

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
: SEALED SUPERSEDING INDICTMENT
- v. - :
: S16 15 Cr. 537 (VEC)
KAREEM LANIER, :
a/k/a "Black," :
a/k/a "Reem," :
JASON MOYE, :
a/k/a "Tall Jay," :
RASHAAD CONYERS, :
a/k/a "Houli," :
ANDY SEDA, :
a/k/a "Andwhite," :
a/k/a "Andy Rivera," :
JAROD SLATER, :
a/k/a "Rod," :
HASWANI TYSON, :
a/k/a "Swani," :
ANTHONY REDDICK, :
a/k/a "Ant Flocka," :
CHRISTOPHER IVEY, :
a/k/a "Light Eyes," :
ORENZO HARRELL, :
a/k/a "Oey," :
SOLOMON ALUKO, :
a/k/a "Dodie," :
DAVOUN MATTHEWS, :
a/k/a "Juice," and :
KYLE HINES, :
a/k/a "Forty," :
Defendants. :
----- X

RACKETEERING VIOLATIONS

COUNT ONE

(Racketeering Conspiracy)

The Grand Jury charges:

1. At all times relevant to this Indictment, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," JASON MOYE, a/k/a "Tall Jay," RASHAAD CONYERS, a/k/a "Houli," ANDY SEDA, a/k/a "Andwhite," JAROD SLATER, a/k/a "Rod," HASWANI TYSON, a/k/a "Swani," ANTHONY REDDICK, a/k/a "Ant Flocka," CHRISTOPHER IVEY, a/k/a "Light Eyes," ORENZO HARRELL, a/k/a "Oey," SOLOMON ALUKO, a/k/a "Dodie," DAVOUN MATTHEWS, a/k/a "Juice," and KYLE HINES, a/k/a "Forty," the defendants, and others known and unknown, were members and associates of the "Young Gunnaz" ("YGz" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other things, murder, robbery, and narcotics trafficking.

The YGz operated principally in the Bronx, New York.

2. The YGz, 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. This Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this

Indictment, the Enterprise was engaged in, and its activities affected, interstate and foreign commerce.

PURPOSES OF THE ENTERPRISE

3. The purposes of the Enterprise included the following:

a. Enriching the members and associates of the Enterprise through, among other things, robbery and the distribution of narcotics, including cocaine base in a form commonly known as "crack," heroin, and marijuana.

b. Preserving and protecting the power of the Enterprise and its members and associates through murder, attempted murder, other acts of violence, and threats of violence.

c. Promoting and enhancing the Enterprise and the activities of its members and associates.

d. The Enterprise operated within multiple housing developments, including the Mott Haven Houses, Maria Lopez Plaza, and River Park Towers, all in the Bronx, New York.

MEANS AND METHODS OF THE ENTERPRISE

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

a. Members and associates of the Enterprise committed, conspired to commit, and attempted to commit, acts of violence, including murder, to protect and expand the Enterprise's

criminal operations, and in connection with rivalries with members of other street gangs.

b. Members and associates of the Enterprise used physical violence and threats of violence, including murder and attempted murder, against various people, including in particular rival gang members and rival narcotics traffickers.

c. Members and associates of the Enterprise planned and committed robberies of individuals in and around the Bronx and New York, New York.

d. Members and associates of the Enterprise planned and committed robberies at banks in and around Westchester and Dutchess Counties, in New York State.

e. Members and associates of the Enterprise sold narcotics, including cocaine base in a form commonly known as "crack," heroin, and marijuana.

THE RACKETEERING CONSPIRACY

5. From at least in or about 2005, up to and including in or about August 2016, in the Southern District of New York and elsewhere, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," JASON MOYE, a/k/a "Tall Jay," RASHAAD CONYERS, a/k/a "Houli," ANDY SEDA, a/k/a "Andwhite," JAROD SLATER, a/k/a "Rod," HASWANI TYSON, a/k/a "Swani," ANTHONY REDDICK, a/k/a "Ant Flocka," CHRISTOPHER IVEY, a/k/a "Light Eyes," ORENZO HARRELL, a/k/a "Oey," SOLOMON ALUKO, a/k/a "Dodie," DAVOUN MATTHEWS, a/k/a "Juice," and KYLE HINES,

a/k/a "Forty," the defendants, and others known and unknown, being persons employed by and associated with the racketeering Enterprise described above, namely, the YGz, which was engaged in, and the activities of which affected, interstate and foreign commerce, willfully and 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 YGz 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 multiple acts involving murder and robbery that are chargeable under the following provisions of state law:

 New York Penal Law, Sections 20.00, 125.25 and 125.27
 (murder);

 New York Penal Law, Sections 20.00, 110.00 and 125.25
 (attempted murder);

 New York Penal Law, Sections 105.15 and 125.25
 (conspiracy to murder);

 New York Penal Law, Sections 20.00, 110.00, 160.05 and
 160.10 (robbery);

 New York Penal Law, Sections 105.10, 160.05 and 160.10
 (conspiracy to commit robbery); and

New York Penal Law, Sections 20.00, 110.00, 160.05 and 160.10 (attempted robbery); multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in controlled substances, including 28 grams and more of cocaine base in a form commonly known as "crack," and quantities of heroin and marijuana, all in violation of the laws of the United States, specifically Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(B), (b)(1)(C), (b)(1)(D), and 846, and Title 18, United States Code, Section 2; and multiple acts that are indictable under Title 18, United States Code, Sections 1951 and 2 (relating to robbery).

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

Overt Acts

7. 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 or elsewhere:

a. On or about December 22, 2005, a YGz member attempted to shoot a rival of the YGz ("Victim-1") in the vicinity of 286 East 149th Street in the Bronx, New York, and JASON MOYE, a/k/a "Tall Jay," the defendant, and another YGz member, attempted to hide from law enforcement the gun used in the shooting.

b. On or about August 10, 2007, RASHAAD CONYERS, a/k/a "Houli," the defendant, shot and injured an associate of a rival gang ("Victim-2") inside a clothing store in the vicinity of 2838 Third Avenue in the Bronx, New York.

c. On or about June 27, 2009, in the vicinity of Willis Avenue and 140th Street in the Bronx, New York, HASWANI TYSON, a/k/a "Swani," the defendant, and others known and unknown, acting in concert, attempted to commit a robbery, and in the course of doing so, a YGz member shot and killed Darrel Ledgister.

d. On or about September 26, 2009, JASON MOYE, a/k/a "Tall Jay," the defendant, participated in a shootout with members of a rival gang, in the vicinity of East 146th Street and College Avenue in the Bronx, New York, during which two bystanders ("Victim-3" and "Victim-4," respectively) were shot and injured.

e. On or about October 27, 2009, KYLIE HINES, a/k/a "Forty," the defendant, and others known and unknown, acting in concert, robbed a Chinese food delivery worker ("Victim-5") in front of 291 East 143rd Street in the Bronx, New York, and during the course of the robbery, a YGz member cut Victim-5's neck with a sharp object.

f. On or about November 22, 2010, JASON MOYE, a/k/a "Tall Jay," the defendant, and others known and unknown, acting in concert, participated in a shootout with members of a rival gang, in the vicinity of East 163rd Street and Park Avenue in the Bronx,

New York, during which a rival gang member ("Victim-6") was shot and nearly killed.

g. On or about January 24, 2011, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," JASON MOYE, a/k/a "Tall Jay," ORENZO HARRELL, a/k/a "Oey," and SOLOMON ALUKO, a/k/a "Dodie," the defendants, and others known and unknown, acting in concert, assaulted and robbed an associate of a rival gang ("Victim-7") inside a bodega located on Courtlandt Avenue near 153rd Street in the Bronx, New York.

h. On or about January 24, 2011, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," JASON MOYE, a/k/a "Tall Jay," ORENZO HARRELL, a/k/a "Oey," and SOLOMON ALUKO, a/k/a "Dodie," the defendants, and others known and unknown, acting in concert, assaulted Dykeem Etheridge in the vicinity of Courtlandt Avenue between 153rd and 154th Streets in the Bronx, New York.

i. On or about January 24, 2011, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," the defendant, shot and killed Dykeem Etheridge in the vicinity of Courtlandt Avenue between 153rd and 154th Streets in the Bronx, New York.

j. On or about July 3, 2011, in the vicinity of Park Avenue and 158th Street in the Bronx, New York, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," the defendant, and others known and unknown, acting in concert, attempted to murder members of a rival gang, and in the course of doing so, shot and injured a rival gang

member ("Victim-8") and shot and killed Curtis Smith.

