

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

SEALED INDICTMENT

-v.-

22 Cr. 641

JEREMY WILLIAMS,
a/k/a "Dubs,"
RANDY JONES,
a/k/a "Nickelz,"
JAMES WHITE,
a/k/a "Infared,"
PAUL AYALA,
a/k/a "Mikey,"
MESSIAH JACKSON,
a/k/a "Two,"
JUSTICE JACKSON,
a/k/a "Tweak,"
OCTAVIOUS GRIFFIN,
a/k/a "Tate,"
MARKELL WILLIAMS,
a/k/a "15,"
TYRELL SIMON,
a/k/a "Insane,"
a/k/a "Rello,"
JOSHUA HENDRICKS,
a/k/a "Hendrix,"
ELIJAH BRIGGS,
a/k/a "Eli,"
SHAMELL WILLIAMS,
a/k/a "Mello Trend,"
THOMAS RODRIGUEZ,
a/k/a "Tom Tom,"
a/k/a "Checks,"
MARCUS CARDONA,
a/k/a "D,"
a/k/a "Honcho,"

Defendants.

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COUNT ONE
(Double Nine Grim Reapers Racketeering Conspiracy)
(ALL DEFENDANTS)

The Grand Jury charges:

The Grimz Enterprise

1. At all times relevant to this Indictment, JEREMY WILLIAMS, a/k/a "Dubs," RANDY JONES, a/k/a "Nickelz," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," the defendants, and others known and unknown, were members and associates of the Double Nine Grim Reapers (the "Grimz" or "Grimz Enterprise"), a criminal organization whose members and associates engaged in, among other activities, acts involving murder, assault, robbery, wire fraud, bank fraud, and narcotics trafficking. The Grimz operated in and around the City of Newburgh, New York.

2. The Grimz, including its leadership, its membership, and its associates, constituted an "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 Grimz Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Grimz Enterprise. At all times relevant to this Indictment, the Grimz Enterprise was engaged in, and its activities affected, interstate and foreign commerce. JEREMY WILLIAMS, a/k/a "Dubs," RANDY JONES, a/k/a "Nickelz," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," the defendants, participated in unlawful and other activity in furtherance of the conduct of the Grimz Enterprise's affairs.

3. Members and associates of the Grimz engaged in a series of violent disputes with rivals of the Grimz, including those aligned with the Grimz who they deemed disloyal to the Grimz Enterprise. During these disputes, members and associates of the Grimz committed multiple shootings, robberies, and assaults against their rivals and against individuals who were aligned with the Grimz.

4. Members and associates of the Grimz sold crack cocaine, Oxycodone, heroin, synthetic cannabinoid, commonly

known as "K2," and marihuana in and around the City of Newburgh, New York.

5. Members, and associates of the Grimz committed and agreed, attempted, and threatened to commit acts of violence to protect and expand their narcotics business and to protect fellow members and associates of the Grimz Enterprise. These acts of violence included acts involving murder, robbery, extortion, and assault, intended to protect the Grimz Enterprise's narcotics business, retaliate against members of rival gangs who had encroached on the Grimz Enterprise's narcotics business, to otherwise promote the standing and reputation of the Grimz amongst rival gangs, and to promote the standing and reputation of Grimz members amongst other Grimz members.

Purposes of the Grimz Enterprise

6. The purposes of the Grimz Enterprise included the following:

a. Preserving and protecting the power, territory, and profits of the Grimz Enterprise through acts involving murder, other acts of violence, and threats of violence.

b. Promoting and enhancing the Grimz Enterprise and the activities of its members and associates.

c. Keeping victims and potential victims in fear of the Grimz Enterprise 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 the gang.

e. Enriching the members and associates of the Grimz Enterprise through, among other things, robbery, wire fraud, bank fraud, and the distribution and sale of narcotics, including crack cocaine, heroin, Oxycodone, synthetic cannabinoid, commonly known as "K2," and marihuana.

Means and Methods of the Grimz Enterprise

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

a. Members and associates of the Grimz Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including acts involving murder, to protect and expand the Grimz Enterprise's criminal operations, and against rival gang members.

