

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. Brian R. Martinotti
	:	
v.	:	Crim. No. 21-838 (BRM)
	:	
ANGEL KEARNEY,	:	
a/k/a "Jim,"	:	
a/k/a "Dred,"	:	21 U.S.C. § 846
THOMAS GIBSON,	:	21 U.S.C. §§ 841(a)(1), (b)(1)(C)
a/k/a "Tommy,"	:	18 U.S.C. § 924(c)(1)(A)(i)
AKIM GIBSON,	:	18 U.S.C. § 922(g)(1)
a/k/a "Ching,"	:	
JAMAR HALL,	:	
a/k/a "Goo,"	:	
KEVIN HALL,	:	
KASIM THURSTON,	:	
a/k/a "KAI,"	:	
a/k/a "KAZ,"	:	
IBN THURSTON,	:	
a/k/a "Wheezy,"	:	
a/k/a "Saheed,"	:	
SHALAMAR McCALL,	:	
a/k/a "Shaggy," and	:	
HAKIS MOSES,	:	
a/k/a "Hak"	:	
	:	

**SUPERSEDING INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark,  
charges:

**COUNT ONE**

(Conspiracy to Distribute and Possess with Intent to Distribute Heroin,  
Fentanyl, and Cocaine Base)

1. From at least as early as in or around July 2020 through in or  
around June 2021, in the District of New Jersey and elsewhere, the  
defendants,

**ANGEL KEARNEY,  
a/k/a “Jim,”  
a/k/a “Dred,”  
THOMAS GIBSON,  
a/k/a “Tommy,”  
AKIM GIBSON,  
a/k/a “Ching,”  
JAMAR HALL,  
a/k/a “Goo”  
KEVIN HALL,  
KASIM THURSTON,  
a/k/a “KAI,”  
a/k/a “KAZ,”  
IBN THURSTON,  
a/k/a “Wheezy,”  
a/k/a “Saheed,”  
SHALAMAR McCALL,  
a/k/a “Shaggy,” and  
HAKIS MOSES,  
a/k/a “Hak,”**

did knowingly and intentionally conspire and agree with one another and with others to distribute and to possess with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

**MANNER AND MEANS**

2. It was part of the conspiracy that Angel Kearney, Thomas Gibson, Akim Gibson, Jamar Hall, Kevin Hall, Kasim Thurston, Ibn Thurston, Shalamar McCall, and Hakis Moses (“the Fairmount co-conspirators”) obtained heroin, fentanyl, and cocaine base (“crack cocaine”) from various sources.

3. It was further a part of the conspiracy that the Fairmount co-conspirators would store heroin, fentanyl, and crack cocaine inside apartments located at a residential building on Fairmount Avenue (the “Fairmount Avenue Residential Building”).

4. It was further a part of the conspiracy that the Fairmount co-conspirators would distribute heroin, fentanyl, and crack cocaine in and around the Fairmount Avenue Residential Building.

5. It was further a part of the conspiracy that the Fairmount co-conspirators would work different “shifts” during which they would distribute heroin, fentanyl, and crack cocaine in and around the Fairmount Avenue Residential Building.

6. It was further a part of the conspiracy that the Fairmount co-conspirators possessed, stored, and used firearms and ammunition to protect the distribution of heroin, fentanyl, and crack cocaine in and around the Fairmount Avenue Residential Building.

7. It was further a part of the conspiracy that the Fairmount co-conspirators communicated using telephones to discuss drug distribution and other business related to the distribution of heroin, fentanyl, and crack cocaine in and around the Fairmount Avenue Residential Building.

In violation of Title 21, United States Code, Section 846.

**COUNT TWO**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about July 21, 2020, in the District of New Jersey and elsewhere,  
the defendant,

**HAKIS MOSES,  
a/k/a "Hak,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT THREE**

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about October 8, 2020, in the District of New Jersey and elsewhere, the defendant,

**KEVIN HALL,**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FOUR**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about October 28, 2020, in the District of New Jersey and elsewhere, the defendant,

**HAKIS MOSES,  
a/k/a "Hak,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FIVE**

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about November 9, 2020, in the District of New Jersey and elsewhere, the defendant,

**HAKIS MOSES,  
a/k/a "Hak,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SIX**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about December 1, 2020, in the District of New Jersey and elsewhere, the defendant,

**THOMAS GIBSON,  
a/k/a "Tommy,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).



**COUNT SEVEN**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about December 8, 2020, in the District of New Jersey and elsewhere, the defendant,

