

AL:JRS/KCB
F. #2021R00129

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

SUPERSEDING
INDICTMENT

- against -

OLUWAGBENGA AGORO,
also known as "Gee Banga,"
LORENZO BAILEY,
also known as "Renzo" and "St.
Clair Bailey,"
QUINCY BATTICE,
also known as "Hush Dinero"
and "George Ayala,"
DAVON BROWN,
also known as "Chico Dinero,"
HANS DESTINE,
also known as "YL Flocks,"
JEAN FREMONT,
also known as "Juno" and "Bigga Twirl,"
RICARDO HEPBURN,
also known as "Riko Floxks,"
TRISTON LAWRENCE,
also known as "Birdy Flock,"
McKOY LIMA,
also known as "Mak,"
DERYCK THOMPSON,
also known as "Benzo,"
"DBenzo" and "Kenzie," and
MICHAEL WILLIAMS,
also known as "Mikey Floxks"
and "Mikey Gzz,"

Cr. No. 20-293 (S-1) (WFK)
(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2),
924(c)(1)(A)(i), 924(c)(1)(A)(ii),
924(c)(1)(A)(iii), 924(d)(1),
1959(a)(3), 1959(a)(5), 1959(a)(6), 2
and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

Defendants.

----- X

THE GRAND JURY CHARGES:

INTRODUCTION

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

The Enterprise

1. The Folk Nation Gangster Disciples, also known as “GD” (hereinafter “GD” or the “enterprise”), was a gang with members located throughout Brooklyn, New York, and elsewhere, divided into subgroups, or “sets.”

2. Members of GD sometimes signified their membership through the use of symbols of GD, including black hearts, a three-pronged pitchfork (also known as the “rake”), a six-pointed star and a spiral (also known as a “twirl”). Members of GD also sometimes signified their membership through references to sets within or associated with GD, including “No Love City,” “74,” “6-Trey” and “Stay Paid Money Burners,” or by appending the words “Gz,” “Flocks” or “Floxks” to their nicknames.

3. Members and associates of GD have committed acts of violence, including acts involving murder and assault, as well as other crimes, including robbery, extortion, trafficking in counterfeit currency, drug trafficking, fraud and obstruction of justice. Participation in criminal activity by a member, especially violence directed at rival gang members, increased the respect accorded to the member and could result in promotion to a leadership position.

4. GD, including its leadership, membership and associates, constituted an “enterprise” as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected,

interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

5. GD, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is (a) acts involving murder and robbery that are chargeable under the New York Penal Law and punishable by imprisonment for more than one year; (b) acts indictable under Title 18, United States Code, Sections 472 and 473 (relating to counterfeiting), 1951 (relating to interference with commerce, robbery or extortion) and 1343 (relating to wire fraud); and (c) offenses involving dealing in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

Purposes of the Enterprise

6. The purposes of the enterprise included the following:

(a) Promoting and enhancing the prestige, reputation and position of the enterprise with respect to rival criminal organizations;

(b) Preserving and protecting the power, territory and criminal ventures of the enterprise through the use of intimidation, threats of violence and acts of violence, including murder and assault;

(c) Keeping victims and rivals in fear of the enterprise and its members and associates;

(d) Enriching the members and associates of the enterprise through criminal activity, including drug trafficking, trafficking in counterfeit currency and fraud;
and

(e) Concealing the activities of the enterprise from law enforcement.

Means and Methods of the Enterprise

7. Among the means and methods by which the members of the enterprise and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:

(a) Members of the enterprise and their associates committed, attempted to commit, threatened to commit and conspired to commit acts of violence, including acts involving murder and assault, to enhance the enterprise's prestige and protect and expand the enterprise's criminal operations;

(b) Members of the enterprise and their associates used and threatened to use physical violence against various individuals, including members of rival criminal organizations; and

(c) Members of the enterprise and their associates used, attempted to use and conspired to use drug trafficking, trafficking in counterfeit currency and fraud as a means of obtaining money.

The Defendants

8. The defendants OLUWAGBENGA AGORO, also known as "Gee Banga," LORENZO BAILEY, also known as "Renzo" and "St. Clair Bailey," DAVON BROWN, also known as "Chico Dinero," HANS DESTINE, also known as "YL Flocks," JEAN FREMONT, also known as "Juno" and "Bigga Twirl," RICARDO HEPBURN, also known as "Riko Floxks," TRISTON LAWRENCE, also known as "Birdy Flock," DERYCK THOMPSON, also known as "Benzo," "DBenzo" and "Kenzie," and MICHAEL

WILLIAMS, also known as “Mikey Floxks” and “Mikey Gzz,” were members of the enterprise.

