UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SHEHNAZ SINGH
a/k/a "Shawn,"

AMRITPAL SINGH,
a/k/a "Amrit," a/k/a "Bal,"

AMRITPAL SINGH,
a/k/a "Cheema,"

TAKDIR SINGH,
a/k/a "Romy,"

SARBSIT SINGH,
a/k/a "Sabi,"

GURLAL SINGH, and
FERNANDO VALLADARES,
a/k/a "Franco,

Defendants.

SEALED INDICTMENT

25 Cr.

25 CRIM

 $6\dot{8}$

COUNT ONE(Narcotics Distribution Conspiracy)

The Grand Jury charges:

- 1. From at least in or about October 2023, up to and including in or about February 2025, in the Southern District of New York and elsewhere, SHEHNAZ SINGH, a/k/a "Shawn," AMRITPAL SINGH, a/k/a "Amrit," a/k/a "Bal," AMRITPAL SINGH, a/k/a "Cheema," TAKDIR SINGH, a/k/a "Romy," SARBSIT SINGH, a/k/a "Sabi," and GURLAL SINGH, a/k/a "Gurlal," the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.
- 2. It was a part and an object of the conspiracy that SHEHNAZ SINGH, a/k/a "Shawn," AMRITPAL SINGH, a/k/a "Amrit," a/k/a "Bal," AMRITPAL SINGH, a/k/a "Cheema,"

TAKDIR SINGH, a/k/a "Romy," SARBSIT SINGH, a/k/a "Sabi," and GURLAL SINGH, a/k/a "Gurlal," 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 SHEHNAZ SINGH, a/k/a "Shawn," AMRITPAL SINGH, a/k/a "Amrit," a/k/a "Bal," AMRITPAL SINGH, a/k/a "Cheema," TAKDIR SINGH, a/k/a "Romy," SARBSIT SINGH, a/k/a "Sabi," and GURLAL SINGH, a/k/a "Gurlal," the defendants, conspired to distribute and possess with intent to distribute was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

COUNT TWO (Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

4. From at least in or about October 2023, up to and including in or about February 2025, in the Southern District of New York and elsewhere, SHEHNAZ SINGH, a/k/a "Shawn," AMRITPAL SINGH, a/k/a "Amrit," a/k/a "Bal," and AMRITPAL SINGH, a/k/a "Cheema," 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 distribution conspiracy charged in Count One of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which, with respect to the firearm used, carried, and possessed by AMRITPAL SINGH, a/k/a "Amrit," a/k/a "Bal," was brandished.

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

COUNT THREE(Narcotics Distribution Conspiracy)

The Grand Jury further charges:

- 5. From at least in or about April 2024, up to and including in or about February 2025, in the Southern District of New York and elsewhere, TAKDIR SINGH, a/k/a "Romy," SARBSIT SINGH, a/k/a "Sabi," and FERNANDO VALLADARES, a/k/a "Franco," the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.
- 6. It was a part and an object of the conspiracy that TAKDIR SINGH, a/k/a "Romy," SARBSIT SINGH, a/k/a "Sabi," and FERNANDO VALLADARES, a/k/a "Franco," 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).
- 7. The controlled substance that TAKDIR SINGH, a/k/a "Romy," SARBSIT SINGH, a/k/a "Sabi," and FERNANDO VALLADARES, a/k/a "Franco," the defendants, conspired to distribute and possess with intent to distribute was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

<u>COUNT FOUR</u> (Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

8. From at least in or about October 2023, up to and including in or about February 2025, in the Southern District of New York and elsewhere, TAKDIR SINGH, a/k/a "Romy," and SARBSIT SINGH, a/k/a "Sabi," 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 distribution conspiracy charged in Count Three of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm.

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

FORFEITURE ALLEGATIONS

9. As a result of a result of committing the offenses alleged in Count One and Count Three of this Indictment, SHEHNAZ SINGH, a/k/a "Shawn," AMRITPAL SINGH, a/k/a "Amrit," a/k/a "Bal," AMRITPAL SINGH, a/k/a "Cheema," TAKDIR SINGH, a/k/a "Romy," SARBSIT SINGH, a/k/a "Sabi," GURLAL SINGH, a/k/a "Gurlal," and FERNANDA VALLADARES, a/k/a "Franco," 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 offenses 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 offenses, 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.

Substitute Assets Provision

- 10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
 - 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) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 924; Title 21, United States Code, Section 853; and

Title 28, United States Code, Section 2461.)

FOREPERSON

MATTHEW PODOLSKY

Acting United States Attorney