

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

JOHNNY DAMUS,  
a/k/a "Ace,"  
RASHAAN RICHARDS,  
a/k/a "Jay Dee,"  
a/k/a "JD,"  
a/k/a "Payso,"  
DEVON RICHARDS,  
a/k/a "Dev,"  
CONRAD HERON,  
a/k/a "Conny Cash,"  
LOUIS JEUNE VERLY,  
a/k/a "Luis Jesus Virola,"  
KAREEM SHEPHERD,  
a/k/a "Reem,"  
a/k/a "Marcus Ford,"  
a/k/a "Frank James,"  
FABIOLA MOMPOINT,  
a/k/a "Lady Fab,"  
NATHANAEL FOUCAULT, and  
JOHNATHAN PERSAUD,  
a/k/a "Junzie-J,"  
  
Defendants.

22 CRIM 514

SEALED INDICTMENT

22 Cr.

- - - - - X

COUNT ONE  
(Conspiracy to Commit Access Device Fraud)

The Grand Jury charges:

Overview

1. Over the course of several years, RASHAAN RICHARDS,  
a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a

"Dev," KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," the defendants, and others, conspired with mail carriers from the United States Postal Service ("USPS"), including FABIOLA MOMPOINT, a/k/a "Lady Fab," NATHANAEL FOUCAULT, JONATHAN PERSAUD, a/k/a "Junzie-J," the defendants, and others, to steal credit cards from the mail. R. RICHARDS, D. RICHARDS, and SHEPHERD, along with CONRAD HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," the defendants, and others, then used the stolen credit cards at a variety of stores, including high-end retailers in Manhattan, resulting in over \$1.3 million in charges to the credit card companies. At the direction of JOHNNY DAMUS, a/k/a "Ace," the defendant, these defendants purchased many luxury items using stolen credit cards.

2. Working together with a close associate ("CC-1"), JOHNNY DAMUS, a/k/a "Ace," the defendant, functionally operated a particular website — LuxurySnob.com — on which many of these fraudulently obtained luxury items were sold. LuxurySnob purports to be an "online consignment and personal shopping company" specializing in "pre-owned luxury items," but, in truth and in fact, many of the items it sells were purchased using stolen credit cards.

### Background on Mail Delivery of Credit Cards

3. Most credit card companies distribute credit cards to customers through mail delivered by the USPS. Typically, when customers order new credit cards, the credit card companies mail those cards in envelopes marked with easily recognizable logos and other identifying information.

4. If a customer fails to receive an expected credit card, the customer can report his missing card to the credit card company. The credit card companies refer to cards that are reported as undelivered as Not Received as Issued.

5. Once a credit card is received by a customer, the customer is generally required to call a particular phone number controlled by the credit card company in order to activate the card. In order to confirm the identity of the individual attempting to activate a credit card, customers are typically asked for personal identifiers, including date of birth or social security number.

### The Fraud Scheme

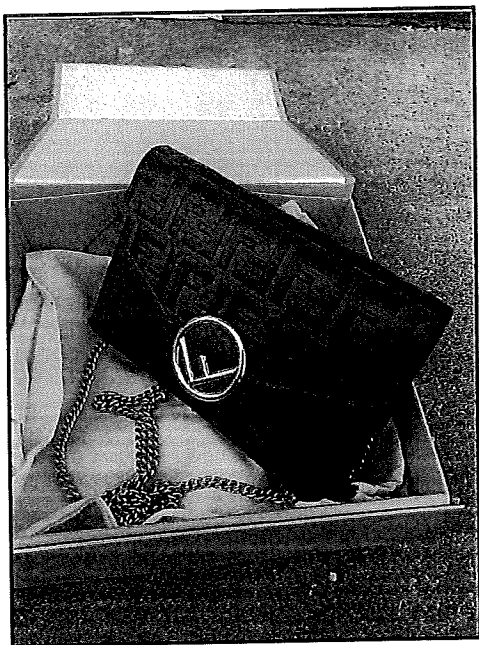
6. FABIOLA MOMPOINT, a/k/a "Lady Fab," NATHANAEL FOUCAULT, JOHNATHAN PERSAUD, a/k/a "Junzie-J," the defendants (collectively, the "Mail Carriers") — all of whom were employed as USPS mail carriers at the time of the scheme — and others stole credit cards from the mail stream before those cards were delivered

