

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

EDWIN CARRASQUILLO,
a/k/a "Malo,"
HECTOR HERNANDEZ,
a/k/a "Hec,"
JOSE HERNANDEZ,
a/k/a "Nene,"
a/k/a "Little,"
NATHANIEL MANNING,
a/k/a "Tio,"
DAMEL MARCUS,
a/k/a "Shank,"
EDUARDO MORENO,
a/k/a "AR,"
JERMAINE SAMUELS,
a/k/a "Maine,"
CHRISTIAN SERRANO,
a/k/a "Chris,"
JOHNNIE CAPELES
a/k/a "Jon Boy,"
JAMIL BANKS
a/k/a "Mel,"
EMILIO BARRERA,
a/k/a "Colombia,"
a/k/a "E,"
JASON RIVERA,
a/k/a "Colombo,"
HECTOR CEREZO
a/k/a "Red,"
JOSUE VARGAS,
a/k/a "Leo,"
JUAN KUANG,
a/k/a "Jo Jo,"
a/k/a "Jay,"
a/k/a "Blanco,"
STEVEN SANTIAGO,
a/k/a "Swizz,"
VICTOR MENDENG,
a/k/a "Cali,"
ANGEL VILLAFANE
YADIRA REYNOSO,
a/k/a "Yadi,"

**SEALED SUPERSEDING
INDICTMENT**

S9 21 Cr. 93 (VM)

ERIKA DAWSON,
ARIYAN LABELLA,
a/k/a "Ari,"
DELILAH CARRIEL,
ROSEMARIE SANCHEZ,
a/k/a "Rosie,"
JOHANA ALCANTARA,
JUAN CALDERON,
a/k/a "Jazzo,"
a/k/a "Juanito,"
KAREEM SMITH,
a/k/a "K," and
CHRISTOPHER MEADOWS,

Defendants.

COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

The Enterprise

1. At all times relevant to this Indictment, EDWIN CARRASQUILLO, a/k/a "Malo," HECTOR HERNANDEZ, a/k/a "Hec," JOSE HERNANDEZ, a/k/a "Nene," a/k/a "Little," NATHANIEL MANNING, a/k/a "Tio," DAMEL MARCUS, a/k/a "Shank," EDUARDO MORENO, a/k/a "AR," JERMAINE SAMUELS, a/k/a "Maine," CHRISTIAN SERRANO, a/k/a "Chris," JOHNNIE CAPELES a/k/a "Jon Boy," JAMIL BANKS a/k/a "Mel," EMILIO BARRERA, a/k/a "Colombia," a/k/a "E," JASON RIVERA, a/k/a "Colombo," HECTOR CEREZO a/k/a "Red," JOSUE VARGAS, a/k/a "Leo," JUAN KUANG, a/k/a "Jo Jo," a/k/a "Jay," a/k/a "Blanco," STEVEN SANTIAGO, a/k/a "Swizz," VICTOR MENDENG, a/k/a "Cali," ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a "Yadi," ERIKA DAWSON, ARIYAN LABELLA, a/k/a "Ari," DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a "Rosie," JOHANA ALCANTARA, JUAN CALDERON, a/k/a "Jazzo," a/k/a "Juanito," KAREEM SMITH, a/k/a "K," and CHRISTOPHER MEADOWS, the defendants, and others known and

unknown, were members and associates of the Valentine Avenue Crew (the “Enterprise”), a criminal organization whose members and associates engaged in, among other things, acts involving murder, robbery, extortion, money laundering, and narcotics trafficking. The Valentine Avenue Crew has operated principally in the Bronx, New York and particularly in the vicinity of the block of Valentine Avenue between East 194th Street and East 196th Street (the “Block”) and its surrounding neighborhood. There, for well over two decades, the members and associates of the Valentine Avenue Crew, including the defendants, operated as a drug trafficking gang that was organized in a hierarchal structure and that took over and controlled the Block, working in shifts throughout the day and night to distribute fentanyl, heroin, cocaine, and cocaine base, in a form commonly known as “crack.” These drugs were often manufactured and packaged elsewhere and then delivered to the Block, where members and associates of the Valentine Avenue Crew, many of whom were typically armed with firearms and other weapons, sold them to a large base of end-user customers. In control of the sidewalks and the street of the Block, as well as the public spaces of multiple buildings along the Block, the Valentine Avenue Crew and its members and associates, including the defendants, worked freely, creating an open market for drugs, in which they extorted payments, including in-kind sexual acts, from customers through violence and the threat of violence. The members and associates of the Valentine Avenue Crew, including the defendants, also used violence—including multiple shootings—to compete with rival drug traffickers and within the Valentine Avenue Crew itself, principally to maintain dominance over the drug trade on the Block and control of the Valentine Avenue Crew.

2. The Valentine Avenue Crew, 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 Enterprise constituted an ongoing organization whose members and associates functioned as a continuing

unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise was engaged in, and its activities affected, interstate and foreign commerce. EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” JAMIL BANKS a/k/a “Mel,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CEREZO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” VICTOR MENDENG, a/k/a “Cali,” ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a “Yadi,” ERIKA DAWSON, ARIYAN LABELLA, a/k/a “Ari,” DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a “Rosie,” JOHANA ALCANTARA, JUAN CALDERON, a/k/a “Jazzo,” a/k/a “Juanito,” KAREEM SMITH, a/k/a “K,” and CHRISTOPHER MEADOWS, the defendants, participated in unlawful and other activities in furtherance of the conduct of the affairs of the Enterprise.

