

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

-v.-

JEFFREY ESTEVEZ,
a/k/a "J,"
ADONIS RAMIREZ,
a/k/a "Frenchie,"
DAVID GARCIA,
a/k/a "Clippa,"
ADONIS RODRIGUEZ,
a/k/a "Crazy,"
a/k/a "Locotron,"
JONATHAN ESPINAL,
a/k/a "Twin,"
DERIAN DEL CARMEN,
a/k/a "Mel,"
BRANDON ESTEVEZ,
a/k/a "Boppy,"
JONATHAN MALDONADO,
a/k/a "Tego,"
ELVIN PEREZ,
a/k/a "Choco,"
YISANDER RAMIREZ,
a/k/a "Bean,"
JOSUE SANCHEZ,
a/k/a "V,"
MARIO DELOSSANTOS,
DANIEL GONZALEZ,
LOUIS RIVERA,

Defendants.

SEALED SUPERSEDING
INDICTMENT

S1 18 Cr. 669 (DAB)

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COUNT ONE

(Racketeering Conspiracy)

**(J. ESTEVEZ, A. RAMIREZ, GARCIA, RODRIGUEZ, ESPINAL, DEL CARMEN,
B. ESTEVEZ, MALDONADO, PEREZ, Y. RAMIREZ, and SANCHEZ)**

The Grand Jury charges:

The Enterprise

1. At all times relevant to this Indictment, JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a "Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," ELVIN PEREZ, a/k/a "Choco," YISANDER RAMIREZ, a/k/a "Bean," and JOSUE SANCHEZ, a/k/a "V," the defendants, and others known and unknown, were members and associates of a gang operating out of 2200 Morris Avenue in the Bronx (the "2200 Block Crew" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other activities, acts involving murder, robbery, and narcotics trafficking. The 2200 Block Crew operated in and around the Bronx, New York.

2. The 2200 Block 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 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. JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a "Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," ELVIN PEREZ, a/k/a "Choco," YISANDER RAMIREZ, a/k/a "Bean," and JOSUE SANCHEZ, a/k/a "V," the defendants, participated in the operation and management of the Enterprise and participated in unlawful and other activity in furtherance of the conduct of the Enterprise's affairs.

3. Members and associates of the 2200 Block Crew engaged in a series of violent disputes with rivals and with their own narcotics customers. During these disputes, members and associates of the 2200 Block Crew committed at least one murder, multiple shootings, robberies, and assaults against their rivals and against their own narcotics customers.

4. Members and associates of the 2200 Block Crew sold heroin, fentanyl, crack cocaine, cocaine, and marijuana in and around the Bronx, New York.

5. Members and associates of the 2200 Block Crew committed and agreed, attempted, and threatened to commit acts of violence to protect and expand their narcotics business and

to protect fellow members and associates of the Enterprise. These acts of violence included acts involving murder, acts involving robbery, and assault, intended either to protect the Enterprise's narcotics business, retaliate against members of rival gangs who had encroached on the Enterprise's narcotics business, or to otherwise promote the standing and reputation of the 2200 Block Crew amongst rival gangs.

Purposes of the Enterprise

6. The purposes of the Enterprise included the following:
 - a. Preserving and protecting the power, territory, and profits of the Enterprise through acts involving murder, other acts of violence, and threats of violence.
 - b. Promoting and enhancing the Enterprise and the activities of its members and associates.
 - c. Keeping victims and potential victims in fear of the Enterprise and its members and associates through acts and threats of violence.
 - d. Providing assistance to members and associates who committed crimes for and on behalf of the gang.
 - e. Enriching the members and associates of the Enterprise through, among other things, robbery and the distribution and sale of narcotics, including heroin, fentanyl, crack cocaine, cocaine, and marijuana.

f. Protecting the Enterprise and its members and associates from detection and prosecution by law enforcement authorities through acts of intimidation and violence against potential witnesses to crimes committed by members of the Enterprise.

Means and Methods of the Enterprise

7. 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, attempted, and threatened to commit acts of violence, including acts involving murder, to protect and expand the Enterprise's criminal operations, and against rival gang members.

b. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including acts involving murder, robbery, and assaults against rival gang members and other individuals adverse to the Enterprise.

c. Members and associates of the Enterprise promoted and celebrated, in music and on social media, the criminal conduct of the Enterprise, namely narcotics distribution, acts involving violence, and the use of firearms.

d. Members and associates of the Enterprise obtained, possessed, and used firearms.

e. Members and associates of the Enterprise distributed controlled substances, including heroin, fentanyl, crack cocaine, cocaine, and marijuana.

