

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

SEALED INDICTMENT

- v. -

21 Cr.

PERRY JOYNER,
MARIO FELICIANO,
SHARON GRIFFITH-MCKNIGHT,
DONNELL MURRAY,
 a/k/a "Don P,"
MARKEEN JORDAN,
 a/k/a "Kingo,"
ANTHONY ELLISON,
 a/k/a "Harv,"
TYRELL SUMPTER,
 a/k/a "Rell,"
KEVIN CROSBY,
 a/k/a "Sama,"
DAVID VALERIO,
 a/k/a "Santana,"
 a/k/a "Bando,"
VIRGILIO ACEVEDO DE LOS SANTOS,
 a/k/a "Jairo Taveras,"
 a/k/a "Junior," and
STARLIN NUNEZ,
 a/k/a "Chino,"
 a/k/a "Junior,"

21 CRIM 673

Defendants.

----- X

Overview

1. As set forth below, from at least in or about October 2019, up to and including at least in or about January 2021, PERRY JOYNER, MARIO FELICIANO, SHARON GRIFFITH-MCKNIGHT, DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a

"Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, together with others known and unknown, carried out an extensive scheme (the "Scheme") involving bribery and the smuggling of contraband into and distribution of contraband within the Metropolitan Correctional Center ("MCC"), a federal jail in Manhattan, New York. As a part of this Scheme, various of the defendants, in the roles described herein, (i) conspired to introduce into the MCC substantial quantities of prison contraband including, but not limited to, controlled substances, cellphones, alcohol, and cigarettes; (ii) conspired to distribute and possess with the intent to distribute controlled substances inside the MCC; and (iii) defrauded the public and the Bureau of Prisons ("BOP") of the honest services of defendants JOYNER and FELICIANO, both of whom during the relevant time period were employees of the BOP working at the MCC.

2. Specifically, at various times from at least in or about October 2019, up to and including at least in or about January 2021, BOP employees PERRY JOYNER, MARIO FELICIANO, SHARON GRIFFITH-MCKNIGHT, the defendants, worked at the MCC and introduced or attempted to introduce into the MCC contraband for the benefit of MCC inmates DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL

SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, together with others known and unknown. The contraband, including controlled substances, that the defendants provided to others and possessed within the MCC included, but were not limited to: oxycodone; alprazolam; buprenorphine and naloxone, often referred to as Suboxone; smokable synthetic cannabinoids, often referred to as "K2"; cellphones and cellphone accessories such as chargers and headphones; alcohol; and cigarettes.

3. In return for introducing the aforementioned contraband and controlled substances into the MCC, PERRY JOYNER and MARIO FELICIANO, the defendants, solicited and received bribes in the form of payments via wire transfer directly or indirectly from DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, and others known and unknown.

4. In addition, PERRY JOYNER and SHARON GRIFFITH-MCKNIGHT, the defendants, obstructed justice, including but not limited to the following conduct:

a. In or about February 2020, JOYNER intimidated and threatened, and caused others to intimidate and threaten, a witness ("Inmate-1") for the purpose of dissuading Inmate-1 from providing the Government with information about the Scheme and JOYNER's participation in the Scheme.

b. Between in or about April 2020 and in or about November 2020, GRIFFITH-MCKNIGHT sought to influence a U.S. District Court judge for the Southern District of New York to impose a less serious punishment upon defendant ANTHONY ELLISON, a/k/a "Harv," during ELLISON's sentencing proceeding, which followed ELLISON's conviction at trial for various federal offenses, including racketeering conspiracy, kidnapping in aid of racketeering, and maiming and assault with a dangerous weapon in aid of racketeering. GRIFFITH-MCKNIGHT, in her stated capacity as a Unit Secretary of the MCC, falsely reported to the Court in connection with ELLISON's sentencing proceeding that ELLISON "had proven himself to be a model inmate" even though at the time GRIFFITH was smuggling to ELLISON contraband and therefore knew that ELLISON was not, in fact, a "model inmate," as set forth and further alleged in Count Five, below. Citing GRIFFITH-MCKNIGHT's letter, among others, the presiding judge stated that ELLISON's purported good behavior in prison was "impressive" and that "[u]nless this is some sort of Grisham novel, and people are all corrupt and making all of this up about [ELLISON], it seems to me

that it's unavoidable that [ELLISON's] trajectory at the MCC contains a lot of good."

