

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
UNITED STATES OF AMERICA : SEALED  
 : INDICTMENT  
 :  
 - v. - : S1 11 Cr. 630  
 :  
 STEVEN KNOWLES, :  
 a/k/a "Manny Fresh," :  
 MICHAEL ANDREWS, :  
 GLEN BASKET, :  
 a/k/a "Big Mugs" :  
 JEROME BROOKS, :  
 a/k/a "Romy," :  
 ROBERT BRUCE, :  
 a/k/a "Rob Loose," :  
 STANLEY BRUCE, :  
 a/k/a "SB," :  
 MARCUS CHAMBERS, :  
 a/k/a "Chino," :  
 GERALD CHARLES, :  
 a/k/a "Twin," :  
 GERARD CHARLES, :  
 a/k/a "Twin," :  
 MICHAEL CLEMONS, :  
 a/k/a "Cartier," :  
 QUEJUAN COLLINS, :  
 a/k/a "Jigger," :  
 MICHAEL DENNIS, :  
 RAYVON DIAZ, :  
 a/k/a "CB," :  
 JOSEPH DUQUESNE, :  
 a/k/a "Joe Lite," :  
 JAMES EDMONSON, :  
 a/k/a "Dewey," :  
 KYLE ELLISON, :  
 CHRISTOPHER GLIVENS, :  
 a/k/a "Young Gunners," :  
 CHRISTOPHER GRANGER, :  
 a/k/a "Crispy," :  
 DEXTER GRANGER, :  
 a/k/a "Compton," :  
 KAREEM GRANGER, :  
 a/k/a "Reem," :  
 RYAN GRANGER, :  
 a/k/a "Ry-G," :  
 DAQUAN GREENE, :  
 a/k/a "Day Day," :  
 PAUL HARDY, :



COUNT ONE

The Grand Jury charges:

BACKGROUND

1. At all times relevant to this Indictment, a drug trafficking organization known as the Elm Street Wolves (the "Organization") was operating in and around Yonkers, New York. The principal objective of the Elm Street Wolves, which was also known as the Wolf Unit, was the enrichment of the members and associates of the Organization through the distribution of cocaine base, commonly known as "crack."

2. Members of the Elm Street Wolves sold crack cocaine primarily at the intersection of Elm Street and Oak Street in Yonkers, New York. Members of the Organization also sold crack cocaine on various streets within a several-block radius of Elm Street and Oak Street, including Linden Street, Ash Street, Maple Street, Riverview Place, Walnut Street, Chestnut Street, Poplar Street, Beech Street, Victor Street, and Van Cortlandt Park Avenue. The Elm Street Wolves controlled crack sales within this several-block area by prohibiting and preventing non-members, outsiders, and rival narcotics dealers from distributing crack in the area controlled by the Organization. Certain people associated with the Elm Street Wolves, such as individuals who had grown up on Elm Street or who had committed acts of violence on behalf of the Elm Street Wolves (the "associates"), were also permitted to sell crack cocaine within the area controlled by the Organization.

3. Though it did not have a rigid hierarchy, the Elm Street Wolves was led by, among others, STEVEN KNOWLES, a/k/a "Manny Fresh," the defendant. KNOWLES began selling crack cocaine on Elm Street with other members of the Organization at least as early as 2000. KNOWLES developed into the Organization's chief enforcer based, in part, on KNOWLES's 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 Elm Street Wolves worked together to ensure that all members of the Organization profited from the Organization's crack cocaine sales. Generally, multiple members and associates of the Elm Street Wolves would sell ten or twenty dollar quantities of crack at the same time on the corner of Elm Street and Oak Street. The Organization's members typically would store the bags of crack, which they referred to as "twists," in their mouths, undergarments, or in nearby stash locations, such as mailboxes. The members of the Organization would typically walk inside buildings in the vicinity of Elm Street to consummate drug sales with crack users. Often, several members and associates of the Organization would share a sale with a single customer if the customer requested multiple bags of crack; that is, several members of the Organization would provide crack to the customer to complete the customer's order in order to ensure that

multiple members of the Organization would profit from a single customer. The members of the Organization referred to the sharing of crack sales in this fashion as "breaking down."

