

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

SEALED
SUPERSEDING
INDICTMENT

LAQUAN PARRISH, :

a/k/a "MadDog," :

a/k/a "Quanzaa," :

S1 16 Cr. 212 (LAK)

ANDRE BENT, :

a/k/a "Dula," :

AARON RODRIGUEZ, :

a/k/a "Gunz," :

a/k/a "Cito," :

SEAN MCINTOSH, :

a/k/a "Slimmy," :

JAQUAN MCINTOSH, :

a/k/a "BJ," :

MARK CLARKE, :

a/k/a "Gritty," :

a/k/a "Mark the Gritty Shark," :

BOWLIN WALLINGFORD, :

a/k/a "BK," :

a/k/a "Bay Kay," :

RODRIGO GONZALEZ, :

a/k/a "Frenchy," :

ELIJAH BROWN, :

a/k/a "Lil Eli," :

JOSHUA BROWN, :

a/k/a "Josh," :

KAYSHAWN CAMPBELL, :

a/k/a "Fresh," :

ROBERT POPE, :

a/k/a "Big Bert," :

DAVID MATTISON, :

a/k/a "Dave," :

a/k/a "Daddy," :

KEVIN MATTISON, :

a/k/a "Kev," :

JAYVON CARTER, :

a/k/a "Jay," :

a/k/a "Jigga," :

MARCEL BENT, :

a/k/a "Marcellus," :

a/k/a "Cellie," :

PRESTON PASLEY, :
 a/k/a "Smooove," :
 TERRENCE PASLEY, :
 a/k/a "Fresh," :
 DAQUAN ANDERSON, :
 a/k/a "BD," :
 DANTE GREGORY, :
 a/k/a "Smiley," :
 CINTRON POWELL, :
 a/k/a "C-Live," :
 WALTER JERNIGAN, :
 a/k/a "Lil G," :
 a/k/a "G-Boo," :
 MOUHAHAMET CHERRY, :
 a/k/a "Momo," :
 HASANI FITTS, :
 a/k/a "Has," :
 EMMANUEL MCKENZIE, :
 a/k/a "Manny Fresh," :
 LLOYD RODRIGUEZ, :
 a/k/a "T-Boy," :
 NICHOLAS BAILEY, :
 a/k/a "Nicholas Dale," :
 a/k/a "Nick," :
 SHAWN WALKER, :
 a/k/a "Styles," :
 PETER LEWIS, :
 a/k/a "Pebbs," :
 KRAIG LEWIS :
 a/k/a "K-Murda," :
 RONALD MATTHEWS, :
 a/k/a "Ronnie," :
 TRAVIS THOMPSON, :
 KAREEM SANDERS, :
 a/k/a "Reem," :
 JONATHON CUMMINGS, :
 a/k/a "J-Starz," :
 WAYNE LEON, :
 a/k/a "Wayne Brady," :
 DANNY JONES, :
 a/k/a "Red," :
 a/k/a "Casper," :
 LAMOR MILES, :
 a/k/a "Ls," :
 ROBERT MILES, :
 PATRICK LITTLEJOHN, :
 a/k/a "Pat," :

ANDREW MONCRIEFFE, :
 a/k/a "Drew," :
 GARY ARRINGTON, :
 a/k/a "G," :
 WILLIAMS RODRIGUEZ, :
 a/k/a "Will," :
 MELVIN RODRIGUEZ, :
 a/k/a "YB," :
 BRANDON ANDERSON, :
 a/k/a "Big BD," :
 EMILE ANDERSON, :
 a/k/a "Fetti," :
 a/k/a "Kev," :
 KAVONE HORTON, :
 a/k/a "Styles," :
 DEVIN WALKER, :
 a/k/a "Dev," :
 JOHN ALVAREZ, :
 a/k/a "Gotti," :
 COURTNEY GREEN, :
 a/k/a "C-Rock," :
 ERICK CANALES, :
 a/k/a "EC," :
 GREGORY CAMERON, :
 a/k/a "Biggs," :
 a/k/a "Bigga," :
 a/k/a "GG," :
 JABRIEL LEWIS, :
 a/k/a "Breeze," :
 a/k/a "Breezy," :
 VAUGHN WASHINGTON, :
 a/k/a "Murder," :
 BRUCE WASHINGTON, :
 a/k/a "BJ," :
 DAMON PARRISH, :
 ROBERTO MUNOZ, :
 a/k/a "Jr," and :
 ALONZO MCINTOSH, :
 a/k/a "Manuke," :