The Defendants and Related Entities

5. At all times relevant to this Indictment:

a. The BOP was a federal law enforcement agency within the United States Department of Justice. It was responsible for the care, custody, and control of incarcerated federal inmates, and for the administration of federal prisons.

b. The United States Marshals Service ("USMS") was a federal law enforcement agency within the United States Department of Justice. Among other things, the USMS was responsible for the care and custody of federal inmates from the time of their arrest by a federal agency or remand by a judge until they are either acquitted, committed to their designated BOP institution following a conviction, or otherwise released from USMS custody. The USMS does not own or operate detention facilities; rather, the USMS houses its inmates at either state or local government facilities, BOP facilities, or private detention facilities.

c. The MCC was a federal administrative detention facility located in Manhattan that, until recently, was one of several facilities used by the USMS to house inmates committed to the USMS's custody and care in the New York City area. The BOP employed Correctional Officers and Unit Secretaries, among others,

to ensure the care, custody, and control of the inmate population of the MCC.

d. PERRY JOYNER, the defendant, was employed by the BOP as a Correctional Officer at the MCC since approximately June 2019.

e. MARIO FELICIANO, the defendant, was employed by the BOP as a Correctional Officer at the MCC between approximately August 2019 and April 2020.

f. SHARON GRIFFITH-MCKNIGHT, the defendant, was employed by the BOP since approximately January 2020 and was assigned to work as a Unit Secretary at the MCC between in or about January 2020 and in or about October 2021.

g. DONNELL MURRAY, a/k/a "Don P," the defendant, was an inmate at the MCC between approximately February 2019 and February 2020.

h. MARKEEN JORDAN, a/k/a "Kingo," the defendant, was an inmate at the MCC between approximately May 2017 and July 2020.

i. ANTHONY ELLISON, a/k/a "Harv," the defendant, was an inmate at the MCC between approximately November 2018 and January 2021.

j. TYRRELL SUMPTER, a/k/a "Rell," the defendant, was an inmate at the MCC between approximately June 2018 and February 2020.

k. KEVIN CROSBY, a/k/a "Sama," the defendant, was an inmate at the MCC between approximately September 2019 and May 2021.

l. DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," the defendant, was an inmate at the MCC between approximately September 2019 and September 2020.

m. VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," was an inmate at the MCC between approximately October 2019 and March 2021.

n. STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendant, was an inmate at the MCC between approximately July 2017 and February 2020.

The BOP Standards of Employee Conduct

6. In connection with their duty to ensure the care, custody, and control of the inmate population at the MCC, Correctional Officers and Unit Secretaries, among others, participate in inspections and searches of inmates and the MCC itself, and are tasked with, among other things, ensuring that contraband is not brought into or distributed in the MCC.

7. According to the BOP's Standards of Employee Conduct (the "Standards of Employee Conduct"), contraband is defined as "material prohibited by law, or by regulation, or material which can reasonably be expected to cause physical injury or adversely affect the security, safety, or good order of the institution."

Cellphones, controlled substances, and alcohol, among other items, are considered contraband. Employees of the MCC are expressly forbidden from "offer[ing] or giv[ing] to an inmate or a former inmate or any member of his/her family, or to any person known to be associated with an inmate or former inmate, any article, favor, or service that is not authorized in the performance of the employee's duties" and from "accept[ing] any gift, personal service, or favor from an inmate or former inmate, or from anyone known to be associated with or related to an inmate or former inmate." Nor are employees of the MCC allowed to become "financially involved with inmates, former inmates, or persons known (or who should have been known based on circumstances) to the employee as a family member or close friend of inmates or former inmates."