k. On or about December 22, 2011, JASON MOYE, a/k/a "Tall Jay," ANDY SEDA, a/k/a "Andwhite," and JAROD SLATER, a/k/a "Rod," the defendants, and others known and unknown, acting in concert, shot and killed Taisheem Ferguson, a/k/a "Trey," near Morris Avenue and 151st Street in the Bronx, New York.

l. On or about April 16, 2012, ANTHONY REDDICK, a/k/a "Ant Flocka," the defendant, and others known and unknown, acting in concert, stomped and killed Moises Lora, a/k/a "Noah" in the vicinity of 700 Morris Avenue in the Bronx, New York.

m. On or about May 1, 2012, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," the defendant, hit a drug customer ("Victim-9") with a gun near Maria Lopez Plaza in the Bronx, New York.

n. On or about July 10, 2012, JASON MOYE, a/k/a "Tall Jay," the defendant, and others known and unknown, were together with other YGz gang members in a vehicle containing a loaded firearm, ammunition, and marijuana at a location near the Mott Haven Houses in the Bronx, New York.

o. On or about December 22, 2013, DAVOUN MATTHEWS, a/k/a "Juice," the defendant, placed a firearm on the ground by a pillar in a courtyard near 383 East 141st Street in the Bronx, New York and another YGz member picked up the firearm.

p. On or about May 12, 2015, RASHAAD CONYERS, a/k/a "Houli," the defendant, and others known and unknown, acting in

concert, fired gunshots in a rival gang's territory near 328 East 145th Street, Bronx, New York.

q. On or about August 19, 2015, in an apartment in the Millbrook Houses in the Bronx, New York, ANDY SEDA, a/k/a "Andwhite," the defendant, possessed approximately 92 plastic bags of crack cocaine that he intended to distribute, and possessed hundreds of rounds of ammunition for several types of firearms, including approximately (i) 300 Winchester S&W .40 caliber rounds, (ii) 100 Federal S&W .40 caliber rounds, (iii) one Federal 12-gauge shotgun shell, (iv) one Fiocchi 12-gauge shotgun shell, (v) seven Luger 9mm rounds, (vi) four Winchester .357 caliber rounds, (vii) two Hornaday .357 caliber rounds, (viii) one Federal .357 caliber round, (ix) six Winchester .38 caliber special rounds, and (x) one Federal .38 caliber special round.

r. On or about July 14, 2016, while detained pending trial in this case at the Bureau of Prisons' Metropolitan Detention Center in Brooklyn, New York (the "MDC"), KYLE HINES, a/k/a "forty," the defendant, and others known and unknown, conspired to assault a rival gang member ("Victim-10") with a dangerous weapon (namely, what appeared to be a scalpel) in Victim-11's jail cell at the MDC and to steal commissary items from Victim-11's jail cell.

NOTICE OF SPECIAL SENTENCING FACTORS

8. On or about June 27, 2009, in the Southern District of New York, HASWANI TYSON, a/k/a "Swani," the defendant, and others known and unknown, knowingly murdered and aided and abetted the murder of Darrel Ledgister in the vicinity of 401 East 140th Street, Bronx, New York, in violation of New York Penal Law, Sections 125.25, 125.27, and 20.00, in that, (i) with intent to cause the death of another person, TYSON caused the death of Ledgister, and (ii) under circumstances evincing a depraved indifference to human life, TYSON recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Ledgister, and (iii) TYSON, acting in concert, attempted to commit a robbery, and in the course of and in furtherance of such attempted robbery, caused the death of Ledgister.

9. On or about January 24, 2011, in the Southern District of New York, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," the defendant, knowingly murdered Dykeem Etheridge in the vicinity of Courtlandt Avenue between 153rd and 154th Streets, Bronx, New York, in violation of New York Penal Law, Section 125.25, in that, (i) with intent to cause the death of Etheridge, LANIER caused the death of Etheridge, and (ii) under circumstances evincing a depraved indifference to human life, LANIER recklessly engaged in conduct which created a grave risk of death to another person, and

thereby caused the death of Etheridge.

10. On or about July 3, 2011, in the Southern District of New York, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," the defendant, knowingly murdered and aided and abetted the murder of Curtis Smith in the vicinity of Park Avenue and 158th Street, Bronx, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (i) with intent to cause the death of another person, LANIER caused the death of Smith, and (ii) under circumstances evincing a depraved indifference to human life, LANIER recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Smith.