9. The defendants QUINCY BATTICE, also known as “Hush Dinero” and “George Ayala,” and MCKOY LIMA, also known as “Mak,” were associates of the enterprise.

COUNT ONE

(Assault In-Aid-Of Racketeering - John Doe #1)

10. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

11. On or about March 14, 2020, within the Eastern District of New York, the defendant DAVON BROWN, also known as “Chico Dinero,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally assault John Doe #1, an individual whose identity is known to the Grand Jury, with a dangerous weapon, in violation of New York Penal Law Sections 120.05(2) and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

COUNT TWO

(Possessing, Brandishing and Discharging a Firearm During a Crime of Violence)

12. On or about March 14, 2020, within the Eastern District of New York, the defendant DAVON BROWN, also known as “Chico Dinero,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a crime of violence, to wit: the crime charged in Count One, and did knowingly and

intentionally possess such firearms in furtherance of said crime of violence, one or more of which firearms was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT THREE

(Felon in Possession of a Firearm)

13. On or about March 14, 2020, within the Eastern District of New York, the defendant DAVON BROWN, also known as “Chico Dinero,” knowing that he had previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: a North American Arms, model NAA-22MS, .22 Magnum caliber revolver with serial number E076347.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

COUNT FOUR

(Attempted Murder In-Aid-Of Racketeering - 130 Saint Pauls Place, Brooklyn, New York)

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

15. On or about July 24, 2020, within the Eastern District of New York, the defendant MICHAEL WILLIAMS, also known as “Mikey Floxks” and “Mikey Gzz,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder one or more individuals in the vicinity of 130 Saint Pauls Place, Brooklyn, New York, in violation of New York Penal Law Sections 125.25(1), 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(5), 2 and 3551 et seq.)

COUNT FIVE

(Assault In-Aid-Of Racketeering - John Doe #2 and Jane Doe #1)

16. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

17. On or about July 24, 2020, within the Eastern District of New York, the defendant MICHAEL WILLIAMS, also known as “Mikey Floxks” and “Mikey Gzz,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally assault John Doe #2 and Jane Doe #1, individuals whose identities are known to the Grand Jury, with a dangerous weapon, in violation of New York Penal Law Sections 120.05(2) and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

COUNT SIX

(Possessing, Brandishing and Discharging a Firearm During a Crime of Violence)

18. On or about July 24, 2020, within the Eastern District of New York, the defendant MICHAEL WILLIAMS, also known as “Mikey Floxks” and “Mikey Gzz,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence, to wit: the crimes charged in Counts Four and Five, and did knowingly and intentionally possess such firearms in furtherance of said crimes of violence, one or more of which firearms was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT SEVEN

(Attempted Murder In-Aid-Of Racketeering - John Doe #3)

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

20. On or about August 2, 2020, within the Eastern District of New York, the defendant TRISTON LAWRENCE, also known as “Birdy Flock,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder John Doe #3, an individual whose identity is known to the Grand Jury, in violation of New York Penal Law Sections 125.25(1), 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(5), 2 and 3551 et seq.)

COUNT EIGHT

(Attempted Assault In-Aid-Of Racketeering - John Doe #3)

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

22. On or about August 2, 2020, within the Eastern District of New York, the defendant TRISTON LAWRENCE, also known as “Birdy Flock,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to assault John Doe #3 with a dangerous weapon, in violation of New York Penal Law Sections 120.05(2), 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(6), 2 and 3551 et seq.)

COUNT NINE

(Possessing, Brandishing and Discharging a Firearm During a Crime of Violence)

23. On or about August 2, 2020, within the Eastern District of New York, the defendant TRISTON LAWRENCE, also known as “Birdy Flock,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence, to wit: the crimes charged in Counts Seven and Eight, and did knowingly and intentionally possess such firearms in furtherance of said crimes of violence, one or more of which firearms was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT TEN

(Conspiracy to Murder Rival Gang Members)

24. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

25. On or about and between November 7, 2020 and November 9, 2020, both dates being approximate and inclusive, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” LORENZO BAILEY, also known as “Renzo” and “St. Clair Bailey,” QUINCY BATTICE, also known as “Hush Dinero” and “George Ayala,” HANS DESTINE, also known as “YL Flocks,” JEAN FREMONT, also known as “Juno” and “Bigga Twirl,” RICARDO HEPBURN, also known as “Riko Floxks,” MCKOY LIMA, also known as “Mak,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity,

did knowingly and intentionally conspire to murder members of rival gangs in Brooklyn, New York, in violation of New York Penal Law Sections 125.25(1) and 105.15.

