

COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
:
UNITED STATES OF AMERICA :
:
- V. - :
:
JEMEL GOODE, :
a/k/a "J Rock" :
BENANCIO CABA, :
a/k/a "Bennie Caba," :
LASEAN GOODE, :
a/k/a "Bones," :
EDWIN HILARIO, :
ANEUDI JIMENEZ, :
a/k/a "Fat Bastard," :
QUELVIN LOPEZ, :
NATHANIEL SAUNDERS, SR., :
NATHANIEL SAUNDERS, JR., :
a/k/a "Quan," :
ALEXANDER SCUDDER, :
DUANE TAYLOR, :
a/k/a "Daquan Jenkins," :
a/k/a "Antwan Scott," :
SHARRAHN WALTON, :
:
Defendants. :
:
----- X

SEALED INDICTMENT

16 Cr.

16 CRIM 529

COUNT ONE

The Grand Jury charges:

1. From at least in or about July 2014, up to and including in or about July 2016, in the Southern District of New York and elsewhere, JEMEL GOODE, a/k/a "J Rock," BENANCIO CABA, a/k/a "Bennie Caba," LASEAN GOODE, a/k/a "Bones," EDWIN HILARIO, QUELVIN LOPEZ, ANEUDI JIMENEZ, a/k/a "Fat Bastard," ALEXANDER

SCUDDER, DUANE TAYLOR, a/k/a "Daquan Jenkins," a/k/a "Antwan Scott," NATHANIEL SAUNDERS, SR., NATHANIEL SAUNDERS, JR., a/k/a "Quan," and SHARRAHN WALTON, 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 JEMEL GOODE, a/k/a "J Rock," BENANCIO CABA, a/k/a "Bennie Caba," LASEAN GOODE, a/k/a "Bones," EDWIN HILARIO, QUELVIN LOPEZ, ANEUDI JIMENEZ, a/k/a "Fat Bastard," ALEXANDER SCUDDER, DUANE TAYLOR, a/k/a "Daquan Jenkins," a/k/a "Antwan Scott," NATHANIEL SAUNDERS, SR., NATHANIEL SAUNDERS, JR., a/k/a "Quan," and SHARRAHN WALTON, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that JEMEL GOODE, a/k/a "J Rock," LASEAN GOODE, a/k/a "Bones," BENANCIO CABA, a/k/a "Bennie Caba," NATHANIEL SAUNDERS, SR., NATHANIEL SAUNDERS, JR., a/k/a "Quan," DUANE TAYLOR, a/k/a "Daquan Jenkins," a/k/a "Antwan Scott," and SHARRAHN WALTON conspired to distribute and possess with intent to distribute 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).

4. The controlled substance that BENANCIO CABA, a/k/a "Bennie Caba," ALEXANDER SCUDDER, EDWIN HILARIO, QUELVIN LOPEZ, and ANEUDI JIMENEZ, a/k/a "Fat Bastard," the defendants, and others known and unknown, conspired to distribute and possess with intent to distribute was 500 grams and more of mixtures and substances containing cocaine, in violation of Title 21, United States Code, Section 841(b) (1) (B).

Overt Acts

5. 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 March 24, 2016, JEMEL GOODE, a/k/a "J rock," the defendant, sold crack to a confidential informant ("CI-1") in or around the Town of Haverstraw, New York.

b. On or about February 13, 2016, BENANCIO CABA, a/k/a "Bennie Caba," and JEMEL GOODE, a/k/a "J rock," the defendants, exchanged text messages regarding JEMEL GOODE purchasing cocaine from CABA.

c. On or about June 9, 2016, LASEAN GOODE, a/k/a "Bones," the defendant, sold crack to a confidential

informant ("CI-2") in or around the Town of Haverstraw, New York.

d. On or about April 28, 2016, EDWIN HILARIO, the defendant, sold cocaine to CI-2 in or around the town of Haverstraw, New York.

e. On or about November 11, 2015, ANEUDI JIMENEZ, a/k/a "Fat Bastard" sold cocaine to a confidential informant ("CI-3") in or around the Town of Haverstraw, New York.

f. On or about March 24, 2016, QUELVIN LOPEZ and JEMEL GOODE, a/k/a "J rock," the defendants, had phone conversations and exchanged text messages regarding JEMEL GOODE purchasing cocaine from QUELVIN LOPEZ.

g. On or about October 1, 2015, NATHANIEL SAUNDERS, SR., the defendant, sold crack to a confidential informant ("CI-4") in or around the town of Haverstraw, New York.

h. On or about April 5, 2016, NATHANIEL SAUNDERS, JR., a/k/a "Quan," the defendant, sold crack to CI-4 in or around the town of Haverstraw, New York.

i. On or about April 5, 2016, ALEXANDER SCUDDER and JEMEL GOODE, a/k/a "J Rock," the defendants, had phone conversations regarding JEMEL GOODE purchasing cocaine from SCUDDER.

j. On or about February 13, 2016, DUANE TAYLOR, a/k/a "Daquan Jenkins," a/k/a "Antwan Scott," and JEMEL GOODE, the defendants, exchanged text messages regarding DUANE TAYLOR purchasing crack from JEMEL GOODE.

k. On or about January 15, 2016, SHARRAHN WALTON, the defendant, sold crack to CI-4 in or around the town of Haverstraw, New York.

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

FORFEITURE ALLEGATION

6. As a result of committing the offense alleged in Count One of this Indictment, JEMEL GOODE, a/k/a "J Rock," BENANCIO CABA, a/k/a "Bennie Caba," LASEAN GOODE, a/k/a "Bones," EDWIN HILARIO, QUELVIN LOPEZ, ANEUDI JIMENEZ, a/k/a "Fat Bastard," ALEXANDER SCUDDER, DUANE TAYLOR, a/k/a "Daquan Jenkins," a/k/a "Antwan Scott," NATHANIEL SAUNDERS, SR., NATHANIEL SAUNDERS, JR., a/k/a "Quan," and SHARRAHN WALTON, 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 obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, 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.

Substitute Assets Provision

7. If any of the above-described forfeitable property, 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 intent 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, Section 853.)



Preet Bharara

PREET BHARARA
United States Attorney