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F.#2016R00249

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2016 JUN 10 PM 3:13

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

U.S. DISTRICT COURT  
EASTERN DISTRICT  
OF NEW YORK

-----X

UNITED STATES OF AMERICA

INDICTMENT

**CR 16 - 317**

- against -

Cr. No. \_\_\_\_\_  
(T. 21, U.S.C., §§ 841(a)(1),  
841(b)(1)(B)(ii)(II), 846, 853(a), 853(p),  
952(a), 960(a)(1), 960(b)(2)(B)(ii) and  
963; T. 18, U.S.C., §§ 2 and 3551 et seq.)

SHAUN NEBBLETT,  
also known as "Shaun Wyatt"  
and "Dapper," and  
CHRISTOPHER RICHARD SPENCER,  
also known as "Christopher Sowell,"  
"Stephen" and "Shirt,"

**KORMAN, J.**

Defendants.

**POLLAK, M.J.**

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THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Import Cocaine)

1. In or about and between August 2015 and September 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants SHAUN NEBBLETT, also known as "Shaun Wyatt" and "Dapper," and CHRISTOPHER RICHARD SPENCER, also known as "Christopher Sowell," "Stephen" and "Shirt," together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 952(a) and 960(a)(1). The amount of cocaine involved in the

conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was 500 grams or more of a substance containing cocaine.

(Title 21, United States Code, Sections 963 and 960(b)(2)(B)(ii); Title 18, United States Code, Sections 3551 et seq.)

**COUNT TWO**  
(Importation of Cocaine)

2. On or about and between August 28, 2015 and September 18, 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants SHAUN NEBBLETT, also known as “Shaun Wyatt” and “Dapper,” and CHRISTOPHER RICHARD SPENCER, also known as “Christopher Sowell,” “Stephen” and “Shirt,” together with others, did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved 500 grams or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(2)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

**COUNT THREE**  
(Conspiracy to Possess Cocaine with Intent to Distribute)

3. In or about and between August 2015 and September 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants SHAUN NEBBLETT, also known as “Shaun Wyatt” and “Dapper,” and CHRISTOPHER RICHARD SPENCER, also known as “Christopher Sowell,” “Stephen” and

“Shirt,” together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of cocaine involved in the conspiracy attributable to the defendants as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was 500 grams or more of a substance containing cocaine.

(Title 21, United States Code, Sections 846 and 841(b)(1)(B)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

**COUNT FOUR**

(Possession of Cocaine with Intent to Distribute)

4. On or about and between August 28, 2015 and September 18, 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants SHAUN NEBBLETT, also known as “Shaun Wyatt” and “Dapper,” and CHRISTOPHER RICHARD SPENCER, also known as “Christopher Sowell,” “Stephen” and “Shirt,” together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved 500 grams or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II); Title 18, United States Code, Sections 2 and 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS ONE THROUGH FOUR**

5. The United States hereby gives notice to the defendants that, upon their conviction of any offense charged in Counts One through Four, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as the result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

6. 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 party;
- (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 divided 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 forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL

\_\_\_\_\_  
[REDACTED]

ROBERT L. CAPERS  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK [REDACTED]

By: [REDACTED] \_\_\_\_\_  
[REDACTED]

F. #2016R00249  
FORM DBD-34  
JUN. 85

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

---

THE UNITED STATES OF AMERICA

vs.

SHAUN NEBBLETT,

*also known as "Shaun Wyatt" and "Dapper" and*

CHRISTOPHER RICHARD SPENCER,

*also known as "Christopher Sowell," "Stephen" and "Shirt,"*

Defendants.

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**INDICTMENT**

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(B)(ii)(II), 846, 853(a), 853(p), 952(a),  
960(a)(1), 960(b)(2)(B)(ii) and 963; T. 18, U.S.C., §§ 2 and 3551 et seq.)

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A [REDACTED]

Foreperson

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[REDACTED] in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

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Bail, \$ \_\_\_\_\_

*Alicia N. Washington, Assistant U.S. Attorney (718) 254-6009*