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

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

d. Members and associates of the Grimz Enterprise promoted and celebrated, in music and on social media, the criminal conduct of the Grimz Enterprise, namely narcotics distribution, acts involving violence, and the use of firearms.

e. Members and associates of the Grimz Enterprise obtained, possessed, and used firearms.

f. Members and associates of the Grimz Enterprise distributed controlled substances, including crack cocaine, Oxycodone, heroin, synthetic cannabinoid, commonly known as "K2," and marihuana.

g. Members and associates of the Grimz Enterprise conspired to commit wire fraud by fraudulently obtaining unemployment benefits, and natural disaster relief benefits, and bank fraud by fraudulently obtaining funds from victims' accounts.

The Grimz Racketeering Conspiracy

8. From at least in or about 2018 to the present, in the Southern District of New York and elsewhere, JEREMY WILLIAMS, a/k/a "Dubs," RANDY JONES, a/k/a "Nickelz," JAMES WHITE, a/k/a

"Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," the defendants, and others known and unknown, being persons employed by and associated with the Grimz Enterprise described in Paragraphs One through Seven of this Indictment, 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, 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 Grimz 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, chargeable under the following provisions of state law: New York Penal Law Sections 125.25 (murder), 110.00 (attempt), 105.15 (conspiracy), and 20.00 (aiding and abetting);

b. multiple acts involving robbery, chargeable under the following provisions of state law: New York Penal Law, Sections 160.00, 160.05, 160.10, 160.15 (robbery), 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

c. multiple acts indictable under Title 18, United States Code, Section 1951 (relating to the interference with commerce, robbery, or extortion);

d. multiple acts indictable under Title 18, United States Code, Section 1343 (wire fraud);

e. multiple acts indictable under Title 18, United States Code, Section 1344 (bank fraud); and

f. multiple offenses involving the distribution of controlled substances, including, crack cocaine, heroin, Oxycodone, synthetic cannabinoid, commonly known as "K2," and marihuana in violation of laws of the United States, namely Title 21, United States Code, Sections 812, 813, 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), 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 each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Grimz Enterprise.

Special Sentencing Factors

10. From at least in or about 2018 to the present, in the Southern District of New York and elsewhere, JEREMY WILLIAMS, a/k/a "Dubs," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," 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.

11. It was a part and an object of the conspiracy that JEREMY WILLIAMS, a/k/a "Dubs," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute

controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

12. The controlled substances that JEREMY WILLIAMS, a/k/a "Dubs," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," the defendants, conspired to distribute and possess with intent to distribute were (i) 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, Sections 841(b)(1)(A); and (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

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

COUNT TWO
(Attempted Murder and Assault with a Dangerous Weapon in Aid of
Racketeering)
(JUSTICE JACKSON, SIMON, RODRIGUEZ, CARDONA)

The Grand Jury further charges:

13. At all times relevant to this Indictment, the Grimz, as described in Paragraphs One through Seven of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals, which engaged in, and the activities of which affected, interstate and foreign commerce. The Grimz Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Grimz Enterprise.

14. At all times relevant to this Indictment, the Grimz, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely acts involving murder and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1343 and 1344, and offenses involving the distribution of

controlled substances, in violation of Title 21, United States Code, Sections 812, 813, 841, and 846.

15. On or about November 3, 2020, in the Southern District of New York and elsewhere, JUSTICE JACKSON, a/k/a "Tweak," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," the defendants, and others known and known, for the purpose of maintaining and increasing position in the Grimz, an enterprise engaged in racketeering activity, as described above, knowingly attempted to murder an individual and assaulted that individual with a dangerous weapon, and aided and abetted the same, to wit, JACKSON, SIMON, RODRIGUEZ, CARDONA, and others known and unknown shot a rival gang member in the vicinity of Roe Street in the City of Newburgh, New York, in violation of New York Penal Law Sections 125.25, 110.00, 120.05 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and 2.)