(Title 18, United States Code, Sections 1959(a)(5), 2 and 3551 et seq.)

COUNT ELEVEN

(Attempted Murder In-Aid-Of Racketeering - 960 East 81st Street, Brooklyn, New York)

26. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

27. On or about November 7, 2020, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” LORENZO BAILEY, also known as “Renzo” and “St. Clair Bailey,” QUINCY BATTICE, also known as “Hush Dinero” and “George Ayala,” JEAN FREMONT, also known as “Juno” and “Bigga Twirl,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder one or more individuals in the vicinity of 960 East 81st Street, Brooklyn, New York, in violation of New York Penal Law Sections 125.25(1), 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(5), 2 and 3551 et seq.)

COUNT TWELVE

(Attempted Assault In-Aid-Of Racketeering - 960 East 81st Street, Brooklyn, New York)

28. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

29. On or about November 7, 2020, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” LORENZO BAILEY, also known as “Renzo” and “St. Clair Bailey,” QUINCY BATTICE, also known

as “Hush Dinero” and “George Ayala,” JEAN FREMONT, also known as “Juno” and “Bigga Twirl,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to assault one or more individuals in the vicinity of 960 East 81st Street, Brooklyn, New York, with a dangerous weapon, in violation of New York Penal Law Sections 120.05(2), 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(6), 2 and 3551 et seq.)

COUNT THIRTEEN

(Attempted Murder In-Aid-Of Racketeering - 9502 Avenue L, Brooklyn, New York)

30. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

31. On or about November 7, 2020, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” LORENZO BAILEY, also known as “Renzo” and “St. Clair Bailey,” QUINCY BATTICE, also known as “Hush Dinero” and “George Ayala,” JEAN FREMONT, also known as “Juno” and “Bigga Twirl,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder one or more individuals in the vicinity of 9502 Avenue L, Brooklyn, New York, in violation of New York Penal Law Sections 125.25(1), 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(5), 2 and 3551 et seq.)

COUNT FOURTEEN

(Assault In-Aid-Of Racketeering - John Doe #4 and John Doe #5)

32. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

33. On or about November 7, 2020, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” LORENZO BAILEY, also known as “Renzo” and “St. Clair Bailey,” QUINCY BATTICE, also known as “Hush Dinero” and “George Ayala,” JEAN FREMONT, also known as “Juno” and “Bigga Twirl,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally assault John Doe #4 and John Doe #5, individuals whose identities are known to the Grand Jury, with a dangerous weapon, in violation of New York Penal Law Sections 120.05(2) and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

COUNT FIFTEEN

(Possessing, Brandishing and Discharging a Firearm During a Crime of Violence)

34. On or about November 7, 2020, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” LORENZO BAILEY, also known as “Renzo” and “St. Clair Bailey,” QUINCY BATTICE, also known as “Hush Dinero” and “George Ayala,” JEAN FREMONT, also known as “Juno” and “Bigga Twirl,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence, to wit: the crimes charged in Counts Eleven through Fourteen, and did knowingly and intentionally possess such

firearms in furtherance of said crimes of violence, one or more of which firearms was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

COUNT SIXTEEN

(Attempted Murder In-Aid-Of Racketeering - 10 Argyle Road, Brooklyn, New York)

35. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

36. On or about November 9, 2020, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” HANS DESTINE, also known as “YL Flocks,” RICARDO HEPBURN, also known as “Riko Floxks,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder one or more individuals in the vicinity of 10 Argyle Road, Brooklyn, New York, in violation of New York Penal Law Sections 125.25(1), 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(5), 2 and 3551 et seq.)

COUNT SEVENTEEN

(Attempted Assault In-Aid-Of Racketeering - 10 Argyle Road, New York)

37. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

38. On or about November 9, 2020, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” HANS DESTINE, also known as “YL Flocks,” RICARDO HEPBURN, also known as “Riko

Floxks,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to assault one or more individuals in the vicinity of 10 Argyle Road, Brooklyn, New York, with a dangerous weapon, in violation of New York Penal Law Sections 120.05(2), 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(6), 2 and 3551 et seq.)

