

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

KAYSHAWN MASSOP,
a/k/a "topski.bz,"
a/k/a "Bz,"
a/k/a "KB,"
a/k/a "Kay Ski,"
GREG BROWN,
a/k/a "ballout.gg,"
a/k/a "GG,"
CARL HENRY,
a/k/a "Big Ski,"
a/k/a "Biggs," and
AMARI JACKSON,
a/k/a "Justo,"

Defendants.

SEALED INDICTMENT

23 Cr. 454

COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

THE ENTERPRISE

1. At all times relevant to this Indictment, KAYSHAWN MASSOP, a/k/a "topski.bz," a/k/a "Bz," a/k/a "KB," a/k/a "Kay Ski"; GREG BROWN, a/k/a "ballout.gg," a/k/a "GG"; CARL HENRY, a/k/a "Big Ski," a/k/a "Biggs"; and AMARI JACKSON, a/k/a "Justo," the defendants, and others known and unknown, were members and associates of the Ski-Ball gang (the "Ski-Ball Gang," or the "Enterprise"), a criminal organization whose members and associates engaged in, among other things, bank fraud, wire fraud, and acts involving murder, assault, and robbery. The Ski-Ball Gang operated principally in the vicinity of the New York City metropolitan area.

2. The Ski-Ball Gang, including its leadership, membership, and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Sections 1959(b)(2) and 1961(4), that is, a group of individuals associated in fact, although not a legal entity, which was engaged in, and the activities of which affected, interstate and foreign commerce. The Ski-Ball Gang constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Ski-Ball Gang.

3. KAYSHAWN MASSOP, a/k/a “topski.bz,” a/k/a “Bz,” a/k/a “KB,” a/k/a “Kay Ski”; GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG”; CARL HENRY, a/k/a “Big Ski,” a/k/a “Biggs”; and AMARI JACKSON, a/k/a “Justo,” the defendants, participated in unlawful and other activities in furtherance of the conduct of the Ski-Ball Gang’s affairs.

PURPOSES OF THE SKI-BALL GANG

4. The purposes of the Ski-Ball Gang included the following:
- a. Preserving and protecting the power, territory, and profits of the Ski-Ball Gang and its members and associates through acts involving assault, murder, and other acts of violence and threats of violence.
 - b. Enriching the members and associates of the Ski-Ball Gang through, among other things, acts involving robbery and fraud.
 - c. Promoting and enhancing the Ski-Ball Gang and the reputation and activities of its members and associates.
 - d. Keeping victims and potential victims in fear of the Ski-Ball Gang and its members and associates through acts and threats of violence.
 - e. Providing assistance to members and associates who committed crimes for and on behalf of the Ski-Ball Gang.

MEANS AND METHODS OF THE SKI-BALL GANG

5. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Ski-Ball Gang were the following:

a. Members and associates of the Ski-Ball Gang committed, and conspired, threatened, and attempted to commit, acts of violence, including acts involving murder, robbery, and assault to protect and expand the Ski-Ball Gang's criminal operations, and to attack and retaliate against the Ski-Ball Gang's rivals.

b. Members and associates of the Ski-Ball Gang committed, and conspired and attempted to commit, bank and wire fraud, including by fraudulently applying for unemployment insurance benefits, depositing checks containing false information into bank accounts controlled by the Ski-Ball Gang members and associates, and providing false information to banks to fraudulently transfer or withdraw money from bank accounts.

c. Members and associates of the Ski-Ball Gang possessed, carried, used, brandished, and discharged firearms in furtherance of the Ski-Ball Gang's interests.

d. Members and associates of the Ski-Ball Gang promoted the Ski-Ball Gang on social media websites such as Facebook, Instagram, and YouTube by posting messages, comments, videos, and photographs referring to, among other things, shootings, firearms, and fraud.

