

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
:
UNITED STATES OF AMERICA :
:
- v. - :
:
ROSHEEN HILLIARD, :
a/k/a "Nyce," :
a/k/a "Ghost," :
a/k/a "Cutt," :
a/k/a "Daddy," :
JERMAINE DRAYTON, :
a/k/a "Jerm," :
JESENIA FIELDS, and :
LEON FOUNTAIN, :
a/k/a "Tiger," :
:
Defendants. :
:
- - - - - X

SEALED
INDICTMENT
17 Cr. 35

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2013, up to and including in or about December 2016, in the Southern District of New York and elsewhere, ROSHEEN HILLIARD, a/k/a "Nyce," a/k/a "Ghost," a/k/a "Cutt," a/k/a "Daddy," JERMAINE DRAYTON, a/k/a "Jerm," JESENIA FIELDS, and LEON FOUNTAIN, a/k/a "Tiger," 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 ROSHEEN HILLIARD, a/k/a "Nyce," a/k/a "Ghost," a/k/a "Cutt,"

a/k/a "Daddy," JERMAINE DRAYTON, a/k/a "Jerm," JESENIA FIELDS, and LEON FOUNTAIN, a/k/a "Tiger," 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 ROSHEEN HILLIARD, a/k/a "Nyce," a/k/a "Ghost," a/k/a "Cutt," a/k/a "Daddy," JERMAINE DRAYTON, a/k/a "Jerm," JESENIA FIELDS, and LEON FOUNTAIN, a/k/a "Tiger," the defendants, conspired to distribute and possess with the intent to distribute was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(A).

4. During the period charged in the Indictment, the conspiracy (the "Hilliard Drug Trafficking Organization" or the "Hilliard DTO") was led by ROSHEEN HILLIARD, a/k/a "Nyce," a/k/a "Ghost," a/k/a "Cutt," a/k/a "Daddy," the defendant.

5. During the period charged in the Indictment, the Hilliard DTO distributed heroin in and around Sullivan County, New York.

OVERT ACTS

6. 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 and elsewhere:

a. Between at least in or about November 2015 and up to and including at least in or about January 2016, JERMAINE DRAYTON, a/k/a "Jerm," the defendant, delivered heroin belonging to the Hilliard DTO to a co-conspirator ("CC-1") in or around Liberty, New York.

b. On or about January 26, 2016, LEON FOUNTAIN, a/k/a "Tiger," the defendant, had phone conversations with CC-1 coordinating the delivery of heroin belonging to the Hilliard DTO.

c. On or about November 28, 2016, JESENIA FIELDS, the defendant, delivered heroin belonging to the Hilliard DTO to a confidential informant ("CI-1") in Sullivan County, New York.

d. On or about December 7, 2016, ROSHEEN HILLIARD, a/k/a "Nyce," a/k/a "Ghost," a/k/a "Cutt," a/k/a "Daddy," the defendant, sold heroin to CI-1 in Sullivan County, New York.

FORFEITURE ALLEGATION

7. As a result of committing the offense alleged in Count One of this Indictment, ROSHEEN HILLIARD, a/k/a "Nyce," a/k/a "Ghost," a/k/a "Cutt," a/k/a "Daddy," JERMAINE DRAYTON, a/k/a "Jerm," JESENIA FIELDS, and LEON FOUNTAIN, a/k/a "Tiger," 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

8. 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), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


FOREPERSON

1/18/2017

Preet Bharara
PREET BHARARA
United States Attorney

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Defendants.

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(21 U.S.C. § 846.)

PREET BHARARA

Foreperson.

United States Attorney.
