

JRS:VAZ  
F. #2023R00035

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

- against -

CHRISTOPHER WORLD,  
also known as “Birdo,”  
LOVELL AMBRISTER,  
also known as “Stali,”  
TRENT DANCE,  
also known as “Tre Savv,”  
WILLIAM HARVIN,  
also known as “Pook,”  
HASSEN LEWIS,  
also known as “Fan Boy,” and  
VON VINCENT,

Defendants.

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THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendants and Relevant Entities

1. The defendant CHRISTOPHER WORLD, also known as “Birdo,” was a resident of Brooklyn, New York.
2. The defendant LOVELL AMBRISTER, also known as “Stali,” was a resident of the Bronx, New York.
3. The defendant TRENT DANCE, also known as “Tre Savv,” was a resident of Brooklyn, New York.

FILED  
IN CLERK'S OFFICE  
US DISTRICT COURT E.D.N.Y.  
\* JANUARY 5, 2024 \*  
BROOKLYN OFFICE

I N D I C T M E N T

Cr. No. 24-CR-7  
(T. 18, U.S.C., §§ 371, 981(a)(1)(C),  
982(a)(5), 982(b)(1), 2312, 2314, 3665, 2  
and 3551 et seq.; T. 21, U.S.C., § 853(p);  
T. 28, U.S.C., § 2461(c))

**Judge Ann M Donnelly**  
**Magistrate Judge Taryn A. Merkl**

4. The defendant WILLIAM HARVIN, also known as “Pook,” was a resident of Brooklyn, New York.

5. The defendant HASSEN LEWIS, also known as “Fan Boy,” was a resident of Brooklyn, New York.

6. The defendant VON VINCENT was a resident of Brooklyn, New York.

7. Company-1, an entity the identity of which is known to the Grand Jury, was a home improvement company headquartered in Mooresville, North Carolina. Company-1 had hundreds of branch stores along the East Coast.

8. Company-2, an entity the identity of which is known to the Grand Jury, was a home improvement company headquartered in Atlanta, Georgia. Company-2 had hundreds of branch stores along the East Coast.

9. Company-3, an entity the identity of which is known to the Grand Jury, was an electronics manufacturing company headquartered in Coopersburg, Pennsylvania. Company-3 manufactured lighting and lighting control devices, including dimmers and light switches. Company-1 and Company-2 sold Company-3’s products in their branch stores.

10. Company-4, an entity the identity of which is known to the Grand Jury, was a car rental company headquartered in Estero, Florida. Company-4 had hundreds of branch facilities along the East Coast.

## II. The Interstate Theft Scheme

11. In or about and between April 2022 and December 2023, both dates being approximate and inclusive, the defendants CHRISTOPHER WORLD, LOVELL AMBRISTER, TRENT DANCE, WILLIAM HARVIN, HASSEN LEWIS and VON VINCENT, together with

others, perpetrated a scheme to transport stolen motor vehicles and stolen goods across state lines.

12. In furtherance of the scheme, the defendants CHRISTOPHER WORLD, LOVELL AMBRISTER, TRENT DANCE, WILLIAM HARVIN, HASSEN LEWIS and VON VINCENT, together with others, stole motor vehicles from various branch facilities of rental car companies along the East Coast, including in the Eastern District of New York. They then drove the stolen motor vehicles across state lines from New York to various branch stores of Company-1 and Company-2 along the East Coast. At the branch stores, WORLD, AMBRISTER, DANCE, HARVIN, LEWIS and VINCENT, together with others, stole goods—often items manufactured by Company-3—the bulk of which they then transported in the stolen motor vehicles from other states to New York for resale.

13. As a result of the scheme, the defendants CHRISTOPHER WORLD, LOVELL AMBRISTER, TRENT DANCE, WILLIAM HARVIN, HASSEN LEWIS and VON VINCENT, together with others, stole goods worth at least \$516,000 from at least 71 branch stores of Company-1 and at least 59 branch stores of Company-2. The branch stores were located in at least 13 states, including New York. WORLD, AMBRISTER, DANCE, HARVIN, LEWIS and VINCENT, together with others, also stole vehicles worth at least \$320,000 from branch facilities of several rental car companies, including Company-4. The branch facilities were located in at least four states, including New York.

COUNT ONE

(Conspiracy to Transport Stolen Motor Vehicles and Property)

14. The allegations contained in paragraphs one through 13 are alleged and incorporated as if fully set forth in this paragraph.