THE RACKETEERING CONSPIRACY

6. From at least in or about January 2019, up to and including the present, in the Southern District of New York and elsewhere, KAYSHAWN MASSOP, a/k/a "topski.bz," a/k/a "Bz," a/k/a "KB," a/k/a "Kay Ski"; GREG BROWN, a/k/a "ballout.gg," a/k/a "GG"; CARL HENRY, a/k/a "Big Ski," a/k/a "Biggs"; and AMARI JACKSON, a/k/a "Justo," the defendants,

and others known and unknown, being persons employed by and associated with the Ski-Ball Gang described in Paragraphs One through Five of this Indictment, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Ski-Ball Gang, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), consisting of

Multiple acts involving:

a. Murder, chargeable under New York Penal Law Sections 125.25, 125.27 (murder), 105.15 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

b. Robbery, chargeable under New York Penal Law Sections 160.00, 160.05, 160.10, 160.15 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

Multiple acts indictable under:

c. Title 18, United States Code, Sections 1951 and 2 (relating to interference with commerce by robbery and aiding and abetting the same);

d. Title 18, United States Code, Sections 1343 and 2 (relating to wire fraud and aiding and abetting the same); and

e. Title 18, United States Code, Sections 1344 and 2 (relating to bank fraud and aiding and abetting the same).

7. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Ski-Ball Gang.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO
**(Attempted Murder, Assault, and Attempted Assault
with a Dangerous Weapon in Aid of Racketeering)**
(HENRY)

The Grand Jury further charges:

8. The allegations contained in paragraphs 1 through 5 of Count One of this Indictment are realleged and incorporated by reference as if fully set forth herein.

9. At all times relevant to this Indictment, Ski-Ball, through its leadership, membership, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder and robbery in violation of the laws of the State of New York and acts indictable under Title 18, United States Code, Sections 1951, 1343, 1344, and 2.

10. On or about January 31, 2020, in the Southern District of New York and elsewhere, CARL HENRY, a/k/a "Big Ski," a/k/a "Biggs," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Ski-Ball Gang, and for the purpose of gaining entrance to and maintaining and increasing position in the Ski-Ball Gang, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, attempted to assault an individual with a dangerous weapon, attempted to murder an individual, and aided and abetted the same, to wit, HENRY shot at a rival gang member in the vicinity of 3964 White Plains Road in the Bronx, New York, in violation of New York Penal Law Sections 120.14, 120.05, 125.25, 110.00, and 20.00.

(Title 18, United States Code, Sections
1959(a)(3), (a)(5), (a)(6), and 2.)

COUNT THREE

**(Use of a Firearm in Furtherance of Assault with a Dangerous Weapon,
Attempted Assault with a Dangerous Weapon, and Attempted Murder)
(HENRY)**

The Grand Jury further charges:

11. On or about January 31, 2020, in the Southern District of New York and elsewhere, CARL HENRY, a/k/a “Big Ski,” a/k/a “Biggs,” 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, assault with a dangerous weapon in aid of racketeering, attempted assault with a dangerous weapon in aid of racketeering, and attempted murder in aid of racketeering, as charged in Count Two of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime possessed a firearm, and aided and abetted the use, carrying and possession of a firearm, which was brandished and discharged.

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

COUNT FOUR

**(Attempted Murder, Assault, and Attempted Assault
with a Dangerous Weapon in Aid of Racketeering)
(BROWN)**

The Grand Jury Further Charges:

12. The allegations contained in paragraphs 1 through 5 of Count One and paragraph 9 of Count Two of this Indictment are realleged and incorporated by reference as if fully set forth herein.

13. On or about August 27, 2020, in the Southern District of New York and elsewhere, GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG,” the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Ski-Ball Gang, and for the purpose of gaining entrance to and maintaining and increasing position in

the Ski-Ball Gang, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, attempted to assault an individual with a dangerous weapon, attempted to murder an individual, and aided and abetted the same, to wit, BROWN shot at rival gang members in the vicinity of 901 East 217th Street in the Bronx, New York, in violation of New York Penal Law Sections 120.14, 120.05, 125.25, 110.00, and 20.00.

(Title 18, United States Code, Sections
1959(a)(3), (a)(5), (a)(6), and 2.)