8. In addition to refraining from introducing or distributing contraband, employees of the MCC are also required to report "any violation, or apparent violation, of standards of conduct to [the Warden] or another appropriate authority," and "to immediately report to management any act or omission by any person that could result in a breach of institution security."

9. All Correctional Officers and Unit Secretaries, among other MCC employees, receive copies of the Standards of Employee Conduct and sign forms acknowledging as much when they start at

the MCC, and each receives yearly training on the topics contained therein, including the regulations against contraband.

10. On or about June 10, 2019, PERRY JOYNER, the defendant, acknowledged he received the BOP Standards of Employee Conduct and that his conduct was to be governed by those standards.

11. On or about August 5, 2019, MARIO FELICIANO, the defendant, acknowledged he received the BOP Standards of Employee Conduct and that his conduct was to be governed by those standards.

12. On or about January 21, 2020, SHARON GRIFFITH-MCKNIGHT, the defendant, acknowledged she received the BOP Standards of Employee Conduct and that her conduct was to be governed by those standards.

Count One
(Conspiracy)

The Grand Jury charges:

13. The allegations contained in paragraphs 1 through 12 of this Indictment are repeated and realleged as if fully set forth herein.

14. From at least in or about October 2019, up to and including at least in or about January 2021, in the Southern District of New York and elsewhere, PERRY JOYNER, MARIO FELICIANO, SHARON GRIFFITH-MCKNIGHT, DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO,

a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, together with others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, the provision and possession of prison contraband, in violation of Title 18, United States Code, Sections 1791(a) and 1791(b)(2).

15. It was a part and an object of the conspiracy that PERRY JOYNER, MARIO FELICIANO, and SHARON GRIFFITH-MCKNIGHT, the defendants, together with others known and unknown, in violation of a statute and a rule and order issued under statute, would and did provide to inmates of a prison prohibited objects - to wit, contraband, including marijuana, K2, oxycodone, alprazolam, buprenorphine and naloxone; cellphones; alcohol; cigarettes; and other contraband - and did attempt to do so, in violation of Title 18, United States Code, Sections 1791(a)(1) and 1791(b)(2).

16. It was further a part and an object of the conspiracy that DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, together with others known and unknown, being

inmates of a prison, would and did make, possess, and obtain prohibited objects - to wit, contraband, including marijuana, K2, oxycodone, alprazolam, buprenorphine and naloxone; cellphones; alcohol; cigarettes; and other contraband - and did attempt to do so, in violation of Title 18, United States Code, Sections 1791(a)(2) and 1791(b)(2).

Overt Acts

17. In furtherance of said 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. Between in or about April 2020 and in or about December 2020, SHARON GRIFFITH-MCKNIGHT, the defendant, provided and agreed to provide ANTHONY ELLISON, a/k/a "Harv," who at the time was an inmate at the MCC, with multiple cellphones.

b. On or about February 14, 2020, MARIO FELICIANO, the defendant, received an electronic payment of \$500 from DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," the defendant.

c. Between on or about November 24, 2019, and on or about January 24, 2020, DONNELL MURRAY, a/k/a "Don P," the defendant, caused his associate to issue electronic payments totaling approximately \$16,650 to two associates (respectively, "Joyner Associate-1" and "Joyner Associate-2") of PERRY JOYNER, the defendant, in exchange for K2, oxycodone, cellphones, and liquor that JOYNER smuggled into the MCC for MURRAY.

d. In or about January 2020, KEVIN CROSBY, a/k/a "Sama," the defendant, arranged for an associate ("Crosby Associate-1") to meet with JOYNER in the Bronx, where Crosby Associate-1 provided JOYNER with, among other items, K2, cigarettes, and alcohol, that JOYNER smuggled into the MCC for CROSBY.

e. On or about January 9, 2020, PERRY JOYNER, the defendant, agreed to smuggle into the MCC cellphones and liquor for TYRRELL SUMPTER, a/k/a "Rell," the defendant, in exchange for approximately \$5,000.

