

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

SEALED
INDICTMENT

ARIEL ACOSTA, :

a/k/a "A-Loc," :

a/k/a "Blue," :

a/k/a "True Blue," :

17 Cr.

ZORA BENITEZ, :

a/k/a "Baby," :

DERRICK RICHARDSON, :

a/k/a "J-Rock," :

KEVIN RIVERA, :

a/k/a "Montana," :

SANTOS RODRIGUEZ, :

a/k/a "Lefty," :

EDWIN ROMAN, :

a/k/a "Capo," :

KENNETH SAMPSON, :

a/k/a "Remo," :

JAYLEN SCOTT-KING, :

a/k/a "Boo," :

a/k/a "Legend," :

a/k/a "Flirm," :

ALEXIS VALDEZ, :

a/k/a "Lil Rico," :

Defendants. :

- - - - - x

COUNT ONE

The Grand Jury charges:

1. From in or about 2016 up to and including in or about August 2017, in the Southern District of New York and elsewhere, ARIEL ACOSTA, a/k/a "A-Loc," a/k/a "Blue," a/k/a "True Blue," ZORA BENITEZ, a/k/a "Baby," DERRICK RICHARDSON, a/k/a "J-Rock," KEVIN

RIVERA, a/k/a "Montana," SANTOS RODRIGUEZ, a/k/a "Lefty," EDWIN ROMAN, a/k/a "Capo," KENNETH SAMPSON, a/k/a "Remo," JAYLEN SCOTT-KING, a/k/a "Boo," a/k/a "Legend," a/k/a "Flirm," ALEXIS VALDEZ, a/k/a "Lil Rico," 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 ARIEL ACOSTA, a/k/a "A-Loc," a/k/a "Blue," a/k/a "True Blue," ZORA BENITEZ, a/k/a "Baby," DERRICK RICHARDSON, a/k/a "J-Rock," KEVIN RIVERA, a/k/a "Montana," SANTOS RODRIGUEZ, a/k/a "Lefty," EDWIN ROMAN, a/k/a "Capo," KENNETH SAMPSON, a/k/a "Remo," JAYLEN SCOTT-KING, a/k/a "Boo," a/k/a "Legend," a/k/a "Flirm," ALEXIS VALDEZ, a/k/a "Lil Rico," 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).

3. The controlled substances that ARIEL ACOSTA, a/k/a "A-Loc," a/k/a "Blue," a/k/a "True Blue," ZORA BENITEZ, a/k/a "Baby," DERRICK RICHARDSON, a/k/a "J-Rock," KEVIN RIVERA, a/k/a "Montana," SANTOS RODRIGUEZ, a/k/a "Lefty," EDWIN ROMAN, a/k/a "Capo," KENNETH SAMPSON, a/k/a "Remo," JAYLEN SCOTT-KING, a/k/a "Boo," a/k/a "Legend," a/k/a "Flirm," ALEXIS VALDEZ, a/k/a "Lil

Rico," the defendants, and others known and unknown, conspired to distribute and possess with intent to distribute were: (a) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (b) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A).

OVERT ACTS

4. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about April 6, 2016, DERRICK RICHARDSON, a/k/a "J-Rock," the defendant, sold a quantity of heroin to an undercover police officer on Hughes Avenue.

b. On or about July 5, 2016, EDWIN ROMAN, a/k/a "Capo," the defendant, sold a quantity of heroin to an undercover police officer on Hughes Avenue.

c. On or about August 17, 2016, KENNETH SAMPSON, a/k/a "Remo," the defendant, sold a quantity of crack cocaine to an undercover police officer on Hughes Avenue.

d. On or about December 1, 2016, ZORA BENITEZ, a/k/a

"Baby," the defendant, sold a quantity of heroin to an undercover police officer on Hughes Avenue.

e. On or about December 1, 2016, KEVIN RIVERA, a/k/a "Montana," the defendant, sold a quantity of crack cocaine to an undercover police officer on Hughes Avenue.

f. On or about May 2, 2017, ARIEL ACOSTA, a/k/a "A-Loc," a/k/a "Blue," a/k/a "True Blue," the defendant, sold a quantity of crack cocaine to an undercover police officer on Hughes Avenue.

g. On or about January 19, 2017, ALEXIS VALDEZ, a/k/a "Lil Rico," the defendant, sold a quantity of crack cocaine to an undercover police officer on Hughes Avenue.

h. On or about March 21, 2017, JAYLEN SCOTT-KING, a/k/a "Boo," a/k/a "Legend," a/k/a "Flirm," the defendant, sold a quantity of crack cocaine to an undercover police officer on Hughes Avenue.

i. On or about May 9, 2017, SANTOS RODRIGUEZ, a/k/a "Lefty," the defendant, sold a quantity of crack cocaine to an undercover police officer on Hughes Avenue.