COUNT FIVE

**(Use of a Firearm in Furtherance of Assault with a Dangerous Weapon,
Attempted Assault with a Dangerous Weapon, and Attempted Murder)
(BROWN)**

The Grand Jury further charges:

14. On or about August 27, 2020, in the Southern District of New York and elsewhere, GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG,” 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, assault with a dangerous weapon in aid of racketeering, attempted assault with a dangerous weapon in aid of racketeering, and attempted murder in aid of racketeering, as charged in Count Four of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime possessed a firearm, and aided and abetted the use, carrying and possession of a firearm, which was brandished and discharged.

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

COUNT SIX
**(Assault and Attempted Assault with a
Dangerous Weapon in Aid of Racketeering)**
(MASSOP)

The Grand Jury Further Charges:

15. The allegations contained in paragraphs 1 through 5 of Count One and paragraph 9 of Count Two of this Indictment are realleged and incorporated by reference as if fully set forth herein.

16. On or about August 27, 2020, in the Southern District of New York and elsewhere, KAYSHAWN MASSOP, a/k/a "topski.bz," a/k/a "Bz," a/k/a "KB," a/k/a "Kay Ski," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Ski-Ball Gang, and for the purpose of gaining entrance to and maintaining and increasing position in the Ski-Ball Gang, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon and attempted to assault an individual with a dangerous weapon, and aided and abetted the same, to wit, MASSOP shot at the occupied home of a rival gang member in the vicinity of 4229 Hill Avenue in the Bronx, New York, in violation of New York Penal Law Sections 120.14, 120.05, 110.00, and 20.00.

(Title 18, United States Code, Sections
1959(a)(3), (a)(6), and 2.)

COUNT SEVEN
**(Use of a Firearm in Furtherance of Assault with a Dangerous Weapon
and Attempted Assault with a Dangerous Weapon)**
(MASSOP)

The Grand Jury further charges:

17. On or about August 27, 2020, in the Southern District of New York and elsewhere, KAYSHAWN MASSOP, a/k/a “topski.bz,” a/k/a “Bz,” a/k/a “KB,” a/k/a “Kay Ski,” 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, assault with a dangerous weapon in aid of racketeering and attempted assault with a dangerous weapon in aid of racketeering, as charged in Count Six of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime possessed a firearm, and aided and abetted the use, carrying and possession of a firearm, which was brandished and discharged.

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

COUNT EIGHT
**(Attempted Murder and Assault with a
Dangerous Weapon in Aid of Racketeering)**
(HENRY and JACKSON)

The Grand Jury Further Charges:

18. The allegations contained in paragraphs 1 through 5 of Count One and paragraph 9 of Count Two of this Indictment are realleged and incorporated by reference as if fully set forth herein.

19. On or about August 23, 2020, in the Southern District of New York and elsewhere, CARL HENRY, a/k/a “Big Ski,” a/k/a “Biggs,” and AMARI JACKSON, a/k/a “Justo,” the defendants, as consideration for the receipt of, and as consideration for a promise and agreement

to pay, a thing of pecuniary value from the Ski-Ball Gang, and for the purpose of gaining entrance to and maintaining and increasing position in the Ski-Ball Gang, an enterprise engaged in racketeering activity, as described above, knowingly attempted to murder an individual and assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, HENRY and JACKSON shot a rival gang member in the vicinity of 3399 Boston Road in the Bronx, New York, in violation of New York Penal Law Sections 120.05, 125.25, 110.00, and 20.00.

(Title 18, United States Code, Sections
1959(a)(3), (a)(5), and 2.)

COUNT NINE
**(Use of a Firearm in Furtherance of
Assault with a Dangerous Weapon and Attempted Murder)**
(HENRY and JACKSON)

The Grand Jury further charges:

20. On or about August 23, 2020, in the Southern District of New York and elsewhere, CARL HENRY, a/k/a “Big Ski,” a/k/a “Biggs,” and AMARI JACKSON, a/k/a “Justo,” the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, assault with a dangerous weapon in aid of racketeering and attempted murder in aid of racketeering, as charged in Count Eight of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime possessed a firearm, and aided and abetted the use, carrying and possession of a firearm, which was brandished and discharged.