Defendants. :

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COUNT ONE

RACKETEERING CONSPIRACY

The Grand Jury charges:

THE ENTERPRISE

1. At all times relevant to this Indictment, LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," EMMANUEL MCKENZIE, a/k/a "Manny Fresh," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem,"

JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," PATRICK LITTLEJOHN, a/k/a "Pat," EMILE ANDERSON, a/k/a "Kev," a/k/a "Fetti," KAVONE HORTON, a/k/a "Styles," and DEVIN WALKER, a/k/a "Dev," the defendants, and others known and unknown, were members and associates of the "2Fly YGz" street gang ("2Fly" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other things, narcotics trafficking, robbery, attempted murder, and murder.

2. The Enterprise was a faction of the "Young Gunnaz," or "YGz" street gang, which operates nationwide. 2Fly operated principally within and around the Eastchester Gardens public housing development in the Bronx, New York ("ECG"), and in an area of the Northern Bronx in the vicinity of Gun Hill Road, commonly called the "Valley," or the "V."

3. Members of 2Fly and their associates sold narcotics and stashed firearms, among other places, at a playground at ECG. They also committed acts of violence, including shootings, against rival gangs in the Bronx, such as the "Big Money Bosses," or "BMB," which is based in the vicinity of White Plains Road and on Boston Road, and the "Slut Gang," which is based in the Boston Secor public housing development.

4. Among the murders and other acts of violence committed by members and associates of the Enterprise were: (a) the murder of Alexander "A.J." Walters, who was stabbed to death

at age 17 by members of 2Fly in the vicinity of 1824 Prospect Avenue in the Bronx, on or about March 8, 2012; and (b) the murder of Donville Simpson, a/k/a "Donny," who was shot to death at ECG at age 17 by members of 2Fly, on or about October 5, 2013.

5. LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," and AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," were leaders of 2Fly authorized to order acts of violence and to recruit new members into the Enterprise. Leaders of 2Fly, including PARRISH, BENT, and RODRIGUEZ, were called "Big Guns."

6. PRESTON PASLEY, a/k/a "Smooove," and TERRENCE PASLEY, a/k/a, "Fresh," were leaders of a faction of the Bloods street gang based in the Bronx called "Sex Money Murder," which was allied with 2Fly and worked with members of the Enterprise to control narcotics trafficking at ECG.

7. BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," was one of the primary suppliers of cocaine base to 2Fly.

8. 2Fly, including its leadership, membership, and 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 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 has engaged in, and its activities affected, interstate and foreign commerce. The defendants participated in the operation and management of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

9. LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," EMMANUEL MCKENZIE, a/k/a "Manny Fresh," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS,

a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," PATRICK LITTLEJOHN, a/k/a "Pat," EMILE ANDERSON, a/k/a "Kev," a/k/a "Fetti," KAVONE HORTON, a/k/a "Styles," and DEVIN WALKER, a/k/a "Dev," the defendants, were members and associates of the Enterprise who carried out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

PURPOSES OF THE ENTERPRISE

10. The purposes of the Enterprise included the following:
 - a. Enriching the members and associates of the Enterprise through, among other things, the distribution of narcotics, including marijuana, cocaine base, powder cocaine, and illegal prescription medication, such as oxycodone, a schedule II controlled substance.
 - b. Preserving and protecting the power of the Enterprise and its members and associates through robbery, 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.

MEANS AND METHODS OF THE ENTERPRISE

11. 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, such as BMB.