to the assigned credit card customers (the "Stolen Cards"). Over the course of the scheme, more than 120 credit cards were stolen from mail routes to which the Mail Carriers were assigned. The Mail Carriers then gave the Stolen Cards to RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," the defendants, and others in exchange for money or luxury items. R. RICHARDS, DEVON RICHARDS, and SHEPHERD distributed the Stolen Cards to other members of the conspiracy, including CONRAD HERON, a/k/a "Conny Cash," and LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," the defendants.

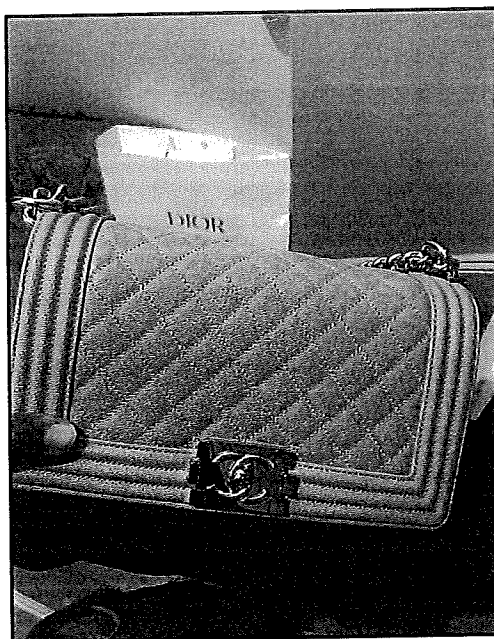
7. Before credit card customers could report their expected credit cards as missing, members of the conspiracy, including RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," CONRAD HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," and KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," the defendants (collectively, "the Shoppers"), activated the cards using stolen personal identifiable information of the cardholders, which they often obtained from online databases.

8. After activating the Stolen Cards, the Shoppers used the cards to make purchases at a variety of retailers, including particular big-box chains in New York and New Jersey.

On many occasions, the Shoppers used the Stolen Cards to purchase luxury goods — including items manufactured by, among others, Chanel, Fendi, Hermes, and Dior — from high-end retailers including, major department stores in, among other places, Manhattan, Brooklyn, and New Jersey.



Photograph of a Fendi purse, sent via text message by a Shopper.



Photograph of a Chanel purse, sent via text message by a Shopper. A Dior shopping bag is visible in the background.

9. Over the course of the scheme, the defendants used Stolen Cards to make purchases resulting in excess of approximately \$1.3 million in intended losses to credit card companies. In addition, in order to activate the cards and facilitate the purchases, the defendants stole hundreds of identities.

10. Often, JOHNNY DAMUS, a/k/a "Ace," the defendant, directed the Shoppers to purchase particular luxury items in specific quantities. DAMUS gave these instructions primarily through KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," and RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," the defendants, who either purchased the items themselves using the Stolen Cards or directed the other Shoppers to do so.

11. In some instances, the Shoppers developed relationships with sales associates (the "Associates") at particular retailers, who were willing to apply additional discounts to purchases, check inventory, and allow the Shoppers to use multiple credit cards in a variety of names in order to complete transactions. Sometimes, the Shoppers coordinated with the Associates in advance to make sure there would be someone available to complete their transactions without making additional inquiries.

12. After obtaining the merchandise using the Stolen Cards, the Shoppers often discussed their purchases with JOHNNY DAMUS, a/k/a "Ace," the defendant, and delivered the goods to DAMUS or those working with DAMUS.

13. After receiving the fraudulently obtained items, JOHNNY DAMUS, a/k/a "Ace," the defendant, working in conjunction

with CC-1 — the purported owner of LuxurySnob — posted the goods on LuxurySnob.com, which claims to be a "one stop shop for fashion lovers."

