

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - : SEALED
:
:
TYRIN GAYLE, : 16 Cr.
a/k/a "Spazzo," :
LAQUAN FALLS, :
a/k/a "Greedy," :
GABRIEL WARREN, :
a/k/a "Stackz" :
DAVID BROWN, :
a/k/a "Baby Thot," :
BRENDAN GERMAINE, :
a/k/a "Brandan Germain," :
RASHUN EVANS, :
LAQUAVIOUS BOYKIN, :
BRITTANY HALL, and :
CHRISTOPHER JOHNSON, :
:
Defendants. :
:
- - - - - X

COUNT ONE

The Grand Jury charges:

1. From at least in or about October 2015, up to and including in or about May 2016, in the Southern District of New York and elsewhere, TYRIN GAYLE, a/k/a "Spazzo," LAQUAN FALLS, a/k/a "Greedy," GABRIEL WARREN, a/k/a "Stackz," DAVID BROWN, a/k/a "Baby Thot," BRENDAN GERMAINE, a/k/a "Brandan Germain," RASHUN EVANS, LAQUAVIOUS BOYKIN, BRITTANY HALL, and CHRISTOPHER JOHNSON, 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 TYRIN GAYLE, a/k/a "Spazzo," LAQUAN FALLS, a/k/a "Greedy," GABRIEL WARREN, a/k/a "Stackz," DAVID BROWN, a/k/a "Baby Thot," BRENDAN GERMAINE, a/k/a "Brandan Germain," RASHUN EVANS, LAQUAVIOUS BOYKIN, BRITTANY HALL, and CHRISTOPHER JOHNSON, 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 TYRIN GAYLE, a/k/a "Spazzo," LAQUAN FALLS, a/k/a "Greedy," GABRIEL WARREN, a/k/a "Stackz," DAVID BROWN, a/k/a "Baby Thot," BRENDAN GERMAINE, a/k/a "Brandan Germain," RASHUN EVANS, LAQUAVIOUS BOYKIN, BRITTANY HALL, and CHRISTOPHER JOHNSON, the defendants, conspired to distribute and possess with the intent to distribute was 28 grams and more of mixtures and substances containing a detectable amount of cocaine base in a form commonly known as crack, in violation of 21 U.S.C. § 841(b)(1)(B).

4. During the period charged in the Indictment, the conspiracy was led, at different times, by TYRIN GAYLE, a/k/a "Spazzo," LAQUAN FALLS, a/k/a "Greedy," and GABRIEL WARREN,

a/k/a "Stackz," the defendants. Members of the conspiracy referred to their organization as the "Yellow Tape Money Gang," or "YTMG."

5. During the period charged in the Indictment, YTMG members distributed crack cocaine in and around the City of Newburgh in Orange County, New York.

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

COUNT TWO

The Grand Jury further charges:

6. In or about May 2016, in the Southern District of New York and elsewhere, RASHUN EVANS, 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 a firearm, and in furtherance of such crime, did possess a firearm, and did aid and abet the same.

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

FORFEITURE ALLEGATION

7. As a result of committing the controlled substance offense alleged in Count One of this Indictment, TYRIN GAYLE, a/k/a "Spazzo," LAQUAN FALLS, a/k/a "Greedy," GABRIEL WARREN, a/k/a "Stackz," DAVID BROWN, a/k/a "Baby Thot," BRENDAN GERMAINE, a/k/a "Brandan Germain," RASHUN EVANS, LAQUAVIOUS

BOYKIN, BRITTANY HALL, and CHRISTOPHER JOHNSON, 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.

Substitute Assets Provision

8. 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
PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

TYRIN GAYLE, et al.,

Defendants.

SEALED INDICTMENT

16 Cr.

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

[REDACTED]

Foreperson.

PREET BHARARA

United States Attorney.