f. Between on or about December 23, 2019, and on or about January 26, 2020, MARKEEN JORDAN, a/k/a "Kingo," the defendant, caused his associate to issue electronic payments totaling approximately \$9,400 to Joyner Associate-1 and Joyner Associate-2 in exchange for JOYNER smuggling contraband into the MCC for JORDAN.

g. On or about December 30, 2019, ELLISON, caused his associate to issue electronic payments totaling approximately \$1,800 to Joyner Associate-1 in exchange for JOYNER smuggling contraband into the MCC for ELLISON.

h. Between on or about November 30, 2019, and on or about January 10, 2020, DAVID VALERIO, the defendant, issued electronic payments totaling approximately \$1,700 to Joyner

Associate-1 in exchange for JOYNER smuggling contraband into the MCC for VALERIO.

i. On or about November 14, 2019 and November 15, 2019, STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendant, caused his associate to issue electronic payments totaling approximately \$1,200 to Joyner Associate-2 in exchange for JOYNER smuggling contraband into the MCC for NUNEZ.

j. Between on or about October 24, 2019, and on or about January 11, 2020, VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," used an electronic payment application registered to a family member to issue payments totaling approximately \$6,799 to Joyner Associate-1 and Joyner Associate-2 in exchange for JOYNER smuggling contraband into the MCC for ACEVEDO DE LOS SANTOS and NUNEZ.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Honest Services Wire Fraud Conspiracy)

The Grand Jury further charges:

18. The allegations contained in paragraphs 1 through 12 and in paragraph 17 of this Indictment are repeated and realleged as if fully set forth herein.

19. From at least in or about October 2019 up through and including in or about April 2020, in the Southern District of New York and elsewhere, PERRY JOYNER, MARIO FELICIANO, DONNELL MURRAY,

a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit honest services wire fraud, in violation of Title 18, United States Code, Sections 1343 and 1346.

20. It was a part and an object of the conspiracy that PERRY JOYNER, MARIO FELICIANO, DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, together with others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and to deprive the public and the BOP of their right to the honest services of JOYNER and FELICIANO, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code,

Sections 1343 and 1346, to wit, MURRAY, JORDAN, ELLISON, SUMPTER, CROSBY, VALERIO, ACEVEDO DE LOS SANTOS, NUNEZ, together with others known and unknown, provided monetary bribes to JOYNER and FELICIANO in exchange for which JOYNER and FELICIANO introduced contraband into the MCC, and facilitated those exchanges through telephone calls, text messages, and electronic payments in interstate commerce.

(Title 18, United States Code, Section 1349.)

COUNT THREE
(Narcotics Distribution Conspiracy)

The Grand Jury further charges:

21. The allegations contained in paragraphs 1 through 12 and in paragraph 17 of this Indictment are repeated and realleged as if fully set forth herein.

22. From at least in or about October 2019 up through and including in or about April 2020, in the Southern District of New York and elsewhere, PERRY JOYNER, DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, together with 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.

23. It was a part and an object of the conspiracy that PERRY JOYNER, DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, together with 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).

24. The controlled substances that PERRY JOYNER, DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, and others known and unknown, conspired to distribute and possess with intent to distribute were:

a. Mixtures and substances containing a detectable amount of oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C);

b. Mixtures and substances containing a detectable amount of alprazolam, in violation of Title 21, United States Code, Section 841(b)(2);

c. Mixtures and substances containing a detectable amount of buprenorphine and naloxone, in violation of Title 21, United States Code, Section 841(b)(1)(E)(i);

d. Mixtures and substances containing a detectable amount of smokable synthetic cannabinoids in violation of Title 21, United States Code, Sections 813 and 841(b)(1)(C); and

e. 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, Sections 846, 841(b)(1)(C), 841(b)(1)(D), 841(b)(1)(E), and 841(b)(2).)