Purposes of the Enterprise

3. The purposes of the Enterprise included the following:
 - a. Preserving and protecting the power and territory of the Enterprise through acts involving murder, other acts of violence, and threats of violence.
 - b. Promoting and enhancing the Enterprise and the reputation and activities of its members and associates.
 - c. Keeping victims, potential victims, and rivals in fear of the Enterprise and its members and associates through acts and threats of violence.

d. Enriching the members and associates of the Enterprise through, among other things, robbery, extortion, and the distribution of controlled substances, including fentanyl, heroin, cocaine, and cocaine base, in a form commonly referred to as “crack.”

e. Promoting the unlawful activities of the Enterprise and protecting and concealing the proceeds of the Enterprise’s unlawful activities through money laundering.

f. Ensuring the members and associates of the Enterprise maintained access to firearms used to maintain dominance of the Block and other locations at which members and associates of the Enterprise worked and traveled on behalf of the Enterprise.

g. Assisting members and associates of the Enterprise who committed crimes for and on behalf of the Enterprise, including members and associates who were imprisoned for those crimes.

Means and Methods of the Enterprise

4. The means and methods employed by the members and associates of the Enterprise in conducting and participating in the conduct of the affairs of the Enterprise included the following:

a. Members and associates of the Enterprise sold controlled substances, including fentanyl, heroin, cocaine, and crack.

b. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including murder, to protect and expand the Enterprise’s power and criminal operations, to resolve disputes within the Enterprise, and to dominate rivals and disfavored members of the Enterprise.

c. Members and associates of the Enterprise extorted individuals whom they alleged owed debts to the Enterprise arising from the distribution of controlled substances through actual and threatened force, violence, and fear, including fear of physical injury in the future.

d. Members and associates of the Enterprise conducted, conspired to conduct, and attempted to conduct financial transactions involving the movement of the proceeds of the Enterprise's unlawful activities.

e. Members and associates of the Enterprise obtained, possessed, transported, and used firearms and other weapons.

The Racketeering Conspiracy

5. From at least in or about 1993 through at least in or February 2025, in the Southern District of New York and elsewhere, EDWIN CARRASQUILLO, a/k/a "Malo," HECTOR HERNANDEZ, a/k/a "Hec," JOSE HERNANDEZ, a/k/a "Nene," a/k/a "Little," NATHANIEL MANNING, a/k/a "Tio," DAMEL MARCUS, a/k/a "Shank," EDUARDO MORENO, a/k/a "AR," JERMAINE SAMUELS, a/k/a "Maine," CHRISTIAN SERRANO, a/k/a "Chris," JOHNNIE CAPELES a/k/a "Jon Boy," JAMIL BANKS a/k/a "Mel," EMILIO BARRERA, a/k/a "Colombia," a/k/a "E," JASON RIVERA, a/k/a "Colombo," HECTOR CEREZO a/k/a "Red," JOSUE VARGAS, a/k/a "Leo," JUAN KUANG, a/k/a "Jo Jo," a/k/a "Jay," a/k/a "Blanco," STEVEN SANTIAGO, a/k/a "Swizz," VICTOR MENDENG, a/k/a "Cali," ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a "Yadi," ERIKA DAWSON, ARIYAN LABELLA, a/k/a "Ari," DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a "Rosie," JOHANA ALCANTARA, JUAN CALDERON, a/k/a "Jazzo," a/k/a "Juanito," KAREEM SMITH, a/k/a "K," and CHRISTOPHER MEADOWS, the defendants, and others known and unknown, being persons employed by and associated with the Enterprise described in paragraphs 1 through 4 of this Indictment, namely, the Valentine Avenue Crew, an 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 the Valentine Avenue Crew 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 and threats 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 and threats involving robbery, chargeable under the following provisions of state law: New York Penal Law, Sections 160.05, 160.10 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

c. multiple acts and threats involving extortion, chargeable under the following provisions of state law: New York Penal Law, Sections 155.05(2)(e) and 155.40 (larceny by extortion), 110.00 (attempt), 105.10 (conspiracy), and 20.00 (aiding and abetting);

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

e. multiple acts indictable under Title 18, United States Code, Section 1956 (relating to the laundering of monetary instruments); and

f. multiple offenses involving the distribution of controlled substances, including fentanyl, heroin, cocaine, and cocaine base, in a form commonly referred to as “crack,” in violation of laws of the United States, to wit, Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846, and Title 18, United States Code, Section 2.

