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- V. -

Defendant.

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2. CMB, including its leadership, its membership, and its associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was 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.

3. From at least in or about 2006 up to and including in or about 2017, members and associates of CMB were engaged in a violent rivalry with a rival street gang operating in and around the Jefferson Housing Projects in Manhattan (the "Jefferson Houses Crew").

4. Members and associates of CMB sold cocaine base, commonly known as "crack cocaine," and marijuana, primarily in and around the intersection of 122nd Street and Lexington Avenue in Manhattan, New York. CMB controlled drug sales within this area by prohibiting and preventing non-members, outsiders, and rival drug dealers from distributing controlled substances in the area controlled by CMB.

5. Certain members and associates of CMB committed and agreed, attempted, and threatened to commit acts of violence to protect and expand their drug trafficking operation and to protect fellow members and associates of CMB. These acts of violence included assaults, acts involving murder, and acts involving robbery intended either to protect CMB's drug territory, retaliate against members of rival gangs who had encroached on the territory controlled by CMB, or to otherwise promote the standing and reputation of CMB amongst rival gangs.

Purposes of CMB

6. The purposes of CMB included the following:

- a. Preserving and protecting the power, territory, and profits of CMB through acts involving murder, assaults, and acts involving robbery, and threats of violence.
- b. Promoting and enhancing CMB and the activities of its members and associates.
- c. Keeping victims and potential victims in fear of CMB 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 CMB.
- e. Enriching the members and associates of CMB through, among other things, the distribution and sale of controlled substances, including crack cocaine and marijuana.
- f. Protecting CMB 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 CMB.

Means and Methods of CMB

7. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of CMB were the following:

a. Members and associates of CMB committed, conspired, attempted, and threatened to commit acts of violence, including acts involving murder, assaults and robbery, to protect and expand CMB's criminal operations, and in connection with the rivalries with members of other street gangs, including the Jefferson Houses Crew.

b. Members and associates of CMB used threats of violence and physical violence against other members and associates to enforce and maintain discipline within the Enterprise.

c. Members and associates of CMB committed, conspired, attempted, and threatened to commit acts of violence, including murder and attempted murder, against rival gang members and other individuals adverse to CMB.

d. Members and associates of CMB obtained, possessed, and used firearms, which were shared by and accessible to members and associates of CMB.

e. Members and associates of CMB distributed controlled substances, including crack cocaine and marijuana.

f. Members and associates of CMB committed acts of intimidation and made threats as a means of deterring and punishing any potential witnesses to its crimes and in connection with protecting CMB and its members and associates from detection and prosecution by law enforcement authorities.

The Racketeering Conspiracy

8. From at least in or about 2006, up to and including in or about 2017, in the Southern District of New York and elsewhere, JAMAL ADAMSON, a/k/a "J-Rock," the defendant, and others known and unknown, being persons employed by and associated with the Enterprise described in Paragraphs One through Seven of this Information, namely, CMB, 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 CMB 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:

a. Multiple acts involving murder and attempted murder, chargeable under the following provisions of state law:

i. New York Penal Law, Sections 20.00, 105.15, 110.00 and 125.25;

b. multiple acts involving the distribution of controlled substances, including cocaine base in a form commonly known as "crack cocaine," and marijuana, in violation of laws of the United States, namely Title 21, United States Code, Sections

812, 841(a)(1), 841(b)(1)(C), 841(b)(1)(D), and 846, and Title 18, United States Code, Section 2.

9. It was a part of the conspiracy that the defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

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

COUNT TWO
(Conspiracy to Distribute Narcotics)

The United States Attorney further charges:

10. From at least in or about 2006, up to and including in or about 2017, in the Southern District of New York and elsewhere, JAMAL ADAMSON, a/k/a "J-Rock," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, distribution and possession with intent to distribute controlled substances in violation of Title 21, United States Code, Section 841(a)(1).

11. It was a part and an object of the conspiracy that JAMAL ADAMSON, a/k/a "J-Rock," the defendant, and others known and unknown, intentionally and knowingly would and did distribute and possess with intent to distribute controlled substances, to wit, mixtures and substances containing: (i) a

detectable amount of cocaine base, in a form commonly known as "crack," and (ii) mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1).

OVERT ACT

12. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. In or about 2010, JAMAL ADAMSON, a/k/a "J-Rock," the defendant, sold marijuana in the vicinity of East 122nd Street and Lexington Avenue in Manhattan.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION AS TO COUNT ONE

13. As a result of committing the offense alleged in Count One of this Information, JAMAL ADAMSON, a/k/a "J-Rock," 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 defendant

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, the offense alleged in Count One of this Information, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense alleged in Count One.

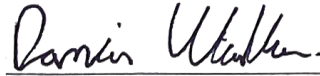
Substitute Assets Provision

14. If any of the above-described forfeitable property, as a result of any act or omission of JAMAL ADAMSON, a/k/a "J-Rock," 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), 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 1963.)

A handwritten signature in black ink, appearing to read "Damian Williams", is written over a horizontal line.

DAMIAN WILLIAMS

United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JAMAL ADAMSON, a/k/a "J-Rock,"

Defendant.

SUPERSEDING INFORMATION

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(18 U.S.C. §§ 1962(d), 371.)

DAMIAN WILLIAMS

United States Attorney.