5. Members and associates of the Elm Street Wolves would routinely pool their money together to purchase crack, or powder cocaine that they could cook into crack, from common suppliers. Elm Street Wolves members, including JEROME BROOKS, a/k/a "Romy," KAREEM GRANGER, a/k/a "Reem," and MARCUS ODOM, a/k/a "Meech," the defendants, supplied crack to other members and associates of the Organization. Associates of the Elm Street Wolves, including GERALD CHARLES, a/k/a "Twin," GERARD CHARLES, a/k/a "Twin," and ERIC SMITH, a/k/a "E," the defendants, agreed with members of the Elm Street Wolves to distribute crack in Yonkers. Among other things, these associates supplied large quantities of crack cocaine to the Elm Street Wolves, and otherwise aided the criminal activities of the Elm Street Wolves.

6. Once the crack was acquired from one of the Organization's suppliers, members and associates of the Organization would package and store the crack cocaine in residences in the vicinity of Elm Street that the Organization used as stash locations. The Organization used multiple stash locations in the vicinity of Elm Street to weigh, cut, package, and store the Organization's crack and packaging equipment, including scales, razors, and clear plastic wrapping.

7. Certain members of the Elm Street Wolves also maintained firearms for use by all the members and associates of the Organization. Members of the Elm Street Wolves would often pool their money to purchase firearms, which would then be stored in hidden, but easily-accessible locations known only to members and associates of the Organization. When a firearm was needed to protect the Elm Street Wolves' territory from encroachment by a rival gang, any member of the Organization could utilize the firearms acquired by members of the Organization.

8. Certain members and associates of the Elm Street Wolves committed armed robberies of narcotics dealers to obtain crack, powder cocaine, and money. Several of these robberies were motivated in part by the increase in price of wholesale quantities of crack, which made it more expensive for the Elm Street Wolves' members to acquire crack from their suppliers. From at least in or about 2005 up to and including at least in or about 2009, certain members and associates of the Elm Street Wolves, including DOMINICK PALLANO, a/k/a "Dom," and MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," the defendants, planned and participated in gunpoint robberies of narcotics dealers in and around Yonkers to acquire narcotics and money that could be used to purchase narcotics for resale.

#### VIOLENCE AGAINST RIVAL GANGS

9. Certain members and associates of the Elm Street Wolves 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, shootings, and murder 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 Elm Street Wolves.

10. From at least in or about 2004 up to and including in or about August 2011, the Elm Street Wolves engaged in a violent dispute with a gang known as the Strip Boys, which is based in the Schlobohm Housing Project on Schroeder Street in Yonkers, New York. During this dispute, members of the Elm Street Wolves and Strip Boys committed multiple shootings, beatings, stabbings, and assaults against one another. For example, on July 4, 2009, after MICHAEL CLEMONS, a/k/a "Cartier," the defendant, a member of the Elm Street Wolves, was attacked, pistol-whipped, and robbed at gunpoint by members of the Strip Boys in the vicinity of Elm Street, STEVEN KNOWLES, a/k/a "Manny Fresh," the defendant, along with MICHAEL ANDREWS and DEXTER GRANGER, a/k/a "Compton," the defendants, and another co-conspirator ("CC-1"), drove to the Schlobohm Housing Project where KNOWLES and CC-1 discharged firearms at members of the Strip Boys, which resulted in the death of Christopher Cokley, a leading member of the Strip Boys.

11. At times relevant to this Indictment, the Elm Street Wolves were aligned with several other criminal organizations

from neighboring areas in Yonkers, New York. Specifically, the Elm Street Wolves were aligned with members of "O-Block," a gang based on Oliver Street, and members of the Cliff Street Gangsters, a gang based on Cliff Street, against the Strip Boys and the Grimy Motherfuckers ("GMF"), another gang that hailed from the Schlobohm Housing Project. Members of the Elm Street Wolves would often join forces with individuals from O-Block and the Cliff Street Gangsters when engaging in acts of violence against the Strip Boys and GMF. Additionally, if a certain individual from O-Block or the Cliff Street Gangsters engaged in acts of violence against the Strip Boys or GMF, the Elm Street Wolves would allow that individual to sell crack in the territory controlled by the Organization.