6. It was a part of the conspiracy that EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a

“Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” JAMIL BANKS a/k/a “Mel,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CERESO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” VICTOR MENDENG, a/k/a “Cali,” ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a “Yadi,” ERIKA DAWSON, ARIYAN LABELLA, a/k/a “Ari,” DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a “Rosie,” JOHANA ALCANTARA, JUAN CALDERON, a/k/a “Jazzo,” a/k/a “Juanito,” KAREEM SMITH, a/k/a “K,” and CHRISTOPHER MEADOWS, the defendants, agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

Notice of Special Sentencing Factors

Narcotics Conspiracy

7. From at least in or about 1993 through at least in or about February 2025, in the Southern District of New York and elsewhere, EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” JAMIL BANKS a/k/a “Mel,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CERESO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” VICTOR MENDENG, a/k/a “Cali,” ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a “Yadi,” ERIKA DAWSON, ARIYAN LABELLA, a/k/a “Ari,” DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a “Rosie,” JOHANA ALCANTARA, JUAN CALDERON, a/k/a “Jazzo,” a/k/a “Juanito,” KAREEM

SMITH, a/k/a “K,” and CHRISTOPHER MEADOWS, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the controlled substance laws of the United States.

8. It was a part and an object of the conspiracy that EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” JAMIL BANKS a/k/a “Mel,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CEREZO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” VICTOR MENDENG, a/k/a “Cali,” ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a “Yadi,” ERIKA DAWSON, ARIYAN LABELLA, a/k/a “Ari,” DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a “Rosie,” JOHANA ALCANTARA, JUAN CALDERON, a/k/a “Jazzo,” a/k/a “Juanito,” KAREEM SMITH, a/k/a “K,” and CHRISTOPHER MEADOWS, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute five kilograms and more of mixtures and substances containing a detectable amount of cocaine; one kilogram and more of mixtures and substances containing a detectable amount of heroin; 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly referred to as “crack”; and 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846.

Murder of Jozei Hullex

9. On or about June 25, 2020, in the Southern District of New York, EDWIN CARRASQUILLO, a/k/a “Malo,” and JOHANA ALCANTARA, the defendants, intentionally and knowingly murdered and solicited, requested, commanded, importuned, and aided and abetted the murder of Jozei Hullex in the Bronx, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (i) with intent to cause the death of another person, CARRASQUILLO and ALCANTARA caused the death of Hullex, and solicited, requested, commanded, importuned, and aided and abetted the same, and (ii) under circumstances evincing a depraved indifference to human life, CARRASQUILLO and ALCANTARA recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Hullex, and solicited, requested, commanded, importuned, and aided and abetted the same.

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

COUNT TWO
(Conspiracy to Commit Murder in Aid of Racketeering)

The Grand Jury further charges:

10. At all times relevant to this Indictment, the Valentine Avenue Crew, as described in paragraphs 1 through 4 of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, although not a legal entity, that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

11. At all times relevant to this Indictment, the Valentine Avenue Crew, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United

States Code, Sections 1959(b)(1) and 1961(1), namely acts and threats involving murder, robbery, and extortion, in violation of New York Penal Law; acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion) and Title 18, United States Code, Section 1956 (relating to laundering of monetary instruments); and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846 and Title 18, United States Code, Section 2.

12. In or about June 2020, in the Southern District of New York and elsewhere, EDWIN CARRASQUILLO, a/k/a “Malo,” and JOHANA ALCANTARA, the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Valentine Avenue Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the Valentine Avenue Crew, an enterprise engaged in racketeering activity, as described above, conspired to murder Jozei Hullex, in violation of New York Penal Law, Sections 125.25 and 105.15, to wit, CARRASQUILLO and ALCANTARA, and one or more other members and associates of the Valentine Avenue Crew, agreed to kill Hullex in the Bronx, New York.

(Title 18, United States Code, Section 1959(a)(5).)

COUNT THREE
(Murder in Aid of Racketeering)

The Grand Jury further charges:

13. At all times relevant to this Indictment, the Valentine Avenue Crew, as described in paragraphs 1 through 4 of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, although not a legal entity, that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an

ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

14. At all times relevant to this Indictment, the Valentine Avenue Crew, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely acts and threats involving murder, robbery, and extortion, in violation of New York Penal Law; acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion) and Title 18, United States Code, Section 1956 (relating to laundering of monetary instruments); and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846 and Title 18, United States Code, Section 2.

15. On or about June 25, 2020, in the Southern District of New York, EDWIN CARRASQUILLO, a/k/a "Malo," and JOHANA ALCANTARA, the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Valentine Avenue Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the Valentine Avenue Crew, an enterprise engaged in racketeering activity, as described above, intentionally and knowingly murdered and solicited, requested, commanded, importuned, and aided and abetted the murder of Jozei Hullex in the Bronx, New York, in violation of New York Penal Law, Sections 125.25(1) and (2) and 20.00, in that, (i) with intent to cause the death of another person, CARRASQUILLO and ALCANTARA caused the death of Hullex, and solicited, requested, commanded, importuned, and aided and abetted the same, and (ii) under circumstances evincing a depraved indifference to human life, CARRASQUILLO and ALCANTARA recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Hullex, and solicited, requested,

commanded, importuned, and aided and abetted the same.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

COUNT FOUR

(Attempted Murder and Assault with a Dangerous Weapon in Aid of Racketeering)

The Grand Jury further charges:

16. At all times relevant to this Indictment, the Valentine Avenue Crew, as described in paragraphs 1 through 4 of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, although not a legal entity, that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

17. At all times relevant to this Indictment, the Valentine Avenue Crew, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely acts and threats involving murder, robbery, and extortion, in violation of New York Penal Law; acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion) and Title 18, United States Code, Section 1956 (relating to laundering of monetary instruments); and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846 and Title 18, United States Code, Section 2.

