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COUNT ONE
(Young Gunnaz Racketeering Conspiracy)
(ALL DEFENDANTS)

The Grand Jury charges:

The YG Enterprise

1. At all times relevant to this Indictment, KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," DALLAS ARCHER, a/k/a "Muggas," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a "Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," the defendants, and others known and unknown, were members and associates of the Young Gunnaz ("YG" or the "YG Enterprise"), a criminal organization whose members and associates engaged in, among other activities, acts involving murder, assault, robbery, narcotics trafficking, wire fraud, and bank fraud. YG operated in and around the City of Newburgh and City of Poughkeepsie, New York.

2. YG, including its leadership, its membership, and its associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The YG Enterprise constituted an ongoing organization whose

members functioned as a continuing unit for a common purpose of achieving the objectives of the YG Enterprise. At all times relevant to this Indictment, the YG Enterprise was engaged in, and its activities affected, interstate and foreign commerce. KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," DALLAS ARCHER, a/k/a "Muggas," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," the defendants, participated in unlawful and other activity in furtherance of the conduct of the YG Enterprise's affairs.

3. Members and associates of YG engaged in a series of violent disputes with rivals of YG, including those aligned with YG who they deemed disloyal to the YG Enterprise. During these disputes, members and associates of YG committed multiple shootings, robberies, and assaults against their rivals and against individuals who were aligned with YG.

4. Members and associates of YG sold crack cocaine, Oxycodone, heroin, Promethazine HCL and Codeine, commonly known as "lean," and marihuana in and around the City of Newburgh and City of Poughkeepsie, New York.

5. Members and associates of YG committed and agreed, attempted, and threatened to commit acts of violence to protect and expand their narcotics business and to protect fellow members and associates of the YG Enterprise. These acts of violence included acts involving murder, robbery, extortion, and assault, intended to protect the YG Enterprise's narcotics business, retaliate against members of rival gangs who had encroached on the YG Enterprise's narcotics business, to otherwise promote the standing and reputation of YG amongst rival gangs, and to promote the standing and reputation of YG members amongst other YG members.

Purposes of the YG Enterprise

6. The purposes of the YG Enterprise included the following:

- a. Preserving and protecting the power, territory, and profits of the YG Enterprise through acts involving murder, other acts of violence, and threats of violence.
- b. Promoting and enhancing the YG Enterprise and the activities of its members and associates.
- c. Keeping victims and potential victims in fear of the YG Enterprise and its members and associates through acts and threats of violence.
- d. Providing assistance to members and associates who committed crimes for and on behalf of the gang.

e. Enriching the members and associates of the YG Enterprise through, among other things, robbery, wire fraud, bank fraud, and the distribution and sale of narcotics, including crack cocaine, Oxycodone, heroin, Promethazine HCL and Codeine, commonly known as "lean," and marihuana.

Means and Methods of the YG Enterprise

7. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the YG Enterprise were the following:

a. Members and associates of the YG Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including acts involving murder, to protect and expand the YG Enterprise's criminal operations, and against rival gang members.

b. Members and associates of the YG Enterprise used threats of violence and physical violence against other members and associates of the YG Enterprise to enforce and maintain discipline within the YG Enterprise.

c. Members and associates of the YG Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including acts involving murder and robbery against rival gang members and other individuals adverse to the YG Enterprise.

d. Members and associates of the YG Enterprise promoted and celebrated, in music and on social media, the criminal conduct of the YG Enterprise, namely narcotics distribution, acts involving violence, and the use of firearms.

e. Members and associates of the YG Enterprise obtained, possessed, and used firearms.

f. Members and associates of the YG Enterprise distributed controlled substances, including crack cocaine, Oxycodone, heroin, Promethazine HCL and Codeine, commonly known as "lean," and marihuana.

g. Members and associates of the YG Enterprise committed, and conspired to commit, wire fraud by fraudulently obtaining unemployment benefits, and committed, and conspired to commit, bank fraud by fraudulently obtaining funds from victims' accounts.

The YG Racketeering Conspiracy

8. From at least in or about 2019 to the present, in the Southern District of New York and elsewhere, KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," DALLAS ARCHER, a/k/a "Muggas," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS

CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," the defendants, and others known and unknown, being persons employed by and associated with the YG Enterprise described in Paragraphs One through Seven of this Indictment, which enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of YG through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of:

a. multiple acts involving murder, chargeable under the following provisions of state law: New York Penal Law Sections 125.25 (murder), 110.00 (attempt), 105.15 (conspiracy), and 20.00 (aiding and abetting);

b. multiple acts involving robbery, chargeable under the following provisions of state law: New York Penal Law, Sections 160.00, 160.05, 160.10, 160.15 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

c. multiple acts indictable under Title 18, United States Code, Section 1951 (relating to the interference with commerce, robbery, or extortion);

d. multiple offenses involving the distribution of controlled substances, including, crack cocaine, heroin, Oxycodone, Promethazine HCL and Codeine, commonly known as "lean," and marihuana in violation of laws of the United States, namely Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 841(b)(1)(C), 841(b)(1)(D), and 846, and Title 18, United States Code, Section 2;

e. multiple acts indictable under Title 18, United States Code, Section 1344 (bank fraud); and

f. multiple acts indictable under Title 18, United States Code, Section 1343 (wire fraud).

9. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the YG Enterprise.

Special Sentencing Factors

10. From at least in or about 2019 to the present, in the Southern District of New York and elsewhere, KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT,

a/k/a "Red Dot," 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.

11. It was a part and an object of the conspiracy that KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," 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).

12. The controlled substances that KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," the defendants, conspired to distribute and possess with intent to distribute were (i) 280 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, Sections 841(b) (1) (A); and (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(b) (1) (A); all in violation of Title 21, United States Code, Section 846.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO
(Attempted Murder and Assault with a Dangerous Weapon in Aid of Racketeering)
(SAMPSON, ARCHER, LALANNE, RAEKWON JACKSON)

The Grand Jury further charges:

13. At all times relevant to this Indictment, YG, as described in Paragraphs One through Seven of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b) (2), that is, an association in fact of individuals, which engaged in, and the activities of which affected, interstate and foreign commerce. The YG Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the YG Enterprise.

14. At all times relevant to this Indictment, YG, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1343 and 1344, and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

15. On or about August 15, 2020, in the Southern District of New York and elsewhere, KASHAD SAMPSON, a/k/a "Shoca," DALLAS ARCHER, a/k/a "Muggas," JOHN LALANNE, a/k/a "JJ," and RAEKWON JACKSON, a/k/a "Tree," the defendants, and others known and unknown, for the purpose of maintaining and increasing position in YG, an enterprise engaged in racketeering activity, as described above, knowingly attempted to murder individuals and assaulted those individuals with a dangerous weapon, and aided and abetted the same, to wit, SAMPSON, ARCHER, LALANNE, JACKSON and others known and unknown shot at rival gang members in the City of Poughkeepsie, New York, in violation of New York Penal Law Sections 125.25, 120.14, 110.00, and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and 2.)

COUNT THREE

**(Discharge of a Firearm in Connection with a Crime of Violence)
(SAMPSON, ARCHER, LALANNE, RAEKWON JACKSON)**

The Grand Jury further charges:

16. On or about August 15, 2020, in the Southern District of New York and elsewhere, KASHAD SAMPSON, a/k/a "Shoca," DALLAS ARCHER, a/k/a "Muggas," JOHN LALANNE, a/k/a "JJ," and RAEKWON JACKSON, a/k/a "Tree," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the attempted murder and assault with a dangerous weapon in aid of racketeering, as charged in Count Two 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, which was brandished and discharged.

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

COUNT FOUR

**(Assault with a Dangerous Weapon in Aid of Racketeering)
(TATUM, ROMAN, TATE)**

The Grand Jury further charges:

17. At all times relevant to this Indictment, YG, as described in Paragraphs One through Seven of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term

is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals, which engaged in, and the activities of which affected, interstate and foreign commerce. The YG Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the YG Enterprise.

18. At all times relevant to this Indictment, YG, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1343 and 1344, and offenses involving distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

19. On or about April 27, 2021, in the Southern District of New York and elsewhere, SYNCERE TATUM, a/k/a "Syn," GABRIEL ROMAN, a/k/a "Gabe," and CHRISTOPHER TATE, a/k/a "Bag," the defendants, and others known and known, for the purpose of maintaining and increasing position in YG, an enterprise engaged in racketeering activity, as described above, knowingly assaulted individuals with a dangerous weapon, and aided and abetted the same, to wit, TATUM, ROMAN, TATE, and others known

and unknown attempted to rob and shot at a rival drug dealer in the City of Newburgh, New York, in violation of New York Penal Law Sections 120.14 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3) and 2.)

COUNT FIVE

**(Discharge of a Firearm in Connection with a Crime of Violence)
(TATUM, ROMAN, TATE)**

The Grand Jury further charges:

20. On or about April 27, 2021, in the Southern District of New York and elsewhere, SYNCERE TATUM, a/k/a "Syn," GABRIEL ROMAN, a/k/a "Gabe," and CHRISTOPHER TATE, a/k/a "Bag," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, assault with a dangerous weapon in aid of racketeering, as charged in Count Four 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, which was brandished and discharged.

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

COUNT SIX

**(Assault with a Dangerous Weapon in Aid of Racketeering)
(SAMPSON, DELGADO, WOOTEN, ALLEN)**

The Grand Jury further charges:

21. At all times relevant to this Indictment, YG, as described in Paragraphs One through Seven of Count One of this

Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals, which engaged in, and the activities of which affected, interstate and foreign commerce. The YG Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the YG Enterprise.