COUNT THREE

**(Discharge of a Firearm in Connection with a Crime of Violence)
(JUSTICE JACKSON, SIMON, RODRIGUEZ, CARDONA)**

The Grand Jury further charges:

16. On or about November 3, 2020, in the Southern District of New York and elsewhere, JUSTICE JACKSON, a/k/a "Tweak," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D,"

a/k/a "Honcho," 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, attempted murder and assault with a dangerous weapon in aid of racketeering, as 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 and discharged.

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

COUNT FOUR
(Hobbs Act Robbery)
(JUSTICE JACKSON, MARKELL WILLIAMS)

The Grand Jury further charges:

17. On or about November 10, 2020, in the Southern District of New York and elsewhere, JUSTICE JACKSON, a/k/a "Tweak," and MARKELL WILLIAMS, a/k/a "15," 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, JACKSON, WILLIAMS and others known and unknown robbed a drug dealer in the area of the Lake Street Apartment Complex in the City of Newburgh, New York.

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

COUNT FIVE
(Discharge of a Firearm in Connection with a Crime of Violence)
(JUSTICE JACKSON, MARKELL WILLIAMS)

The Grand Jury further charges:

18. On or about November 10, 2020, in the Southern District of New York and elsewhere, JUSTICE JACKSON, a/k/a "Tweak," and MARKELL WILLIAMS, a/k/a "15," 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 Hobbs Act 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 and discharged.

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

COUNT SIX
(Hobbs Act Robbery)
(GRIFFIN)

The Grand Jury further charges:

19. In or about 2019, in the Southern District of New York and elsewhere, OCTAVIOUS GRIFFIN, a/k/a "Tate," the defendant, 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, GRIFFIN and others known and unknown, robbed a drug dealer in the City of Newburgh, New York.

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

COUNT SEVEN
(Brandishing a Firearm in Connection with a Crime of Violence)
(GRIFFIN)

The Grand Jury further charges:

20. In or about 2019, in the Southern District of New York and elsewhere, OCTAVIOUS GRIFFIN, a/k/a "Tate," the defendant, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Hobbs Act 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.

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

COUNT EIGHT
(Hobbs Act Robbery)
(MESSIAH JACKSON)

The Grand Jury further charges:

21. On or about January 18, 2020, in the Southern District of New York and elsewhere, MESSIAH JACKSON, a/k/a "Two," the defendant, 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, MESSIAH JACKSON, and others known and unknown robbed a marihuana dealer in the vicinity of Liberty Street in the City of Newburgh, New York.

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

COUNT NINE
(Brandishing a Firearm in Connection with a Crime of Violence)
(MESSIAH JACKSON)

The Grand Jury further charges:

22. On or about January 18, 2020, in the Southern District of New York and elsewhere, MESSIAH JACKSON, a/k/a "Two," the defendant, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Eight 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) and (ii) and 2.)

COUNT TEN
(Hobbs Act Robbery)
(MARKELL WILLIAMS)

The Grand Jury further charges:

23. On or about September 15, 2021, in the Southern District of New York and elsewhere, MARKELL WILLIAMS, a/k/a "15," the defendant, 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, WILLIAMS and others known and unknown robbed a drug dealer in the City of Newburgh, New York.

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

COUNT ELEVEN
(Brandishing a Firearm in Connection with a Crime of Violence)
(MARKELL WILLIAMS)

The Grand Jury further charges:

24. On or about September 15, 2021, in the Southern District of New York and elsewhere, MARKELL WILLIAMS, a/k/a "15," the defendant, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Ten 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) and (ii) and 2.)

COUNT TWELVE
(Hobbs Act Robbery)
(JUSTICE JACKSON, SIMON, SHAMELL WILLIAMS)

The Grand Jury further charges:

25. On or about October 31, 2021, in the Southern District of New York and elsewhere, JUSTICE JACKSON, a/k/a "Tweak," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," and SHAMELL WILLIAMS, a/k/a "Mello Trend," 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, JACKSON, SIMON, WILLIAMS, and others known and unknown robbed a drug dealer in the vicinity of South Clark Street in the City of Newburgh, New York.

