

COPY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

MONDU ALLAH, :

 a/k/a "Mindu Allah," :

 a/k/a "Duberry," :

 a/k/a "Du," :

CARITA BENNERMAN, :

CLIFTON CATTS, :

EUGENE LAMONT GRAVES, :

LARRY GRAVES, :

 a/k/a "Knowledge," :

MAURICE HOLLIS, :

 a/k/a "Mo," :

JULIENNE KOLOZY, and :

SAMUEL TURNER, :

 Defendants. :

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SEALED INDICTMENT

15 Cr. 509

COUNT ONE

The Grand Jury charges:

1. From at least in or about December 2013, up to and including in or about June 2015, in the Southern District of New York and elsewhere, MONDU ALLAH, a/k/a "Mindu Allah," a/k/a "Duberry," a/k/a "Du," CARITA BENNERMAN, CLIFTON CATTS, EUGENE LAMONT GRAVES, LARRY GRAVES, a/k/a "Knowledge," MAURICE HOLLIS, a/k/a "Mo," JULIENNE KOLOZY, and SAMUEL TURNER, 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 MONDU ALLAH, a/k/a "Mindu Allah," a/k/a "Duberry," a/k/a "Du," CARITA BENNERMAN, CLIFTON CATTS, EUGENE LAMONT GRAVES, LARRY GRAVES, a/k/a "Knowledge," MAURICE HOLLIS, a/k/a "Mo," JULIENNE KOLOZY, and SAMUEL TURNER, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a) (1).

3. The controlled substance that MONDU ALLAH, a/k/a "Mindu Allah," a/k/a "Duberry," a/k/a "Du," CARITA BENNERMAN, CLIFTON CATTS, EUGENE LAMONT GRAVES, LARRY GRAVES, a/k/a "Knowledge," MAURICE HOLLIS, a/k/a "Mo," JULIENNE KOLOZY, and SAMUEL TURNER, the defendants, conspired to distribute and possess with the intent to distribute was one kilogram or more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b) (1) (A).

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about February 18, 2015, MONDU ALLAH, a/k/a "Mindu Allah," a/k/a "Duberry," a/k/a "Du," the defendant, sold

heroin to an undercover agent in or around the City of Poughkeepsie, New York.

b. On or about June 3, 2015, CARITA BENNERMAN, the defendant, sold heroin to a confidential informant in or around the City of Poughkeepsie, New York.

c. On or about May 9, 2015, ALLAH and CLIFTON CATTS, the defendant, had phone conversations regarding ALLAH purchasing heroin for resale from CATTS.

d. On or about May 4, 2015, ALLAH and EUGENE LAMONT GRAVES, the defendant, had phone conversations regarding EUGENE LAMONT GRAVES purchasing heroin for resale from ALLAH.

e. On or about March 25, 2015, LARRY GRAVES, a/k/a "Knowledge," the defendant, sold heroin to an undercover agent in or around the City of Poughkeepsie, New York.

f. On or about May 3, 2015, ALLAH and MAURICE HOLLIS, a/k/a "Mo," the defendant, had phone conversations regarding HOLLIS purchasing heroin for resale from ALLAH.

g. On or about March 5, 2015, JULIENNE KOLOZY, the defendant, drove ALLAH to and from a location in or around the City of Poughkeepsie, New York, where ALLAH sold heroin to an undercover agent.

h. On or about May 5, 2015, ALLAH and SAMUEL TURNER, the defendant, had a phone conversation regarding TURNER purchasing heroin for resale from ALLAH.

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

COUNT TWO

The Grand Jury further charges:

5. On or about May 13, 2015, in the Southern District of New York and elsewhere, MONDU ALLAH, a/k/a "Mindu Allah," a/k/a "Duberry," a/k/a "Du," and MAURICE HOLLIS, a/k/a "Mo," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the crime charged in Count One of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

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

FORFEITURE ALLEGATION WITH RESPECT TO COUNT ONE

6. As a result of committing the controlled substance offense alleged in Count One of this Indictment, MONDU ALLAH, a/k/a "Mindu Allah," a/k/a "Duberry," a/k/a "Du," CARITA BENNERMAN, CLIFTON CATTS, EUGENE LAMONT GRAVES, LARRY GRAVES, a/k/a "Knowledge," MAURICE HOLLIS, a/k/a "Mo," JULIENNE KOLOZY, and SAMUEL TURNER, 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.


Substitute Assets Provision


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 intention 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(a)(1) and 853.)


FOREPERSON



PREET BHARARA
United States Attorney