

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JALEN TEAGUE,  
a/k/a "Bizzle,"  
a/k/a "Too Official,"  
CHELEIA COUNCIL SANDERS,  
a/k/a "Mercedes," and  
MEGAN STERNGAST,  
a/k/a "Megan - E Village,"

Defendants.

**SUPERSEDING INDICTMENT**

S2 25 Cr. 40 (VSB)

**COUNT ONE**  
**(Racketeering Conspiracy)**

The Grand Jury charges:

At all times relevant to this Indictment,

**THE TEAGUE ENTERPRISE**

1. JALEN TEAGUE, a/k/a "Bizzle," a/k/a "Too Official," and CHELEIA COUNCIL SANDERS, a/k/a "Mercedes," the defendants, and others known and unknown, were members and associates of a criminal organization that operated principally in the New York City metropolitan area and elsewhere. Members and associates of the criminal organization (the "Teague Enterprise") engaged in, among other activities, narcotics trafficking, robberies, and acts involving murder and assault.

2. The Teague Enterprise (or the "Enterprise"), including its leaders, members, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Sections 1959(b)(2) and 1961(4), that is, a group of individuals associated in fact that engaged in, and the

activities of which affected, interstate and foreign commerce. The Teague Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the Teague Enterprise.

3. JALEN TEAGUE, a/k/a “Bizzle,” a/k/a “Too Official,” the defendant, was a leader and member of the Teague Enterprise and participated in unlawful and other activities in furtherance of the conduct of the Teague Enterprise’s affairs.

4. CHELEIA COUNCIL SANDERS, a/k/a “Mercedes,” the defendant, was a member and associate of the Teague Enterprise and participated in unlawful and other activities in furtherance of the conduct of the Teague Enterprise’s affairs.

PURPOSES OF THE TEAGUE ENTERPRISE

5. The purposes of the Teague Enterprise included the following:

a. Enriching members and associates of the Teague Enterprise, including its leader TEAGUE, through, among other things, (1) the distribution of narcotics and controlled substances, including gamma hydroxybutyric acid (“GHB”); (2) robberies; (3) interstate transportation of stolen property; (4) fraud and related activity in connection with identification documents and access devices; and (5) transportation of individuals in interstate commerce to engage in prostitution;

b. Promoting and enhancing the Teague Enterprise and the reputation and activities of its members, associates, and leader;

c. Securing loyalty from members of the Teague Enterprise, including through acts of violence, manipulation, and threats;

d. Obtaining and flaunting wealth and status symbols to, among other things, attract new members to the Teague Enterprise and ensure continuation of the Teague Enterprise; and

e. Avoiding detection and prosecution by law enforcement authorities through acts of intimidation, deception, and evasion, such as lying to law enforcement officers, using false identifications and fraudulent access devices, and traveling among cities and states.

MEANS AND METHODS OF THE TEAGUE ENTERPRISE

6. Among the means and methods by which members, associates, and leaders of the Teague Enterprise conducted and participated in the conduct of the affairs of the Teague Enterprise were the following:

a. Members and associates of the Teague Enterprise, including CHELEIA COUNCIL SANDERS, a/k/a “Mercedes,” the defendant, frequented bars and night clubs, targeted men wearing expensive watches or spending large amounts of money, and persuaded these intended victims to take them to the victims’ homes or to a hotel purportedly for sexual activity, but in fact for the purpose of robbing them.

b. Once alone with their intended victims, members and associates of the Enterprise, including SANDERS, surreptitiously drugged victims with narcotics and controlled substances, including GHB, which caused them to lose consciousness or otherwise become vulnerable to robbery.

c. In this way, members and associates of the Teague Enterprise, including SANDERS, robbed the victims of watches, cash, jewelry, electronics, identification documents, credit cards, and other valuable personal property.

d. After perpetrating the robberies, members and associates of the Teague Enterprise, including SANDERS, met with other members, associates, and leaders of the Enterprise, including TEAGUE, and together, they, among other things, (i) made purchases at nearby establishments using the recently-stolen credit cards, until they reached the cards' spending limits, and (ii) used the recently-stolen electronics and identification documents to obtain authorization for cash and other transfers of value to members and associates of the Teague Enterprise.

e. The Teague Enterprise operated in multiple states and cities. For example, between in or about February 2023 and in or about September 2023, the Enterprise operated in at least New Orleans, Louisiana; Chicago, Illinois; and New York, New York. Operating in multiple states and cities allowed members, associates and leaders of the Enterprise to more easily avoid arrest and detection by law enforcement authorities. When arrested, members and associates of the Enterprise, including SANDERS, on occasion lied to law enforcement authorities to protect the Enterprise.

#### THE RACKETEERING CONSPIRACY

7. From at least in or about November 2022 through at least in or about June 2024, in the Southern District of New York and elsewhere, JALEN TEAGUE, a/k/a "Bizzle," a/k/a "Too Official," and CHELEIA COUNCIL SANDERS, a/k/a "Mercedes," the defendants, and others known and unknown, each being a person employed by and associated with the Teague Enterprise, 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 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 Teague Enterprise through a pattern of racketeering

activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), which pattern of racketeering activity consisted of:

a. multiple acts involving

(i) murder, chargeable under the following provisions of New York State law: New York Penal Law, Sections 125.25 (murder), 105.15 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting); and

(ii) robbery, chargeable under the following provisions of state law: Illinois Compiled Statutes, Chapter 720, Sections 5/18-1 (robbery), 5/8-2 (conspiracy), 5/8-4 (attempt), and 5/5-1 and 5/5-2 (accountability for conduct of another); Louisiana Revised Statutes Sections 14:65 (simple robbery), 14:26 (conspiracy), 14:27 (attempt), and 14:24 (aiding and abetting); New Jersey Annotated Statutes Sections 2C:15-1 (robbery), 2C:5-2 (conspiracy), 2C:5-1 (attempt), and 2C:2-6 (liability for conduct of another); and 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);

b. multiple offenses involving the distribution of narcotics and controlled substances, including gamma hydroxybutyric acid, chargeable under Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute) and 846 (conspiracy), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing);

c. multiple acts indictable under:

(i) Title 18, United States Code, Sections 2314 and 2315 (relating to interstate transportation of stolen property), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing);

the conspiracy that TEAGUE and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, gamma hydroxybutyric acid, which resulted in the death of Stanley Stark, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C).