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

COUNT THIRTEEN
(Brandishing a Firearm in Connection with a Crime of Violence)
(JUSTICE JACKSON, SIMON, SHAMELL WILLIAMS)

The Grand Jury further charges:

26. On or about October 31, 2021, in the Southern District of New York and elsewhere, JUSTICE JACKSON, a/k/a "Tweak," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," and SHAMELL WILLIAMS, a/k/a "Mello Trend," 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 Hobbs Act robbery charged in Count Twelve 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) and (ii) and 2.)

COUNT FOURTEEN
(Narcotics Trafficking)
(ALL DEFENDANTS EXCEPT JONES)

The Grand Jury further charges:

27. From at least in or about 2018 to the present, in the Southern District of New York and elsewhere, JEREMY WILLIAMS, a/k/a "Dubs," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA

HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," 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.

28. It was a part and an object of the conspiracy that JEREMY WILLIAMS, a/k/a "Dubs," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

29. The controlled substances that JEREMY WILLIAMS, a/k/a "Dubs," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS,

a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," the defendants, conspired to distribute and possess with intent to distribute were: (i) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack cocaine"; (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin; (iii) mixtures and substances containing a detectable amount of Oxycodone; (iv) less than 50 kilogram of mixtures and substances containing a detectable amount of marihuana; and (v) mixtures and substances containing a detectable amount of synthetic cannabinoids, commonly known as "K2," in violation of Title 21, United States Code, Sections 813 and 841(b)(1)(A).

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

COUNT FIFTEEN

(Possession of a Firearm In Furtherance of a Drug Trafficking Crime)

(ALL DEFENDANTS EXCEPT JONES)

The Grand Jury further charges:

30. From at least in or about 2018 to the present, in the Southern District of New York and elsewhere, JEREMY WILLIAMS, a/k/a "Dubs," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS,

a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," the defendants, during and in relation to a drug trafficking offense for which they may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count Fourteen of this Indictment, knowingly did use and carry a firearm, and in furtherance of such drug trafficking offense, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

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

FORFEITURE ALLEGATIONS

31. As a result of committing the offenses alleged in Count One of this Indictment, JEREMY WILLIAMS, a/k/a "Dubs," RANDY JONES, a/k/a "Nickelz," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," the defendants, shall forfeit to the United

States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendants 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 the racketeering activity alleged in Count One of this Indictment, 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 that the defendants personally obtained.

32. As a result of committing the offense charged in Count Fourteen of this Indictment, JEREMY WILLIAMS, a/k/a "Dubs," JAMES WHITE, a/k/a "Infared," PAUL AYALA, a/k/a "Mikey," MESSIAH JACKSON, a/k/a "Two," JUSTICE JACKSON, a/k/a "Tweak," OCTAVIOUS GRIFFIN, a/k/a "Tate," MARKELL WILLIAMS, a/k/a "15," TYRELL SIMON, a/k/a "Insane," a/k/a "Rello," JOSHUA HENDRICKS, a/k/a "Hendrix," ELIJAH BRIGGS, a/k/a "Eli," SHAMELL WILLIAMS, a/k/a "Mello Trend," THOMAS RODRIGUEZ, a/k/a "Tom Tom," a/k/a "Checks," MARCUS CARDONA, a/k/a "D," a/k/a "Honcho," 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 that the defendants personally obtained. -

Substitute Assets Provision

33. If any of the property described above as subject to forfeiture, as a result of any act or omission of the above-named 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 18, United States Code, Section 1963(m), 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 defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 1963;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

[REDACTED]

FOREPERSON

Damian Williams
DAMIAN WILLIAMS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JEREMY WILLIAMS, a/k/a "Dubs," et al.,
Defendants.


SEALED INDICTMENT

22 Cr.

(18 U.S.C. §§ 924, 1951, 1959,
1962, and 2; 21 U.S.C. § 846.)

DAMIAN WILLIAMS

United States Attorney


foreperson
