

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

SEALED INDICTMENT

GARY DAVIS, : 17 Cr. ____

a/k/a "Reckless," :

a/k/a "Poppa," :

RAMEL JACKSON, :

a/k/a "Ruger," :

ANDREW BURRELL, :

a/k/a "Andy," :

a/k/a "Panda," :

QUENTIN STARKES, :

a/k/a "Polo," :

ANDRE COFIELD, :

a/k/a "Dre," :

PATRICK INNIS, :

a/k/a "Face," :

MATTHEW COOPER, :

a/k/a "Matt," :

JUSTIN COOPER, :

NAYSEAN CHAVIS, :

a/k/a "Nate," :

HASSAN MUHAMMAD, :

a/k/a "Has," :

CHIMBA CARLOS, :

WILLIAM RAY, :

a/k/a "Will," :

JEFFREY GOODRIDGE, :

a/k/a "E," :

MICHAEL LAMAR, :

a/k/a "Dolo," and :

LUIS GOMEZ, :

Defendants.

- - - - - X

17 CRIM 610

COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

1. At all times relevant to this Indictment, GARY DAVIS, a/k/a "Reckless," a/k/a "Poppa," RAMEL JACKSON, a/k/a "Ruger," ANDREW BURRELL, a/k/a "Andy," a/k/a "Panda," and QUENTIN STARKES, a/k/a "Polo," the defendants, and others known and unknown, were members and associates of "Killbrook" ("Killbrook" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other things, acts involving murder, shootings, robbery, and narcotics trafficking. Killbrook operated principally in the vicinity of the housing development known as the Mill Brook Houses in the Bronx, New York.

2. Killbrook, 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 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. GARY DAVIS, a/k/a "Reckless," a/k/a "Poppa," RAMEL JACKSON, a/k/a "Ruger," ANDREW BURRELL, a/k/a "Andy," a/k/a "Panda," and QUENTIN STARKES,

a/k/a "Polo," the defendants, participated in the operation of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

PURPOSES OF THE ENTERPRISE

3. The purposes of the Enterprise included the following:

a. Enriching the members and associates of the Enterprise through, among other things, robbery and the distribution of narcotics, including marijuana and cocaine base in a form commonly known as "crack."

b. Preserving and protecting the power of the Enterprise and its members and associates through acts involving murder, other acts of violence and threats of violence.

c. Promoting and enhancing the Enterprise and the activities of its members and associates.

MEANS AND METHODS OF THE ENTERPRISE

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

a. Members and associates of the Enterprise committed, conspired to commit, and attempted to commit, acts of violence, including murder, to protect and expand the Enterprise's criminal operations, and in connection with rivalries with members of other street gangs.

b. Members and associates of the Enterprise used physical violence and threats of violence, including murder and attempted murder, against various people, including in particular rival gang members.

c. Members and associates of the Enterprise planned and committed robberies of individuals in and around the Bronx and New York, New York.

d. Members and associates of the Enterprise sold narcotics, including marijuana and cocaine base in a form commonly known as "crack."

THE RACKETEERING CONSPIRACY

5. From approximately in or about 2007, up to and including in or about October 2017, in the Southern District of New York and elsewhere, GARY DAVIS, a/k/a "Reckless," a/k/a "Poppa," RAMEL JACKSON, a/k/a "Ruger," ANDREW BURRELL, a/k/a "Andy," a/k/a "Panda," and QUENTIN STARKES, a/k/a "Polo," the defendants, and others known and unknown, being persons employed by and associated with the racketeering enterprise described in Paragraphs 1 through 4 above, namely, Killbrook, which enterprise was engaged in, and the activities of which affected, interstate and foreign commerce, willfully and 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 Killbrook 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 multiple:

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

b. 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), 105.05, 105.10 (conspiracy to commit robbery), 110.00 (attempted robbery), and 20.00 (aiding and abetting);

c. offenses involving the distribution of controlled substances, including marijuana and cocaine base in a form commonly known as "crack," in violation of the laws of the United States, namely Title 21, United States Code, Sections 812, 841(a)(1), and 846.