STATUTORY ALLEGATION

12. From at least in or about 2000 up to and including in or about August 2011, in the Southern District of New York and elsewhere, STEVEN KNOWLES, a/k/a "Manny Fresh," MICHAEL ANDREWS, GLEN BASKET, a/k/a "Big Mugs," JEROME BROOKS, a/k/a "Romy," ROBERT BRUCE, a/k/a "Rob Loose," STANLEY BRUCE, a/k/a "SB," MARCUS CHAMBERS, a/k/a "Chino," GERALD CHARLES, a/k/a "Twin," GERARD CHARLES, a/k/a "Twin," MICHAEL CLEMONS, a/k/a "Cartier," QUEJUAN COLLINS, a/k/a "Jigger," MICHAEL DENNIS, RAYVON DIAZ, a/k/a "CB," JOSEPH DUQUESNE, a/k/a "Joe Lite," JAMES EDMONSON, a/k/a "Dewey," KYLE ELLISON, CHRISTOPHER GLIVENS, a/k/a "Young Gunners," CHRISTOPHER GRANGER, a/k/a "Crispy," DEXTER GRANGER, a/k/a "Compton," KAREEM GRANGER, a/k/a "Reem," RYAN GRANGER,

a/k/a "Ry-G," DAQUAN GREENE, a/k/a "Day Day," PAUL HARDY, JASON HARRIS, a/k/a "J-Rock," TYREE HUGHES, a/k/a "Capo," WILLIE JACKSON, a/k/a "Wop," MARK JONES, a/k/a "Banger," RASHAD MCNULTY, a/k/a, "Roger," DONTE MELVIN, a/k/a "Pudgy," ANTHONY NORTHOVER, a/k/a "Zimbabwe," MARCUS ODOM, a/k/a "Meech," DOMINICK PALLANO, a/k/a "Dom," SHAWN PATTERSON, a/k/a "SP," DONALD PEGUES, a/k/a "Vegas," DEXTER PICKETT, a/k/a "Dex Digs," MARQUISE PICKETT, a/k/a "Fresh Gualla," BERNARD POTILLO, a/k/a "Bernie," TRAVIS ROBINSON, a/k/a "730," MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," ERIC SMITH, a/k/a "E," SHARIF STEWART, a/k/a "FUBU," JAMES SUMMERS, a/k/a "Smoke," SAMUEL SUTTON, a/k/a "Thug," DEXTER THOMAS, a/k/a "Dex," RONNELL THOMAS, EDWARD WHITNEY, a/k/a "Edro," ANDREW WILSON, a/k/a "Drew," 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 STEVEN KNOWLES, a/k/a "Manny Fresh," MICHAEL ANDREWS, GLEN BASKET, a/k/a "Big Mugs," JEROME BROOKS, a/k/a "Romy," ROBERT BRUCE, a/k/a "Rob Loose," STANLEY BRUCE, a/k/a "SB," MARCUS CHAMBERS, a/k/a "Chino," GERALD CHARLES, a/k/a "Twin," GERARD CHARLES, a/k/a "Twin," MICHAEL CLEMONS, a/k/a "Cartier," QUEJUAN COLLINS, a/k/a "Jigger," MICHAEL DENNIS, RAYVON DIAZ, a/k/a "CB," JOSEPH DUQUESNE, a/k/a "Joe Lite," JAMES EDMONSON, a/k/a "Dewey," KYLE ELLISON, CHRISTOPHER GLIVENS, a/k/a "Young