The Racketeering Conspiracy

8. From at least in or about 2017, up to and including in or about April 2019, in the Southern District of New York and elsewhere, JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a "Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," ELVIN PEREZ, a/k/a "Choco," YISANDER RAMIREZ, a/k/a "Bean," and JOSUE SANCHEZ, a/k/a "V," the defendants, and others known and unknown, being persons employed by and associated with the Enterprise described in Paragraphs One through Seven of this Indictment, namely, the 2200 Block Crew, which 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, Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the 2200 Block 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, multiple acts:

a. involving murder, in violation of New York Penal Law, Sections 125.25 (murder in the second degree), 110.00 (attempt to commit a crime), 105.15 (conspiracy in the second degree), and 20.00 (accessory liability);

b. involving robbery, in violation of New York Penal Law, Sections 160.00, 160.05, 160.10, 160.15 (robbery), 105.10 (conspiracy in the fourth degree), 110.00 (attempt to commit a crime), and 20.00 (accessory liability);

c. and offenses involving the distribution of controlled substances, including, heroin, fentanyl, crack cocaine, cocaine, and marijuana in violation of laws of the United States, namely Title 21, United States Code, Sections 812, 841, and 846, and Title 18, United States Code, Section 2.

9. 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 Factors

Narcotics

10. From at least in or about 2017, up to and including in or about April 2019, in the Southern District of New York and elsewhere, JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a

"Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," ELVIN PEREZ, a/k/a "Choco," YISANDER RAMIREZ, a/k/a "Bean," and JOSUE SANCHEZ, a/k/a "V," 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.

11. It was a part and an object of the conspiracy that JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a "Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," ELVIN PEREZ, a/k/a "Choco," YISANDER RAMIREZ, a/k/a "Bean," and JOSUE SANCHEZ, a/k/a "V," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute: (i) one kilogram and more of mixtures and substances containing a detectable amount of heroin; (ii) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack;" and (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(a)(1), 841(b)(1)(A), and 846.

Murder in Aid of Racketeering

12. On or about September 28, 2017, in the Southern District of New York, ADONIS RAMIREZ, a/k/a "Frenchie," the defendant, and others known and unknown, murdered, and aided and abetted the murder of Charles DelToro, in the vicinity of 2200 Morris Avenue, Bronx, New York, in violation of New York Penal Law Sections 125.25 and 20.00, in that, under circumstances evincing a depraved indifference to human life, A. RAMIREZ did recklessly engage in conduct which created a grave risk of death to another person, and thereby caused the death of Charles DelToro.

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

COUNT TWO
(Murder in Aid of Racketeering)
(A. RAMIREZ)

The Grand Jury further charges:

13. At all times relevant to this Indictment, the 2200 Block Crew, as described in paragraphs 1 through 7 of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals

engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members 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 2200 Block Crew, 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 murder and robbery, in violation of New York Penal Law, and offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846.

15. On or about September 28, 2017, in the Southern District of New York and elsewhere, ADONIS RAMIREZ, a/k/a "Frenchie," the defendant, 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 2200 Block Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the 2200 Block Crew, an enterprise engaged in racketeering activity, as described above, murdered, and aided and abetted the murder of Charles DelToro, in the vicinity of 2200 Morris Avenue in the Bronx, New York, in violation of New York Penal Law Section 125.25 and 20.00, to wit, in that, under circumstances evincing a depraved indifference to human life, A. RAMIREZ did recklessly engage in

conduct which created a grave risk of death to another person, and thereby caused the death of Charles DelToro.

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

COUNT THREE
(Violent Crime in Aid of Racketeering)
(B. ESTEVEZ, MALDONADO, and PEREZ)

The Grand Jury further charges:

16. Paragraphs 13 and 14 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

17. On or about February 11, 2018, in the Southern District of New York and elsewhere, BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," and ELVIN PEREZ, a/k/a "Choco," 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 2200 Block Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the 2200 Block Crew, an enterprise engaged in racketeering activity, as described above, knowingly attempted to assault an individual with a dangerous weapon; attempted to murder an individual; and aided and abetted the same, to wit, B. ESTEVEZ, MALDONADO, and PEREZ shot at a rival gang member, in the vicinity of 2200 Morris Avenue in the Bronx, New York, in violation of New York Penal Law Sections 125.25, 120.00, 110.00, 20.00.

(Title 18, United States Code, Sections 1959(a)(5), (a)(6), and 2.)

COUNT FOUR
(Firearms Offense)
(B. ESTEVEZ, MALDONADO, and PEREZ)

The Grand Jury further charges:

18. On or about February 11, 2018, in the Southern District of New York, BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," and ELVIN PEREZ, a/k/a "Choco," 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, the attempted murder and assault with a dangerous weapon, as charged in Count Three of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime did possess a firearm, and did aid and abet the use, carrying and possession of a firearm, which was brandished and discharged.