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

c. Members and associates of the Enterprise used physical violence against various people, including robbery, murders, and attempted murders.

d. Members and associates of the Enterprise sold narcotics, including marijuana, cocaine base, powder cocaine, and illegal prescription medication, including oxycodone.

THE RACKETEERING VIOLATION

12. From at least in or about 2007, up to and including in or about 2016, in the Southern District of New York and elsewhere, LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa,"

ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," EMMANUEL MCKENZIE, a/k/a "Manny Fresh," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," PATRICK LITTLEJOHN, a/k/a "Pat," EMILE ANDERSON, a/k/a "Kev," a/k/a "Fetti," KAVONE HORTON, a/k/a "Styles," and DEVIN WALKER, a/k/a "Dev," the defendants, and others known and unknown, being persons employed by and associated with the Enterprise described in paragraphs 1 through 11 of Count One of

this Indictment, to wit, 2Fly, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the 2Fly Enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity consisting of:

Multiple acts involving murder, that is, 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);

Multiple acts involving robbery, that is, New York Penal Law, Sections 160.10, 160.05, 20.00 (robbery); New York Penal Law, Section 160.10, 160.05, 110.00 (attempted robbery); New York Penal Law 105.10 (conspiracy to commit robbery).

Multiple acts indictable under 18 U.S.C. § 1951 (Hobbs Act robbery); and

Multiple acts involving the distribution of controlled substances, including 280 grams and more of cocaine base, marijuana, powder cocaine, and oxycodone, in violation of the laws of the United States, specifically Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), and 846, and Title 18, United States Code, Section 2.

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.

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

COUNT TWO

NARCOTICS CONSPIRACY

The Grand Jury further charges:

13. From at least in or about 2007, up to and including in or about 2016, in the Southern District of New York and elsewhere, LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE

LEON, a/k/a "Wayne Brady," DANNY JONES, a/k/a "Red," a/k/a "Casper," LAMOR MILES, a/k/a "Ls," ROBERT MILES, PATRICK LITTLEJOHN, a/k/a "Pat," ANDREW MONCRIEFFE, a/k/a "Drew," GARY ARRINGTON, a/k/a "G," WILLIAMS RODRIGUEZ, a/k/a "Will," MELVIN RODRIGUEZ, a/k/a "YB," BRANDON ANDERSON, a/k/a "Big BD," EMILE ANDERSON, a/k/a "Fetti," a/k/a "Kev," KAVONE HORTON, a/k/a "Styles," JOHN ALVAREZ, a/k/a "Gotti," COURTNEY GREEN, a/k/a "C-Rock," ERICK CANALES, a/k/a "EC," GREGORY CAMERON, a/k/a "Biggs, a/k/a "Bigga," a/k/a "GG," JABRIEL LEWIS, a/k/a "Breeze, a/k/a "Breezy," VAUGHN WASHINGTON, a/k/a "Murder," BRUCE WASHINGTON, a/k/a "BJ," DAMON PARRISH, ROBERTO MUNOZ, a/k/a "Jr," and ALONZO MCINTOSH, a/k/a "Manuke," 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.

14. It was a part and an object of the conspiracy that LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy,"

KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," DANNY JONES, a/k/a "Red," a/k/a "Casper," LAMOR MILES, a/k/a "Ls," ROBERT MILES, PATRICK LITTLEJOHN, a/k/a "Pat," ANDREW MONCRIEFFE, a/k/a "Drew," GARY ARRINGTON, a/k/a "G," WILLIAMS RODRIGUEZ, a/k/a "Will," MELVIN RODRIGUEZ, a/k/a "YB," BRANDON ANDERSON, a/k/a "Big BD," EMILE ANDERSON, a/k/a "Fetti," a/k/a "Kev," KAVONE HORTON, a/k/a "Styles," JOHN ALVAREZ, a/k/a "Gotti," COURTNEY GREEN, a/k/a "C-Rock," ERICK CANALES, a/k/a "EC," GREGORY CAMERON, a/k/a "Biggs, a/k/a "Bigga," a/k/a "GG," JABRIEL LEWIS, a/k/a "Breeze, a/k/a "Breezy," VAUGHN WASHINGTON, a/k/a "Murder," BRUCE WASHINGTON, a/k/a "BJ," DAMON PARRISH, ROBERTO MUNOZ, a/k/a "Jr," and ALONZO MCINTOSH, a/k/a "Manuke," 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).