Gunners," CHRISTOPHER GRANGER, a/k/a "Crispy," DEXTER GRANGER, a/k/a "Compton," KAREEM GRANGER, a/k/a "Reem," RYAN GRANGER, a/k/a "Ry-G," DAQUAN GREENE, a/k/a "Day Day," PAUL HARDY, JASON HARRIS, a/k/a "J-Rock," TYREE HUGHES, a/k/a "Capo," WILLIE JACKSON, a/k/a "Wop," MARK JONES, a/k/a "Banger," RASHAD MCNULTY, a/k/a, "Roger," DONTE MELVIN, a/k/a "Pudgy," ANTHONY NORTHOVER, a/k/a "Zimbabwe," MARCUS ODOM, a/k/a "Meech," DOMINICK PALLANO, a/k/a "Dom," SHAWN PATTERSON, a/k/a "SP," DONALD PEGUES, a/k/a "Vegas," DEXTER PICKETT, a/k/a "Dex Digs," MARQUISE PICKETT, a/k/a "Fresh Gualla," BERNARD POTILLO, a/k/a "Bernie," TRAVIS ROBINSON, a/k/a "730," MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," ERIC SMITH, a/k/a "E," SHARIF STEWART, a/k/a "FUBU," JAMES SUMMERS, a/k/a "Smoke," SAMUEL SUTTON, a/k/a "Thug," DEXTER THOMAS, a/k/a "Dex," RONNELL THOMAS, EDWARD WHITNEY, a/k/a "Edro," and ANDREW WILSON, a/k/a "Drew," 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 substance involved in the offense was 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).

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 and elsewhere:

a. On or about July 4, 2008, STEVEN KNOWLES, a/k/a "Manny Fresh," the defendant, possessed a quantity of crack cocaine in the vicinity of Beech Street, Yonkers, New York.

b. On or about July 4, 2009, MICHAEL ANDREWS, the defendant, drove STEVEN KNOWLES, a/k/a "Manny Fresh," MICHAEL DENNIS, and DEXTER GRANGER, a/k/a "Compton," the defendants, to the vicinity of Schroeder Street, Yonkers, New York, where KNOWLES and DENNIS shot at rival gang members.

c. On or about February 11, 2006, GLEN BASKET, a/k/a "Big Mugs," the defendant, possessed fifteen bags of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

d. On or about May 14, 2004, JEROME BROOKS, a/k/a "Romy," the defendant, possessed nineteen bags of crack cocaine and forty-four rounds of .380 caliber ammunition in the vicinity of Yonkers Avenue, Yonkers, New York.

e. On or about June 4, 2008, ROBERT BRUCE, a/k/a "Rob Loose," the defendant, possessed approximately seven twists of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

f. On or about December 21, 2005, STANLEY BRUCE, a/k/a "SB," the defendant, possessed a quantity of crack cocaine

in the vicinity of Elm Street and Linden Street in Yonkers, New York.

g. On or about March 12, 2009, MARCUS CHAMBERS, a/k/a "Chino," the defendant, possessed a loaded firearm and ten twists of crack cocaine in the vicinity of Ash Street, Yonkers, New York.

h. On or about October 28, 2010, GERALD CHARLES, a/k/a "Twin," the defendant, possessed approximately one gram of crack cocaine in the vicinity of Ashburton Avenue, Yonkers, New York.

i. On or about September 8, 2010, GERARD CHARLES, a/k/a "Twin," the defendant, sold approximately 20 grams of crack cocaine in the vicinity of Warburton Avenue, Yonkers, New York.

j. On or about January 26, 2005, MICHAEL CLEMONS, a/k/a "Cartier," the defendant, possessed three twists of crack cocaine in the vicinity of Oak Street, Yonkers, New York.

k. On or about June 17, 2010, QUEJUAN COLLINS, a/k/a "Jigger," the defendant, possessed approximately seven twists of crack cocaine in the vicinity of Warburton Avenue, Yonkers, New York.

l. On or about July 6, 2009, MICHAEL DENNIS, the defendant, possessed a quantity of crack cocaine in the vicinity of Oak Street, Yonkers, New York.

m. On or about December 5, 2008, RAYVON DIAZ, a/k/a "CB," the defendant, possessed a quantity of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

n. On or about April 18, 2008, JOSEPH DUQUESNE, a/k/a "Joe Lite," the defendant, possessed approximately fifty-six twists of crack cocaine in the vicinity of Elm Street and Oak Street, Yonkers, New York.

o. On or about April 6, 2010, JAMES EDMONSON, a/k/a "Dewey," the defendant, possessed a quantity of crack cocaine and a loaded Mac-11 firearm in the vicinity of Ash Street, Yonkers, New York.

p. On or about September 27, 2010, KYLE ELLISON and PAUL HARDY, the defendants, sold approximately 20 grams of crack cocaine in the vicinity of Van Cortlandt Park Avenue, Yonkers, New York.

