

COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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 :
 UNITED STATES OF AMERICA :
 :
 - v. - :
 :
 LAMAR KINGWOOD, :
 a/k/a "L," :
 a/k/a "Corleone," :
 JAMEL BAILEY, :
 a/k/a "Murder," :
 MELISSA DABBS, :
 ISAAC MALLORY, :
 a/k/a "Face," :
 TYRON BRICKHOUSE, :
 a/k/a "Teflon," :
 a/k/a "Trays," :
 KENYATA BURNETT, :
 a/k/a "Yatta," :
 RONALD CARTER, :
 a/k/a "Run Run," :
 :
 Defendants. :
 ----- X

SEALED
INDICTMENT

13 Cr. 198

COUNT ONE

The Grand Jury charges:

1. From at least in or about January 2008, up to and including in or about March 2013, in the Southern District of New York and elsewhere, LAMAR KINGWOOD, a/k/a "L," a/k/a "Corleone," JAMEL BAILEY, a/k/a "Murder," MELISSA DABBS, and ISAAC MALLORY, a/k/a "Face," 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 LAMAR KINGWOOD, a/k/a "L," a/k/a "Corleone," JAMEL BAILEY, a/k/a "Murder," MELISSA DABBS, and ISAAC MALLORY, a/k/a "Face," 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 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) 1 kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

COUNT TWO

The Grand Jury further charges:

4. From at least in or about November 2010 up to and including in or about March 2013, in the Southern District of New York and elsewhere, TYRON BRICKHOUSE, a/k/a "Teflon," a/k/a "Trays," KENYATA BURNETT, a/k/a "Yatta," and RONALD CARTER, a/k/a "Run Run," 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.

5. It was a part and an object of the conspiracy that TYRON BRICKHOUSE, a/k/a "Teflon," a/k/a "Trays," KENYATA BURNETT, a/k/a "Yatta," and RONALD CARTER, a/k/a "Run Run," 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).

6. 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).

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

FORFEITURE ALLEGATION WITH RESPECT TO COUNT ONE

7. As a result of committing the controlled substance offense alleged in Count One of this Indictment, LAMAR KINGWOOD, a/k/a "L," a/k/a "Corleone," JAMEL BAILEY, a/k/a "Murder," MELISSA DABBS, and ISAAC MALLORY, a/k/a "Face," 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 the offense.

FORFEITURE ALLEGATION WITH RESPECT TO COUNT TWO

8. As a result of committing the controlled substance offense alleged in Count Two of this Indictment, TYRON BRICKHOUSE, a/k/a "Teflon," a/k/a "Trays," KENYATA BURNETT, a/k/a "Yatta," and RONALD CARTER, a/k/a "Run Run," 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 Two 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

9. 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

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

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

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LAMAR KINGWOOD, et al.,

Defendants.

SEALED
INDICTMENT

13 Cr. 198

(21 U.S.C. § 846.)

PREET BHARARA
United States Attorney.


Foreperson