11. On or about December 22, 2011, in the Southern District of New York, JASON MOYE, a/k/a "Tall Jay," ANDY SEDA, a/k/a "Andwhite," and JAROD SLATER, a/k/a "Rod," the defendants, and others known and unknown, knowingly murdered and aided and abetted the murder of Taisheem Ferguson, a/k/a "Trey," in the vicinity of Morris Avenue and 151st Street, Bronx, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (i) with intent to cause the death of another person, MOYE, SEDA, and SLATER caused the death of Ferguson, and (ii) under circumstances evincing a depraved indifference to human life, MOYE, SEDA, and SLATER recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Ferguson.

12. On or about April 16, 2012, in the Southern District of New York, ANTHONY REDDICK, a/k/a "Ant Flocka," the defendant, and others known and unknown, knowingly murdered and aided and abetted the murder of Moises Lora, a/k/a "Noah," in the vicinity of 700 Morris Avenue, Bronx, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (i) with intent to cause the death of Lora, REDDICK caused the death of Lora, and (ii) under circumstances evincing a depraved indifference to human life, REDDICK recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Lora.

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

COUNT TWO

(Murder of Darrel Ledgister in Aid of Racketeering)

The Grand Jury further charges:

13. At all times relevant to this Indictment, the YGz, as described in Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its 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 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.

14. At all times relevant to this Indictment, the YGz, through its members and associates, knowingly 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, narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846, and robberies and attempted robberies of banks, in violation of Title 18, United States Code, Sections 1951 and 2.

15. On or about June 27, 2009, in the Southern District of New York, HASWANI TYSON, a/k/a "Swani," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the YGz, and for the purpose of gaining entrance to and maintaining and increasing position in the YGz, an enterprise engaged in racketeering activity, as described above, knowingly murdered and aided and abetted the murder of Darrel Ledgister in the vicinity of 401 East 140th Street, Bronx, New York, in violation of New York Penal Law, Sections 125.25, 125.27, and 20.00, in that, (i) with intent to cause the death of another person, TYSON caused the death of Ledgister; and (ii) under circumstances evincing a depraved indifference to human life,

TYSON recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Ledgister; and (iii) TYSON, acting in concert, attempted to commit a robbery, and in the course of and in furtherance of such attempted robbery, caused the death of Ledgister.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

COUNT THREE

(Murder of Dykeem Etheridge in Aid of Racketeering)

The Grand Jury further charges:

16. Paragraphs 13 and 14 of Count Two of this Indictment are repeated and incorporated by reference as though fully set forth herein.

17. On or about January 24, 2011, in the Southern District of New York, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the YGz, and for the purpose of gaining entrance to and maintaining and increasing position in the YGz, an enterprise engaged in racketeering activity, as described above, knowingly murdered Dykeem Etheridge in the vicinity of Courtlandt Avenue between 153rd and 154th Streets, Bronx, New York, in violation of New York Penal Law, Section 125.25, in that, (i) with intent to cause the death of Etheridge, LANIER caused the death of Etheridge; and (ii) under circumstances evincing a depraved

indifference to human life, LANIER recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Etheridge.

(Title 18, United States Code, Section 1959(a)(1).)

COUNT FOUR

(Murder of Taisheem Ferguson in Aid of Racketeering)

The Grand Jury further charges:

18. Paragraphs 13 and 14 of Count Two of this Indictment are repeated and incorporated by reference as though fully set forth herein.

19. On or about December 22, 2011, in the Southern District of New York, JASON MOYE, a/k/a "Tall Jay," ANDY SEDA, a/k/a "Andwhite," and JAROD SLATER, a/k/a "Rod," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the YGz, and for the purpose of gaining entrance to and maintaining and increasing position in the YGz, an enterprise engaged in racketeering activity, as described above, MOYE, SEDA, and SLATER knowingly murdered and aided and abetted the murder of Taisheem Ferguson, a/k/a "Trey," in the vicinity of Morris Avenue and 151st Street, Bronx, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (i) with intent to cause the death of another person, MOYE, SEDA, and SLATER caused the death of Ferguson; and (ii) under circumstances evincing

a depraved indifference to human life, MOYE, SEDA, and SLATER recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Ferguson.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

COUNT FIVE

(Murder of Moises Lora in Aid of Racketeering)

The Grand Jury further charges:

20. Paragraphs 13 and 14 of Count Two of this Indictment are repeated and incorporated by reference as though fully set forth herein.