15. The controlled substances that LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," DANNY JONES, a/k/a "Red," a/k/a "Casper," LAMOR MILES, a/k/a "Ls," ROBERT MILES, PATRICK LITTLEJOHN, a/k/a "Pat,"

ANDREW MONCRIEFFE, a/k/a "Drew," GARY ARRINGTON, a/k/a "G," WILLIAMS RODRIGUEZ, a/k/a "Will," MELVIN RODRIGUEZ, a/k/a "YB," BRANDON ANDERSON, a/k/a "Big BD," EMILE ANDERSON, a/k/a "Fetti," a/k/a "Kev," KAVONE HORTON, a/k/a "Styles," JOHN ALVAREZ, a/k/a "Gotti," COURTNEY GREEN, a/k/a "C-Rock," ERICK CANALES, a/k/a "EC," GREGORY CAMERON, a/k/a "Biggs, a/k/a "Bigga," a/k/a "GG," JABRIEL LEWIS, a/k/a "Breeze, a/k/a "Breezy," VAUGHN WASHINGTON, a/k/a "Murder," BRUCE WASHINGTON, a/k/a "BJ," DAMON PARRISH, ROBERTO MUNOZ, a/k/a "Jr," and ALONZO MCINTOSH, a/k/a "Manuke," the defendants, conspired to distribute and possess with intent to distribute were: (1) 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, Section 841(b)(1)(A); (2) 100 kilograms and more of a quantity of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B); (3) a quantity of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (4) a quantity of mixtures and substances containing a detectable amount of oxycodone, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

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

COUNT THREE

DISTRIBUTION OF NARCOTICS WITHIN ONE THOUSAND FEET OF A
HOUSING FACILITY OWNED BY A PUBLIC HOUSING AUTHORITY, A
PLAYGROUND, AND A PUBLIC ELEMENTARY SCHOOL

The Grand Jury further charges:

16. From at least in or about 2007, up to and including in or about 2016, in the Southern District of New York and elsewhere, LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM

SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," DANNY JONES, a/k/a "Red," a/k/a "Casper," LAMOR MILES, a/k/a "Ls," ROBERT MILES, PATRICK LITTLEJOHN, a/k/a "Pat," ANDREW MONCRIEFFE, a/k/a "Drew," GARY ARRINGTON, a/k/a "G," WILLIAMS RODRIGUEZ, a/k/a "Will," MELVIN RODRIGUEZ, a/k/a "YB," BRANDON ANDERSON, a/k/a "Big BD," EMILE ANDERSON, a/k/a "Fetti," a/k/a "Kev," KAVONE HORTON, a/k/a "Styles," JOHN ALVAREZ, a/k/a "Gotti," COURTNEY GREEN, a/k/a "C-Rock," ERICK CANALES, a/k/a "EC," GREGORY CAMERON, a/k/a "Biggs, a/k/a "Bigga," a/k/a "GG," JABRIEL LEWIS, a/k/a "Breeze, a/k/a "Breezy," VAUGHN WASHINGTON, a/k/a "Murder," BRUCE WASHINGTON, a/k/a "BJ," DAMON PARRISH, ROBERTO MUNOZ, a/k/a "Jr," and ALONZO MCINTOSH, a/k/a "Manuke," the defendants, intentionally and knowingly did distribute and possess with the intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1).

