

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
JORDAN CAMPBELL, : 20 Cr.
a/k/a "Jayoh," :
DERRICK DICKEY, :
a/k/a "D," :
TERRANCE PATTERSON, :
a/k/a "Cupid," a/k/a "Q," and :
JOHNNIE THOMAS, :
a/k/a "Country," :
:
Defendants. :
- - - - - X

SEALED INDICTMENT

COUNT ONE

(Narcotics Conspiracy)

The Grand Jury charges:

1. From at least in or about March 2020 through in or about August 2020, in the Southern District of New York and elsewhere, JORDAN CAMPBELL, a/k/a "Jayoh," DERRICK DICKEY, a/k/a "D," TERRANCE PATTERSON, a/k/a "Cupid," a/k/a "Q," and JOHNNIE THOMAS, a/k/a "Country," 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 JORDAN CAMPBELL, a/k/a "Jayoh," DERRICK DICKEY, a/k/a "D," TERRANCE PATTERSON, a/k/a "Cupid," a/k/a "Q," and JOHNNIE THOMAS, a/k/a

"Country," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that JORDAN CAMPBELL, a/k/a "Jayoh," DERRICK DICKEY, a/k/a "D," TERRANCE PATTERSON, a/k/a "Cupid," a/k/a "Q," and JOHNNIE THOMAS, a/k/a "Country," the defendants, conspired to distribute and possess with intent to distribute was 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).

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

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Indictment, JORDAN CAMPBELL, a/k/a "Jayoh," DERRICK DICKEY, a/k/a "D," TERRANCE PATTERSON, a/k/a "Cupid," a/k/a "Q," and JOHNNIE THOMAS, a/k/a "Country," 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.


FOREPERSON


AUDREY STRAUSS
Acting United States Attorney

UNITED STATES DISTRICT COURT
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v.

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DICKY, a/k/a "D," TERRANCE PATTERSON,
a/k/a "Cupid," a/k/a "Q," and JOHNNIE
THOMAS, a/k/a "Country,"

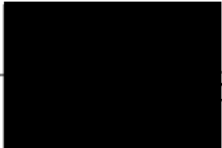
Defendants.

SEALED INDICTMENT

20 Cr.

(21 U.S.C. § 846.)

AUDREY STRAUSS
Acting United States Attorney

 Foreperson