21. On or about April 16, 2012, in the Southern District of New York, ANTHONY REDDICK, a/k/a "Ant Flocka," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the YGz, and for the purpose of gaining entrance to and maintaining and increasing position in the YGz, an enterprise engaged in racketeering activity, as described above, REDDICK knowingly murdered and aided and abetted the murder of Moises Lora, a/k/a "Noah," in the vicinity of 700 Morris Avenue, Bronx, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (i) with intent to cause the death of Lora, REDDICK caused the death of Lora; and (ii) under circumstances evincing a depraved indifference to human life, REDDICK recklessly engaged in conduct which created a grave risk

of death to another person, and thereby caused the death of Lora.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

COUNT SIX

(Assault and Attempted Murder in Aid of Racketeering)

The Grand Jury further charges:

22. Paragraphs 13 and 14 of Count Two of this Indictment are repeated and incorporated by reference as though fully set forth herein.

23. On or about May 12, 2015, in the Southern District of New York, RASHAAD CONYERS, a/k/a "Houli," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the YGz, and for the purpose of gaining entrance to and maintaining and increasing position in the YGz, an enterprise engaged in racketeering activity, as described above, intentionally and knowingly assaulted an individual with a dangerous weapon; attempted to murder an individual; and aided and abetted the same, to wit, CONYERS fired gunshots in a rival gang's territory in the vicinity of 328 East 145th Street, Bronx, New York with the intent to murder such members of that rival gang, in violation of New York Penal Law, Sections 120.05, 120.14(1), 120.20, 125.25, and 110.00, and 20.00.

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

COUNT SEVEN

(Conspiracy to Commit Assault in Aid of Racketeering)

The Grand Jury further charges:

24. Paragraphs 13 and 14 of Count Two of this Indictment are repeated and incorporated by reference as though fully set forth herein.

25. On or about July 14, 2016, in the Southern District of New York and elsewhere, KYLE HINES, a/k/a "Forty," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the YGz, and for the purpose of gaining entrance to and maintaining and increasing position in the YGz, an enterprise engaged in racketeering activity, as described above, knowingly conspired to assault Victim-10 with a dangerous weapon, to wit, while detained pending trial in this case at the MDC, HINES agreed with others to assault Victim-10 with what appeared to be a scalpel, in violation of New York Penal Law, Sections 120.00, 120.05, 120.06, and 105.10, and 105.15.

(Title 18, United States Code, Section 1959(a)(6).)

NARCOTICS VIOLATIONS

COUNT EIGHT

(Narcotics Conspiracy)

The Grand Jury further charges:

26. From at least in or about 2005 up to and including in or about August 2016, in the Southern District of New York and elsewhere, ANDY SEDA, a/k/a "Andwhite," CHRISTOPHER IVEY, a/k/a "Light Eyes," DAVOUN MATTHEWS, a/k/a "Juice," ORENZO HARRELL, a/k/a "Oey," SOLOMON ALUKO, a/k/a "Dodie," and KYLE HINES, a/k/a "Forty," 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.

27. It was a part and an object of the conspiracy that SEDA, IVEY, MATTHEWS, HARRELL, ALUKO, and HINES, 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).

28. The controlled substances involved in the offense were (a) 28 grams and more of cocaine base in a form commonly known as "crack," in violation of Title 18, United States Code, Section 841(b)(1)(B); (b) a quantity of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (c) a quantity of mixtures

and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

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

FIREARMS VIOLATIONS

COUNT NINE

(Use of Firearms for the Murder of Darrel Ledgister)

The Grand Jury further charges:

29. On or about June 27, 2009, in the Southern District of New York, HASWANI TYSON, a/k/a "Swani," 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 murder of Darrel Ledgister in aid of racketeering charged in Count Two of this Indictment, willfully and knowingly did use and carry firearms, and, in furtherance of such crime of violence, did possess firearms, and did aid and abet such use, carrying, and possession of firearms, and in the course of that crime of violence did cause the death of a person through the use of at least one of those firearms, namely the death of Ledgister, which killing is murder as defined in Title 18, United States Code, Section 1111(a).