B. Murder

11. On or about August 16, 2023, in the Southern District of New York and elsewhere, JALEN TEAGUE, a/k/a “Bizzle,” a/k/a “Too Official,” the defendant, (i) acting with one or more other persons known and unknown, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of another person, to wit, the Stanley Stark, and aided and abetted the same, and (ii) acting with one or more other persons known and unknown, committed and attempted to commit robbery and, in the course of and in furtherance of that crime and of immediate flight therefrom, TEAGUE or another participant caused the death of a person other than one of the participants in the crime, to wit, Stanley Stark, and aided and abetted the same, in violation of New York Penal Law, Sections 125.25(2), 125.25(3) and 20.00.

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

**COUNT TWO**  
**(Murder in Aid of Racketeering)**

The Grand Jury further charges:

12. At all times relevant to this Indictment, the Teague Enterprise, as described in paragraphs one through six of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leaders, members, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and

foreign commerce. The Teague Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

13. At all times relevant to this Indictment, the Teague Enterprise, 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 robbery, chargeable under Illinois Compiled Statutes, Chapter 720, Sections 5/18-1 (robbery), 5/8-2 (conspiracy), 5/8-4 (attempt), and 5/5-1 and 5/5-2 (accountability for conduct of another); Louisiana Revised Statutes Sections 14:65 (simple robbery), 14:26 (conspiracy), 14:27 (attempt), and 14:24 (aiding and abetting); New Jersey Annotated Statutes Sections 2C:15-1 (robbery), 2C:5-2 (conspiracy), 2C:5-1 (attempt), and 2C:2-6 (liability for conduct of another); and 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); offenses involving distribution of narcotics and controlled substances, including gamma hydroxybutyric acid, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute) and 846 (conspiracy), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing); and acts indictable under Title 18, United States Code, Sections 2314 and 2315 (relating to interstate transportation of stolen property), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing); Title 18, United States Code, Section 1028 (relating to fraud and related activity in connection with identification documents), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing); Title 18, United States Code, Section 1029 (relating to fraud and related activity in connection with access devices), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing); and Title 18, United States Code, Sections 2421 and 2422 (relating to transportation of any individual in interstate commerce with intent that such individual engage

in prostitution), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing).

14. On or about August 16, 2023, in the Southern District of New York and elsewhere, JALEN TEAGUE, a/k/a “Bizzle,” a/k/a “Too Official,” the defendant, with others known and unknown to the Grand Jury, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Teague Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Teague Enterprise, an enterprise engaged in racketeering activity, murdered Stanley Stark, that is, (i) acting with one or more other persons known and unknown, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of another person, to wit, Stanley Stark, and aided and abetted the same, and (ii) acting with one or more other persons known and unknown, committed and attempted to commit robbery and, in the course of and in furtherance of that crime and of immediate flight therefrom, TEAGUE or another participant caused the death of a person other than one of the participants in the crime, to wit, Stanley Stark, and aided and abetted the same, in violation of New York Penal Law, Sections 125.25(2), 125.25(3) and 20.00.

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

**COUNT THREE**  
**(Conspiracy to Distribute Controlled Substances Resulting in Death)**

The Grand Jury further charges:

15. From at least in or about November 2022 through at least in or about June 2024, in the Southern District of New York and elsewhere, JALEN TEAGUE, a/k/a “Bizzle,” a/k/a “Too Official,” CHELEIA COUNCIL SANDERS, a/k/a “Mercedes,” and MEGAN STERNGAST, a/k/a “Megan - E Village,” 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.

16. It was a part and an object of the conspiracy that JALEN TEAGUE, a/k/a “Bizzle,” a/k/a “Too Official,” CHELEIA COUNCIL SANDERS, a/k/a “Mercedes,” and MEGAN STERNGAST, a/k/a “Megan - E Village,” 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).

17. The controlled substance involved in the offense was gamma hydroxybutyric acid, in violation of Title 21, United States Code, Section 841(b)(1)(C).

18. The use of such controlled substance resulted in the death of Stanley Stark on or about August 16, 2023, in New York, New York.

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

### **FORFEITURE ALLEGATION**

19. As a result of committing the offense alleged in Count One of this Indictment, JALEN TEAGUE, a/k/a “Bizzle,” a/k/a “Too Official,” and CHELEIA COUNCIL SANDERS, a/k/a “Mercedes,” 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 offense 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 offense.

20. As a result of committing the offense alleged in Count Three of this Indictment, JALEN TEAGUE, a/k/a “Bizzle,” a/k/a “Too Official,” CHELEIA COUNCIL SANDERS, a/k/a “Mercedes,” and MEGAN STERNGAST, a/k/a “Megan - E Village,” 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 offense.

**Substitute Assets Provision**

21. 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 18, United States Code, Section 1963(m), and Title 21, United States Code, Section 853(p), 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 1963;  
Title 21, United States Code, Section 853.)



FOREPERSON

2/10/26

A handwritten signature in cursive script that reads "Jay Clayton".

JAY CLAYTON

United States Attorney