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

COUNT TEN
(Attempted Murder and Assault with a Dangerous Weapon in Aid of Racketeering)
(MASSOP and BROWN)

The Grand Jury Further Charges:

21. The allegations contained in paragraphs 1 through 5 of Count One and paragraph 9 of Count Two of this Indictment are realleged and incorporated by reference as if fully set forth herein.

22. On or about June 25, 2021, in the Southern District of New York and elsewhere, KAYSHAWN MASSOP, a/k/a “topski.bz,” a/k/a “Bz,” a/k/a “KB,” a/k/a “Kay Ski,” and GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG,” the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Ski-Ball Gang, and for the purpose of gaining entrance to and maintaining and increasing position in the Ski-Ball Gang, an enterprise engaged in racketeering activity, as described above, knowingly attempted to murder an individual and assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, MASSOP and BROWN shot rival gang members in the vicinity of 1066A Zerega Avenue in the Bronx, New York, in violation of New York Penal Law Sections 120.05, 125.25, 110.00, and 20.00.

(Title 18, United States Code, Sections
1959(a)(3), (a)(5), and 2.)

COUNT ELEVEN
(Use of a Firearm in Furtherance of
Assault with a Dangerous Weapon and Attempted Murder)
(MASSOP and BROWN)

The Grand Jury further charges:

23. On or about June 25, 2021, in the Southern District of New York and elsewhere, KAYSHAWN MASSOP, a/k/a “topski.bz,” a/k/a “Bz,” a/k/a “KB,” a/k/a “Kay Ski,”

and GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG,” the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, assault with a dangerous weapon in aid of racketeering and attempted murder in aid of racketeering, as charged in Count Ten of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime possessed a firearm, and aided and abetted the use, carrying and possession of a firearm, which was brandished and discharged.

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

COUNT TWELVE
(Conspiracy to Commit Hobbs Act Robbery)
(BROWN)

The Grand Jury further charges:

24. On or about January 13, 2022, in the Southern District of New York and elsewhere, GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG,” the defendant, and others known and unknown, knowingly combined, conspired, confederated, and agreed 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 interstate 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, BROWN and others conspired to commit the armed robbery of an individual offering to sell a black 2017 Mercedes Benz E430 (AMG 43) on Facebook Marketplace.

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

COUNT THIRTEEN
(Hobbs Act Robbery)
(BROWN)

The Grand Jury further charges:

25. On or about January 13, 2022, in the Southern District of New York and elsewhere, GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG,” the defendant, knowingly committed robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstructed, delayed, and affected interstate 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), and aided and abetted the same, to wit, BROWN participated in an armed robbery of an individual attempting to sell a black 2017 Mercedes Benz E430 (AMG 43) on Facebook Marketplace.

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

COUNT FOURTEEN
(Use of a Firearm)
(BROWN)

The Grand Jury further charges:

26. On or about January 13, 2022, in the Southern District of New York and elsewhere, GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG,” 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 Hobbs Act robbery charged in Count Thirteen of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime possessed a firearm, and aided and abetted the use, carrying and possession of a firearm, which was brandished.

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

COUNT FIFTEEN
(Conspiracy to Commit Bank Fraud)
(MASSOP, BROWN, HENRY, and JACKSON)

The Grand Jury further charges:

27. From at least in or about 2019 through at least in or about 2022, in the Southern District of New York and elsewhere, KAYSHAWN MASSOP, a/k/a “topski.bz,” a/k/a “Bz,” a/k/a “KB,” a/k/a “Kay Ski”; GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG”; CARL HENRY, a/k/a “Big Ski,” a/k/a “Biggs”; and AMARI JACKSON, a/k/a “Justo,” the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

28. It was a part and an object of the conspiracy that KAYSHAWN MASSOP, a/k/a “topski.bz,” a/k/a “Bz,” a/k/a “KB,” a/k/a “Kay Ski”; GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG”; CARL HENRY, a/k/a “Big Ski,” a/k/a “Biggs”; and AMARI JACKSON, a/k/a “Justo,” the defendants, and others known and unknown, knowingly would and did execute, and attempt to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344, to wit, MASSOP, BROWN, HENRY, and JACKSON participated in a scheme to: (1) fraudulently deposit stolen and manipulated checks into accounts and withdraw funds from those accounts; and (2) impersonate bank customers to obtain funds from those customers’ accounts without authorization.