(Title 18, United States Code, Sections 924(j)(1) and 2.)

COUNT TEN

(Use of a Firearm for the Murder of Dykeem Etheridge)

The Grand Jury further charges:

30. On or about January 24, 2011, in the Southern

District of New York, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," the defendant, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the murder of Dykeem Etheridge in aid of racketeering charged in Count Three of this Indictment, willfully and knowingly did use and carry a firearm, and, in furtherance of such crime of violence, did possess a firearm, and in the course of that crime of violence did cause the death of a person through the use of a firearm, namely the death of Etheridge, which killing is murder as defined in Title 18, United States Code, Section 1111(a).

(Title 18, United States Code, Section 924(j)(1).)

COUNT ELEVEN

(Use of Firearms for Murder of Taisheem Ferguson)

The Grand Jury further charges:

31. On or about December 22, 2011, in the Southern District of New York, JASON MOYE, a/k/a "Tall Jay," ANDY SEDA, a/k/a "Andwhite," and JAROD SLATER, a/k/a "Rod," the defendants, and other known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the murder of Taisheem Ferguson, a/k/a "Trey," in aid of racketeering charged in Count Four of this Indictment, willfully and knowingly did use and carry a firearm, and, in furtherance of such crime of violence, did possess a firearm, and did aid and abet such use, carrying, and possession of a firearm,

and in the course of that crime of violence did cause the death of a person through the use of a firearm, namely the death of Ferguson, which killing is murder as defined in Title 18, United States Code, Section 1111(a).

(Title 18, United States Code, Sections 924(j)(1) and 2.)

COUNT TWELVE

(Use of Firearms for Violent Racketeering Conspiracy)

The Grand Jury further charges:

32. From at least in or about 2005, up to and including in or about August 2016, in the Southern District of New York, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," ANDY SEDA, a/k/a "Andwhite," JASON MOYE, a/k/a "Tall Jay," CHRISTERHER IVEY, a/k/a "Light Eyes," DAVOUN MATTHEWS, a/k/a "Juice," RASHAAD CONYERS, a/k/a "Houli," ORENZO HARRELL, a/k/a "Oey," SOLOMON ALUKO, a/k/a "Dodie," the defendants, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the racketeering conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime of violence, did possess firearms, and did aid and abet such use, carrying, and possession of firearms, several of which were brandished and discharged on multiple occasions.

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

SPECIAL FINDINGS

SPECIAL FINDINGS AS TO KAREEM LANIER

33. Counts Three and Ten of this Indictment are repeated and incorporated by reference as though fully set forth herein. As to Count Three of this Indictment, charging the murder of Dykeem Etheridge in aid of racketeering, and Count Ten of this Indictment, charging the use of a firearm during and in relation to that crime of violence, defendant KAREEM LANIER, a/k/a "Black," a/k/a "Reem":

a. was 18 years of age or older at the time of the offense;

b. intentionally killed Dykeem Etheridge (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of Dykeem Etheridge (Title 18, United States Code, Section 3591(a)(2)(B));

d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Dykeem Etheridge died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(c));

e. intentionally and specifically engaged in an act of

violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Dykeem Etheridge died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)); and

f. in the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5)).

SPECIAL FINDINGS AS TO JASON MOYE

34. Counts Four and Eleven of this Indictment are repeated and incorporated by reference as though fully set forth herein. As to Count Four of this Indictment, charging the murder of Taisheem Ferguson, a/k/a "Trey," in aid of racketeering, and Count Eleven of this Indictment, charging the use of a firearm during and in relation to that crime of violence, defendant JASON MOYE, a/k/a "Tall Jay":

a. was 18 years of age or older at the time of the offense;

b. intentionally killed Taisheem Ferguson (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of Taisheem Ferguson (Title 18, United States Code, Section 3591(a)(2)(B));

d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Taisheem Ferguson died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(c));

e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Taisheem Ferguson died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. in the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5)); and

g. intentionally killed or attempted to kill more than one person in a single criminal episode (Title 18, United States Code, Section 3592(c)(16)).