18. On or about June 25, 2020, in the Southern District of New York, EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” and JERMAINE SAMUELS, a/k/a “Maine,” the defendants, as consideration for the

receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Valentine Avenue Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the Valentine Avenue Crew, an enterprise engaged in racketeering activity, as described above, intentionally and knowingly attempted to murder and assaulted with a dangerous weapon certain other individuals, including certain of each other, and solicited, requested, commanded, importuned, and aided and abetted the same, to wit, CARRASQUILLO, H. HERNANDEZ, J. HERNANDEZ, MANNING, MARCUS, and SAMUELS used firearms to shoot at rival members of the Valentine Avenue Crew, including certain of each other, and solicited, requested, commanded, importuned, and aided and abetted the same, during a shootout for control of the Valentine Avenue Crew and in turn the Block in the Bronx, New York, in violation of New York Penal Law, Sections 125.25(1) and (2), 120.14(1), 110.00, and 20.00.

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

COUNT FIVE

(Use of a Firearm for Attempted Murder and Assault with a Dangerous Weapon)

The Grand Jury further charges:

19. On or about June 25, 2020, in the Southern District of New York, EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” and JERMAINE SAMUELS, a/k/a “Maine,” 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, attempted murder and assault with a dangerous weapon in aid of racketeering, as charged in Count Four of this Indictment, knowingly did use and carry firearms, and in furtherance of such crime did possess firearms, which were brandished and discharged, and did aid and abet the same.

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

COUNT SIX

(Attempted Murder and Assault with a Dangerous Weapon in Aid of Racketeering)

The Grand Jury further charges:

20. At all times relevant to this Indictment, the Valentine Avenue Crew, as described in paragraphs 1 through 4 of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, although not a legal entity, that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

21. At all times relevant to this Indictment, the Valentine Avenue Crew, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely acts and threats involving murder, robbery, and extortion, in violation of New York Penal Law; acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion) and Title 18, United States Code, Section 1956 (relating to laundering of monetary instruments); and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846 and Title 18, United States Code, Section 2.

22. On or about September 22, 2020, in the Southern District of New York, EDWIN CARRASQUILLO, a/k/a “Malo,” and HECTOR CERESO a/k/a “Red,” the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Valentine Avenue Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the Valentine Avenue Crew, an enterprise engaged in racketeering activity, as described above, intentionally and knowingly attempted to murder and

assaulted with a dangerous weapon another individual, and solicited, requested, commanded, importuned, and aided and abetted the same, to wit, CARRASQUILLO and CEREZO used a firearm to shoot at a rival gang member, and solicited, requested, commanded, importuned, and aided and abetted the same, in the Bronx, New York, in violation of New York Penal Law, Sections 125.25(1) and (2), 120.14(1), 110.00, and 20.00.

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

COUNT SEVEN

(Use of a Firearm for Attempted Murder and Assault with a Dangerous Weapon)

The Grand Jury further charges:

23. On or about September 22, 2020, in the Southern District of New York, EDWIN CARRASQUILLO, a/k/a “Malo,” the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, attempted murder and assault with a dangerous weapon in aid of racketeering, as charged in Count Six of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime did possess a firearm, which was brandished and discharged, and did aid and abet the same.

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

COUNT EIGHT

(Assault with a Dangerous Weapon and Assault Resulting in Serious Bodily Injury in Aid of Racketeering)

The Grand Jury further charges:

24. At all times relevant to this Indictment, the Valentine Avenue Crew, as described in paragraphs 1 through 4 of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, although not a legal entity, that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise

constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

25. At all times relevant to this Indictment, the Valentine Avenue Crew, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely acts and threats involving murder, robbery, and extortion, in violation of New York Penal Law; acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion) and Title 18, United States Code, Section 1956 (relating to laundering of monetary instruments); and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846 and Title 18, United States Code, Section 2.

26. On or about January 1, 2021, in the Southern District of New York, EDWIN CARRASQUILLO, a/k/a “Malo,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Valentine Avenue Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the Valentine Avenue Crew, an enterprise engaged in racketeering activity, as described above, intentionally and knowingly assaulted with a dangerous weapon another individual resulting in serious bodily injury, and solicited, requested, commanded, importuned, and aided and abetted the same, to wit, CARRASQUILLO, MARCUS, MORENO, and SAMUELS used a chain and one or more firearms to beat a rival member of the Valentine Avenue Crew, who was seriously injured and hospitalized following the attack, and solicited, requested, commanded, importuned, and aided and abetted the same, in the Bronx, New York, in violation of New York Penal Law, Sections 120.05(1) and (2), and 20.00.

