



GOODWIN, ANTOINE ELMONE, and JAREL SABLE, the defendants, and others known and unknown, would and did distribute and possess with the 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 (i) 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)(C), and (ii) less than 50 kilograms of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

OVERT ACTS

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

a. On or about October 20, 2011, an undercover law enforcement officer ("UC-1") spoke with JUAN CASTILLO, a/k/a "Max," the defendant, on the telephone. UC-1 told CASTILLO, in sum and substance, that UC-1 wanted to purchase crack cocaine and marijuana. CASTILLO directed UC-1 to DEVON JOHNSON, a/k/a Omar, the defendant, who sold a quantity of crack cocaine and a quantity of marijuana to UC-1 in exchange for United States

currency in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York.

b. On or about October 25, 2011, in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, JOHNSON sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

c. On or about November 8, 2011, in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, JOHNSON sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

d. On or about November 29, 2011, in the vicinity of the intersection of Third Avenue and East 143rd Street, Bronx, New York, JOHNSON sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

e. On or about December 2, 2011, in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, CASTILLO sold a quantity of crack cocaine and a quantity of marijuana to UC-1 in exchange for United States currency.

f. On or about December 6, 2011, in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, CASTILLO sold a quantity of crack cocaine and a

quantity of marijuana to UC-1 in exchange for United States currency.

g. On or about January 6, 2012, UC-1 spoke with CASTILLO on the telephone and UC-1 told CASTILLO, in sum and substance, that UC-1 wanted to purchase crack cocaine and marijuana. CASTILLO directed UC-1 to a co-conspirator not named herein ("CC-1"). CC-1 sold a quantity of crack cocaine and a quantity of marijuana to UC-1 in exchange for United States currency in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York.

h. On or about January 17, 2012, in the vicinity of the intersection of Third Avenue and East 143rd Street, Bronx, New York, JOHNSON sold a quantity of crack cocaine and a quantity of marijuana to UC-1 in exchange for United States currency.

i. On or about January 24, 2012, in the vicinity of the intersection of Third Avenue and East 143rd Street, Bronx, New York, JOHNSON sold a quantity of crack cocaine and a quantity of marijuana to UC-1 in exchange for United States currency.

j. On or about March 14, 2012, in the vicinity of Morris Avenue and East 143rd Street, Bronx, New York, REGGIE GOODWIN and ANTOINE ELMONE, the defendants, sold a quantity of

crack cocaine and a quantity of a substance that appeared to be marijuana to UC-1 in exchange for United States currency.

k. On or about March 15, 2012, in the vicinity of Morris Avenue and East 143rd Street, Bronx, New York, ELMONE sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

l. On or about April 3, 2012, in the vicinity of the intersection of Third Avenue and East 145th Street, Bronx, New York, ELMONE sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

m. On or about April 24, 2012, in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, JAREL SABLE, the defendant, and CASTILLO sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

n. On or about April 25, 2012, UC-1 sent a text message to CASTILLO that stated, in sum and substance, that UC-1 wanted to purchase crack cocaine. CASTILLO directed UC-1 to a location inside of a building in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, where SABLE sold UC-1 a quantity of crack cocaine to UC-1 in exchange for United States currency.

o. On or about May 2, 2012, in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, CASTILLO sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

p. On or about May 8, 2012, in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, CASTILLO sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

q. On or about May 15, 2012, in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, CASTILLO sold a quantity of crack cocaine to UC-1 in exchange for United States currency.

r. On or about May 18, 2012, in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, CASTILLO sold a quantity of crack cocaine and a quantity of marijuana to UC-1 in exchange for United States currency.

s. On or about May 23, 2012, in the vicinity of the intersection of Morris Avenue and East 143rd Street, Bronx, New York, CASTILLO and GOODWIN sold a quantity of crack cocaine and a quantity of marijuana to UC-1 in exchange for United States currency.

(Title 21, United States Code, Section 846)

FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offense alleged in Count One of this Indictment, JUAN CASTILLO, a/k/a "Max," DEVON JOHNSON, a/k/a "Omar," REGGIE GOODWIN, ANTOINE ELMONE, and JAREL SABLE, the defendants, shall forfeit to the United States, pursuant to Title 21 United States Code § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said 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 alleged in Count One 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 offense alleged in Count One of this Indictment.

Substitute Asset Provision

6. 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;

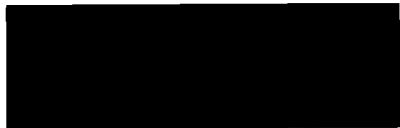
c. has been placed beyond the jurisdiction of the Court;

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 21 U.S.C. § 853(p), to seek forfeiture of any other property of the said defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)



FOREPERSON

11-27-12

Preet Bharara  
PREET BHARARA  
United States Attorney



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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

JUAN CASTILLO, a/k/a "Max," DEVON JOHNSON, a/k/a "Omar," REGGIE  
GOODWIN, ANTOINE ELMONE, and JAREL SABLE,  
Defendants.

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INDICTMENT

12 Cr. \_\_\_\_\_

(21 U.S.C. § 846)

PREET BHARARA

United States Attorney.

A TRUE BILL

Foreperson

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