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BROOKLYN OFFICE

MKM:MEG/AS/DG
F. #2017R00246

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

TYVON BANNISTER,
also known as "Turtle,"

Defendant.

----- X

THE GRAND JURY CHARGES:

INDICTMENT

Cr. No. **CR 17 00116**
(T. 18, U.S.C., §§ 924(c)(1)(A)(i),
924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 924(d),
924(j)(1), 1959(a)(1), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

COGAN, J.

ORENSTEIN, M.J.

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

The Enterprise

1. The Cypress Gangsta Crips ("CGC" or the "enterprise"), was a gang comprised of individuals residing in and around the Cypress Hills Houses, a New York City Housing Authority complex located in East New York, Brooklyn, New York ("Cypress"), and was a "set," or subgroup, of the Crips street gang. Many members of CGC also identified themselves by their membership in either of two local crews within Cypress that were closely aligned with each other, namely, "P.T.F." (which stands for "Protect the Family"), a local crew that was comprised of CGC members and associates who were affiliated with what was referred to as the "Backside" section of Cypress, and "H.G." (which stands for "Handsum Gang"), a local crew that was comprised of CGC members and associates who were affiliated with what was referred to as the "Teamside" section of

Cypress. Members and associates of CGC have engaged in drug trafficking and firearms trafficking, and have committed acts of violence, including murder, attempted murder, robbery and assault, as well as other crimes.

2. The defendant TYVON BANNISTER, also known as “Turtle,” was a member of CGC.

3. CGC, including its leadership, membership and associates, constituted an “enterprise” as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that 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.

4. CGC, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving murder and robbery, that are chargeable under New York Penal Law and punishable by imprisonment for more than one year, acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce by robbery and extortion), and offenses involving drug trafficking, punishable under Title 21, United States Code, Sections 841 and 846.

Purposes of the Enterprise

5. The purposes of CGC included the following:

a. Enriching the members and associates of the enterprise through criminal activity, including drug trafficking, firearms trafficking and robbery;