14. On its website, LuxurySnob further claims that "[e]very order that ships is presented and packaged to standards that match or exceed luxury retail stores," including, in some instances, "original boxes, dust bags, authenticity certificates and manuals." Throughout the scheme, JOHNNY DAMUS, a/k/a "Ace," the defendant, took steps to ensure that items would be suitable for sale on LuxurySnob.com. To do so, DAMUS worked with the Shoppers to make sure that he had a supply of boxes and bags from luxury retailers to package items sold on LuxurySnob.com including merchandise from "Dior, [G]ucci, Chanel, louis" — references to luxury brands Dior, Gucci, Chanel and Louis Vuitton. The Shoppers also took care to ensure that they obtained certificates of authenticity for items, such as Chanel purses.

15. In exchange for the fraudulently obtained goods, JOHNNY DAMUS, a/k/a "Ace," the defendant, paid the Shoppers. The Shoppers were aware that the items they had purchased with the Stolen Cards were being sold on LuxurySnob.com.

16. In sum, over the course of at least three years, JOHNNY DAMUS, a/k/a "Ace," RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," CONRAD

HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," FABIOLA MOMPOINT, a/k/a "Lady Fab," NATHANAEL FOUCAULT, and JOHNATHAN PERSAUD, a/k/a "Junzie-J," the defendants, and others, conspired to steal credit cards from the mail; use those stolen credit cards at a variety of stores, including high-end retailers; and sell some of the merchandise purchased with the stolen cards on LuxurySnob.com. The scheme exposed credit card companies and financial institutions to over \$1.3 million in loss and resulted in the theft of hundreds of identities.

#### Statutory Allegations

17. From at least in or around December 2018 up to and including the present, in the Southern District of New York and elsewhere, JOHNNY DAMUS, a/k/a "Ace," RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," CONRAD HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," FABIOLA MOMPOINT, a/k/a "Lady Fab," NATHANAEL FOUCAULT, and JOHNATHAN PERSAUD, a/k/a "Junzie-J," the defendants, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to commit access device fraud, in violation of Title 18, United States Code, Section 1029(a)(5).



18. It was a part and object of the conspiracy that JOHNNY DAMUS, a/k/a "Ace," RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," CONRAD HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," FABIOLA MOMPOINT, a/k/a "Lady Fab," NATHANAEL FOUCAULT, and JOHNATHAN PERSAUD, a/k/a "Junzie-J," the defendants, and others known and unknown, knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, would and did effect transactions with one and more access devices issued to another person or persons, to receive payment and things of value during a one-year period, the aggregate value of which was equal to and greater than \$1,000, in violation of Title 18, United States Code, Section 1029(a)(5).

#### OVERT ACTS

19. 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. Between on or about July 20, 2019 and on or about July 22, 2019, RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," the defendant, made fraudulent purchases of particular luxury items at the direction of JOHNNY DAMUS, a/k/a "Ace," the defendant.

b. On or about August 5, 2019, CONRAD HERON, a/k/a "Conny Cash," the defendant, used a Stolen Card to make a fraudulent \$11,431.88 purchase at a high-end retailer ("High-End Retailer-1") in New York, New York.

c. On or about September 16, 2020, DAMUS made a \$1,595 mobile banking payment to R. RICHARDS in exchange for fraudulent purchases of luxury items.

d. On or about September 6, 2019, DAMUS directed KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," the defendant, to make fraudulent purchases of particular luxury items.

e. On or about September 9, 2020, FABIOLA MOMPOINT, a/k/a "Lady Fab," the defendant, obtained Stolen Cards from a postal facility in New York, New York and transferred the Stolen Cards to SHEPHERD.

f. On or about September 13, 2020, R. RICHARDS and DEVON RICHARDS, a/k/a "Dev," the defendants, used the Stolen Cards to make fraudulent purchases at a major department store ("Department Store-1") in New York, New York.

g. On or about October 19, 2021, SHEPHERD used a Stolen Card to make a fraudulent purchase at a big-box retailer in New York, New York.

h. On or about November 2, 2020, NATHANAEL FOUCAULT, the defendant, transferred a Stolen Card to R. RICHARDS. The transferred Stolen Card was used between November 3, 2020 and on or about November 4, 2020 to make fraudulent purchases in White Plains, New York and New York, New York.

i. On or about March 1, 2022, LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," the defendant, made a fraudulent \$1,388 purchase at high-end retailer ("High-End Retailer-2") in New York, New York, using a Stolen Card.

j. A particular Chase Stolen Card (the "Chase Stolen Card") was expected to be delivered by JOHNATHAN PERSAUD, a/k/a "Junzie-J," the defendant, on or about June 11, 2022. On or about June 14, 2022, an associate of D. RICHARDS ("CC-2"), acting in conjunction with D. RICHARDS, used the Chase Stolen Card at a major department store ("Department Store-2") in New York, New York to make a fraudulent \$6,423.63 purchase.

