

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :
- v. - :
RONALD MILLER, :
a/k/a "Solo," :
JASON PARADIES, :
FRANK NESBITT, :
a/k/a "Nitty," :
COREY WEBB, and :
KIYON WEBB, :
Defendants. :
- - - - - X

SEALED INDICTMENT
19 Cr. 245

COUNT ONE

(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about 2016 up to and including at least in or about October 2018, in the Southern District of New York and elsewhere, RONALD MILLER, a/k/a "Solo," JASON PARADIES, FRANK NESBITT, a/k/a "Nitty," COREY WEBB, and KIYON WEBB, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that RONALD MILLER, a/k/a "Solo," JASON PARADIES, FRANK NESBITT,

a/k/a "Nitty," COREY WEBB, and KIYON WEBB, the defendants, and others known and unknown, would and did distribute, and possess with the intent to distribute, controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that RONALD MILLER, a/k/a "Solo," JASON PARADIES, FRANK NESBITT, a/k/a "Nitty," COREY WEBB, and KIYON WEBB, the defendants, conspired to distribute and to possess with the intent to distribute were: i) five kilograms and more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); and ii) 280 grams and more of a mixture and substance containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Indictment, RONALD MILLER, a/k/a "Solo," JASON PARADIES, FRANK NESBITT, a/k/a "Nitty," COREY WEBB, and KIYON WEBB, 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.

SUBSTITUTE ASSET PROVISION

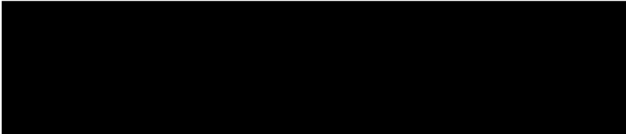
5. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred, or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been comingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendants up to the value of the above
forfeitable property.

(Title 21, United States Code, Section 853.)



FOREPERSON

Geoffrey S. Berman

GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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v.

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COREY WEBB,
and KIYON WEBB,

Defendants.

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(21 U.S.C. § 846.)

GEOFFREY S. BERMAN
United States Attorney

Foreperson