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

NOTICE OF SPECIAL SENTENCING FACTOR

7. On or about April 18, 2011, in the Southern District of New York, GARY DAVIS, a/k/a "Reckless," a/k/a "Poppa," the

defendant, and others known and unknown, knowingly murdered and aided and abetted the murder of Bolivia Beck in the vicinity of the Mill Brook Houses in the Bronx, New York, in violation of New York Penal Law, Sections 125.25, 125.27, and 20.00, in that, with intent to cause the death of another person, DAVIS and others known and unknown caused the death of Bolivia Beck, and under circumstances evincing a depraved indifference to human life, DAVIS and others known and unknown recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Bolivia Beck.

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

COUNT TWO
(Conspiracy to Distribute Narcotics)

The Grand Jury further charges:

8. Between in or about 2007 and in or about October 2017, in the Southern District of New York and elsewhere, ANDRE COFIELD, a/k/a "Dre," PATRICK INNIS, a/k/a "Face," GARY DAVIS, a/k/a "Reckless," a/k/a "Poppa," RAMEL JACKSON, a/k/a "Ruger," ANDREW BURRELL, a/k/a "Andy," a/k/a "Panda," QUENTIN STARKES, a/k/a "Polo," MATTHEW COOPER, a/k/a "Matt," JUSTIN COOPER, NAYSEAN CHAVIS, a/k/a "Nate," HASSAN MUHAMMAD, a/k/a "Has," CHIMBA CARLOS, WILLIAM RAY, a/k/a "Will," JEFFREY GOODRIDGE, a/k/a "E," MICHAEL LAMAR, a/k/a "Dolo," and LUIS GOMEZ, the defendants, and others known and unknown did combine, conspire, confederate, and agree

together and with each other to violate the narcotics laws of the United States.

9. It was a part and object of the conspiracy that ANDRE COFIELD, a/k/a "Dre," PATRICK INNIS, a/k/a "Face," GARY DAVIS, a/k/a "Reckless," a/k/a "Poppa," RAMEL JACKSON, a/k/a "Ruger," ANDREW BURRELL, a/k/a "Andy," a/k/a "Panda," QUENTIN STARKES, a/k/a "Polo," MATTHEW COOPER, a/k/a "Matt," JUSTIN COOPER, NAYSEAN CHAVIS, a/k/a "Nate," HASSAN MUHAMMAD, a/k/a "Has," CHIMBA CARLOS, WILLIAM RAY, a/k/a "Will," JEFFREY GOODRIDGE, a/k/a "E," MICHAEL LAMAR, a/k/a "Dolo," and LUIS GOMEZ, the defendants, and others known and unknown would and did distribute and possess with the intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1).

10. The controlled substances that ANDRE COFIELD, a/k/a "Dre," PATRICK INNIS, a/k/a "Face," GARY DAVIS, a/k/a "Reckless," a/k/a "Poppa," RAMEL JACKSON, a/k/a "Ruger," ANDREW BURRELL, a/k/a "Andy," a/k/a "Panda," QUENTIN STARKES, a/k/a "Polo," MATTHEW COOPER, a/k/a "Matt," JUSTIN COOPER, NAYSEAN CHAVIS, a/k/a "Nate," HASSAN MUHAMMAD, a/k/a "Has," CHIMBA CARLOS, WILLIAM RAY, a/k/a "Will," JEFFREY GOODRIDGE, a/k/a "E," MICHAEL LAMAR, a/k/a "Dolo," and LUIS GOMEZ, the defendants, conspired to distribute and possess with the intent to distribute were: (a) 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); (b) mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C); (c) mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (d) marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

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

COUNT THREE
(Firearms Offense)

The Grand Jury further charges:

11. From in or about 2007, up to and including in or about October 2017, in the Southern District of New York and elsewhere, RAMEL JACKSON, a/k/a "Ruger," and ANDREW BURRELL, a/k/a "Andy," a/k/a "Panda," the defendants, and others known and unknown, during and in relation to a crime of violence and a drug trafficking offense for which they may be prosecuted in a court of the United States, namely the racketeering conspiracy charged in Count One of this Indictment and the drug conspiracy charged in Count Two of this Indictment, knowingly did use and carry firearms, and in furtherance of such crimes, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, some of which were brandished and discharged.

