

COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
UNITED STATES OF AMERICA :
 : SEALED INDICTMENT
 :
- v. - : 15 Cr. 471
 :
FREDERICK GANG, :
APRIL WATSON, :
a/k/a "Nee Nee," and :
TYRONE HAGANS, :
a/k/a "Dirty T," :
 :
Defendants. :
 :
- - - - - x

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2007, up to and including in or about 2015, in the Southern District of New York and elsewhere, FREDERICK GANG, APRIL WATSON, a/k/a "Nee Nee," and TYRONE HAGANS, a/k/a "Dirty T," 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 FREDERICK GANG, APRIL WATSON, a/k/a "Nee Nee," and TYRONE HAGANS, a/k/a "Dirty T," 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 that FREDERICK GANG, APRIL WATSON, a/k/a "Nee Nee," and TYRONE HAGANS, a/k/a "Dirty T," the defendants, conspired to distribute and possess with intent to distribute were 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).

4. During the period charged in the Indictment, the conspiracy was based in Monticello, New York, and led by FREDERICK GANG, the defendant. GANG supplied crack to other drug dealers for resale. APRIL WATSON, a/k/a "Nee Nee," the defendant, maintained crack for GANG at her residence on Wood Avenue in Monticello and distributed crack in furtherance of the conspiracy. TYRONE HAGANS, a/k/a "Dirty T," the defendant, distributed crack in furtherance of the conspiracy.

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

COUNT TWO

The Grand Jury further charges:

5. From at least in or about 2012, up to and including in or about 2013, in the Southern District of New York and elsewhere, APRIL WATSON, a/k/a "Nee Nee," the defendant, during and in relation to a drug trafficking crime for which she may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment,

knowingly did use and carry firearms, and in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

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

FORFEITURE ALLEGATION

6. As a result of committing the controlled substance offense alleged in Count One of this Indictment, FREDERICK GANG, APRIL WATSON, a/k/a "Nee Nee," and TYRONE HAGANS, a/k/a "Dirty T," 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.

7. 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 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 above forfeitable property.

(Title 21, United States Code, Sections 841 and 853.)



FOREPERSON

Preet Bharara
PREET BHARARA
United States Attorney

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Defendants.

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(18 U.S.C. §§ 924(c) and 2,
21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL


Foreperson.