COUNT EIGHTEEN

(Attempted Murder In-Aid-Of Racketeering - 41 Newport Street, Brooklyn, New York)

39. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

40. On or about November 9, 2020, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” JEAN FREMONT, also known as “Juno” and “Bigga Twirl,” RICARDO HEPBURN, also known as “Riko Floxks,” MCKOY LIMA, also known as “Mak,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder one or more individuals in the vicinity of 41 Newport Street, Brooklyn, New York, in violation of New York Penal Law Sections 125.25(1), 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(5), 2 and 3551 et seq.)

COUNT NINETEEN

(Assault In-Aid-Of Racketeering - Jane Doe #2)

41. The allegations contained in paragraphs one through nine are realleged and incorporated as if fully set forth in this paragraph.

42. On or about November 9, 2020, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” JEAN FREMONT, also known as “Juno” and “Bigga Twirl,” RICARDO HEPBURN, also known as “Riko Floxks,” MCKOY LIMA, also known as “Mak,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, for the purpose of maintaining and increasing position in GD, an enterprise engaged in racketeering activity, did knowingly and intentionally assault Jane Doe #2, an individual whose identity is known to the Grand Jury, with a dangerous weapon, in violation of New York Penal Law Sections 120.05(2) and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), 2 and 3551 et seq.)

COUNT TWENTY

(Possessing, Brandishing and Discharging a Firearm During a Crime of Violence)

43. On or about November 9, 2020, within the Eastern District of New York, the defendants OLUWAGBENGA AGORO, also known as “Gee Banga,” HANS DESTINE, also known as “YL Flocks,” JEAN FREMONT, also known as “Juno” and “Bigga Twirl,” RICARDO HEPBURN, also known as “Riko Floxks,” MCKOY LIMA, also known as “Mak,” and DERYCK THOMPSON, also known as “Benzo,” “DBenzo” and “Kenzie,” together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence, to wit: the crimes charged in Counts Sixteen through Nineteen, and did knowingly and intentionally possess such

firearms in furtherance of said crimes of violence, one or more of which firearms was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

44. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922 or Section 924, or any other violation of any criminal law of the United States, including but not limited to:

- (a) one .22 Magnum caliber North American Arms model NAA-22MS revolver bearing serial number E076347, and ammunition contained therein, recovered on or about March 14, 2020, in Brooklyn, New York
- (b) one .380 Auto caliber Bersa model Thunder 380 semi-automatic pistol bearing serial number 494819, and ammunition contained therein, seized on or about July 26, 2020, in Brooklyn, New York;
- (c) one 9mm Luger caliber Kahr Arms model PM9 semi-automatic pistol bearing serial number 1B3064, and ammunition contained therein, seized from the defendant DERYCK THOMPSON on or about September 6, 2020, in Brooklyn, New York;
- (d) one 9mm Luger caliber Glock model 26 semi-automatic pistol bearing serial number NCM187, and ammunition contained therein, recovered on or about November 8, 2020, in Brooklyn, New York; and

- (e) one .380 Auto caliber Taurus model Spectrum semi-automatic pistol bearing serial number 1F033490, and ammunition contained therein, seized on or about May 19, 2021, in Brooklyn, New York.

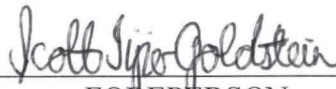
45. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (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;

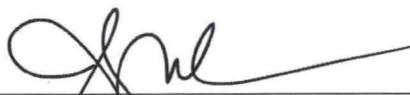
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON



JACQUELYN M. KASULIS
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2021R00129
FORM DBD-34
JUN. 85

No. 20-CR-293 (S-1) (WFK)

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

OLUWAGBENGA AGORO, LORENZO BAILEY, QUINCY BATTICE,
DAVON BROWN, HANS DESTINE, JEAN FREMONT, RICARDO
HEPBURN, TRISTON LAWRENCE, McKOY LIMA, DERYCK
THOMPSON, and MICHAEL WILLIAMS,

Defendants.

SUPERSEDING INDICTMENT

(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2), 924(c)(1)(A)(i), 924(c)(1)(A)(ii),
924(c)(1)(A)(iii), 924(d)(1), 1959(a)(3), 1959(a)(5), 1959(a)(6), 2 and 3551 et
seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Jonathan Siegel/Kayla C. Bensing, Assistant U.S. Attorneys (718) 254-6293/6279