

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA :

v. :

MARK ALLIE, :
a/k/a "Capone," :
JOSE VERA, :
a/k/a "JB," :
JONATHAN SAMBULA, :
a/k/a "Bula," :
GUILLERMO ORTIZ, :
a/k/a "Gordo," :
MICHAEL ORTIZ, :
a/k/a "Fatz," :
JAMAINE TAYLOR, :
a/k/a "Maine," :
RACHEL DIAZ, :
a/k/a "Gotti," :
CHRISTIAN FABRE, :
a/k/a "Blue," :
DAMON GROOMS, :
a/k/a "Mo," :
ROBERT HENDERSON, :
a/k/a "Cain," :
NOEL FELICIANO, :
a/k/a "Chuckie," :
a/k/a "Bebo," :
JOSE AVILES, :
a/k/a "Abel," :
JONATHAN MIRABAL, :
a/k/a "Jose Lorenzo," :
a/k/a "JJ," :
ANDRE CUNNINGHAM, :
a/k/a "Drizz," :
HARANAKK DINGLE, :
a/k/a "Pookie," :
LUIS GUZMAN, :
a/k/a "Fro," :
ZOA BRIGGS, :
a/k/a "Blaze," :
ROBERT TORRES, :
DARNELL HOPKINS, :
a/k/a "D," :

SEALED
INDICTMENT

13 Cr.

1 3 CRIM 242

JELFREY GUTIERREZ, :
a/k/a "Dez," :
a/k/a "Sati," :
JASON LEWIS, :
MAX JORDAN, :
a/k/a "Maxi," :
EDWARD ALEXIS MEDRANO, :
a/k/a "Lex," :
LUZ FIGUEROA, :
a/k/a "Destiny," :
a/k/a "Lucy," :
FNU LNU, :
a/k/a "Kat" :
MICHAEL McDUFFIE, :
DAVID WILSON, and :
STEVE RAMSNAMY, :
:
Defendants. :
:
-----X

COUNT ONE

The Grand Jury charges:

1. From approximately in or about 2008, up to and including on or about April 2, 2013, in the Southern District of New York, MARK ALLIE, a/k/a "Capone," JOSE VERA, a/k/a "JB," JONATHAN SAMBULA, a/k/a "Bula," GUILLERMO ORTIZ, a/k/a "Gordo," MICHAEL ORTIZ, a/k/a "Fatz," JAMAINE TAYLOR, a/k/a "Maine," RACHEL DIAZ, a/k/a "Gotti," CHRISTIAN FABRE, a/k/a "Blue," DAMON GROOMS, a/k/a "Mo," ROBERT HENDERSON, a/k/a "Cain," NOEL FELICIANO, a/k/a "Chuckie," a/k/a "Bebo," JOSE AVILES, a/k/a "Abel," JONATHAN MIRABAL, a/k/a "Jose Lorenzo," a/k/a "JJ," ANDRE CUNNINGHAM, a/k/a "Drizz," HARANAKK DINGLE, a/k/a "Pookie," LUIS GUZMAN, a/k/a "Fro," ZOA BRIGGS, a/k/a "Blaze,"

ROBERT TORRES, DARNELL HOPKINS, a/k/a "D," JELFREY GUTIERREZ, a/k/a "Dez," a/k/a "Sati," JASON LEWIS, MAX JORDAN, a/k/a "Maxi," EDWARD ALEXIS MEDRANO, a/k/a "Lex," LUZ FIGUEROA, a/k/a "Destiny," a/k/a "Lucy," FNU LNU, a/k/a "Kat," MICHAEL McDUFFIE, and DAVID WILSON, 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 MARK ALLIE, a/k/a "Capone," JOSE VERA, a/k/a "JB," JONATHAN SAMBULA, a/k/a "Bula," GUILLERMO ORTIZ, a/k/a "Gordo," MICHAEL ORTIZ, a/k/a "Fatz," JAMAINE TAYLOR, a/k/a "Maine," RACHEL DIAZ, a/k/a "Gotti," CHRISTIAN FABRE, a/k/a "Blue," DAMON GROOMS, a/k/a "Mo," ROBERT HENDERSON, a/k/a "Cain," NOEL FELICIANO, a/k/a "Chuckie," a/k/a "Bebo," JOSE AVILES, a/k/a "Abel," JONATHAN MIRABAL, a/k/a "Jose Lorenzo," a/k/a "JJ," ANDRE CUNNINGHAM, a/k/a "Drizz," HARANAKK DINGLE, a/k/a "Pookie," LUIS GUZMAN, a/k/a "Fro," ZOA BRIGGS, a/k/a "Blaze," ROBERT TORRES, DARNELL HOPKINS, a/k/a "D," JELFREY GUTIERREZ, a/k/a "Dez," a/k/a "Sati," JASON LEWIS, MAX JORDAN, a/k/a "Maxi," EDWARD ALEXIS MEDRANO, a/k/a "Lex," LUZ FIGUEROA, a/k/a "Destiny," a/k/a "Lucy," FNU LNU, a/k/a "Kat," MICHAEL McDUFFIE, and DAVID WILSON, 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 substances involved in the offense were (1) 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 (2) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, commonly referred to as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

COUNT TWO

The Grand Jury further charges:

4. From approximately in or about 2008, up to and including on or about April 2, 2013, in the Southern District of New York, MARK ALLIE, a/k/a "Capone," JONATHAN SAMBULA, a/k/a "Bula," GUILLERMO ORTIZ, a/k/a "Gordo," JAMAINE TAYLOR, a/k/a "Maine," DAMON GROOMS, a/k/a "Mo," ANDRE CUNNINGHAM, a/k/a "Drizz," MAX JORDAN, a/k/a "Maxi," LUZ FIGUEROA, a/k/a "Destiny," a/k/a "Lucy," and FNU LNU, a/k/a "Kat," the defendants, 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 One 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, which were discharged.