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

COUNT FIVE
(Violent Crime in Aid of Racketeering)
(J. ESTEVEZ)

The Grand Jury further charges:

19. Paragraphs 13 and 14 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

20. On or about May 25, 2018, in the Southern District of New York and elsewhere, JEFFREY ESTEVEZ, a/k/a "J," the

defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 2200 Block Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the 2200 Block Crew, an enterprise engaged in racketeering activity, as described above, knowingly attempted to assault an individual with a dangerous weapon; and attempted to murder an individual; to wit, J. ESTEVEZ shot at a rival of the 2200 Block Crew in the vicinity of East 182nd Street and Morris Avenue in the Bronx, New York, in violation of New York Penal Law, Sections 125.25, 120.00, and 110.00.

(Title 18, United States Code, Sections 1959(a)(5) and (a)(6).)

COUNT SIX
(Firearms Offense)
(J. ESTEVEZ)

The Grand Jury further charges:

21. On or about May 25, 2018, in the Southern District of New York and elsewhere, JEFFREY ESTEVEZ, a/k/a "J," 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, the attempted murder and assault with a dangerous weapon, as charged in Count Five 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.

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

COUNT SEVEN
(Violent Crime in Aid of Racketeering)
(DEL CARMEN, MALDONADO, and RODRIGUEZ)

The Grand Jury further charges:

22. Paragraphs 13 and 14 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

23. On or about June 19, 2018, in the Southern District of New York and elsewhere, DERIAN DEL CARMEN, a/k/a "Mel," JONATHAN MALDONADO, a/k/a "Tego," and ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," 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 2200 Block Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the 2200 Block Crew, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon; attempted to murder an individual; and aided and abetted the same, to wit, DEL CARMEN, MALDONADO, and RODRIGUEZ, and others participated in a stabbing and assault of an individual in the vicinity of 2200 Morris Avenue in the Bronx, New York, in violation of New York Penal Law, Sections 125.25, 120.00, 110.00 and 20.00.

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

COUNT EIGHT
(Violent Crime in Aid of Racketeering)
(ESPINAL)

The Grand Jury further charges:

24. Paragraphs 13 and 14 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

25. On or about November 22, 2018, in the Southern District of New York and elsewhere, JONATHAN ESPINAL, a/k/a "Twin," the defendant, 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 2200 Block Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the 2200 Block Crew, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon; and attempted to murder an individual, to wit, ESPINAL threw a brick at an individual, striking the individual in the back of the head, in the vicinity of 2200 Morris Avenue in the Bronx, New York, in violation of New York Penal Law, 125.25, 120.00, and 110.00.

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

COUNT NINE
(Violent Crime in Aid of Racketeering)
(SANCHEZ, Y. RAMIREZ, GARCIA, and DEL CARMEN)

The Grand Jury further charges:

26. Paragraphs 13 and 14 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

27. On or about March 24, 2019, in the Southern District of New York and elsewhere, JOSUE SANCHEZ, a/k/a "V," YISANDER RAMIREZ, a/k/a "Bean," DAVID GARCIA, a/k/a "Clippa," and DERIAN DEL CARMEN, a/k/a "Mel," 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 2200 Block Crew, and for the purpose of gaining entrance to and maintaining and increasing position in the 2200 Block Crew, an enterprise engaged in racketeering activity, as described above, knowingly attempted to assault an individual with a dangerous weapon; attempted to murder an individual; and aided and abetted the same, to wit, SANCHEZ, Y. RAMIREZ, GARCIA, and DEL CARMEN shot at a rival gang member in the vicinity of 182nd Street and Grand Concourse in the Bronx, New York, in violation of New York Penal Law, Sections 125.25, 120.00, and 110.00, and 20.00.

(Title 18, United States Code, Sections 1959(a)(5), (a)(6), and 2.)

COUNT TEN
(Firearms Offense)
(SANCHEZ, Y. RAMIREZ, GARCIA, and DEL CARMEN)

The Grand Jury further charges:

28. On or about March 24, 2019, in the Southern District of New York and elsewhere, JOSUE SANCHEZ, a/k/a "V," YISANDER RAMIREZ, a/k/a "Bean," DAVID GARCIA, a/k/a "Clippa," and DERIAN DEL CARMEN, a/k/a "Mel," 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, the attempted murder and assault with a dangerous weapon, as charged in Count Nine of this Indictment, knowingly did use and carry a firearm, and in furtherance of such crime did possess a firearm, and did aid and abet the use, carrying and possession of a firearm, which was brandished and discharged.