**IBN THURSTON,  
a/k/a "Wheezy,"  
a/k/a "Saheed,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT EIGHT**

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about December 8, 2020, in the District of New Jersey and elsewhere, the defendant,

**KEVIN HALL,**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT NINE**

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about January 7, 2021, in the District of New Jersey and elsewhere, the defendant,

**SHALAMAR MCCALL,  
a/k/a “Shaggy,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TEN**

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about January 12, 2021, in the District of New Jersey and elsewhere, the defendant,

**SHALAMAR MCCALL,  
a/k/a "Shaggy,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT ELEVEN**

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about February 5, 2021, in the District of New Jersey and elsewhere, the defendant,

**AKIM GIBSON,  
a/k/a "Ching,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWELVE**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about February 10, 2021, in the District of New Jersey and elsewhere, the defendants,

**AKIM GIBSON,  
a/k/a "Ching," and  
KASIM THURSTON,  
a/k/a "Kai,"  
a/k/a "Kaz,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT THIRTEEN**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about February 25, 2021, in the District of New Jersey and elsewhere, the defendant,

**THOMAS GIBSON,  
a/k/a "Tommy,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FOURTEEN**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about March 4, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**AKIM GIBSON,  
a/k/a “Ching,”**

did knowingly and intentionally distribute and possess with intent to distribute  
a mixture and substance containing a detectable amount of heroin, a Schedule  
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and  
(b)(1)(C).



**COUNT FIFTEEN**

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about March 17, 2021, in the District of New Jersey and elsewhere, the defendant,

**KASIM THURSTON,  
a/k/a "Kai,"  
a/k/a "Kaz,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SIXTEEN**

(Distribution and Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)

On or about March 19, 2021, in the District of New Jersey and elsewhere, the defendant,

**JAMAR HALL,  
a/k/a “Goo,”**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT SEVENTEEN**

(Possession of Ammunition by a Convicted Felon)

On or about March 26, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KASIM THURSTON,  
a/k/a "Kai,"  
a/k/a "Kaz,"**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce at least nine (9) rounds of .40 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT EIGHTEEN**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about April 13, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**THOMAS GIBSON,  
a/k/a "Tommy,"**

did knowingly and intentionally distribute and possess with intent to distribute  
a mixture and substance containing a detectable amount of heroin, a Schedule  
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and  
(b)(1)(C).

**COUNT NINETEEN**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about April 20, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**THOMAS GIBSON,  
a/k/a "Tommy,"**

did knowingly and intentionally distribute and possess with intent to distribute  
a mixture and substance containing a detectable amount of heroin, a Schedule  
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and  
(b)(1)(C).

**COUNT TWENTY**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about April 27, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**THOMAS GIBSON,  
a/k/a "Tommy,"**

did knowingly and intentionally distribute and possess with intent to distribute  
a mixture and substance containing a detectable amount of heroin, a Schedule  
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and  
(b)(1)(C).

**COUNT TWENTY-ONE**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 4, 2021, in the District of New Jersey and elsewhere,  
the defendants,

**ANGEL KEARNEY,  
a/k/a "Jim,"  
a/k/a "Dred," and  
JAMAR HALL,  
a/k/a "Goo,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWENTY-TWO**

(Possession of A Firearm in Furtherance of a Drug Trafficking Crime)

On or about May 4, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**JAMAR HALL,  
a/k/a “Goo,”**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, distribution and possession with intent to distribute heroin and fentanyl charged in Count Twenty-One of this Superseding Indictment, did knowingly possess a firearm—namely, a loaded 9mm Taurus handgun, bearing serial number TCO28853.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).



**COUNT TWENTY-THREE**

(Possession of A Firearm and Ammunition by a Convicted Felon)

On or about May 4, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**JAMAR HALL,  
a/k/a "Goo,"**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a 9mm Taurus handgun, bearing serial number TCO28853 and 17 rounds of 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWENTY-FOUR**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 8, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**KEVIN HALL,**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWENTY-FIVE**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 12, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**JAMAR HALL,  
a/k/a "Goo,"**

did knowingly and intentionally distribute and possess with intent to distribute  
a mixture and substance containing a detectable amount of heroin, a Schedule  
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and  
(b)(1)(C).

