

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - :
:
LAMAR WILLIAMS, :
a/k/a "Black," :
a/k/a "Little Black," :
a/k/a "Chase Money Marz," :
:
Defendant. :
:
----- X

SEALED INDICTMENT

22 Cr. ()

22 CRIM 600

COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

THE ENTERPRISE

1. At all times relevant to this Indictment, LAMAR WILLIAMS, a/k/a "Black," a/k/a "Little Black," a/k/a "Chase Money Marz," the defendant, and others known and unknown, were members and associates of the Mac Baller Brims subset of the national Bloods gang (the "Mac Ballers" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other activities, narcotics trafficking, acts involving witness tampering and retaliation, and acts involving murder. The Mac Ballers operated primarily in the northeast United States, including, among other locations, in and around the Bronx, New York and in the jails and prisons of New York City and the State of New York.

2. The Mac Ballers, including its leadership, membership, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise has engaged in, and its activities affected, interstate and foreign commerce.

3. Certain members and associates of the Mac Ballers committed and agreed, attempted, and threatened to commit acts of violence to protect and expand the territory of the Enterprise, to protect fellow members and associates of the Enterprise, and to protect and expand the drug trafficking operation engaged in by members of the Enterprise. These acts of violence included acts involving murder and assaults intended to protect the Enterprise's territory, retaliate against members of rival groups, and to otherwise promote the standing and reputation of the Mac Ballers amongst rival gangs and others in the community.

4. Certain members and associates of the Mac Ballers also sold narcotics primarily in and around areas in the Bronx, New York controlled by the Enterprise, as well as trafficked narcotics to other locations, including Pennsylvania. The Mac Ballers controlled narcotics sales in certain areas by prohibiting and

preventing non-members, outsiders, and rival dealers from distributing narcotics in the area controlled by the Enterprise.

5. LAMAR WILLIAMS, a/k/a "Black," a/k/a "Little Black," a/k/a "Chase Money Marz," the defendant, was a member of the Mac Ballers who participated in unlawful and other activity in furtherance of the conduct of the Enterprise's affairs.

PURPOSES OF THE ENTERPRISE

6. The purposes of the Enterprise included the following:

a. Enriching the members and associates of the Enterprise through, among other things, the distribution of narcotics, including cocaine base and marijuana.

b. Preserving and protecting the power, territory, and profits of the Enterprise and its members and associates through acts involving murder, assaults, and other acts of violence and threats of violence.

c. Promoting and enhancing the Enterprise and the activities of its members and associates.

d. Keeping victims and potential victims in fear of the Enterprise and its members and associates through acts and threats of violence.

e. Providing assistance to members and associates who committed crimes for and on behalf of the Enterprise.

MEANS AND METHODS OF THE ENTERPRISE

7. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the Enterprise committed, conspired to commit, attempted to commit, and threatened to commit acts of violence, including acts involving murder and assault, to protect and expand the Enterprise's criminal operations, and in connection with rivalries with other street gangs and individuals adverse to the Enterprise.

b. Members and associates of the Enterprise used threats of violence and physical violence against other members and associates to enforce and maintain discipline within the Enterprise.

c. Members and associates of the Enterprise used force and threats, among other means, including against cooperating witnesses and suspected cooperating witnesses, to control and attempt to control territory in the Bronx, New York and elsewhere.

d. Members and associates of the Enterprise sold controlled substances, including cocaine base and marijuana.

e. Members and associates of the Enterprise obtained, possessed, and used firearms.

f. Members and associates of the Enterprise promoted and celebrated the criminal conduct of the Enterprise, namely

narcotics distribution, acts involving violence, and firearm usage, in music videos and on social media websites.