(Title 18, United States Code, Section 1029(b)(2).)

**COUNT TWO**  
**(Access Device Fraud)**

The Grand Jury further charges:

20. The allegations contained in paragraphs 1 through 19 of this Indictment are repeated and realleged as if fully set forth herein.

21. From in or around December 2018 up to and including the present, in the Southern District of New York and elsewhere, JOHNNY DAMUS, a/k/a "Ace," RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," CONRAD HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," FABIOLA MOMPOINT, a/k/a "Lady Fab," NATHANAEL FOUCAULT, and JOHNATHAN PERSAUD, a/k/a "Junzie-J," the defendants, and others known and unknown, did knowingly and with intent to defraud, as part of an offense affecting interstate and foreign commerce, effect transactions with one and more access devices issued to another person or persons, to receive payment and things of value during a one-year period, the aggregate value of which was equal to or greater than \$1,000, in violation of Title 18, United States Code, Section 1029(a)(5), to wit, the defendants stole and used credit cards issued to other persons to purchase merchandise of at least \$1,000 in value, and aided and abetted the same.

(Title 18, United States Code, Sections 1029(a)(5),  
(c)(1)(A)(ii), and 2.)

**COUNT THREE**  
**(Conspiracy to Commit Bank Fraud)**

The Grand Jury further charges:

22. The allegations contained in paragraphs 1 through 19 of this Indictment are repeated and realleged as if fully set forth herein.

23. From at least on or about December 2018 up to and including the present, in the Southern District of New York and elsewhere, JOHNNY DAMUS, a/k/a "Ace," RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," CONRAD HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," and KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

24. It was a part and object of the conspiracy that JOHNNY DAMUS, a/k/a "Ace," RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," CONRAD HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," and KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," the defendants, and others known and unknown, would and did knowingly and attempt to execute a scheme and artifice to defraud financial institutions, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under

the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

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

**COUNT FOUR**  
**(Aggravated Identity Theft)**

The Grand Jury further charges:

25. The allegations contained in paragraphs 1 through 19 of this Indictment are repeated and realleged as if fully set forth herein.

26. From at least on or about December 2018 up to and including the present, in the Southern District of New York and elsewhere, JOHNNY DAMUS, a/k/a "Ace," RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," CONRAD HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," FABIOLA MOMPOINT, a/k/a "Lady Fab," NATHANAEL FOUCAULT, and JOHNATHAN PERSAUD, a/k/a "Junzie-J," the defendants, and others known and unknown, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), and aided and abetted the same, to wit, the defendants transferred,

possessed, and used, and aided and abetted the transfer, possession, and use of, among other things, the names, dates of birth, addresses, phone numbers, social security numbers, and credit card numbers of other individuals during and in relation to the conspiracy to commit access device fraud as charged in Count One of this Indictment and the conspiracy to commit bank fraud as charged in Count Three of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1),  
1028A(b), and 2.)

**COUNT FIVE**  
**(Conspiracy to Steal Mail While Employed as a Postal Employee)**

The Grand Jury further charges:

30. The allegations contained in paragraphs 1 through 19 of this Indictment are repeated and realleged as if fully set forth herein.

31. From at least on or about December 2018 up to and including the present, in the Southern District of New York and elsewhere, RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," FABIOLA MOMPOINT, a/k/a "Lady Fab," NATHANAEL FOUCAULT, and JOHNATHAN PERSAUD, a/k/a "Junzie-J," the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an

offense against the United States, to wit, the theft of mail while being a Postal Service employee, in violation of Title 18, United States Code, Section 1709.

