

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALIEU JARJOU,  
a/k/a "Sally,"  
a/k/a "Lu Sally,

Defendant.

SEALED INDICTMENT

24 Cr.

**24 CRIM 571**

COUNT ONE  
(Racketeering Conspiracy)

The Grand Jury charges:

THE ROLLIN 20s CRIPS

1. From at least in or about January 2021, through at least in or about January 2022, ALIEU JARJOU, a/k/a "Sally," a/k/a "Lu Sally," the defendant, and others known and unknown, were members and associates of the Rollin 20s Crips, a criminal organization that operated principally in and around the Bronx (the "Enterprise"). Members and associates of the Enterprise engaged in, among other activities, narcotics and marijuana trafficking and acts involving murder and assault.

2. The Rollin 20s Crips, including its leadership, its membership, and its associates, constituted an "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 Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise was engaged in, and its activities affected, interstate commerce.

3. ALIEU JARJOU, a/k/a "Sally," a/k/a "Lu Sally," the defendant, participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

#### PURPOSES OF THE ENTERPRISE

4. The purposes of Rollin 20s Crips included the following:

a. Preserving and protecting the power and territory of the Enterprise and its members and associates through acts involving murder, assault, other acts of violence, and threats of violence.

b. Enriching the members and associates of the Enterprise through, among other things, the distribution of narcotics and controlled substances, including oxycodone and marijuana.

c. Promoting and enhancing the Enterprise and the reputation and activities of its members and associates by, among other things, retaliating against rivals and other individuals who harm, attempt to harm, insult, challenge, or otherwise impede the activities of Enterprise members and associates.

#### MEANS AND METHODS OF THE ENTERPRISE

5. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Rollin 20s Crips were the following:

a. Members and associates of the Enterprise committed and conspired, attempted, and threatened to commit, acts of violence, including acts involving murder and assault, to protect and to expand the Enterprise's criminal operations, resolve disputes within the Enterprise, and to retaliate against rival gangs.

b. Members and associates of the Enterprise sold narcotics and controlled substances, including oxycodone and marijuana.

c. Members and associates of the Enterprise obtained, possessed, and used firearms and ammunition.

#### THE RACKETEERING CONSPIRACY

6. From at least in or about January 2021, through at least in or about January 2022, in the Southern District of New York and elsewhere, ALIEU JARJOU, a/k/a “Sally,” a/k/a “Lu Sally,” the defendant, and others known and unknown, being persons employed by and associated with the enterprise described in Paragraphs One through Five of this Indictment, namely, the Rollin 20s Crips, which Enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of:

a. multiple acts involving murder, chargeable under the following provisions of state law: New York Penal Law, Sections 125.25 (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 oxycodone 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 ALIEU JARJOU, a/k/a "Sally," a/k/a "Lu Sally," the defendant, agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

NOTICE OF SPECIAL SENTENCING FACTORS

8. On or about March 9, 2021, in the Southern District of New York and elsewhere, ALIEU JARJOU, a/k/a "Sally," a/k/a "Lu Sally," the defendant, and others known and unknown, murdered Jadon Robinson, in that, (1) with the intent to cause the death of Jadon Robinson, JARJOU caused the death of Jadon Robinson, in violation of New York Penal Law Section 125.25(1), and (2) under circumstances evincing a depraved indifference to human life, JARJOU recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Jadon Robinson, in violation of New York Penal Law Section 125.25(2), to wit, JARJOU shot and killed Robinson in the vicinity of 1268 Morrison Avenue, Bronx, New York.

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

**COUNT TWO**  
**(Murder in Aid of Racketeering)**

The Grand Jury further charges:

9. At all times relevant to this Indictment, the Rollin 20s Crips, as described in Paragraphs One through Five of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals which was engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose

members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

10. At all times relevant to this Indictment, the 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, offenses involving the distribution of controlled substances, including oxycodone and marijuana, in violation of Title 21, United States Code, Sections 841 (distribution and possession with intent to distribute) and 846 (conspiracy), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing)..

11. On or about March 9, 2021, in the Southern District of New York and elsewhere, ALIEU JARJOU, a/k/a "Sally," a/k/a "Lu Sally," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Enterprise, an enterprise engaged in racketeering activity, as described above, knowingly and intentionally murdered Jadon Robinson, that is, (1) with the intent to cause the death of Jadon Robinson, caused the death of Jadon Robinson, in violation of New York Penal Law, Section 125.25(1), and (2) under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct that created a grave risk of death to another person, and thereby caused the death of Jadon Robinson, in violation of New York Penal Law, Section 125.25(2), in the vicinity of 1268 Morrison Avenue, Bronx, New York.

(Title 18, United States Code, Section 1959(a)(1).)

**COUNT THREE**  
**(Murder Through Use of a Firearm)**

The Grand Jury further charges:

12. On or about March 9, 2021, in the Southern District of New York and elsewhere, ALIEU JARJOU, a/k/a “Sally,” a/k/a “Lu Sally,” 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 Two of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and in the course of such offense caused the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111, to wit, JARJOU shot and killed Jadon Robinson in the vicinity of 1268 Morrison Avenue, Bronx, New York.

(Title 18, United States Code, Section 924(j)(1).)

**COUNT FOUR**  
**(Firearm Use, Carrying, and Possession)**

The Grand Jury further charges:

13. On or about March 9, 2021, in the Southern District of New York and elsewhere, ALIEU JARJOU, a/k/a “Sally,” a/k/a “Lu Sally,” 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 Two of this Indictment, knowingly used and carried a firearm, and, in furtherance of such crime, possessed a firearm, which was brandished and discharged.

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

## **SPECIAL FINDINGS REGARDING THE MURDER OF JADON ROBINSON**

14. Counts Two and Three of this Indictment are realleged and incorporated by reference as though fully set forth herein. As to Counts Two and Three, alleging the murder of Jadon Robinson, the defendant ALIEU JARJOU, a/k/a “Sally,” a/k/a “Lu Sally”:

- a. was eighteen years of age or older at the time of the offense;
- b. intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A)); and
- c. in the commission of the offense, and in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5)).

## **FORFEITURE ALLEGATIONS**

15. As a result of committing the racketeering offense alleged in Count One of this Indictment, ALIEU JARJOU, a/k/a “Sally,” a/k/a “Lu Sally,” 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.

16. As a result of committing the offenses alleged in Counts Two and Three of this Indictment, ALIEU JARJOU, a/k/a "Scally," a/k/a "Lu Scally," 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 offenses.


**Substitute Assets Provision**

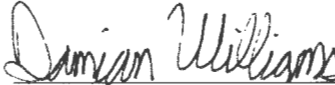
17. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- 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 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1963.)

  
FOREPERSON

  
DAMIAN WILLIAMS  
United States Attorney