COUNT FOUR
(Obstruction of Justice)

The Grand Jury further charges:

25. The allegations contained in paragraphs 1 through 12 of this Indictment are repeated and realleged as if fully set forth herein.

26. In or about February 2020, in the Southern District of New York and elsewhere, PERRY JOYNER, the defendant, did knowingly use intimidation, threaten, and corruptly persuade another person, and attempt to do so, and engage in misleading conduct toward another person, with intent to hinder, delay and prevent the

communication to a law enforcement officer of the United States of information relating to the commission and possible commission of a federal offense, to wit, JOYNER intimidated and threatened, and caused others to intimidate and threaten, Inmate-1 for the purpose of dissuading Inmate-1 from providing the Government with information about the Scheme and JOYNER's participation in the Scheme.

(Title 18, United States Code, Sections 1512(b)(3) and 2.)

COUNT FIVE
(Obstruction of Justice)

The Grand Jury further charges:

27. The allegations contained in paragraphs 1 through 12 of this Indictment are repeated and realleged as if fully set forth herein.

28. From at least in or about April 2020 through at least in or about November 2020, in the Southern District of New York and elsewhere, SHARON GRIFFITH-MCKNIGHT, the defendant, did corruptly obstruct, influence, and impede an official proceeding, and attempt to do so, to wit, GRIFFITH-MCKNIGHT, in an attempt to influence a federal sentencing proceeding, falsely reported to the U.S. District Court for the Southern District of New York that a particular inmate at the MCC, ANTHONY ELLISON, a/k/a/ "Harv," the defendant, was a "model inmate" even though at the time GRIFFITH-MCKNIGHT was smuggling to ELLISON contraband and therefore

GRIFFITH-MCKNIGHT knew at the time that ELLISON was not, in fact, a "model inmate."

(Title 18, United States Code, Sections 1512(a)(2)(c) and 2.)

FORFEITURE ALLEGATIONS

29. As a result of committing the offense alleged in Count Two of this Indictment, PERRY JOYNER, MARIO FELICIANO, DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

30. As a result of committing the offense alleged in Count Three of this Indictment, PERRY JOYNER, DONNELL MURRAY, a/k/a "Don P," MARKEEN JORDAN, a/k/a "Kingo," ANTHONY ELLISON, a/k/a "Harv," TYRELL SUMPTER, a/k/a "Rell," KEVIN CROSBY, a/k/a "Sama," DAVID VALERIO, a/k/a "Santana," a/k/a "Bando," VIRGILIO

ACEVEDO DE LOS SANTOS, a/k/a "Jairo Taveras," a/k/a "Junior," and STARLIN NUNEZ, a/k/a "Chino," a/k/a "Junior," 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 obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

31. 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 the defendants 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.)

[REDACTED]

FOREPERSON

Damian Williams

DAMIAN WILLIAMS

United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

PERRY JOYNER,
MARIO FELICIANO,
SHARON GRIFFITH-MCKNIGHT,
DONNELL MURRAY,
a/k/a "Don P,"
MARKEEN JORDAN,
a/k/a "Kingo,"
ANTHONY ELLISON,
a/k/a "Harv,"
TYRELL SUMPTER,
a/k/a "Rell,"
KEVIN CROSBY,
a/k/a "Sama,"
DAVID VALERIO,
a/k/a "Santana,"
a/k/a "Bando,"
VIRGILIO ACEVEDO DE LOS
SANTOS,
a/k/a "Jairo Taveras,"
a/k/a "Junior,"
STARLIN NUNEZ,
a/k/a "Chino,"
a/k/a "Junior,"

Defendants.

INDICTMENT

21 Cr.

(18 U.S.C. §§ 371, 1349, 1512(b)(3), 1512(a)
(2)(c) and 2; 21 U.S.C. § 846.)

DAMIAN WILLIAMS

United States Attorney

Brian Cove

Foreperson

11/3/21
NE

Sealed indictment filed
Arrest warrants included

Sarah Cove
usm.j