32. It was a part and object of the conspiracy that United States Postal Service employees would and did embezzle, steal, abstract, and remove a letter, postal card, package, bag, and mail, and any article and thing contained therein entrusted to them and which came into their possession intended to be conveyed by mail, and carried and delivered by a carrier, messenger, agent, and other person employed by a department of the Postal Service, and forwarded through and delivered from a post office and station thereof established by authority of the Postal Service.

33. 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 September 9, 2020, FABIOLA MOMPOINT, a/k/a "Lady Fab," the defendant, a United States Postal Service employee, obtained Stolen Cards from a postal facility in New York, New York and transferred the Stolen Cards to KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," the defendant.

b. On or about November 2, 2020, NATHANAEL FOUCAULT, the defendant, a United States Postal Service employee,



transferred a Stolen Card to RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," the defendant. The transferred Stolen Card was used between November 3, 2020 and on or about November 4, 2020 to make fraudulent purchases in White Plains, New York and New York, New York.

c. On or about June 11, 2022, JOHNATHAN PERSAUD, a/k/a "Junzie-J," the defendant, a United States Postal Service employee, transferred the Chase Stolen Card to DEVON RICHARDS, a/k/a "Dev," the defendant. The Chase Stolen Card was used by CC-2, acting in conjunction with D. RICHARDS, at Department Store-2 in New York, New York to make a fraudulent \$6,423.63 purchase.

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

#### **FORFEITURE ALLEGATIONS**

34. As a result of committing the offenses alleged in Counts One and Two of this Indictment, JOHNNY DAMUS, a/k/a "Ace," RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," CONRAD HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," FABIOLA MOMPOINT, a/k/a "Lady Fab," NATHANAEL FOUCAULT, and JOHNATHAN PERSAUD, a/k/a "Junzie-J," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1029(c)(1)(C), any and all property constituting,

or derived from, proceeds obtained directly or indirectly, as a result of the commission of said offenses, and any and all personal property used or intended to be used to commit said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

35. As a result of committing the offense alleged in Count Three of this Indictment, JOHNNY DAMUS, a/k/a "Ace," RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," CONRAD HERON, a/k/a "Conny Cash," LOUIS JEUNE VERLY, a/k/a "Luis Jesus Virola," and KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendants obtained directly or indirectly, as a result of 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.

36. As a result of committing the offense alleged in Count Five of this Indictment, RASHAAN RICHARDS, a/k/a "Jay Dee," a/k/a "JD," a/k/a "Payso," DEVON RICHARDS, a/k/a "Dev," KAREEM SHEPHERD, a/k/a "Reem," a/k/a "Marcus Ford," a/k/a "Frank James,"

FABIOLA MOMPOINT, a/k/a "Lady Fab," NATHANAEL FOUCAULT, and JOHNATHAN PERSAUD, a/k/a "Junzie-J," 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.

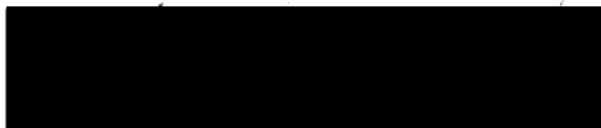
**SUBSTITUTE ASSETS PROVISION**

37. 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, Sections 981 and 982;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)



*Damian Williams*  
DAMIAN WILLIAMS  
United States Attorney

---

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

v.

JOHNNY DAMUS,  
a/k/a "Ace,"  
RASHAAN RICHARDS,  
a/k/a "Jay Dee,"  
a/k/a "JD,"  
a/k/a "Payso,"  
DEVON RICHARDS,  
a/k/a "Dev,"  
CONRAD HERON,  
a/k/a "Conny Cash,"  
LOUIS JEUNE VERLY,  
a/k/a "Luis Jesus Virola,"  
KAREEM SHEPHERD,  
a/k/a "Reem,"  
a/k/a "Marcus Ford,"  
a/k/a "Frank James,"  
FABIOLA MOMPOINT,  
a/k/a "Lady Fab,"  
NATHANAEL FOUCAULT, and  
JOHNATHAN PERSAUD,  
a/k/a "Junzie-J,"

Defendants.

---

SEALED INDICTMENT

22 Cr.

(18 U.S.C. §§ 371, 1029(b)(2),  
1029(a)(5), 1349, 1028A, and 2.)

Damian Williams

United States Attorney

---