22. At all times relevant to this Indictment, YG, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1343 and 1344, and offenses involving distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

23. On or about November 17, 2021, in the Southern District of New York and elsewhere, KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," the defendants, and others known and unknown, for the purpose of maintaining and increasing

position in YG, an enterprise engaged in racketeering activity, as described above, knowingly assaulted four individuals with a dangerous weapon, and aided and abetted the same, to wit, SAMPSON, DELGADO, WOOTEN, ALLEN, and others known and unknown shot four rival gang members in the City of Newburgh, New York, in violation of New York Penal Law Sections 120.05 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3) and 2.)

COUNT SEVEN
(Hobbs Act Robbery)
(LALANNE)

The Grand Jury further charges:

24. On or about November 10, 2020, in the Southern District of New York and elsewhere, JOHN LALANNE a/k/a "JJ," the defendant, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, LALANNE and others known and unknown robbed a drug dealer in the area of the Lake Street Apartment Complex in the City of Newburgh, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT EIGHT
(Discharge of a Firearm in Connection with a Crime of Violence)
(LALANNE)

The Grand Jury further charges:

25. On or about November 10, 2020, in the Southern District of New York and elsewhere, JOHN LALANNE, a/k/a "JJ," the defendant, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Seven 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, which was brandished and discharged.

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

COUNT NINE
(Narcotics Trafficking)
(ALL DEFENDANTS EXCEPT ARCHER)

The Grand Jury further charges:

26. From at least in or about 2019 to the present, in the Southern District of New York and elsewhere, KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Grocc," GABRIEL ROMAN, a/k/a "Gabe," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," 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.

27. It was a part and an object of the conspiracy that KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," 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).

28. The controlled substances that KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," the defendants, conspired to distribute and possess with intent to distribute were: (i) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack cocaine"; (ii)

one kilogram and more of mixtures and substances containing a detectable amount of heroin; (iii) mixtures and substances containing a detectable amount of Oxycodone; (iv) less than 50 kilogram of mixtures and substances containing a detectable amount of marihuana; and (v) mixtures and substances containing a detectable amount of Promethazine HCL and Codeine, commonly known as "lean," in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

COUNT TEN
(Possession of a Firearm In Furtherance of a Drug Trafficking Crime)
(ALL DEFENDANTS EXCEPT ARCHER)

The Grand Jury further charges:

29. From at least in or about 2019 to the present, in the Southern District of New York and elsewhere, KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," the defendants, during and in relation to a drug trafficking offense for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy

charged in Count Nine of this Indictment, knowingly did use and carry a firearm, and in furtherance of such drug trafficking offense, 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 ALLEGATIONS

30. As a result of committing the offenses alleged in Count One of this Indictment, KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," DALLAS ARCHER, a/k/a "Muggas," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendants acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all

property constituting and derived from proceeds obtained, directly and indirectly, from the racketeering activity alleged in Count One of this Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendants personally obtained.

31. As a result of committing the offense charged in Count Nine of this Indictment, KASHAD SAMPSON, a/k/a "Shoca," GEORGE DELGADO, a/k/a "Groc," GABRIEL ROMAN, a/k/a "Gabe," JASIAH WOOTEN, a/k/a "Hov," BRUCE ALLEN, a/k/a "Bam," SYNCERE TATUM, a/k/a "Syn," JOHN LALANNE, a/k/a "JJ," RAEKWON JACKSON, a/k/a "Tree," BASHIR MALLORY, a/k/a "BG," a/k/a "Bear," MEKHI McDONALD, a/k/a "Khi," CHRISTOPHER TATE, a/k/a "Bag," KRISTOPHER BURGESS CUNNINGHAM, a/k/a "KG," DEJON SCOTT, a/k/a "Red Dot," 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 obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

Substitute Assets Provision

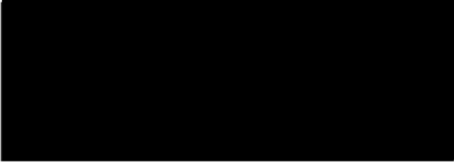
32. If any of the property described above as subject to forfeiture, as a result of any act or omission of the above-named defendants:

- 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 18, United States Code, Section 1963(m), Title 21 United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c) to seek forfeiture of any other property of the

defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 1963;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



Damian Williams
DAMIAN WILLIAMS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KASHAD SAMPSON, a/k/a "Shoca," et al.,
Defendants.

SEALED INDICTMENT

22 Cr.

(18 U.S.C. §§ 924, 1951, 1959,
1962, and 2; 21 U.S.C. § 846.)

DAMIAN WILLIAMS

United States Attorney



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