q. On or about March 5, 2007, CHRISTOPHER GLIVENS, a/k/a "Young Gunners," the defendant, possessed a quantity of crack cocaine in the vicinity of Orchard Street and Nepperhan Avenue in Yonkers, New York.

r. On or about October 15, 2006, CHRISTOPHER GRANGER, a/k/a "Crispy," the defendant, possessed approximately ten twists of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

s. On or about May 26, 2007, DEXTER GRANGER, a/k/a "Compton," the defendant, possessed approximately ten twists of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

t. On or about September 17, 2010, KAREEM GRANGER, a/k/a "Reem," the defendant, sold approximately 20 grams of crack cocaine in Bronx, New York.

u. In or about 2008, RYAN GRANGER, a/k/a "Ry-G," the defendant, sold crack cocaine to drug users in the vicinity of Elm Street, Yonkers, New York.

v. On or about August 10, 2010, DAQUAN GREENE, a/k/a "Day Day," the defendant, possessed a quantity of crack cocaine in the vicinity of Oak Street and Maple Street in Yonkers, New York.

w. On or about September 10, 2008, PAUL HARDY, the defendant, possessed forty twists of crack cocaine in the vicinity of Oliver Street, Yonkers, New York.

x. On or about April 2, 2008, JASON HARRIS, a/k/a "J-Rock," the defendant, possessed approximately 25 twists of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

y. In or about 2010, TYREE HUGHES, a/k/a "Capo," the defendant, sold crack cocaine to customers in the vicinity of Elm Street, Yonkers, New York.

z. In or about summer 2009, WILLIE JACKSON, a/k/a "Wop," the defendant, sold crack cocaine to drug users in the vicinity of Elm Street, Yonkers, New York.

aa. On or about September 19, 2008, MARK JONES, a/k/a "Banger," the defendant, sold a quantity of crack cocaine to a drug user in the vicinity of Oak Street, Yonkers, New York.

bb. On or about July 7, 2011, RASHAD MCNULTY, a/k/a, "Roger," the defendant, sold a quantity of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

cc. On or about January 7, 2009, DONTE MELVIN, a/k/a "Pudgy," the defendant, possessed a .38 caliber Colt revolver in the vicinity of Warburton Avenue in Yonkers, New York.

dd. On or about April 10, 2009, ANTHONY NORTHOVER, a/k/a "Zimbabwe," the defendant, possessed approximately twenty twists of crack cocaine in the vicinity of South Broadway and Post Street in Yonkers, New York.

ee. On or about July 16, 2008, MARCUS ODOM, a/k/a "Meech," the defendant, possessed approximately seven twists of crack cocaine in the vicinity of Ash Street and Oak Street in Yonkers, New York.

ff. In or about 2007, DOMINICK PALLANO, a/k/a "Dom," the defendant, packaged crack cocaine in the vicinity of Orchard Street and Orchard Place in Yonkers, New York.

gg. On or about October 8, 2008, SHAWN PATTERSON, a/k/a "SP," the defendant, possessed a quantity of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

hh. In or about 2010, DONALD PEGUES, a/k/a "Vegas," the defendant, sold crack cocaine to drug users in the vicinity of Ash Street and Oak Street in Yonkers, New York.

ii. On or about March 15, 2011, DEXTER PICKETT, a/k/a "Dex Digs," the defendant, discharged a firearm at rival gang members in the vicinity of Elm Street, Yonkers, New York.

jj. On or about April 30, 2009, MARQUISE PICKETT, a/k/a "Fresh Gualla," the defendant, possessed a quantity of crack cocaine in the vicinity of Maple Street and Oak Street in Yonkers, New York.

kk. On or about July 7, 2010, BERNARD POTILLO, a/k/a "Bernie," the defendant, possessed approximately 90 bags of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

ll. In or about July 2009, TRAVIS ROBINSON, a/k/a "730," the defendant, obtained a quantity of crack cocaine from MARCUS ODOM, a/k/a "Meech," the defendant, in Yonkers, New York.

mm. On or about October 11, 2005, MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," the defendant, possessed approximately nineteen twists of crack cocaine in the vicinity of Willow Street, Yonkers, New York.

