

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

DAMON GUADALUPE,  
a/k/a "Pappy,"  
MOHAMMED FABELO,  
a/k/a "Mo,"  
WILLIAM RODRIGUEZ,  
JASON HOOKS,  
a/k/a "Hamo," and  
WILFREDO LABOY,  
a/k/a "Gutter,"

Defendants.

SEALED INDICTMENT

16 Cr.

16 CRIM 318

COUNT ONE

(Conspiracy to Distribute Narcotics)

The Grand Jury charges:

1. From at least in or about 2010, up to and including in or about May 2016, in the Southern District of New York and elsewhere, DAMON GUADALUPE, a/k/a "Pappy," MOHAMMED FABELO, a/k/a "Mo," WILLIAM RODRIGUEZ, JASON HOOKS, a/k/a "Hamo," and WILFREDO LABOY, a/k/a "Gutter," 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 DAMON GUADALUPE, a/k/a "Pappy," MOHAMMED FABELO, a/k/a "Mo,"

WILLIAM RODRIGUEZ, JASON HOOKS, a/k/a "Hamo," WILFREDO LABOY, a/k/a "Gutter," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were: (i) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) 28 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack cocaine," in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), 841(b)(1)(B).)

#### COUNT TWO

##### **(Possession of Firearms in Furtherance of Drug Trafficking)**

The Grand Jury further charges:

4. From at least in or about 2010 up to and including in or about May 2016, in the Southern District of New York and elsewhere, DAMON GUADALUPE, a/k/a "Pappy," the defendant, during and in relation to a drug trafficking crime for which he 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, to wit, handguns.

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

**FORFEITURE ALLEGATION**

5. As a result of committing the controlled substance offense alleged in Count One of this Indictment, DAMON GUADALUPE, a/k/a "Pappy," MOHAMMED FABELO, a/k/a "Mo," WILLIAM RODRIGUEZ, JASON HOOKS, a/k/a "Hamo," and WILFREDO LABOY, a/k/a "Gutter," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the controlled substance violation alleged in Count One of this Indictment.

**SUBSTITUTE ASSET PROVISION**

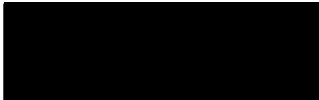
6. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- 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 to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 21, United States Code, Section 853.)

  
FOREPERSON



PREET BHARARA  
United States Attorney

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INDICTMENT

16 Cr.


(21 U.S.C. §§ 841(a)(1), 841(b)(1)(A),  
841(b)(1)(B), and 846; 18 U.S.C. §§  
924(c)(1)(A)(i), and 2.)

PREET BHARARA

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United States Attorney

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Foreperson

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