

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

SEALED INDICTMENT

- v. -

16 Cr.

RASHEED BAILEY,
a/k/a "Ciroc,"
WILLIAM BRYANT,
a/k/a "Kenny,"
KEVIN CHAVIS,
JEFFREY CHILDS,
a/k/a "Pap,"
a/k/a "CJ,"
TYRONE GLADDEN,
a/k/a "Ty Boogie,"
a/k/a "Ty Zooted,"
TRAVIS HARRY,
a/k/a "Trav Game,"
RICHARD HILL,
MICHAEL JOHNSON,
a/k/a "Air,"
KEVIN LEWIS,
a/k/a "Ice,"
DONTE MCGILL,
TORELL NIUELDER,
a/k/a "Young,"
a/k/a "Relli,"
TUQUAN ROGERS,
a/k/a "Tay,"
DONALD ROSE,
JAMAL RUSSEL,
a/k/a "Mally,"
LUKE RYANT,
a/k/a "Berger,"
KEVIN SAXON,
a/k/a "Sax,"
ANDREW SINGLETON,
a/k/a "Drew,"
SEON THOMAS,
a/k/a "Cee,"
a/k/a "Goon,"
HENRY TRENTON,
a/k/a "Kay,"
a/k/a "Kels,"

16 CRIM 396

RENE VELEZ,	:
a/k/a "White Boy,"	:
TREVOR WATSON,	:
a/k/a "Trev Wild," and	:
TYLER WILLIAMS,	:
a/k/a "Ty Cracks,"	:
	:
	:
Defendants.	:
	x

COUNT ONE

The Grand Jury charges:

Background

1. The New York City Housing Authority ("NYCHA") operates, among others, a housing development in the East Harlem neighborhood of Manhattan, New York: the Lincoln Houses, spanning an area between East 132nd Street and East 135th Street to the North-South, and Park Avenue and Fifth Avenue, to the East-West (the "Lincoln Houses").

2. From at least in or about 2008, up to and including in or about 2016, in the Southern District of New York and elsewhere, RASHEED BAILEY, a/k/a "Ciroc," WILLIAM BRYANT, a/k/a "Kenny," KEVIN CHAVIS, JEFFREY CHILDS, a/k/a "Pap," a/k/a "CJ," TYRONE GLADDEN, a/k/a "Ty Boogie," a/k/a "Ty Zooted," TRAVIS HARRY, a/k/a "Trav Game," RICHARD HILL, MICHAEL JOHNSON, a/k/a "Air," KEVIN LEWIS, a/k/a "Ice," DONTE MCGILL, TORELL NIUELDER, a/k/a "Young," a/k/a "Relli," TUQUAN ROGERS, a/k/a "Tay," DONALD

ROSE, JAMAL RUSSEL, a/k/a "Mally," LUKE RYANT, a/k/a "Berger," KEVIN SAXON, a/k/a "Sax," ANDREW SINGLETON, a/k/a "Drew," SEON THOMAS, a/k/a "Cee," a/k/a "Goon," HENRY TRENTON, a/k/a "Kay," a/k/a "Kels," RENE VELEZ, a/k/a "White Boy," TREVOR WATSON, a/k/a "Trev Wild," and TYLER WILLIAMS, a/k/a "Ty Cracks," the defendants (collectively, the "Defendants"), and others known and unknown, conspired to distribute significant amounts of crack cocaine, in and around, among other places, the Lincoln Houses. Specifically, the Defendants sold narcotics most frequently on public streets and inside public housing developments between East 132nd Street and East 135th Street, to the North-South, and between Madison Avenue and Fifth Avenue, to the East-West. This section of Lincoln Houses is referred to herein as the "West Side."

3. The Defendants and others working with them operated a drug trafficking organization (the "West Side DTO"), which distributed crack cocaine twenty-four hours each day, seven days each week.

4. Members of the West Side DTO had access to firearms and engaged in acts of violence to, among other reasons, protect and maintain their drug business.

Statutory Allegations

5. From at least in or about 2008, up to and including in or about 2016, in the Southern District of New York and

elsewhere, RASHEED BAILEY, a/k/a "Ciroc," WILLIAM BRYANT, a/k/a "Kenny," KEVIN CHAVIS, JEFFREY CHILDS, a/k/a "Pap," a/k/a "CJ," TYRONE GLADDEN, a/k/a "Ty Boogie," a/k/a "Ty Zooted," TRAVIS HARRY, a/k/a "Trav Game," RICHARD HILL, MICHAEL JOHNSON, a/k/a "Air," KEVIN LEWIS, a/k/a "Ice," DONTE MCGILL, TORELL NIUELDER, a/k/a "Young," a/k/a "Relli," TUQUAN ROGERS, a/k/a "Tay," DONALD ROSE, JAMAL RUSSEL, a/k/a "Mally," LUKE RYANT, a/k/a "Berger," KEVIN SAXON, a/k/a "Sax," ANDREW SINGLETON, a/k/a "Drew," SEON THOMAS, a/k/a "Cee," a/k/a "Goon," HENRY TRENTON, a/k/a "Kay," a/k/a "Kels," RENE VELEZ, a/k/a "White Boy," TREVOR WATSON, a/k/a "Trev Wild," and TYLER WILLIAMS, a/k/a "Ty Cracks," 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.