17. The controlled substances that LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert,"

DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," DANNY JONES, a/k/a "Red," a/k/a "Casper," LAMOR MILES, a/k/a "Ls," ROBERT MILES, PATRICK LITTLEJOHN, a/k/a "Pat," ANDREW MONCRIEFFE, a/k/a "Drew," GARY ARRINGTON, a/k/a "G," WILLIAMS RODRIGUEZ, a/k/a "Will," MELVIN RODRIGUEZ, a/k/a "YB," BRANDON ANDERSON, a/k/a "Big BD," EMILE ANDERSON, a/k/a "Fetti," a/k/a "Kev," KAVONE HORTON, a/k/a "Styles," JOHN ALVAREZ, a/k/a "Gotti," COURTNEY GREEN, a/k/a "C-Rock," ERICK CANALES, a/k/a "EC," GREGORY CAMERON, a/k/a "Biggs, a/k/a "Bigga," a/k/a "GG," JABRIEL LEWIS, a/k/a "Breeze, a/k/a "Breezy," VAUGHN WASHINGTON, a/k/a "Murder," BRUCE WASHINGTON, a/k/a "BJ," DAMON PARRISH, ROBERTO MUNOZ, a/k/a "Jr," and ALONZO MCINTOSH, a/k/a "Manuke," the defendants, distributed and possessed with intent to

distribute were (1) 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, Section 841(b)(1)(A); (2) 100 kilograms and more of a quantity of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B); (3) a quantity of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (4) a quantity of mixtures and substances containing a detectable amount of oxycodone, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

18. LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a

"Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," DANNY JONES, a/k/a "Red," a/k/a "Casper," LAMOR MILES, a/k/a "Ls," ROBERT MILES, PATRICK LITTLEJOHN, a/k/a "Pat," ANDREW MONCRIEFFE, a/k/a "Drew," GARY ARRINGTON, a/k/a "G," WILLIAMS RODRIGUEZ, a/k/a "Will," MELVIN RODRIGUEZ, a/k/a "YB," BRANDON ANDERSON, a/k/a "Big BD," EMILE ANDERSON, a/k/a "Fetti," a/k/a "Kev," KAVONE HORTON, a/k/a "Styles," JOHN ALVAREZ, a/k/a "Gotti," COURTNEY GREEN, a/k/a "C-Rock," ERICK CANALES, a/k/a "EC," GREGORY CAMERON, a/k/a "Biggs, a/k/a "Bigga," a/k/a "GG," JABRIEL LEWIS, a/k/a "Breeze, a/k/a "Breezy," VAUGHN WASHINGTON, a/k/a "Murder," BRUCE WASHINGTON, a/k/a "BJ," DAMON PARRISH, ROBERTO MUNOZ, a/k/a "Jr," and ALONZO MCINTOSH, a/k/a "Manuke," the defendants, knowingly committed the narcotics trafficking offense charged in Count Three of this Indictment within 1000 feet of: (1) a housing facility owned by a public housing authority, to wit, ECG; (2) a playground, to wit, the Eastchester Playground at ECG; and (3) a public

elementary school, to wit, Public School 121, 2750 Throop Avenue, Bronx, New York.

(Title 21, United States Code, Sections 846 and 860, and Title 18, United States Code, Section 2.)

COUNT FOUR

USE OF FIREARMS IN FURTHERANCE OF COUNTS ONE AND TWO

The Grand Jury further charges:

19. From at least in or about 2007 up to and including in or about 2016, in the Southern District of New York and elsewhere, LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," EMMANUEL