nn. On or about August 27, 2010, ERIC SMITH, a/k/a "E," the defendant, sold approximately 14 grams of crack cocaine in Mt. Vernon, New York.

oo. On or about August 19, 2009, SHARIF STEWART, a/k/a "FUBU," the defendant, possessed approximately three bags of crack cocaine in the vicinity of Oak Street and Ash Street in Yonkers, New York.

pp. On or about June 1, 2011, JAMES SUMMERS, a/k/a "Smoke," the defendant, sold a quantity of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

qq. On or about October 13, 2010, SAMUEL SUTTON, a/k/a "Thug," the defendant, possessed a quantity of crack cocaine in the vicinity of Elm Street, Yonkers, New York.

rr. On or about July 20, 2009, DEXTER THOMAS, a/k/a "Dex," the defendant, possessed a firearm in the vicinity of Cliff Street and Spruce Street in Yonkers, New York.

ss. In or about 2007, RONNELL THOMAS, the defendant, sold crack cocaine to drug users in the vicinity of Elm Street, Yonkers, New York.

tt. On or about April 28, 2009, EDWARD WHITNEY, a/k/a "Edro," the defendant, possessed a loaded .38 caliber pistol and approximately three grams of crack cocaine in the vicinity of Cliff Street, Yonkers, New York.

uu. On or about June 1, 2010, ANDREW WILSON, a/k/a "Drew," the defendant, possessed a quantity of crack cocaine in the vicinity of Ash Street and Linden Street 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 2000 up to and including in or about August 2011, in the Southern District of New York and elsewhere, STEVEN KNOWLES, a/k/a "Manny Fresh," MICHAEL ANDREWS, JEROME BROOKS, a/k/a "Romy," STANLEY BRUCE, a/k/a "SB," MARCUS CHAMBERS, a/k/a "Chino," GERALD CHARLES, a/k/a "Twin," GERARD CHARLES, a/k/a "Twin," MICHAEL CLEMONS, a/k/a "Cartier," QUEJUAN

COLLINS, a/k/a "Jigger," MICHAEL DENNIS, RAYVON DIAZ, a/k/a "CB," JOSEPH DUQUESNE, a/k/a "Joe Lite," JAMES EDMONSON, a/k/a "Dewey," KYLE ELLISON, CHRISTOPHER GLIVENS, a/k/a "Young Gunners," CHRISTOPHER GRANGER, a/k/a "Crispy," DEXTER GRANGER, "Compton," KAREEM GRANGER, a/k/a "Reem," RYAN GRANGER, a/k/a "Ry-G," DAQUAN GREENE, a/k/a "Day Day," JASON HARRIS, a/k/a "J-Rock," TYREE HUGHES, a/k/a "Capo," MARK JONES, a/k/a "Banger," RASHAD MCNULTY, a/k/a, "Roger," DONTE MELVIN, a/k/a "Pudgy," ANTHONY NORTHOVER, a/k/a "Zimbabwe," MARCUS ODOM, a/k/a "Meech," DOMINICK PALLANO, a/k/a "Dom," SHAWN PATTERSON, a/k/a "SP," DONALD PEGUES, a/k/a "Vegas," DEXTER PICKETT, a/k/a "Dex Digs," MARQUISE PICKETT, a/k/a "Fresh Gualla," BERNARD POTILLO, a/k/a "Bernie," MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," ERIC SMITH, a/k/a "E," SHARIF STEWART, a/k/a "FUBU," JAMES SUMMERS, a/k/a "Smoke," SAMUEL SUTTON, a/k/a "Thug," DEXTER THOMAS, a/k/a "Dex," RONNELL THOMAS, and EDWARD WHITNEY, a/k/a "Edro," 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.)

COUNT THREE

The Grand Jury further charges:

17. On or about July 4, 2009, in the Southern District of New York, STEVEN KNOWLES, a/k/a "Manny Fresh," MICHAEL ANDREWS, and DEXTER GRANGER, a/k/a "Compton," the defendants, and others known and unknown, willfully and knowingly, 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, 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, and in the course of the violation of Title 18, United States Code, Section 924(c), did cause 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, KNOWLES, ANDREWS, and GRANGER caused the death of Christopher Cokley, a rival gang member, by discharging and aiding and abetting the discharge of firearms at Cokley.