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

COUNT NINE
**(Use of a Firearm for Assault with a Dangerous Weapon and
Assault Resulting in Serious Bodily Injury)**

The Grand Jury further charges:

27. On or about January 1, 2021, in the Southern District of New York, EDWIN CARRASQUILLO, a/k/a “Malo,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” 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 and assault resulting in serious bodily injury in aid of racketeering, as charged in Count Eight of this Indictment, knowingly did use and carry one or more firearms, and in furtherance of such crime did possess one or more firearms, at least one of which was brandished, and did aid and abet the same.

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

COUNT TEN
(Narcotics Conspiracy)

The Grand Jury further charges:

28. From at least in or about 1993 through at least in or about February 2025, in the Southern District of New York and elsewhere, EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CEREZO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” VICTOR MENDENG, a/k/a “Cali,” ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a “Yadi,” ERIKA DAWSON, ARIYAN LABELLA, a/k/a “Ari,” DELILAH

CARRIEL, ROSEMARIE SANCHEZ, a/k/a "Rosie," JOHANA ALCANTARA, JUAN CALDERON, a/k/a "Jazzo," a/k/a "Juanito," KAREEM SMITH, a/k/a "K," and CHRISTOPHER MEADOWS, 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.

29. It was a part and an object of the conspiracy that EDWIN CARRASQUILLO, a/k/a "Malo," HECTOR HERNANDEZ, a/k/a "Hec," JOSE HERNANDEZ, a/k/a "Nene," a/k/a "Little," NATHANIEL MANNING, a/k/a "Tio," DAMEL MARCUS, a/k/a "Shank," EDUARDO MORENO, a/k/a "AR," JERMAINE SAMUELS, a/k/a "Maine," CHRISTIAN SERRANO, a/k/a "Chris," JOHNNIE CAPELES a/k/a "Jon Boy," EMILIO BARRERA, a/k/a "Colombia," a/k/a "E," JASON RIVERA, a/k/a "Colombo," HECTOR CEREZO a/k/a "Red," JOSUE VARGAS, a/k/a "Leo," JUAN KUANG, a/k/a "Jo Jo," a/k/a "Jay," a/k/a "Blanco," STEVEN SANTIAGO, a/k/a "Swizz," VICTOR MENDENG, a/k/a "Cali," ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a "Yadi," ERIKA DAWSON, ARIYAN LABELLA, a/k/a "Ari," DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a "Rosie," JOHANA ALCANTARA, JUAN CALDERON, a/k/a "Jazzo," a/k/a "Juanito," KAREEM SMITH, a/k/a "K," and CHRISTOPHER MEADOWS, 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).

30. The controlled substances involved in the offense were (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A), (ii) 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), (iii) 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), and (iv) 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).

31. The use of such 400 grams and more of mixtures and substances containing a detectable amount of fentanyl that EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CEREZO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” VICTOR MENDENG, a/k/a “Cali,” ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a “Yadi,” ERIKA DAWSON, ARIYAN LABELLA, a/k/a “Ari,” DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a “Rosie,” JOHANA ALCANTARA, JUAN CALDERON, a/k/a “Jazzo,” a/k/a “Juanito,” KAREEM SMITH, a/k/a “K,” and CHRISTOPHER MEADOWS, conspired to distribute and possess with intent to distribute, resulted in the death of Jozei Hullex on or about June 25, 2020 in the Bronx, New York.

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

COUNT ELEVEN
(Continuing Criminal Enterprise)

The Grand Jury further charges:

32. From at least in or about 1993 through at least in or about February 2025, in the Southern District of New York and elsewhere, EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,”

NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” JAMIL BANKS a/k/a “Mel,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CEREZO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” and VICTOR MENDENG, a/k/a “Cali,” the defendants, and others known and unknown, engaged in a continuing criminal enterprise (the “Continuing Criminal Enterprise,” *i.e.*, the Valentine Avenue Crew), in that each of the defendants knowingly and intentionally participated in a continuing series of violations of Title 21, United States Code, Chapter 13, Subchapter I, to wit, a continuing series of regular and typically daily violations of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), which were undertaken by each of the defendants in concert with five and more persons with respect to whom each of the defendants occupied a position of organizer, a supervisory position, and any other position of management, and from which each of the defendants obtained substantial income and resources.

Notice of Special Sentencing Factors

33. From at least in or about 1993 through at least in or about February 2025, in the Southern District of New York and elsewhere, EDWIN CARRASQUILLO, a/k/a “Malo,” and HECTOR HERNANDEZ, a/k/a “Hec,” the defendants, were two of the principal administrators, organizers, and leaders of the Continuing Criminal Enterprise, in which the continuing series of violations of Title 21, United States Code, Chapter 13, Subchapters I involved at least 300 times the quantity of mixtures and substances containing a detectable amount of fentanyl described in Title 21, United States Code, Section 841(b)(1)(B), at least 300 times the quantity of mixtures and substances containing a detectable amount of heroin described in Title 21, United States Code,

Section 841(b)(1)(B), and at least 300 times the quantity of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as “crack,” described in Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Sections 848(a), 848(b), and 848(c); and Title 18, United States Code, Section 2.)