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

COUNT THREE

The Grand Jury further charges:

5. On or about September 18, 2012, in the Southern District of New York, STEVE RAMSNAMY, the defendant, after 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 a firearm, to wit, an 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).)

FORFEITURE ALLEGATION AS TO COUNT ONE

6. As a result of committing the controlled substance offense alleged in Count One of this Indictment, MARK ALLIE, a/k/a "Capone," JOSE VERA, a/k/a "JB," JONATHAN SAMBULA, a/k/a "Bula," GUILLERMO ORTIZ, a/k/a "Gordo," MICHAEL ORTIZ, a/k/a "Fatz," JAMAINE TAYLOR, a/k/a "Maine," RACHEL DIAZ, a/k/a "Gotti," CHRISTIAN FABRE, a/k/a "Blue," DAMON GROOMS, a/k/a "Mo," ROBERT HENDERSON, a/k/a "Cain," NOEL FELICIANO, a/k/a "Chuckie," a/k/a "Bebo," JOSE AVILES, a/k/a "Abel," JONATHAN MIRABAL, a/k/a "Jose Lorenzo," a/k/a "JJ," ANDRE CUNNINGHAM, a/k/a "Drizz," HARANAKK DINGLE, a/k/a "Pookie," LUIS GUZMAN,

a/k/a "Fro," ZOA BRIGGS, a/k/a "Blaze," ROBERT TORRES, DARNELL HOPKINS, a/k/a "D," JELFREY GUTIERREZ, a/k/a "Dez," a/k/a "Sati," JASON LEWIS, MAX JORDAN, a/k/a "Maxi," EDWARD ALEXIS MEDRANO, a/k/a "Lex," LUZ FIGUEROA, a/k/a "Destiny," a/k/a "Lucy," FNU LNU, a/k/a "Kat," MICHAEL McDUFFIE, and DAVID WILSON, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. S 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the 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 alleged in Count One of this Indictment, including but not limited to a sum in United States Currency representing the amount of proceeds obtained as a result of the offense.

8. If any of the property described above as being subject to forfeiture, as a result of any act or omission of MARK ALLIE, a/k/a "Capone," JOSE VERA, a/k/a "JB," JONATHAN SAMBULA, a/k/a "Bula," GUILLERMO ORTIZ, a/k/a "Gordo," MICHAEL ORTIZ, a/k/a "Fatz," JAMAINE TAYLOR, a/k/a "Maine," RACHEL DIAZ, a/k/a "Gotti," CHRISTIAN FABRE, a/k/a "Blue," DAMON GROOMS, a/k/a "Mo," ROBERT HENDERSON, a/k/a "Cain," NOEL FELICIANO, a/k/a "Chuckie," a/k/a "Bebo," JOSE AVILES, a/k/a "Abel," JONATHAN MIRABAL, a/k/a "Jose Lorenzo," a/k/a "JJ," ANDRE CUNNINGHAM, a/k/a "Drizz," HARANAKK DINGLE, a/k/a

"Pookie," LUIS GUZMAN, a/k/a "Fro," ZOA BRIGGS, a/k/a "Blaze," ROBERT TORRES, DARNELL HOPKINS, a/k/a "D," JELFREY GUTIERREZ, a/k/a "Dez," a/k/a "Sati," JASON LEWIS, MAX JORDAN, a/k/a "Maxi," EDWARD ALEXIS MEDRANO, a/k/a "Lex," LUZ FIGUEROA, a/k/a "Destiny," a/k/a "Lucy," FNU LNU, a/k/a "Kat," MICHAEL McDUFFIE, or DAVID WILSON, the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

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 divided 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 MARK ALLIE, a/k/a "Capone," JOSE VERA, a/k/a "JB," JONATHAN SAMBULA, a/k/a "Bula," GUILLERMO ORTIZ, a/k/a "Gordo," MICHAEL ORTIZ, a/k/a "Fatz," JAMAINE TAYLOR, a/k/a "Maine," RACHEL DIAZ, a/k/a "Gotti," CHRISTIAN FABRE, a/k/a "Blue," DAMON GROOMS, a/k/a "Mo," ROBERT HENDERSON, a/k/a "Cain," NOEL FELICIANO, a/k/a "Chuckie," a/k/a "Bebo," JOSE

AVILES, a/k/a "Abel," JONATHAN MIRABAL, a/k/a "Jose Lorenzo,"
a/k/a "JJ," ANDRE CUNNINGHAM, a/k/a "Drizz," HARANAKK DINGLE,
a/k/a "Pookie," LUIS GUZMAN, a/k/a "Fro," ZOA BRIGGS, a/k/a
"Blaze," ROBERT TORRES, DARNELL HOPKINS, a/k/a "D," JELFREY
GUTIERREZ, a/k/a "Dez," a/k/a "Sati," JASON LEWIS, MAX JORDAN,
a/k/a "Maxi," EDWARD ALEXIS MEDRANO, a/k/a "Lex," LUZ FIGUEROA,
a/k/a "Destiny," a/k/a "Lucy," FNU LNU, a/k/a "Kat," MICHAEL
McDUFFIE, and DAVID WILSON, the defendants, up to the value of
the above forfeitable property.

(Title 21, United States Code, Sections 846 and 853.)



FOR PERSON

Preet Bharara

PREET BHARARA
United States Attorney



FNU LNU
a/k/a
"Kat"