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

COUNT ELEVEN
(Narcotics Trafficking)
(All Defendants)

The Grand Jury further charges:

29. From at least in or about 2017, up to and including in or about April 2019, in the Southern District of New York and elsewhere, JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a "Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin,"

DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," ELVIN PEREZ, a/k/a "Choco," MARIO DELOSSANTOS, DANIEL GONZALEZ, YISANDER RAMIREZ, a/k/a "Bean," LOUIS RIVERA, and JOSUE SANCHEZ, a/k/a "V," 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.

30. It was a part and an object of the conspiracy that JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a "Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," ELVIN PEREZ, a/k/a "Choco," MARIO DELOSSANTOS, DANIEL GONZALEZ, YISANDER RAMIREZ, a/k/a "Bean," LOUIS RIVERA, and JOSUE SANCHEZ, a/k/a "V," 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).

31. The controlled substances that JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a "Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a

"Tego," ELVIN PEREZ, a/k/a "Choco," MARIO DELOSSANTOS, DANIEL GONZALEZ, YISANDER RAMIREZ, a/k/a "Bean," LOUIS RIVERA, and JOSUE SANCHEZ, a/k/a "V," the defendants, conspired to distribute and possess with intent to distribute were: (i) 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); (ii) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as crack cocaine, 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) mixtures and substances containing marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

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

COUNT TWELVE
(Firearms Offense - Narcotics Trafficking)
(All Defendants)

32. From at least in or about 2017 up to and including in or about April 2019, in the Southern District of New York and elsewhere, JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a "Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy,"

JONATHAN MALDONADO, a/k/a "Tego," ELVIN PEREZ, a/k/a "Choco," MARIO DELOSSANTOS, DANIEL GONZALEZ, YISANDER RAMIREZ, a/k/a "Bean," LOUIS RIVERA, and JOSUE SANCHEZ, a/k/a "V," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count Eleven of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the same.

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

FORFEITURE ALLEGATION AS TO COUNT ONE

33. As a result of committing the offense alleged in Count One of this Indictment, JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a "Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," ELVIN PEREZ, a/k/a "Choco," YISANDER RAMIREZ, a/k/a "Bean," and JOSUE SANCHEZ, a/k/a "V," 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 racketeering activity 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 that the defendants personally obtained.

FORFEITURE ALLEGATION AS TO COUNT ELEVEN

34. As a result of committing the offense charged in Count ELEVEN of this Indictment, JEFFREY ESTEVEZ, a/k/a "J," ADONIS RAMIREZ, a/k/a "Frenchie," DAVID GARCIA, a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a "Crazy," a/k/a "Locotron," JONATHAN ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN, a/k/a "Mel," BRANDON ESTEVEZ, a/k/a "Boppy," JONATHAN MALDONADO, a/k/a "Tego," ELVIN PEREZ, a/k/a "Choco," MARIO DELOSSANTOS, DANIEL GONZALEZ, YISANDER RAMIREZ, a/k/a "Bean," LOUIS RIVERA, and JOSUE SANCHEZ, a/k/a "V," 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 that the defendants personally obtained.

Substitute Assets Provision


35. If any of the property described above as subject to forfeiture, as a result of any act or omission of the above-named defendants:

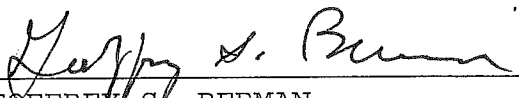
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot 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 981 and 1963;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


Foreperson



GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -


JEFFREY ESTEVEZ, a/k/a "J," ADONIS
RAMIREZ, a/k/a "Frenchie," DAVID GARCIA,
a/k/a "Clippa," ADONIS RODRIGUEZ, a/k/a
"Crazy," a/k/a "Locotron," JONATHAN
ESPINAL, a/k/a "Twin," DERIAN DEL CARMEN,
a/k/a "Mel," BRANDON ESTEVEZ, a/k/a
"Boppy," JONATHAN MALDONADO, a/k/a
"Tego," ELVIN PEREZ, a/k/a "Choco,"
YISANDER RAMIREZ, a/k/a "Bean," JOSUE
SANCHEZ, a/k/a "V," MARIO DELOSSANTOS,
DANIEL GONZALEZ, and LOUIS RIVERA

Defendants.

SUPERSEDING INDICTMENT

S1 18 Cr. 669 (DAB)

(18 U.S.C. §§ 924(c), 1959,
1962, and 2; 21 U.S.C. §§ 812,
841(a)(1), (b)(1)(A), and 846)

 GEOFFREY S. BERMAN

United States Attorney.