COUNT TWELVE
(Murder While Engaged in a Narcotics Conspiracy)

The Grand Jury further charges:

34. On or about June 25, 2020, in the Southern District of New York, EDWIN CARRASQUILLO, a/k/a “Malo,” and JOHANA ALCANTARA, the defendants, while engaging in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A), namely, a conspiracy to distribute and possess with intent to distribute (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin, (iii) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, and (iv) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as “crack,” intentionally and knowingly killed, and counseled, commanded, induced, procured, and caused the intentional killing of an individual which resulted in such killing, and aided and abetted the same, to wit CARRASQUILLO and ALCANTARA used fentanyl to poison Jozei Hullex, a disfavored member of the Valentine Avenue Crew, in the vicinity of the Bronx, New York.

(Title 21, United States Code, Section 848(e)(1)(A); Title 18, United States Code, Section 2.)

COUNT THIRTEEN
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

35. From at least in or about 1993 up to and including in or about February 2025, other

than on or about June 25, 2020, September 22, 2020, and January 1, 2021, in the Southern District of New York and elsewhere, EDWIN CARRASQUILLO, a/k/a “Malo,” 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 drug trafficking crime charged in Count Ten of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, at least one of which was brandished and discharged, and aided and abetted the same.

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

COUNT FOURTEEN
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

36. From at least in or about 1993 up to and including in or about February 2025, other than on or about June 25, 2020, in the Southern District of New York and elsewhere, HECTOR HERNANDEZ, a/k/a “Hec,” 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 drug trafficking crime charged in Count Ten of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, at least one of which was brandished and discharged, and aided and abetted the same.

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

COUNT FIFTEEN
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

37. From at least in or about 1993 up to and including in or about February 2025, other than on or about June 25, 2020, in the Southern District of New York and elsewhere, JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” 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 drug

trafficking crime charged in Count Ten of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, at least one of which was brandished and discharged, and aided and abetted the same.

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

COUNT SIXTEEN
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

38. From at least in or about 1993 up to and including in or about February 2025, other than on or about June 25, 2020, in the Southern District of New York and elsewhere, NATHANIEL MANNING, a/k/a “Tio,” 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 drug trafficking crime charged in Count Ten of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, at least one of which was brandished and discharged, and aided and abetted the same.

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

COUNT SEVENTEEN
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

39. From at least in or about 1993 up to and including in or about February 2025, other than on or about June 25, 2020 and January 1, 2021, in the Southern District of New York and elsewhere, DAMEL MARCUS, a/k/a “Shank,” 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 drug trafficking crime charged in Count Ten of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, at least one of which was brandished and discharged, and aided and abetted the same.

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

COUNT EIGHTEEN
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

40. From at least in or about 1993 up to and including in or about February 2025, other than on or about January 1, 2021, in the Southern District of New York and elsewhere, EDUARDO MORENO, a/k/a “AR,” 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 drug trafficking crime charged in Count Ten of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, at least one of which was brandished and discharged, and aided and abetted the same.

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

COUNT NINETEEN
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

41. From at least in or about 1993 up to and including in or about February 2025, other than on or about June 25, 2020 and January 1, 2021, in the Southern District of New York and elsewhere, JERMAINE SAMUELS, a/k/a “Maine,” 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 drug trafficking crime charged in Count Ten of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, at least one of which was brandished and discharged, and aided and abetted the same.

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

COUNT TWENTY
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

42. From at least in or about 1993 up to and including in or about February 2025, other than in or about September 2020 and October 2020, in the Southern District of New York and elsewhere, HECTOR CERESO a/k/a “Red,” 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 drug trafficking crime charged in Count Ten of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, at least one of which was brandished and discharged, and aided and abetted the same..

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

COUNT TWENTY-ONE
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

43. From at least in or about 1993 up to and including in or about February 2025, other than on or about July 5, 2020, in the Southern District of New York and elsewhere, ANGEL VILLAFANE, 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, namely, the drug trafficking crime charged in Count Ten of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, at least one of which was brandished and discharged, and aided and abetted the same..

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

COUNT TWENTY-TWO
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

44. From at least in or about 1993 up to and including in or about February 2025, in the Southern District of New York and elsewhere, CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” JAMIL BANKS a/k/a “Mel,” EMILIO BARRERA, a/k/a

“Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” VICTOR MENDENG, a/k/a “Cali,” YADIRA REYNOSO, a/k/a “Yadi,” ERIKA DAWSON, ARIYAN LABELLA, a/k/a “Ari,” DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a “Rosie,” JOHANA ALCANTARA, JUAN CALDERON, a/k/a “Jazzo,” a/k/a “Juanito,” KAREEM SMITH, a/k/a “K,” and CHRISTOPHER MEADOWS, 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 drug trafficking crime charged in Count Ten of this Indictment, knowingly used and carried one or more firearms, and in furtherance of such crime, possessed one or more firearms, at least one of which was brandished and discharged, and aided and abetted the same.