MCKENZIE, a/k/a "Manny Fresh," LLOYD RODRIGUEZ, a/k/a "T-Boy,"
NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN
WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS,
a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS
THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a
"J-Starz," WAYNE LEON, a/k/a "Wayne Brady," DANNY JONES, a/k/a
"Red," a/k/a "Casper," LAMOR MILES, a/k/a "Ls," PATRICK
LITTLEJOHN, a/k/a "Pat," MELVIN RODRIGUEZ, a/k/a "YB," EMILE
ANDERSON, a/k/a "Fetti," a/k/a "Kev," KAVONE HORTON, a/k/a
"Styles," DEVIN WALKER, a/k/a "Dev," JOHN ALVAREZ, a/k/a
"Gotti," COURTNEY GREEN, a/k/a "C-Rock," ERICK CANALES, a/k/a
"EC," GREGORY CAMERON, a/k/a "Biggs," a/k/a "Bigga," a/k/a "GG,"
JABRIEL LEWIS, a/k/a "Breeze," a/k/a "Breezy," VAUGHN
WASHINGTON, a/k/a "Murder," BRUCE WASHINGTON, a/k/a "BJ," DAMON
PARRISH, ROBERTO MUNOZ, a/k/a "Jr," and ALONZO MCINTOSH, a/k/a
"Manuke," 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,
and during and in relation to a drug trafficking crime for which
they may be prosecuted in a court of the United States, namely,
the narcotics conspiracy charged in Count Two of this
Indictment, knowingly did use and carry firearms, and, in
furtherance of such crime, did possess firearms, and did aid and

abet the use, carrying, and possession of firearms, including firearms that were discharged on multiple occasions.

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

FORFEITURE ALLEGATION AS TO COUNT ONE

20. As a result of committing the offense alleged in Count One of this Indictment, LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," EMMANUEL MCKENZIE, a/k/a "Manny Fresh," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS,

a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," PATRICK LITTLEJOHN, a/k/a "Pat," KAVONE HORTON, a/k/a "Styles," and DEVIN WALKER, a/k/a "Dev," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, (i) any interest the defendants acquired or maintained as a result of the commission of the offense alleged in Count One of the Indictment; (ii) any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendant has established, operated, controlled, conducted, or participated in the conduct of, in committing the offense alleged in Count One of the Indictment; and (iii) any property, constituting or derived from, any proceeds which the defendants obtained, directly and indirectly, from the racketeering activity alleged in Count One of this Indictment.

Substitute Assets Provision

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

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

FORFEITURE ALLEGATION AS TO COUNT TWO

22. As a result of committing the controlled substance offense alleged in Count Two of this Indictment, LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a

"Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMET CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," LLOYD RODRIGUEZ, a/k/a "T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," DANNY JONES, a/k/a "Red," a/k/a "Casper," LAMOR MILES, a/k/a "Ls," ROBERT MILES, PATRICK LITTLEJOHN, a/k/a "Pat," ANDREW MONCRIEFFE, a/k/a "Drew," GARY ARRINGTON, a/k/a "G," WILLIAMS RODRIGUEZ, a/k/a "Will," MELVIN RODRIGUEZ, a/k/a "YB," BRANDON ANDERSON, a/k/a "Big BD," EMILE ANDERSON, a/k/a "Fetti," a/k/a "Kev," KAVONE HORTON, a/k/a "Styles," JOHN ALVAREZ, a/k/a "Gotti," COURTNEY GREEN, a/k/a "C-Rock," ERICK CANALES, a/k/a "EC," GREGORY CAMERON, a/k/a "Biggs, a/k/a "Bigga," a/k/a "GG," JABRIEL LEWIS, a/k/a "Breeze, a/k/a "Breezy," VAUGHN WASHINGTON, a/k/a "Murder," BRUCE WASHINGTON, a/k/a "BJ," DAMON PARRISH, ROBERTO MUNOZ, a/k/a "Jr," and ALONZO MCINTOSH, a/k/a "Manuke," the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds said

defendants obtained directly or indirectly as a result of the violation alleged in Count Two of this Indictment and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of said violation, 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 alleged in Count Two of the Indictment.

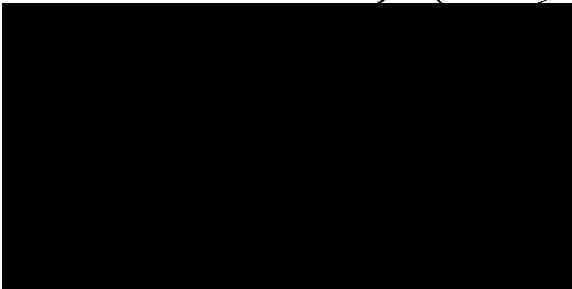
Substitute Asset Provision

23. If any of the property described above as being subject to forfeiture, 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 intention 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.)