(Title 18, United States Code, Section 1349.)

COUNT SIXTEEN
(Wire Fraud Conspiracy)
(MASSOP, BROWN, HENRY, and JACKSON)

The Grand Jury further charges:

29. From at least in or about 2019 through at least in or about 2022, in the Southern District of New York and elsewhere, KAYSHAWN MASSOP, a/k/a “topski.bz,” a/k/a “Bz,” a/k/a “KB,” a/k/a “Kay Ski”; GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG”; CARL HENRY, a/k/a “Big Ski,” a/k/a “Biggs”; and AMARI JACKSON, a/k/a “Justo,” the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

30. It was a part and an object of the conspiracy that KAYSHAWN MASSOP, a/k/a “topski.bz,” a/k/a “Bz,” a/k/a “KB,” a/k/a “Kay Ski”; GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG”; CARL HENRY, a/k/a “Big Ski,” a/k/a “Biggs”; and AMARI JACKSON, a/k/a “Justo,” the defendants, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, MASSOP, BROWN, HENRY, and JACKSON participated in a scheme to fraudulently apply for and obtain unemployment benefits in the name of other persons, and sent and received, and caused others to send and receive, emails and other electronic communications, to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Section 1349.)

COUNT SEVENTEEN
(Aggravated Identity Theft)
(MASSOP, BROWN, HENRY, and JACKSON)

The Grand Jury further charges:

31. From at least in or about 2019 through at least in or about 2022, in the Southern District of New York and elsewhere, KAYSHAWN MASSOP, a/k/a “topski.bz,” a/k/a “Bz,” a/k/a “KB,” a/k/a “Kay Ski”; GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG”; CARL HENRY, a/k/a “Big Ski,” a/k/a “Biggs”; and AMARI JACKSON, a/k/a “Justo,” the defendants, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code,

Section 1028A(c), to wit, MASSOP, BROWN, HENRY, and JACKSON used, and aided and abetted the use of, the names of other persons during and in relation to the bank fraud offense charged in Count Fifteen of this Indictment and the wire fraud offense charged in Count Sixteen of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1),
1028A(b), and 2.)

FORFEITURE ALLEGATIONS

32. As a result of committing the racketeering offense alleged in Count One of this Indictment, KAYSHAWN MASSOP, a/k/a “topski.bz,” a/k/a “Bz,” a/k/a “KB,” a/k/a “Kay Ski”; GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG,”; CARL HENRY, a/k/a “Big Ski,” a/k/a “Biggs,”; and AMARI JACKSON, a/k/a “Justo,” the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendants acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, from the offense alleged in Count One of this Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

33. As a result of committing the offenses alleged in Count Twelve and Count Thirteen of this Indictment, GREG BROWN, a/k/a “ballout.gg,” a/k/a “GG,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28

United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

34. As a result of committing the offense alleged in Count Fifteen of this Indictment, KAYSHAWN MASSOP, a/k/a "topski.bz," a/k/a "Bz," a/k/a "KB," a/k/a "Kay Ski"; GREG BROWN, a/k/a "ballout.gg," a/k/a "GG,"; CARL HENRY, a/k/a "Big Ski," a/k/a "Biggs,"; and AMARI JACKSON, a/k/a "Justo," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendants obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

35. As a result of committing the offense alleged in Count Sixteen of this Indictment, KAYSHAWN MASSOP, a/k/a "topski.bz," a/k/a "Bz," a/k/a "KB," a/k/a "Kay Ski"; GREG BROWN, a/k/a "ballout.gg," a/k/a "GG,"; CARL HENRY, a/k/a "Big Ski," a/k/a "Biggs,"; and AMARI JACKSON, a/k/a "Justo," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

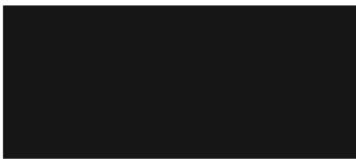
36. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third 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 Title 18, United States Code, Section 1963(m), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 982, and 1963;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



Damian Williams

DAMIAN WILLIAMS
United States Attorney