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

COUNT TWENTY-THREE
(Murder for Hire)

The Grand Jury further charges:

45. In or about July 2020, in the Southern District of New York and elsewhere, ANGEL VILLAFANE, the defendant, traveled in and caused another person to travel in interstate and foreign commerce, and used and caused another person to use the mail and a facility of interstate and foreign commerce, with intent that a murder be committed in violation of the laws of a State and the United States as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, which resulted in the personal injury of another person (“Victim-1”), and aided and abetted and conspired to do the same, to wit, VILLAFANE paid a co-conspirator (“CC-1”) to lure Victim-1 to a location where VILLAFANE attempted to murder Victim-1 over a drug debt, and CC-1 did so, resulting in personal injury to Victim-1.

(Title 18, United States Code, Sections 1958 and 2.)

COUNT TWENTY-FOUR
(Use of a Firearm for a Drug Trafficking Crime)

The Grand Jury further charges:

46. On or about July 5, 2020, in the Southern District of New York and elsewhere, ANGEL VILLAFANE, 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, a conspiracy, other than the conspiracy charged in Count Ten of this Indictment, to distribute and possess with intent to distribute (i) mixtures and substances containing a detectable amount of heroin, and (ii) mixtures and substance containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C), knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, which was brandished and discharged, and aided and abetted the same.

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

COUNT TWENTY-FIVE
(Possession of Ammunition After a Felony Conviction)

The Grand Jury further charges:

47. On or about January 8, 2021, in the Southern District of New York, ANGEL VILLAFANE, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed ammunition, to wit, one FC Luger nine-millimeter cartridge, one Win Luger nine-millimeter cartridge, and one FC Luger nine-millimeter cartridge casing, and the ammunition was in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 922(g)(1) and 2.)

SPECIAL FINDINGS AS TO THE MURDER OF JOZEI HULLEX

48. Counts Three and Twelve of this Indictment are realleged and incorporated by

reference as though fully set forth herein. As to Counts Three and Twelve of the Indictment, alleging the murder of Jozei Hullex, EDWIN CARRASQUILLO, a/k/a “Malo,” and JOHANA ALCANTARA:

- a. were 18 years of age or older at the time of the offense;
- b. intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and Jozei Hullex died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)); and
- c. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Jozei Hullex died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)).

(Title 18, United States Code, Section 3591.)

FORFEITURE ALLEGATIONS

49. As a result of committing the offense alleged in Count One of this Indictment, EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” JAMIL BANKS a/k/a “Mel,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CEREZO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” VICTOR MENDENG, a/k/a “Cali,” ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a “Yadi,” ERIKA DAWSON, ARIYAN LABELLA, a/k/a “Ari,” DELILAH CARRIEL, ROSEMARIE SANCHEZ,

a/k/a “Rosie,” JOHANA ALCANTARA, JUAN CALDERON, a/k/a “Jazzo,” a/k/a “Juanito,” KAREEM SMITH, a/k/a “K,” and CHRISTOPHER MEADOWS, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any interest acquired or maintained as a result of said offense; any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise established, operated, controlled, conducted, or participated in the conduct of as a result of said offense; any property constituting, or derived from, any proceeds obtained, directly or indirectly, from the racketeering activity alleged in said offense; and the following specific property:

a. \$120,071.00 of United States currency seized at the Newark Liberty International Airport in Newark, New Jersey on or about October 26, 2020 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001108501;

b. \$51,220 of United States currency seized at the Newark Liberty International Airport in Newark, New Jersey on or about October 26, 2020 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001073083;

c. \$30,000 of United States currency seized at the Newark Liberty International Airport in Newark, New Jersey on or about October 26, 2020 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001108513;

d. \$10,726 of United States currency seized in the vicinity of the front of 2451 Valentine Avenue in the Bronx, New York on or about March 16, 2023 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001777753;

e. assorted yellow-gold jewelry valued at \$117,755 and seized in the vicinity of the front of 2451 Valentine Avenue in the Bronx, New York on or about March 16, 2023 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001777754, including multiple yellow-gold chains, bracelets, a ring, and a pendant, all more fully

described in Drug Enforcement Administration Seizure Form 23-DEA-702719.

50. As a result of committing the offense alleged in Count Ten of this Indictment, EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” JAMIL BANKS a/k/a “Mel,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CEREZO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” VCITOR MENDENG, a/k/a “Cali,” ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a “Yadi,” ERIKA DAWSON, ARIYAN LABELLA, a/k/a “Ari,” DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a “Rosie,” JOHANA ALCANTARA, JUAN CALDERON, a/k/a “Jazzo,” a/k/a “Juanito,” KAREEM SMITH, a/k/a “K,” and CHRISTOPHER MEADOWS, 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, and the following specific property:

a. \$120,071.00 of United States currency seized at the Newark Liberty International Airport in Newark, New Jersey on or about October 26, 2020 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001108501;

b. \$51,220 of United States currency seized at the Newark Liberty International Airport in Newark, New Jersey on or about October 26, 2020 and initially secured in

Drug Enforcement Administration Self-Sealing Evidence Envelope # S001073083;

c. \$30,000 of United States currency seized at the Newark Liberty International Airport in Newark, New Jersey on or about October 26, 2020 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001108513;

d. \$10,726 of United States currency seized in the vicinity of the front of 2451 Valentine Avenue in the Bronx, New York on or about March 16, 2023 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001777753;

e. assorted yellow-gold jewelry valued at \$117,755 and seized in the vicinity of the front of 2451 Valentine Avenue in the Bronx, New York on or about March 16, 2023 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001777754, including multiple yellow-gold chains, bracelets, a ring, and a pendant, all more fully described in Drug Enforcement Administration Seizure Form 23-DEA-702719.