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

COUNT FOUR
(Firearm Offense)

The Grand Jury further charges:

12. On or about September 29, 2017, in the Southern District of New York, WILLIAM RAY, a/k/a "Will," 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 narcotics conspiracy charged in Count Two of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crimes, 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 ALLEGATION AS TO COUNT ONE

13. As a result of committing the offense alleged in Count One of this Indictment, GARY DAVIS, a/k/a "Reckless," a/k/a "Poppa," RAMEL JACKSON, a/k/a "Ruger," ANDREW BURRELL, a/k/a "Andy," a/k/a "Panda," and QUENTIN STARKES, a/k/a "Polo," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963:

a. any interest acquired or maintained as a result of the offense alleged in Count One;

b. 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 the offense alleged in Count One; and

c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from the racketeering activity alleged in Count One.

FORFEITURE ALLEGATION AS TO COUNT TWO

14. As a result of committing the controlled substance offense charged in Count Two of this Indictment, ANDRE COFIELD, a/k/a "Dre," PATRICK INNIS, a/k/a "Face," GARY DAVIS, a/k/a "Reckless," a/k/a "Poppa," RAMEL JACKSON, a/k/a "Ruger," ANDREW BURRELL, a/k/a "Andy," a/k/a "Panda," QUENTIN STARKES, a/k/a "Polo," MATTHEW COOPER, a/k/a "Matt," JUSTIN COOPER, NAYSEAN CHAVIS, a/k/a "Nate," HASSAN MUHAMMAD, a/k/a "Has," CHIMBA CARLOS, WILLIAM RAY, a/k/a "Will," JEFFREY GOODRIDGE, a/k/a "E," MICHAEL LAMAR, a/k/a "Dolo," and LUIS GOMEZ, 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 the defendant obtained directly or indirectly as a result of the offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense charged in Count Two.

Substitute Assets Provision

15. If any of the above-described forfeitable property, as a result of any act or omission of ANDRE COFIELD, a/k/a "Dre,"

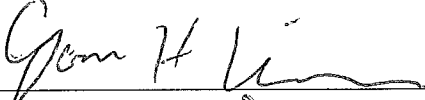

PATRICK INNIS, a/k/a "Face," GARY DAVIS, a/k/a "Reckless," a/k/a "Poppa," RAMEL JACKSON, a/k/a "Ruger," ANDREW BURRELL, a/k/a "Andy," a/k/a "Panda," QUENTIN STARKES, a/k/a "Polo," MATTHEW COOPER, a/k/a "Matt," JUSTIN COOPER, NAYSEAN CHAVIS, a/k/a "Nate," HASSAN MUHAMMAD, a/k/a "Has," CHIMBA CARLOS, WILLIAM RAY, a/k/a "Will," JEFFREY GOODRIDGE, a/k/a "E," MICHAEL LAMAR, a/k/a "Dolo," and LUIS GOMEZ, 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 18 U.S.C. § 1963(m), 21 U.S.C § 853(p), and 28 U.S.C. § 2461 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; and
Title 28, United States Code, Section 2461.)


FOREPERSON


JOON H. KIM 
Acting United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

GARY DAVIS, a/k/a "Reckless,"
a/k/a "Poppa," et al.,
Defendants.

SEALED INDICTMENT

17 Cr. ____

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

JOON H. KIM

Acting United States Attorney.


Foreperson.
