

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
RANDY SARGEANT, :
a/k/a "Black," :
KELVIN GANPAT, :
JEANCARLOS LAUREANO, :
a/k/a "Rico," :
CHRISTOPHER MARTINEZ, :
a/k/a "Panama," :
HOWARD MEREDITH, :
WILLIAM BRITO, :
AMANDA COPPOLLA, :
JAMAAL PETERS, :
a/k/a "Mega Head," :
BERT HICKSON, :
CHRISTINE MORRISON, and :
CRYSTAL MARTINEZ, :
:
Defendants. :
X

SEALED INDICTMENT

19 Cr. 666

COUNT ONE
(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about 2018 up to and including in or about September 2019, in the Southern District of New York and elsewhere, RANDY SARGEANT, a/k/a "Black," KELVIN GANPAT, JEANCARLOS LAUREANO, a/k/a "Rico," CHRISTOPHER MARTINEZ, a/k/a "Panama," HOWARD MEREDITH, WILLIAM BRITO, AMANDA COPPOLLA, JAMAAL PETERS, a/k/a "Mega Head," BERT HICKSON, CHRISTINE MORRISON, and CRYSTAL MARTINEZ, 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 RANDY SARGEANT, a/k/a "Black," KELVIN GANPAT, JEANCARLOS LAUREANO, a/k/a "Rico," CHRISTOPHER MARTINEZ, a/k/a "Panama," HOWARD MEREDITH, WILLIAM BRITO, AMANDA COPPOLLA, JAMAAL PETERS, a/k/a "Mega Head," BERT HICKSON, CHRISTINE MORRISON, and CRYSTAL MARTINEZ, the defendants, and others known and unknown, would and did distribute, and possess with the intent to distribute, a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that RANDY SARGEANT, a/k/a "Black," KELVIN GANPAT, JEANCARLOS LAUREANO, a/k/a "Rico," CHRISTOPHER MARTINEZ, a/k/a "Panama," HOWARD MEREDITH, WILLIAM BRITO, AMANDA COPPOLLA, JAMAAL PETERS, a/k/a "Mega Head," BERT HICKSON, CHRISTINE MORRISON, and CRYSTAL MARTINEZ, the defendants, conspired to distribute and to possess with the intent to distribute was two-hundred and eighty grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(A).

Overt Acts

4. In furtherance of the conspiracy and to effect the

illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York:

a. On or about September 11, 2018, CHRISTOPHER MARTINEZ, the defendant, sold a quantity of crack cocaine to an individual.

b. On or about February 18, 2019, in Yonkers, New York, RANDY SARGEANT, a/k/a "Black," and CHRISTOPHER MARTINEZ, the defendants, sold a quantity of crack cocaine to an individual.

c. On or about April 22, 2019, in Hartsdale, New York, JEANCARLOS LAUREANO, a/k/a "Rico," the defendant, sold a quantity of crack cocaine to an individual.

d. On or about May 29, 2019, in Yonkers, New York, RANDY SARGEANT, a/k/a "Black" and AMANDA COPPOLLA, the defendants, sold approximately 250 grams of crack cocaine to an individual, in a transaction that had been arranged by KELVIN GANPAT, the defendant.

e. On or about July 10, 2019 and July 11, 2019, RANDY SARGEANT, a/k/a "Black," JEANCARLOS LAUREANO, a/k/a "Rico," and CHRISTINA MORRISON, the defendants, provided a quantity of crack cocaine to JAMAAL PETERS, a/k/a "Mega Head," the defendant, for resale to other customers.

f. On or about July 11, 2019, RANDY SARGEANT, a/k/a "Black," and JEANCARLOS LAUREANO, a/k/a "Rico," the defendants,

had telephone conversations in which they discussed storing narcotics in vehicles.

g. On or about July 15, 2019, RANDY SARGEANT, a/k/a "Black," and JAMAAL PETERS, a/k/a "Mega Head," the defendants, had a telephone conversation in which they discussed selling narcotics.

h. On or about July 15, 2019 and July 16, 2019, RANDY SARGEANT, a/k/a "Black," and HOWARD MEREDITH, the defendants, had multiple telephone conversations in which they discussed purchasing cocaine and crack cocaine.

i. On or about July 27, 2019, in Yonkers, New York, RANDY SARGEANT, a/k/a "Black," CRYSTAL MARTINEZ, and CHRISTOPHER MARTINEZ, the defendants, arranged and conducted a delivery of a quantity crack cocaine to BERT HICKSON, the defendant, for resale to other customers.

j. On or about July 30, 2019, in Yonkers, New York, RANDY SARGEANT, a/k/a "Black," WILLIAM BRITO, and CHRISTOPHER MARTINEZ, the defendants, sold approximately 290 grams of crack cocaine to an individual.

k. On or about July 30, 2019, RANDY SARGEANT, a/k/a "Black," and KELVIN GANPAT, the defendants, had a telephone conversation during which they discussed, among other things, selling crack cocaine.

l. On or about August 1, 2019, RANDY SARGEANT, a/k/a

"Black," and HOWARD MEREDITH, the defendants, had a telephone conversation in which they discussed SARGEANT selling narcotics to a customer identified by MEREDITH.

m. On or about August 28, 2019, RANDY SARGEANT, a/k/a "Black," and WILLIAM BRITO, the defendants, had a telephone conversation in which they discussed, among other things, cooking crack cocaine.

n. On or about August 29, 2019, RANDY SARGEANT, a/k/a "Black," and CHRISTINA MORRISON, the defendants, had telephone conversations in which they discussed preparing crack cocaine for distribution.

o. On or about September 1, 2019, RANDY SARGEANT, a/k/a "Black," and HOWARD MEREDITH, the defendants, had multiple telephone conversations during which they discussed selling narcotics.

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

FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Indictment, RANDY SARGEANT, a/k/a "Black," KELVIN GANPAT, JEANCARLOS LAUREANO, a/k/a "Rico," CHRISTOPHER MARTINEZ, a/k/a "Panama," HOWARD MEREDITH, WILLIAM BRITO, AMANDA COPPOLLA, JAMAAL PETERS, a/k/a "Mega Head," BERT HICKSON, CHRISTINE MORRISON, and CRYSTAL MARTINEZ, 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 Assets Provision

6. 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 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 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



Geoffrey S. Berman
GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

RANDY SARGEANT, a/k/a "Black," KELVIN
GANPAT, JEANCARLOS LAUREANO, a/k/a
"Rico," CHRISTOPHER MARTINEZ, a/k/a
"Panama," HOWARD MEREDITH, WILLIAM
BRITO, AMANDA COPPOLLA, JAMAAL PETERS,
a/k/a "Mega Head," BERT HICKSON,
CHRISTINE MORRISON, and CRYSTAL MARTINEZ

Defendants.

INDICTMENT

19 Cr.

(21 U.S.C. § 846)

GEOFFREY S. BERMAN
United States Attorney