Preet Bharara

PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

LAQUAN PARRISH, a/k/a "MadDog," a/k/a "Quanzaa," ANDRE BENT, a/k/a "Dula," AARON RODRIGUEZ, a/k/a "Gunz," a/k/a "Cito," SEAN MCINTOSH, a/k/a "Slimmy," JAQUAN MCINTOSH, a/k/a "BJ," MARK CLARKE, a/k/a "Gritty," a/k/a "Mark the Gritty Shark," BOWLIN WALLINGFORD, a/k/a "BK," a/k/a "Bay Kay," RODRIGO GONZALEZ, a/k/a "Frenchy," ELIJAH BROWN, a/k/a "Lil Eli," JOSHUA BROWN, a/k/a "Josh," KAYSHAWN CAMPBELL, a/k/a "Fresh," ROBERT POPE, a/k/a "Big Bert," DAVID MATTISON, a/k/a "Dave," a/k/a "Daddy," KEVIN MATTISON, a/k/a "Kev," JAYVON CARTER, a/k/a "Jay," a/k/a "Jigga," MARCEL BENT, a/k/a "Marcellus," a/k/a "Cellie," PRESTON PASLEY, a/k/a "Smooove," TERRENCE PASLEY, a/k/a "Fresh," DAQUAN ANDERSON, a/k/a "BD," DANTE GREGORY, a/k/a "Smiley," CINTRON POWELL, a/k/a "C-Live," WALTER JERNIGAN, a/k/a "Lil G," a/k/a "G-Boo," MOUHAHAMED CHERRY, a/k/a "Momo," HASANI FITTS, a/k/a "Has," EMMANUEL MCKENZIE, a/k/a "Manny Fresh," LLOYD RODRIGUEZ, a/k/a T-Boy," NICHOLAS BAILEY, a/k/a "Nicholas Dale," a/k/a "Nick," SHAWN WALKER, a/k/a "Styles," PETER LEWIS, a/k/a "Pebbs," KRAIG LEWIS, a/k/a "K-Murda," RONALD MATTHEWS, a/k/a "Ronnie," TRAVIS THOMPSON, KAREEM SANDERS, a/k/a "Reem," JONATHON CUMMINGS, a/k/a "J-Starz," WAYNE LEON, a/k/a "Wayne Brady," DANNY JONES, a/k/a "Red," a/k/a "Casper," LAMOR MILES, a/k/a "Ls," ROBERT MILES, PATRICK LITTLEJOHN, a/k/a "Pat," ANDREW MONCRIEFFE, a/k/a "Drew," GARY ARRINGTON, a/k/a "G," WILLIAMS RODRIGUEZ, a/k/a "Will," MELVIN RODRIGUEZ, a/k/a "YB," BRANDON ANDERSON, a/k/a "Big BD," EMILE ANDERSON, a/k/a "Fetti," a/k/a "Kev," KAVONE HORTON, a/k/a "Styles," DEVIN WALKER, a/k/a "Dev," JOHN ALVAREZ, a/k/a "Gotti," COURTNEY GREEN, a/k/a "C-Rock," ERICK CANALES, a/k/a "EC," GREGORY CAMERON, a/k/a "Biggs, a/k/a "Bigga," a/k/a "GG," JABRIEL LEWIS, a/k/a "Breeze, a/k/a "Breezy," VAUGHN WASHINGTON, a/k/a "Murder," BRUCE WASHINGTON, a/k/a "BJ," DAMON PARRISH, ROBERTO MUNOZ, a/k/a "Jr," and ALONZO MCINTOSH, a/k/a "Manuke,"

Defendants.

SEALED SUPERSEDING INDICTMENT

S1 16 Cr. 212 (LAK)

(18 U.S.C. §§ 1962(d), 924(c)(1)(A)(iii), and 2, and 21 U.S.C. 846.)

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