

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
 :
 - v. - :
ESTEBAN MORALES, :
TRAVIS SWAIN, :
BOBBY BROWN, :
ISHMAEL MORALES, :
JONATHAN LONG, SR., :
DAYSHAWN RIVERS, :
SHANNA LEWIS, :
DWAYNE HUDSON, and :
SHONTEEA WALKER, :
X
Defendants.

sealed
Indictment
22 Cr. 485 (VB)

COUNT ONE
(Narcotics Conspiracy)

The Grand Jury charges:

1. Between in or about January 2022 and November 2022, in the Southern District of New York and elsewhere, ESTEBAN MORALES, TRAVIS SWAIN, BOBBY BROWN, ISHMAEL MORALES, JONATHAN LONG, SR., DAYSHAWN RIVERS, SHANNA LEWIS, DWAYNE HUDSON, and SHONTEEA WALKER, the defendants, and 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.

2. It was a part and object of the conspiracy that ESTEBAN MORALES, TRAVIS SWAIN, BOBBY BROWN, ISHMAEL MORALES,

JONATHAN LONG, SR., DAYSHAWN RIVERS, SHANNA LEWIS, DWAYNE HUDSON, and SHONTEEA WALKER, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that ESTEBAN MORALES, TRAVIS SWAIN, BOBBY BROWN, ISHMAEL MORALES, JONATHAN LONG, SR., DAYSHAWN RIVERS, SHANNA LEWIS, DWAYNE HUDSON, and SHONTEEA WALKER, the defendants, and others known and unknown, conspired to distribute and possess with intent to distribute was 280 grams and more of a mixture or substance containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Sections 846 and Title 18, United States Code, Section 2.)

COUNT TWO

(Possession of a Firearm in Furtherance of Drug Trafficking)

The Grand Jury further charges:

4. On or about May 25, 2022, in the Southern District of New York and elsewhere, ISHMAEL MORALES, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry a firearm, and in furtherance of

such a crime, did possess a firearm, to wit, a black and silver Taurus 9 mm semi-automatic firearm.

(Title 18, United States Code, Section 924(c)(1)(A)(i)).

COUNT THREE
(Unlawful Possession of a Firearm)

The Grand Jury further charges:

5. On or about May 25, 2022, in the Southern District of New York, ISHMAEL MORALES, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess a firearm, to wit, a loaded Taurus 9mm semi-automatic firearm, and the firearm was in and affecting interstate and foreign commerce.

(Title 18, United States Code, Section 922(g).)

COUNT FOUR
(Possession of a Firearm in Furtherance of Drug Trafficking)

The Grand Jury further charges:

6. On or about June 27, 2022, in the Southern District of New York and elsewhere, ESTEBAN MORALES, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry a firearm, and in furtherance of such a crime, did possess such a firearm.

(Title 18, United States Code, Section 924(c)(1)(A)(i)).

COUNT FIVE

(Possession of a Firearm in Furtherance of Drug Trafficking)

The Grand Jury further charges:

7. On or about May 19, 2022, in the Southern District of New York, BOBBY BROWN, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry a firearm, and in furtherance of such a crime, did possess such a firearm.

(Title 18, United States Code, Section 924(c)(1)(A)(i)).

COUNT SIX

(Possession of a Firearm in Furtherance of Drug Trafficking)

The Grand Jury further charges:

8. On or about March 14, 2022, in the Southern District of New York and elsewhere, DAYSHAWN RIVERS, the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry a firearm, and in furtherance of such a crime, did possess such a firearm.

(Title 18, United States Code, Section 924(c)(1)(A)(i)).

FORFEITURE ALLEGATION

9. As a result of committing the offenses alleged in Count One this Indictment, ESTEBAN MORALES, TRAVIS SWAIN, BOBBY BROWN, ISHMAEL MORALES, JONATHAN LONG, SR., DAYSHAWN RIVERS, SHANNA LEWIS, DWAYNE HUDSON, and SHONTEEA WALKER, 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 offenses 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 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.

SUBSTITUTE ASSET PROVISION

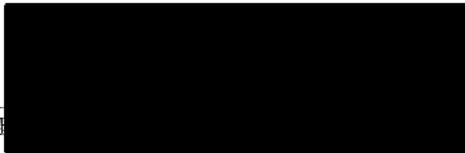
10. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- 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 21, United States Code, Section 853.)



Damian Williams
DAMIAN WILLIAMS
United States Attorney

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Defendants.

INDICTMENT

22 Cr.

(21 U.S.C. § 846; 18 U.S.C. § 2; 18
U.S.C. § 924(c); 18 U.S.C. § 922(g))

DAMIAN WILLIAMS
United States Attorney