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

COUNT TWO

The Grand Jury further charges:

5. From at least in or about in or about October 2016 up

to and including in or about May 2017, in the Southern District of New York and elsewhere, ARIEL ACOSTA, a/k/a "A-Loc," a/k/a "Blue," a/k/a "True Blue," JAYLEN SCOTT-KING, a/k/a "Boo," a/k/a "Legend," a/k/a "Flirm," ALEXIS VALDEZ, a/k/a "Lil Rico," the defendants, not being licensed importers, licensed manufacturers, and licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully and knowingly engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, to wit, ACOSTA, SCOTT-KING, and VALDEZ sold, offered to sell, and arranged to sell firearms and ammunition on multiple occasions.

(Title 18, United States Code, Sections 922(a)(1)(A), and 2.)

COUNT THREE

The Grand Jury further charges:

6. On or about January 11, 2017, in the Southern District of New York, ARIEL ACOSTA, a/k/a "A-Loc," a/k/a "Blue," a/k/a "True Blue" and ALEXIS VALDEZ, a/k/a "Lil Rico," the defendants, after each having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess, in and affecting commerce, firearms, to wit, a ROMARM Model S1 AK-47 Assault Rifle, which previously had

been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Section 922(g)(1).)

COUNT FOUR

The Grand Jury further charges:

7. On or about March 1, 2017, in the Southern District of New York, ARIEL ACOSTA, a/k/a "A-Loc," a/k/a "Blue," a/k/a "True Blue" and ALEXIS VALDEZ, a/k/a "Lil Rico," the defendants, after each having been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess, in and affecting commerce, firearms, to wit, a Norinco Model SKS Assault Rifle, which previously had been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Section 922(g)(1).)

FORFEITURE ALLEGATION

8. As a result of committing the controlled substance offense charged in Count One of this Indictment, ARIEL ACOSTA, a/k/a "A-Loc," a/k/a "Blue," a/k/a "True Blue," ZORA BENITEZ, a/k/a "Baby," DERRICK RICHARDSON, a/k/a "J-Rock," KEVIN RIVERA, a/k/a "Montana," SANTOS RODRIGUEZ, a/k/a "Lefty," EDWIN ROMAN, a/k/a "Capo," KENNETH SAMPSON, a/k/a "Remo," JAYLEN SCOTT-KING, a/k/a "Boo," a/k/a "Legend," a/k/a "Flirm," ALEXIS VALDEZ, a/k/a "Lil Rico," 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

defendants obtained directly or indirectly as a result of the offense 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 offense charged in Count One of this Indictment.

9. As a result of committing the offense alleged in Count Two of this Indictment, ARIEL ACOSTA, a/k/a "A-Loc," a/k/a "Blue," a/k/a "True Blue," JAYLEN SCOTT-KING, a/k/a "Boo," a/k/a "Legend," a/k/a "Flirm," ALEXIS VALDEZ, a/k/a "Lil Rico," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code, Section 2461(c), any firearm or ammunition involved in or used in said offense.

Substitute Assets Provision

10. If any of the above-described forfeitable property, as a result of any act or omission of ARIEL ACOSTA, a/k/a "A-Loc," a/k/a "Blue," a/k/a "True Blue," ZORA BENITEZ, a/k/a "Baby," DERRICK RICHARDSON, a/k/a "J-Rock," KEVIN RIVERA, a/k/a "Montana," SANTOS RODRIGUEZ, a/k/a "Lefty," EDWIN ROMAN, a/k/a "Capo," KENNETH SAMPSON, a/k/a "Remo," JAYLEN SCOTT-KING, a/k/a "Boo," a/k/a "Legend," a/k/a "Flirm," ALEXIS VALDEZ, a/k/a "Lil Rico," 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;

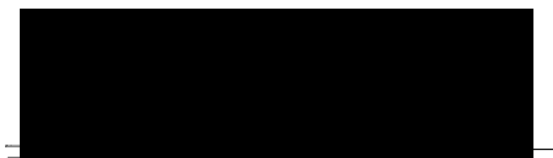
c. has been placed beyond the jurisdiction of the Court;

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 21 U.S.C. § 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.)



FOREPERSON


JOON H. KIM
Acting United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ARIEL ACOSA, a/k/a "A-Loc," a/k/a
"Blue," "True Blue,"
ZORA BENITEZ, a/k/a "Baby,"
DERRICK RICHARDSON, a/k/a "J-Rock,"
KEVIN RIVERA, a/k/a "Montana,"
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JAYLEN SCOTT-KING, a/k/a "Boo," a/k/a
"Legend," a/k/a "Flirm,"
ALEXIS VALDEZ, a/k/a "Lil Rico,"

Defendants.

INDICTMENT

17 Cr. ____ (____)

(18 U.S.C. §§ 922(a)(1)(A), 922(g)(1)
and 2; 21 U.S.C. § 846.)

JOON H. KIM

Acting United States Attorney.


Foreperson.
