

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

SEALED SUPERSEDING
INDICTMENT

- v. - :

S6 17 Cr. 283 (LAP)

JAHSON FEVERIE, :
a/k/a "Jah," :

Defendant. :

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COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

THE ENTERPRISE

1. At all times relevant to this Indictment, JAHSON FEVERIE, a/k/a "Jah," the defendant, and others known and unknown, were members and associates of the Wild Card Crips, a criminal organization whose members and associates engaged in, among other things, acts involving murder, assault, and narcotics trafficking. The Wild Card Crips operated principally in the Bronx, New York.

2. The Wild Card Crips, including its leadership, membership, and associates, constituted an "enterprise" (hereinafter the "Wild Card Crips 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 Wild Card Crips Enterprise constituted an ongoing

organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Wild Card Crips Enterprise. At all times relevant to this Indictment, the Wild Card Crips Enterprise has engaged in, and its activities affected, interstate and foreign commerce.

PURPOSES OF THE ENTERPRISE

3. The purposes of the Wild Card Crips Enterprise included the following:

a. Preserving and protecting the power of the Wild Card Crips Enterprise and its members and associates through acts involving murder, other acts of violence, and threats of violence.

b. Promoting and enhancing the Wild Card Crips Enterprise and the activities of its members and associates.

c. Enriching the members and associates of the Wild Card Crips Enterprise through, among other things, the distribution of narcotics, including heroin, cocaine base, cocaine, marijuana, and alprazolam.

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 Wild Card Crips Enterprise were the following:

a. Members and associates of the Wild Card

Crips Enterprise committed, conspired to commit, and attempted to commit acts of violence, including acts involving murder, and assault, to protect and expand the Wild Card Crips Enterprise's criminal operations, and in connection with rivalries with members of street gangs, such as the Bloods and the Trinitarios.

b. Members and associates of the Wild Card Crips Enterprise used physical violence and threats of violence, including murder and attempted murder, against others, including in particular rival gang members and rival narcotics traffickers.

c. Members and associates of the Wild Card Crips Enterprise sold narcotics, including heroin, cocaine base, cocaine, oxycodone, marijuana, and alprazolam.

THE RACKETEERING VIOLATION

5. From at least in or about 2016, up to and including the present, in the Southern District of New York and elsewhere, JAHSON FEVERIE, a/k/a "Jah," the defendant, and others known and unknown, being persons employed by and associated with the racketeering enterprise described in paragraphs 1 through 4 of this Indictment, namely, the Wild Card Crips, an enterprise which engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with others 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 Wild Card Crips Enterprise 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 involving murder that are chargeable under the following provisions of state law:

New York Penal Law, Sections 20.00, 125.25 and 125.27
(murder);

New York Penal Law, Sections 20.00, 110.00 and 125.25
(attempted murder);

New York Penal Law, Sections 105.15 and 125.25
(conspiracy to murder); and

multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in controlled substances, including mixtures and substances containing a detectable amount of heroin, mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," mixtures and substances containing a detectable amount of cocaine, quantities of oxycodone, quantities of alprazolam, and mixtures and substances containing a detectable amount of marijuana, in violation of the laws of the United States, specifically Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A),

(b) (1) (C), (b) (1) (D), and 846, and Title 18, United States Code, Section 2.

6. It was a part of the conspiracy that JAHSON FEVERIE, a/k/a "Jah," the defendant, agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the Wild Card Crips Enterprise.

NOTICE OF SPECIAL SENTENCING FACTOR

7. On or about September 27, 2016, in the Southern District of New York, JAHSON FEVERIE, a/k/a "Jah," the defendant, and others known and unknown, murdered, and aided and abetted the murder of Yunion Manion, in the vicinity of West Tremont Avenue and University Avenue in the Bronx, New York, in violation of New York Penal Law, Sections 125.25, 125.27, and 20.00, in that, (i) with intent to cause the death of another person, FEVERIE caused the death of Manion, and aided and abetted the same, and (ii) under circumstances evincing a depraved indifference to human life, FEVERIE recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Manion, and aided and abetted the same.

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

COUNT TWO
(Firearms Offense)

The Grand Jury further charges:

8. From at least in or about 2016, up to and including the present, in the Southern District of New York, JAHSON FEVERIE, a/k/a "Jah," the defendant, and others known and unknown, during and in relation to a crime of violence and 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, knowingly did use and carry firearms, and, in furtherance of such crime of violence and drug trafficking offense 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.)

FORFEITURE ALLEGATION AS TO COUNT ONE

9. As a result of committing the offense alleged in Count One of this Indictment, JAHSON FEVERIE, a/k/a "Jah," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendant 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 racketeering activity in violation of Title 18, United States Code, Section 1962; 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 alleged in Count One of this Indictment.

Substitute Assets Provision

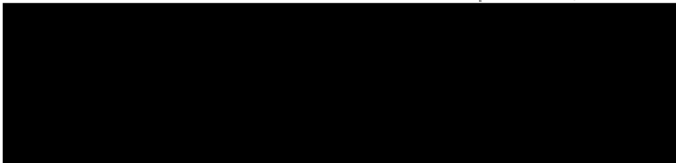
10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- 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 28 United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981, 1963; and Title 28, United States Code, Section 2461.)



FOREPERSON




GEOFFREY S. BERMAN *JMS*
United States Attorney

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(18 U.S.C. §§ 924(c), 1962(d), and 2.)

GEOFFREY S. BERMAN

United States Attorney.

A TRUE BILL