6. It was a part and an object of the conspiracy that RASHEED BAILEY, a/k/a "Ciroc," WILLIAM BRYANT, a/k/a "Kenny," KEVIN CHAVIS, JEFFREY CHILDS, a/k/a "Pap," a/k/a "CJ," TYRONE GLADDEN, a/k/a "Ty Boogie," a/k/a "Ty Zooted," TRAVIS HARRY, a/k/a "Trav Game," RICHARD HILL, MICHAEL JOHNSON, a/k/a "Air," KEVIN LEWIS, a/k/a "Ice," DONTE MCGILL, TORELL NIUELDER, a/k/a "Young," a/k/a "Relli," TUQUAN ROGERS, a/k/a "Tay," DONALD ROSE, JAMAL RUSSEL, a/k/a "Mally," LUKE RYANT, a/k/a "Berger," KEVIN SAXON, a/k/a "Sax," ANDREW SINGLETON, a/k/a "Drew," SEON THOMAS,

a/k/a "Cee," a/k/a "Goon," HENRY TRENTON, a/k/a "Kay," a/k/a "Kels," RENE VELEZ, a/k/a "White Boy," TREVOR WATSON, a/k/a "Trev Wild," and TYLER WILLIAMS, a/k/a "Ty Cracks," 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).

7. The controlled substance that RASHEED BAILEY, a/k/a "Ciroc," WILLIAM BRYANT, a/k/a "Kenny" KEVIN CHAVIS, JEFFREY CHILDS, a/k/a "Pap," a/k/a "CJ," TYRONE GLADDEN, a/k/a "Ty Boogie," a/k/a "Ty Zooted," TRAVIS HARRY, a/k/a "Trav Game," RICHARD HILL, MICHAEL JOHNSON, a/k/a "Air," KEVIN LEWIS, a/k/a "Ice," DONTE MCGILL, TORELL NIUELDER, a/k/a "Young," a/k/a "Relli," TUQUAN ROGERS, a/k/a "Tay," DONALD ROSE, JAMAL RUSSEL, a/k/a "Mally," LUKE RYANT, a/k/a "Berger," KEVIN SAXON, a/k/a "Sax," ANDREW SINGLETON, a/k/a "Drew," SEON THOMAS, a/k/a "Cee," a/k/a "Goon," HENRY TRENTON, a/k/a "Kay," a/k/a "Kels," RENE VELEZ, a/k/a "White Boy," TREVOR WATSON, a/k/a "Trev Wild," and TYLER WILLIAMS, a/k/a "Ty Cracks," the defendants, conspired to distribute and possess with intent to distribute was 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).

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

COUNT TWO

The Grand Jury further charges:

8. From at least in or about 2008, up to and including in or about 2015, in the Southern District of New York and elsewhere, JEFFREY CHILDS, a/k/a "Pap," a/k/a "CJ," TUQUAN ROGERS, a/k/a "Tay," JAMAL RUSSEL, a/k/a "Mally," LUKE RYANT, a/k/a "Berger," SEON THOMAS, a/k/a "Cee," and TREVOR WATSON, a/k/a "Trev Wild," 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 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

9. As a result of committing the controlled substance offense alleged in Count One of this Indictment, RASHEED BAILEY, a/k/a "Ciroc," WILLIAM BRYANT, a/k/a "Kenny," KEVIN CHAVIS, JEFFREY CHILDS, a/k/a "Pap," a/k/a "CJ," TYRONE GLADDEN, a/k/a "Ty Boogie," a/k/a "Ty Zooted," TRAVIS HARRY, a/k/a "Trav Game," RICHARD HILL, MICHAEL JOHNSON, a/k/a "Air," KEVIN LEWIS, a/k/a "Ice," DONTE MCGILL, TORELL NIUELDER, a/k/a "Young," a/k/a "Relli," TUQUAN ROGERS, a/k/a "Tay," DONALD ROSE, JAMAL RUSSEL,

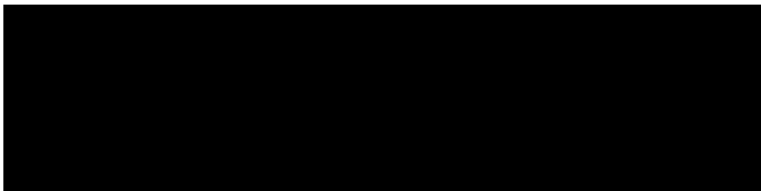
a/k/a "Mally," LUKE RYANT, a/k/a "Berger," KEVIN SAXON, a/k/a "Sax," ANDREW SINGLETON, a/k/a "Drew," SEON THOMAS, a/k/a "Cee," a/k/a "Goon," HENRY TRENTON, a/k/a "Kay," a/k/a "Kels," RENE VELEZ, a/k/a "White Boy," TREVOR WATSON, a/k/a "Trev Wild," and TYLER WILLIAMS, a/k/a "Ty Cracks," the defendants, 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.

10. 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

A handwritten signature in cursive script that reads "Preet Bharara".

PREET BHARARA *rk*
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

RASHEED BAILEY, et al.

Defendants.

SEALED INDICTMENT

16 Cr.

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

PREET BHARARA

United States Attorney.

A TRUE


Foreperson.