15. In or about April 2022 and December 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants CHRISTOPHER WORLD, also known as “Birido,” LOVELL AMBRISTER, also known as “Stali,” TRENT DANCE, also known as “Tre Savv,” WILLIAM HARVIN, also known as “Pook,” HASSEN LEWIS, also known as “Fan Boy,” and VON VINCENT, together with others, did knowingly and willfully conspire to (1) transport in interstate commerce one or more motor vehicles, knowing the same to have been stolen, contrary to Title 18, United States Code, Section 2312, and (2) transport, transmit and transfer in interstate commerce goods, wares and merchandise of the value of \$5,000 or more, to wit: goods from branch stores of Company-1 and Company-2 and motor vehicles, knowing the same to have been stolen, converted and taken by fraud, contrary to Title 18, United States Code, Section 2314.

16. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants CHRISTOPHER WORLD, LOVELL AMBRISTER, TRENT DANCE, WILLIAM HARVIN, HASSEN LEWIS and VON VINCENT, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about August 28, 2022, WORLD and VINCENT, together with others, stole goods from a branch store of Company-1 located in Binghamton, New York; a branch store of Company-1 located in Vestal, New York; and a branch store of Company-2 located in Binghamton, New York.

(b) On or about August 28, 2022, WORLD and VINCENT, together with others, transported a black Honda CR-V bearing a Vehicle Identification Number ending in 240895 (“Vehicle-1”) from New York to Pennsylvania.

(c) On or about August 28, 2022, WORLD and VINCENT, together with others, transported goods stolen from branch stores of Company-1 and Company-2 from the Eastern District of New York to Pennsylvania.

(d) On or about October 27, 2022, WORLD and VINCENT, together with others, stole goods from a branch store of Company-1 located in Camden, Delaware; a branch store of Company-1 located in Pocomoke City, Maryland; a branch store of Company-2 located in Brandywine, Delaware; and a branch store of Company-2 located in Ocean City, Maryland.

(e) On or about November 4, 2022, WORLD, together with others, stole goods from a branch store of Company-1 located in Anderson, South Carolina.

(f) On or about January 5, 2023, AMBRISTER, together with others, stole goods from a branch store of Company-2 located in Glasgow, Delaware, and a branch store of Company-2 located in Rehoboth, Delaware.

(g) On or about February 9, 2023, DANCE and HARVIN, together with others, transported a white Buick Encore GX bearing a Vehicle Identification Number ending in 124942 (“Vehicle-2”) from New York to New Jersey.

(h) On or about February 9, 2023, DANCE and HARVIN, together with others, stole goods from a branch store of Company-1 located in Lumberton, New Jersey; a branch store of Company-2 located in Delran, New Jersey; and a branch store of Company-2 located in Starrett City, New York.

(i) On or about February 9, 2023, DANCE and HARVIN, together with others, transported goods stolen from branch stores of Company-1 and Company-2 from New Jersey to New York.

(j) On or about February 10, 2023, LEWIS, together with others, transported Vehicle-2 from New York to New Jersey.

(k) On or about February 10, 2023, LEWIS, together with others, stole goods from a branch store of Company-2 located in Forked River, New Jersey.

(l) On or about February 10, 2023, LEWIS, together with others, transported goods stolen from branch stores of Company-2 from New Jersey to New York.

(m) On or about February 22, 2023, AMBRISTER and LEWIS, together with others, transported a white Buick Encore GX bearing a Vehicle Identification Number ending in 162381 ("Vehicle-3") from New York to Pennsylvania.

(n) On or about February 22, 2023, AMBRISTER and LEWIS, together with others, stole goods from a branch store of Company-2 located in Carlisle, Pennsylvania; a branch store of Company-2 located in Wyomissing, Pennsylvania; and a branch store of Company-2 located in York, Pennsylvania.

(o) On or about February 22, 2023, AMBRISTER and LEWIS, together with others, transported goods stolen from branch stores of Company-2 from Pennsylvania to New York.

(p) On or about August 29, 2023, DANCE and HARVIN, together with others, stole goods from a branch store of Company-2 located in Wappingers Falls, New York.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO

(Interstate Transportation of Stolen Property)

17. The allegations contained in paragraphs one through 13 are alleged and incorporated as if fully set forth in this paragraph.