SPECIAL FINDINGS AS TO ANDY SEDA

35. Counts Four and Eleven of this Indictment are repeated and incorporated by reference as though fully set forth herein. As to Count Four of this Indictment, charging the murder of Taisheem Ferguson, a/k/a "Trey," in aid of racketeering, and

Count Eleven of this Indictment, charging the use of a firearm during and in relation to that crime of violence, defendant ANDY SEDA, a/k/a "Andwhite":

a. was 18 years of age or older at the time of the offense;

b. intentionally killed Taisheem Ferguson (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of Taisheem Ferguson (Title 18, United States Code, Section 3591(a)(2)(B));

d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and Taisheem Ferguson died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(c));

e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and Taisheem Ferguson died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. in the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the

victim of the offense (Title 18, United States Code, Section 3592(c)(5)); and

g. intentionally killed or attempted to kill more than one person in a single criminal episode (Title 18, United States Code, Section 3592(c)(16)).

FORFEITURE ALLEGATION AS TO COUNT ONE

36. As a result of committing the offense charged in Count One of this Indictment, KAREEM LANIER, a/k/a "Black," a/k/a "Reem," JASON MOYE, a/k/a "Tall Jay," RASHAAD CONYERS, a/k/a "Houli," ANDY SEDA, a/k/a "Andwhite," JAROD SLATER, a/k/a "Rod," HASWANI TYSON, a/k/a "Swani," ANTHONY REDDICK, a/k/a "Ant Flocka," CHRISTOPHER IVEY, a/k/a "Light Eyes," ORENZO HARRELL, a/k/a "Oey," SOLOMON ALUKO, a/k/a "Dodie," DAVOUN MATTHEWS, a/k/a "Juice," and KYLE HINES, a/k/a "Forty," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963:

- a. any interest acquired or maintained as a result of the offense charged in Count One;
- b. any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over any enterprise established, operated, controlled, conducted, or participated in the conduct of as a result of the offense charged in Count One; and

c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from the racketeering activity charged in Count One.

37. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1), and (3), include but are not limited to, a sum that represents the gross proceeds received by the defendants pursuant to their racketeering activities as charged in Count One of the Indictment during the relevant time period charged in the Indictment and all interests and proceeds traceable thereto.

38. 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 18, United States Code, Section 1963(m), to seek forfeiture of any other property of said defendants up to the value of the above

forfeitable property.

39. The defendants are jointly and severally liable for the forfeiture obligations as charged above.

(Title 18, United States Code, Section 1963.)

FORFEITURE ALLEGATION AS TO COUNT EIGHT

40. As a result of committing the controlled substance offense charged in Count Eight of this Indictment, ANDY SEDA, a/k/a "Andwhite," CHRISTOPHER IVEY, a/k/a "Light Eyes," ORENZO HARRELL, a/k/a "Oey," DAVOUN MATTHEWS, a/k/a "Juice," SOLOMON ALUKO, a/k/a "Dodie," and KYLE HINES, a/k/a "Forty," 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 the said defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation charged in Eight of this Indictment, including but not limited to, a sum in United States currency representing the amount of all proceeds obtained as a result of the controlled substance offense charged in Count Eight of the Indictment.

SUBSTITUTE ASSET PROVISION

41. 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;

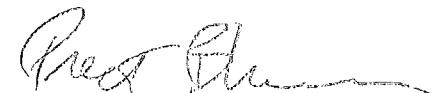
c. has been placed beyond the jurisdiction of the Court;

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 said defendants up to the value of the above forfeitable property.

[REDACTED] ions 841(a)(1), 846 and 853.)



PREET BHARARA *MS*
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- V. -

KAREEM LANIER, a/k/a "Black," a/k/a "Reem,"
JASON MOYE, a/k/a "Tall Jay," RASHAAD CONYERS, a/k/a "Houli,"
ANDY SEDA, a/k/a "Andwhite," JAROD SLATER, a/k/a "Rod," HASWANI
TYSON, a/k/a "Swani," ANTHONY REDDICK, a/k/a "Ant Flocka,"
CHRISTOPHER IVEY, a/k/a "Light Eyes," ORENZO HARRELL, a/k/a
"Oey," SOLOMON ALUKO, a/k/a "Dodie," DAVOUN MATTHEWS, a/k/a
"Juice," and KYLE HINES, a/k/a "Forty,"

Defendants.

SEALED SUPERSEDING INDICTMENT

S16 15 Cr. 537 (VEC)

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

PREET BHARARA
United States Attorney

FOCUS