51. As a result of committing the offense alleged in Count Eleven of this Indictment, EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” JAMIL BANKS a/k/a “Mel,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CEREZO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” and VICTOR MENDENG, a/k/a “Cali,” 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; 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; and

any and all interest in, claims against, and property and contractual rights affording a source of control over the continuing criminal enterprise described in Count Eleven 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 the offense, and the following specific property:

a. \$120,071.00 of United States currency seized at the Newark Liberty International Airport in Newark, New Jersey on or about October 26, 2020 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001108501;

b. \$51,220 of United States currency seized at the Newark Liberty International Airport in Newark, New Jersey on or about October 26, 2020 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001073083;

c. \$30,000 of United States currency seized at the Newark Liberty International Airport in Newark, New Jersey on or about October 26, 2020 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001108513;

d. \$10,726 of United States currency seized in the vicinity of the front of 2451 Valentine Avenue in the Bronx, New York on or about March 16, 2023 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001777753;

e. assorted yellow-gold jewelry valued at \$117,755 and seized in the vicinity of the front of 2451 Valentine Avenue in the Bronx, New York on or about March 16, 2023 and initially secured in Drug Enforcement Administration Self-Sealing Evidence Envelope # S001777754, including multiple yellow-gold chains, bracelets, a ring, and a pendant, all more fully described in Drug Enforcement Administration Seizure Form 23-DEA-702719.

52. As a result of committing the offenses alleged in Counts Five, Seven, Nine, Thirteen, Fourteen, Fifteen, Sixteen, Seventeen, Eighteen, Nineteen, Twenty, Twenty-One, Twenty-Two, Twenty-Three, Twenty-Four and Twenty-Five of this Indictment, EDWIN

CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE HERNANDEZ, a/k/a “Nene,” a/k/a “Little,” NATHANIEL MANNING, a/k/a “Tio,” DAMEL MARCUS, a/k/a “Shank,” EDUARDO MORENO, a/k/a “AR,” JERMAINE SAMUELS, a/k/a “Maine,” CHRISTIAN SERRANO, a/k/a “Chris,” JOHNNIE CAPELES a/k/a “Jon Boy,” JAMIL BANKS a/k/a “Mel,” EMILIO BARRERA, a/k/a “Colombia,” a/k/a “E,” JASON RIVERA, a/k/a “Colombo,” HECTOR CEREZO a/k/a “Red,” JOSUE VARGAS, a/k/a “Leo,” JUAN KUANG, a/k/a “Jo Jo,” a/k/a “Jay,” a/k/a “Blanco,” STEVEN SANTIAGO, a/k/a “Swizz,” VICTOR MENDENG, a/k/a “Cali,” ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a “Yadi,” ERIKA DAWSON, ARIYAN LABELLA, a/k/a “Ari,” DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a “Rosie,” JOHANA ALCANTARA, JUAN CALDERON, a/k/a “Jazzo,” a/k/a “Juanito,” KAREEM SMITH, a/k/a “K,” and CHRISTOPHER MEADOWS, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offenses.

53. As a result of committing the offense alleged in Count Twenty-Four of this Indictment, ANGEL VILLAFANE, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to 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 VILLAFANE personally obtained.

Substitute Assets Provision

54. If any of the above-described forfeitable property, as a result of any act or omission of EDWIN CARRASQUILLO, a/k/a “Malo,” HECTOR HERNANDEZ, a/k/a “Hec,” JOSE

HERNANDEZ, a/k/a "Nene," a/k/a "Little," NATHANIEL MANNING, a/k/a "Tio," DAMEL MARCUS, a/k/a "Shank," EDUARDO MORENO, a/k/a "AR," JERMAINE SAMUELS, a/k/a "Maine," CHRISTIAN SERRANO, a/k/a "Chris," JOHNNIE CAPELES a/k/a "Jon Boy," JAMIL BANKS a/k/a "Mel," EMILIO BARRERA, a/k/a "Colombia," a/k/a "E," JASON RIVERA, a/k/a "Colombo," HECTOR CERESO a/k/a "Red," JOSUE VARGAS, a/k/a "Leo," JUAN KUANG, a/k/a "Jo Jo," a/k/a "Jay," a/k/a "Blanco," STEVEN SANTIAGO, a/k/a "Swizz," VICTOR MENDENG, a/k/a "Cali," ANGEL VILLAFANE, YADIRA REYNOSO, a/k/a "Yadi," ERIKA DAWSON, ARIYAN LABELLA, a/k/a "Ari," DELILAH CARRIEL, ROSEMARIE SANCHEZ, a/k/a "Rosie," JOHANA ALCANTARA, JUAN CALDERON, a/k/a "Jazzo," a/k/a "Juanito," KAREEM SMITH, a/k/a "K," and CHRISTOPHER MEADOWS, 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 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 924, 981, and 1963;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


MATTHEW PODOLSKY
Acting United States Attorney