(Title 18, United States Code, Sections  
924(j)(1) and 2.)

COUNT FOUR

The Grand Jury further charges:

18. From at least in or about 2005, up to and including at least in or about 2009, in the Southern District of New York and elsewhere, DOMINICK PALLANO, a/k/a "Dom," and MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire,

confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b) (1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b) (3), to wit, PALLANO and SHEPPERD, and others known and unknown, agreed together to commit robberies of individuals they believed to be in possession of narcotics and narcotics proceeds.

Overt Acts

19. 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. In or about December 2007, DOMINICK PALLANO, a/k/a "Dom," the defendant, stole United States currency from a crack dealer in the vicinity of Elm Street, Yonkers, New York, during which robbery PALLANO brandished a firearm.

b. On or about January 14, 2008, MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," the defendant, and a co-conspirator not named as a defendant in this Indictment, stole jewelry and United States currency from an individual they believed to be a narcotics dealer in the vicinity of 34 Prospect Street, Yonkers, New York, during which robbery SHEPPERD brandished a firearm.

(Title 18, United States Code, Section 1951.)

COUNT FIVE

The Grand Jury further charges:

20. In or about December 2007, in the Southern District of New York, DOMINICK PALLANO, a/k/a "Dom," the defendant, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, PALLANO stole United States currency from a crack dealer in the vicinity of Elm Street, Yonkers, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT SIX

The Grand Jury further charges:

21. In or about December 2007, DOMINICK PALLANO, a/k/a "Dom," 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 robbery charged in Count Five of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which firearm was brandished.

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

COUNT SEVEN

The Grand Jury further charges:

22. On or about January 14, 2008, in the Southern District of New York, MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," the defendant, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, SHEPPERD and a co-conspirator not named as a defendant in this Indictment stole jewelry and United States currency from an individual they believed to be a narcotics dealer in the vicinity of 34 Prospect Street, Yonkers, New York.

---

(Title 18, United States Code, Sections 1951 and 2.)

COUNT EIGHT

The Grand Jury further charges:

23. On or about January 14, 2008, in the Southern District of New York, MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," 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 robbery charged in Count Seven of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, to wit, a .32 caliber Smith & Wesson revolver, which SHEPPERD brandished during the

robbery.

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

COUNT NINE

The Grand Jury further charges:

24. On or about September 8, 2010, in the Southern District of New York, GERARD CHARLES, a/k/a "Twin," 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 TEN

The Grand Jury further charges:

25. On or about September 10, 2010, in the Southern District of New York, GERARD CHARLES, a/k/a "Twin," 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 ELEVEN

The Grand Jury further charges:

26. On or about September 17, 2010, in the Southern District of New York, KAREEM GRANGER, a/k/a "Reem," 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 TWELVE

The Grand Jury further charges:

27. On or about September 22, 2010, in the Southern District of New York, KAREEM GRANGER, a/k/a "Reem," 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 THIRTEEN

The Grand Jury further charges:

28. On or about September 27, 2010, in the Southern District of New York, KYLE ELLISON and PAUL HARDY, the defendants, 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 FOURTEEN

The Grand Jury further charges:

29. On or about August 27, 2010, in the Southern District of New York, ERIC SMITH, a/k/a "E," 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 FIFTEEN

The Grand Jury further charges:

30. On or about December 3, 2010, in the Southern District of New York, ERIC SMITH, a/k/a "E," 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 SIXTEEN

The Grand Jury further charges:

31. On or about February 25, 2011, in the Southern District of New York, JAMES SUMMERS, a/k/a "Smoke," 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 SEVENTEEN**

The Grand Jury further charges:

32. On or about March 3, 2011, in the Southern District of New York, JAMES SUMMERS, a/k/a "Smoke," 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 EIGHTEEN**

The Grand Jury further charges:

33. On or about June 1, 2011, in the Southern District of New York, JAMES SUMMERS, a/k/a "Smoke," 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 NINETEEN**

The Grand Jury further charges:

34. On or about June 7, 2011, in the Southern District of New York, SAMUEL SUTTON, a/k/a "Thug," 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 TWENTY

The Grand Jury further charges:

35. On or about June 15, 2011, in the Southern District of New York, SAMUEL SUTTON, a/k/a "Thug," 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 TWENTY-ONE

The Grand Jury further charges:

36. On or about July 7, 2011, in the Southern District of New York, RASHAD MCNULTY, a/k/a "Roger," 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 ALLEGATIONS

37. As a result of committing one or more of the controlled substance offenses alleged in Count One and Counts Nine through Twenty-One of this Indictment, STEVEN KNOWLES, a/k/a "Manny Fresh," MICHAEL ANDREWS, GLEN BASKET, a/k/a "Big Mugs," JEROME BROOKS, a/k/a "Romy," ROBERT BRUCE, a/k/a "Rob Loose," STANLEY BRUCE, a/k/a "SB," MARCUS CHAMBERS, a/k/a "Chino," GERALD CHARLES, a/k/a "Twin," GERARD CHARLES, a/k/a "Twin," MICHAEL CLEMONS, a/k/a "Cartier," QUEJUAN COLLINS, a/k/a "Jigger," MICHAEL DENNIS, RAYVON DIAZ, a/k/a "CB," JOSEPH DUQUESNE, a/k/a "Joe Lite," JAMES EDMONSON, a/k/a "Dewey," KYLE ELLISON, CHRISTOPHER GLIVENS, a/k/a "Young Gunners," CHRISTOPHER GRANGER, a/k/a "Crispy," DEXTER GRANGER, a/k/a "Compton," KAREEM GRANGER, a/k/a "Reem," RYAN GRANGER, a/k/a "Ry-G," DAQUAN GREENE, a/k/a "Day Day," PAUL HARDY, JASON HARRIS, a/k/a "J-Rock," TYREE HUGHES, a/k/a "Capo," WILLIE JACKSON, a/k/a "Wop," MARK JONES, a/k/a "Banger," RASHAD MCNULTY, a/k/a "Roger," DONTE MELVIN, a/k/a "Pudgy," ANTHONY NORTHOVER, a/k/a "Zimbabwe," MARCUS ODOM, a/k/a "Meech," DOMINICK PALLANO, a/k/a "Dom," SHAWN PATTERSON, a/k/a "SP," DONALD PEGUES, a/k/a "Vegas," DEXTER PICKETT, "Dex Digs," MARQUISE PICKETT, a/k/a "Fresh Gualla," BERNARD POTILLO, a/k/a "Bernie," TRAVIS ROBINSON, a/k/a "730," MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," ERIC SMITH, a/k/a "E," SHARIF STEWART, a/k/a "FUBU," JAMES SUMMERS, a/k/a "Smoke," SAMUEL SUTTON, a/k/a "Thug," DEXTER THOMAS, a/k/a "Dex," RONNELL THOMAS, EDWARD WHITNEY, a/k/a "Edro," and ANDREW

WILSON, a/k/a "Drew," 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 one or more 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 one or more of the violations alleged in Count One and Counts Nine through Twenty-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 offenses.

38. As the result of committing one or more of the offenses in violation of Title 18, United States Code, Section 1951, alleged in Counts Four, Five, and Seven of this Indictment, DOMINICK PALLANO, a/k/a "Dom," and MARCUS SHEPPERD, a/k/a "Do Dirt," a/k/a "Pesci," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of one or more of the offenses alleged in Counts Four, Five and Seven 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 offenses.

Substitute Assets Provision

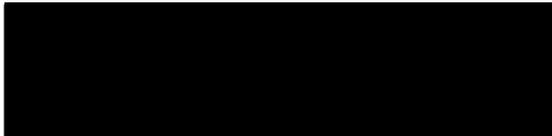
39. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- 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 intent of the United States, pursuant to 18 U.S.C. § 981, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461, to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981 and 1951;  
Title 28, United States Code, Section 2461; and  
Title 21, United States Code, Sections 841(a)(1) and 853.)



  
PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

- v. -

STEVEN KNOWLES, et al.

Defendants.

---

SEALED INDICTMENT

S1 11 Cr. 630

(21 U.S.C. § 846)

(18 U.S.C. §§ 924(c)(1)(A)(iii), 924(j), 1951 and 2)

PREET BHARARA  
United States Attorney.