**COUNT TWENTY-SIX**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 19, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**ANGEL KEARNEY,  
a/k/a "Jim,"  
a/k/a "Dred,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWENTY-SEVEN**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 26, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**ANGEL KEARNEY,  
a/k/a "Jim,"  
a/k/a "Dred,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWENTY-EIGHT**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about May 30, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**KEVIN HALL,**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWENTY-NINE**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about June 3, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**ANGEL KEARNEY,  
a/k/a "Jim,"  
a/k/a "Dred,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT THIRTY**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about June 29, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**ANGEL KEARNEY,  
a/k/a "Jim,"  
a/k/a "Dred,"**

did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).



**COUNT THIRTY-ONE**

(Possession of A Firearm in Furtherance of a Drug Trafficking Crime)

On or about June 29, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**ANGEL KEARNEY,  
a/k/a “Jim,”  
a/k/a “Dred,”**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, distribution and possession with intent to distribute heroin and fentanyl charged in Count Thirty of this Superseding Indictment, did knowingly possess a firearm—namely, a loaded 9mm G2S model handgun, bearing serial number TLS18910.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT THIRTY-TWO**

(Possession of Ammunition by a Convicted Felon)

On or about June 29, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**ANGEL KEARNEY,  
a/k/a "Jim,"  
a/k/a "Dred,"**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a 9mm G2S model handgun, bearing serial number TLS18910, and six (6) rounds of 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THIRTY-THREE**

(Possession of A Firearm and Ammunition by a Convicted Felon)

On or about June 29, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**KASIM THURSTON,  
a/k/a "Kai,"  
a/k/a "Kaz,"**

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a Springfield Hellcat 9mm handgun, bearing serial number BY344715, and ten rounds of 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THIRTY-FOUR**

(Distribution and Possession with Intent to Distribute Heroin and Fentanyl)

On or about June 29, 2021, in the District of New Jersey and elsewhere,  
the defendant,

**THOMAS GIBSON,  
a/k/a "Tommy,"**

did knowingly and intentionally distribute and possess with intent to distribute  
a mixture and substance containing a detectable amount of heroin, a Schedule  
I controlled substance, and fentanyl, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and  
(b)(1)(C).

**FORFEITURE ALLEGATION ONE**

As a result of committing the firearms offenses in violation of 18 U.S.C. §§ 922(g)(1) and 924(c), as charged in Counts 17, 22, 23, 31, 32, and 33 of this Superseding Indictment, the defendants,

**KASIM THURSTON,  
a/k/a “Kai,”  
a/k/a “Kaz,”  
JAMAR HALL,  
a/k/a “Goo,” and  
ANGEL KEARNEY,  
a/k/a “Jim,”  
a/k/a “Dred,”**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offenses, including, but not limited to:

- (1) nine rounds of .40 caliber ammunition;
- (2) one 9mm Taurus handgun, bearing serial number TC028853;
- (3) 17 rounds of 9mm ammunition;
- (4) one 9mm G2S model handgun, bearing serial number  
TLS18910;
- (5) six rounds of 9mm ammunition;
- (6) one Springfield Hellcat 9mm handgun, bearing serial number  
BY344715; and
- (7) ten rounds of 9mm ammunition.

**FORFEITURE ALLEGATION TWO**

As a result of committing the controlled substance offenses in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C), as charged in Counts 1 through 16, 18 through 21, 24 through 30, and 34 of this Superseding Indictment, the defendants,

**ANGEL KEARNEY,  
a/k/a “Jim,”  
a/k/a “Dred,”  
THOMAS GIBSON,  
a/k/a “Tommy,”  
AKIM GIBSON,  
a/k/a “Ching,”  
JAMAR HALL,  
a/k/a “Goo”  
KEVIN HALL,  
KASIM THURSTON,  
a/k/a “KAI,”  
a/k/a “KAZ,”  
IBN THURSTON,  
a/k/a “Wheezy,”  
a/k/a “Saheed,”  
SHALAMAR McCALL  
a/k/a “Shaggy,” and  
HAKIS MOSES,  
a/k/a “Hak,”**

shall forfeit to the United States any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of violating 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C), and any property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged in this Superseding Indictment.

**Substitute Assets Provision**  
**(Applicable to all Forfeiture Provisions)**

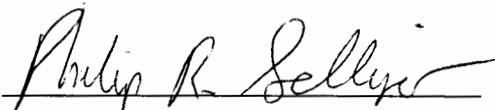
If any of the property described above, as a result of any act or omission of the defendants:

- 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 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
PHILIP R. SELLINGER  
United States Attorney