18. In or about and between April 2022 and December 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants CHRISTOPHER WORLD, also known as “Birdo,” LOVELL AMBRISTER, also known as “Stali,” TRENT DANCE, also known as “Tre Savv,” WILLIAM HARVIN, also known as “Pook,” HASSEN LEWIS, also known as “Fan Boy,” and VON VINCENT, together with others, did knowingly and intentionally transport, transmit and transfer in interstate commerce goods, wares and merchandise of the value of \$5,000 or more, to wit: goods from branch stores of Company-1 and Company-2 and motor vehicles, knowing the same to have been stolen, converted and taken by fraud.

(Title 18, United States Code, Sections 2314, 2 and 3551 et seq.)

COUNT THREE

(Interstate Transportation of Stolen Motor Vehicle)

19. The allegations contained in paragraphs one through 13 are alleged and incorporated as if fully set forth in this paragraph.

20. In or about August 2022, within the Eastern District of New York and elsewhere, the defendants CHRISTOPHER WORLD, also known as “Birdo,” and VON

VINCENT, together with others, did knowingly and intentionally transport in interstate commerce a motor vehicle, to wit: Vehicle-1, knowing the same to have been stolen.

(Title 18, United States Code, Sections 2312, 2 and 3551 et seq.)

COUNT FOUR

(Interstate Transportation of Stolen Motor Vehicle)

21. The allegations contained in paragraphs one through 13 are alleged and incorporated as if fully set forth in this paragraph.

22. In or about February 2023, within the Eastern District of New York and elsewhere, the defendants TRENT DANCE, also known as “Tre Savv,” WILLIAM HARVIN, also known as “Pook,” and HASSEN LEWIS, also known as “Fan Boy,” together with others, did knowingly and intentionally transport in interstate commerce a motor vehicle, to wit: Vehicle-2, knowing the same to have been stolen.

(Title 18, United States Code, Sections 2312, 2 and 3551 et seq.)

COUNT FIVE

(Interstate Transportation of Stolen Motor Vehicle)

23. The allegations contained in paragraphs one through 13 are alleged and incorporated as if fully set forth in this paragraph.

24. In or about February 2023, within the Eastern District of New York and elsewhere, the defendants LOVELL AMBRISTER, also known as “Stali,” and HASSEN LEWIS, also known as “Fan Boy,” together with others, did knowingly and intentionally



transport in interstate commerce a motor vehicle, to wit: Vehicle-3, knowing the same to have been stolen.

(Title 18, United States Code, Sections 2312, 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT ONE

25. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count One, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offense; (b) Title 18, United States Code, Section 982(a)(5), which requires any person convicted of such offense to forfeit any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such offense; and (c) Title 18, United States Code, Section 3665, which requires the confiscation and disposal of firearms and ammunition found in the possession or under the immediate control of the defendants at the time of their arrest.

26. 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 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 intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(5), 982(b)(1) and 3665; Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNT TWO

27. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offense.

28. 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 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 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 forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS THREE THROUGH FIVE

29. The United States hereby gives notice to the defendants charged in Counts Three through Five that, upon their conviction of any such offenses, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 982(a)(5), which requires any person convicted of such offenses to forfeit any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such offenses; and (b) Title 18, United States Code, Section 3665, which requires the confiscation and disposal of firearms and ammunition found in the possession or under the immediate control of the defendants at the time of their arrest.

30. 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 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

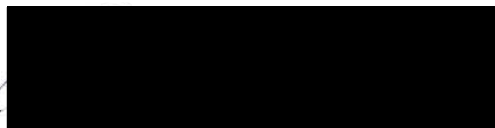
without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as

incorporated by Title 18, United States Code, Section 982(b)(1), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 982(a)(5), 982(b)(1) and 3665; Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

CHRISTOPHER WORLD et al.,

Defendants.

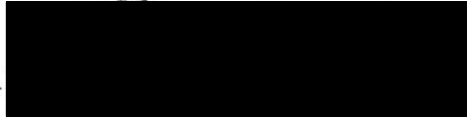
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**INDICTMENT**

(T. 18, U.S.C., §§ 371, 981(a)(1)(C), 982(a)(5), 982(b)(1), 2312, 2314,  
3665, 2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C.,  
§ 2461(c))

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*A true bill.*



Foreperson

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Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

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Bail, \$ \_\_\_\_\_

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*Victor Zapana, Assistant U.S. Attorney (718) 254-7180*