, knowingly combined, conspired, confederated, and agreed with each other to violate the racketeering laws of the United States, to wit, Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the OGz Enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity, as defined in Title 18, United States Code, Section 1961(1) and (5), consisting of:

a. multiple acts involving murder, chargeable under the following provisions of state law: New York Penal Law, Sections 125.25(1) and (2) (murder), 105.15 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting); and

b. multiple offenses involving the distribution of narcotics and controlled substances, including cocaine, codeine, and marijuana, chargeable under Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute) and 846 (conspiracy), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing).

7. It was a part of the conspiracy that PAUL JOHNSON, a/k/a "PJ Glizzy," the defendant, agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the OGz Enterprise.

Notice of Special Sentencing Factors

8. On or about February 6, 2022, in the Southern District of New York and elsewhere, as part of his agreement to conduct and participate in the conduct of the affairs of the OGz Enterprise through a pattern of racketeering activity, PAUL JOHNSON, a/k/a "PJ Glizzy," the defendant, and others known and unknown, murdered Jayquan McKenley, and aided and abetted

the same, in the vicinity of Greene Avenue and Lewis Avenue, in Brooklyn, New York, in violation of New York Penal Law, Sections 125.25(1) and (2) and 20.00, in that, (i) with intent to cause the death of another person, JOHNSON caused the death of McKenley, and aided and abetted the same; and (ii) under circumstances evincing a depraved indifference to human life, JOHNSON recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of McKenley, and aided and abetted the same.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO
(Conspiracy to Commit Murder in Aid of Racketeering)

The Grand Jury further charges:

9. At all times relevant to this Indictment, the OGz, as described in paragraphs 1 through 5 of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, membership, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate and foreign commerce. The OGz Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the OGz Enterprise.

10. At all relevant times to this Indictment, the OGz Enterprise, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder, in violation of New York Penal Law, and offenses involving the distribution of controlled substances, including cocaine, codeine, and marijuana, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 846, and Title 18, United States Code, Section 2.

11. On or about February 6, 2022, in the Southern District of New York and elsewhere, PAUL JOHNSON, a/k/a "PJ Glizzy," the defendant, and others known and unknown, for the purpose of gaining entrance to and maintaining and increasing position in the OGz Enterprise, an enterprise engaged in racketeering activity, as described above, did knowingly combine, conspire, confederate, and agree to murder Jayquan McKenley, in violation of New York Penal Law, Sections 125.25 and 105.15.

(Title 18, United States Code, Section 1959(a)(5).)

COUNT THREE
(Murder in Aid of Racketeering)

The Grand Jury further charges:

12. At all times relevant to this Indictment, the OGz, as described in paragraphs 1 through 5 of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, membership, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate and foreign commerce. The OGz Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the OGz Enterprise.

13. At all relevant times to this Indictment, the OGz Enterprise, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder, in violation of New York Penal Law, and offenses involving the distribution of controlled substances, including cocaine, codeine, and marijuana and codeine, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 846 and Title 18, United States Code, Section 2.

14. On or about February 6, 2022, in the Southern District of New York and elsewhere, PAUL JOHNSON, a/k/a "PJ Glizzy," the defendant, and others known and unknown, for the purpose of gaining entrance to and maintaining and increasing position in the OGz Enterprise, an enterprise engaged in racketeering activity, as described above, murdered and aided and abetted the murder of Jayquan McKenley in the vicinity of Greene Avenue and Lewis Avenue, in Brooklyn, New York, in that, (i) with intent to cause the death of another person, JOHNSON caused the death of McKenley, and aided and abetted the same; and (ii) under circumstances evincing a depraved indifference to human life, JOHNSON recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of McKenley, and aided and abetted the same, in violation of New York Penal Law, Sections 125.25(1), 125.25(2), and 20.00.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

SPECIAL FINDINGS AS TO PAUL JOHNSON, A/K/A "PJ GLIZZY"

15. Counts Three of this Indictment is realleged and incorporated by reference as though fully set forth herein. As to Count Three of the Indictment, alleging the murder of Jayquan McKenley, PAUL JOHNSON, a/k/a "PJ Glizzy," the defendant:

- a. was 18 years of age or older at the time of the offense;
- b. intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Jayquan McKenley died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)); and,
- c. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants

in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)).

COUNT FOUR
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

16. On or about February 6, 2022, in the Southern District of New York and elsewhere, PAUL JOHNSON, a/k/a "PJ Glizzy," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the murder in aid of racketeering charged in Count Three of this Indictment, knowingly used and carried a firearm, and, in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished and discharged.

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

FORFEITURE ALLEGATIONS

17. As a result of committing the offense alleged in Count One of this Indictment, PAUL JOHNSON, a/k/a "PJ Glizzy," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendant acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendant established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, from the offense alleged in Count One of this Indictment,

including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

18. As a result of committing the offense alleged in Count Four of this Indictment, PAUL JOHNSON, a/k/a "PJ Glizzy," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offense.

Substitute Assets Provision

19. If any of the above-described forfeitable property, 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 Title 28, United States Code, Section 1963(m) and 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 924 and 1963;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



EDWARD Y. KIM
Acting United States Attorney