

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :
 :
 : SEALED SUPERSEDING
- v. - : INDICTMENT
 :
PATRICK CHELLEL, : S1 21 Cr. 441 (KMK)
a/k/a "Pat," :
DARREN LINDSAY, :
a/k/a "DJ," :
ANTOINE KOEN, :
a/k/a "Twon," :
ROBERT OJEDA, :
a/k/a "Mini," :
ONITAYO ARE, :
a/k/a "Oni," :
INDIGO GRANT, and :
PATRICIA KONCO, :
a/k/a "Flacca" :
 :
Defendants. :
 :
- - - - - X

COUNT ONE
(Conspiracy to Commit Hobbs Act Robbery)

The Grand Jury charges:

1. From at least in or about November 2019 and continuing through at least in or about January 2020, in the Southern District of New York and elsewhere, PATRICK CHELLEL, a/k/a "Pat," DARREN LINDSAY, a/k/a "DJ," ANTOINE KOEN, a/k/a "Twon," ROBERT OJEDA, a/k/a "Mini," ONITAYO ARE, a/k/a "Oni," INDIGO GRANT, and PATRICIA KONCO, a/k/a "Flacca," and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is

defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, CHELLEL, LINDSAY, KOEN, OJEDA, ARE, GRANT, KONCO and other co-conspirators known and unknown agreed to rob suspected drug dealers and associates of drugs and drug proceeds in New York and Connecticut.

(Title 18, United States Code, Section 1951.)

COUNT TWO

(Violence in Furtherance of a Plan to Commit Hobbs Act Robbery)

The Grand Jury further charges:

2. On or about November 14, 2019, in the Southern District of New York and elsewhere, PATRICK CHELLEL, a/k/a "Pat," and DARREN LINDSAY, a/k/a "DJ," the defendants, knowingly did commit and threaten physical violence to any person or property in furtherance of a plan or purpose to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, CHELLEL, LINDSAY, and other co-conspirators assaulted at gunpoint the occupants of a residence who they believed to be drug dealers in

the vicinity of Mount Hope, New York as part of a plan organized by CHELLEL to rob the occupants of drugs.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE
(Firearms Offense)

The Grand Jury further charges:

3. On or about November 14, 2019, in the Southern District of New York and elsewhere, PATRICK CHELLEL, a/k/a "Pat," and DARREN LINDSAY, a/k/a "DJ," 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 offense charged in Count Two 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.

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

COUNT FOUR
(Hobbs Act Robbery)

The Grand Jury further charges:

4. On or about December 15, 2019, in the Southern District of New York and elsewhere, DARREN LINDSAY, a/k/a "DJ," ANTOINE KOEN, a/k/a "Twon," and ROBERT OJEDA, a/k/a "Mini," the defendants, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and

did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, LINDSAY, KOEN, OJEDA, and other co-conspirators robbed the occupants of a residence who they believed to be drug dealers of marijuana in the vicinity of Harding Park in the Bronx, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FIVE
(Firearms Offense)

The Grand Jury further charges:

5. On or about December 15, 2019, in the Southern District of New York and elsewhere, DARREN LINDSAY, a/k/a "DJ," ANTOINE KOEN, a/k/a "Twon," and ROBERT OJEDA, a/k/a "Mini," 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 robbery charged in Count Four 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.

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

COUNT SIX
(Hobbs Act Robbery)

The Grand Jury further charges:

6. On or about January 19, 2020, in the Southern District of New York and elsewhere, PATRICK CHELLEL, a/k/a "Pat," DARREN LINDSAY, a/k/a "DJ," ANTOINE KOEN, a/k/a "Twon," ONITAYO ARE, a/k/a "Oni," INDIGO GRANT, and PATRICIA KONCO, a/k/a "Flacca," the defendants, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and aided and abetted the same, to wit, CHELLEL, LINDSAY, KOEN, ARE, GRANT, KONCO, and other co-conspirators robbed a suspected drug runner of drug proceeds in the vicinity of Hartford, Connecticut, after surreptitiously tracking the drug runner's location in the vicinity of Orange County, New York, and thereafter took the stolen drug proceeds into the vicinity of Middletown, New York to distribute among themselves and other co-conspirators.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT SEVEN
(Firearms Offense)

The Grand Jury further charges:

7. On or about January 19, 2020, in the Southern District

of New York and elsewhere, PATRICK CHELLEL, a/k/a "Pat," DARREN LINDSAY, a/k/a "DJ," ANTOINE KOEN, a/k/a "Twon," ONITAYO ARE, a/k/a "Oni," INDIGO GRANT, and PATRICIA KONCO, a/k/a "Flacca," 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 robbery charged in Count Six 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 EIGHT
(Narcotics Conspiracy)

The Grand Jury further charges:

8. From at least in or about 2015 and continuing through at least in or about 2020, in the Southern District of New York and elsewhere, PATRICK CHELLEL, a/k/a "Pat," the defendant, 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.

9. It was a part and an object of the conspiracy that PATRICK CHELLEL, a/k/a "Pat," the defendant, 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).

10. The controlled substance that PATRICK CHELLEL, a/k/a "Pat," the defendant, conspired to distribute and possess with intent to distribute was 1,000 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

FORFEITURE ALLEGATIONS

11. As a result of committing the offenses alleged in Counts One, Two, Four, and Six of this Indictment, PATRICK CHELLEL, a/k/a "Pat," DARREN LINDSAY, a/k/a "DJ," ANTOINE KOEN, a/k/a "Twon," ROBERT OJEDA, a/k/a "Mini," ONITAYO ARE, a/k/a "Oni," INDIGO GRANT, and PATRICIA KONCO, a/k/a "Flacca," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

12. As a result of committing the offense alleged in Count Eight of this Indictment, PATRICK CHELLEL, a/k/a "Pat," the defendant, 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

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

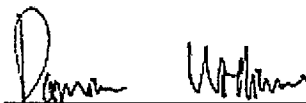
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) 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, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

[REDACTED]

FOREPERSON



DAMIAN WILLIAMS

United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Defendants.

SEALED SUPERSEDING INDICTMENT

S1 21 Cr. 441 (KMK)

(18 U.S.C. §§ 1951, 924(c), and 2; 21
U.S.C. § 846.)

DAMIAN WILLIAMS
United States Attorney

[REDACTED]
Foreperson