THE RACKETEERING CONSPIRACY

8. From at least in or about 2013, up to and including in or about 2022, in the Southern District of New York and elsewhere, LAMAR WILLIAMS, a/k/a "Black," a/k/a "Little Black," a/k/a "Chase Money Marz," the defendant, and others known and unknown, being persons employed by and associated with the enterprise described in Paragraphs One through Seven above, namely, the Mac Ballers Enterprise, which Enterprise was engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit, Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Section 1961(1) and 1961(5), consisting of:

a. multiple acts involving murder, in violation of New York Penal Law, Sections 125.25 (murder), 110.00 (attempt), 105.15 (conspiracy), and 20.00 (accessory liability);

b. multiple offenses involving the distribution of controlled substances, including, 280 grams and more of cocaine base, in a form commonly referred to as "crack cocaine," and

quantities of marijuana, in violation of the laws of the United States, specifically Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A), 841(b)(1)(D) and 846, and Title 18, United States Code, Section 2;

c. multiple acts indictable under Title 18, United States Code, Sections 1512 and 1513 (relating to tampering with and retaliation against a victim, witness or an informant).

9. It was a part of the conspiracy that LAMAR WILLIAMS, a/k/a "Black," a/k/a "Little Black," a/k/a "Chase Money Marz," the defendant, agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

Notice of Special Sentencing Factors

Narcotics

10. From at least in or about 2013, up to and including in or about 2016, in the Southern District of New York and elsewhere, LAMAR WILLIAMS, a/k/a "Black," a/k/a "Little Black," a/k/a "Chase Money Marz," the defendant, 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.

11. The controlled substance that LAMAR WILLIAMS, a/k/a "Black," a/k/a "Little Black," a/k/a "Chase Money Marz," the defendant, conspired to distribute and possess with intent to

distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Sections 846 and 841(b) (1) (A).

Murder

12. On or about August 11, 2013, in the Southern District of New York and elsewhere, LAMAR WILLIAMS, a/k/a "Black," a/k/a "Little Black," a/k/a "Chase Money Marz," the defendant, knowingly murdered and aided and abetted the murder of Rasheed Barton in the vicinity of East 174th Street and Bronx River Avenue, in the Bronx, New York, in violation of New York Penal Law, Sections 125.25(1) and (2) and 20.00, in that, (i) with intent to cause the death of another person, WILLIAMS caused the death of Rasheed Barton, and aided and abetted the same; and (ii) under circumstances evincing a depraved indifference to human life, WILLIAMS recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Barton, and aided and abetted the same.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO
(Murder in Aid of Racketeering)

The Grand Jury further charges:

13. At all times relevant to this Indictment, the Mac Ballers, as more fully described in Paragraphs One through Seven of this Indictment, which are realleged and incorporated by reference as

though fully set forth herein, including its leadership, its membership, and its associates, constituted an enterprise, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which was 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.

14. At all times relevant to this Indictment, the Mac Ballers, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely, acts involving murder, in violation of New York Penal Law; offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846; and multiple acts indictable under Title 18, United States Code, Sections 1512 and 1513 relating to tampering with and retaliation against a victim, witness or an informant.

15. On or about August 11, 2013, in the Southern District of New York and elsewhere, LAMAR WILLIAMS, a/k/a "Black," a/k/a "Little Black," a/k/a "Chase Money Marz," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Mac Ballers, and for the purpose of gaining entrance to and maintaining and increasing position in the Mac Ballers, an enterprise engaged

in racketeering activity, as described above, knowingly murdered Rasheed Barton, and aided and abetted the same, in the vicinity of East 174th Street and Bronx River Avenue, in the Bronx, New York, in that (i) with intent to cause the death of another person, WILLIAMS caused the death of Rasheed Barton, and aided and abetted the same; and (ii) under circumstances evincing a depraved indifference to human life, WILLIAMS recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Barton, and aided and abetted the same, in violation of New York Penal Law, Sections 125.25(1), 125.25(2), and 20.00.

(Title 18, United States Code, Sections 1959(a)(1) and 2.)

COUNT THREE
(Murder Through Use of a Firearm)

The Grand Jury further charges:

16. On or about August 11, 2013, in the Southern District of New York, LAMAR WILLIAMS, a/k/a "Black," a/k/a "Little Black," a/k/a "Chase Money Marz," the defendant, during and in relation to (1) a crime of violence for which he may be prosecuted in a court of the United States, namely, the murder in aid of racketeering charged in Count Two of this Indictment; and (2) a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, a conspiracy to distribute cocaine base, in a form commonly known as crack, from at least in or about 2013 up to and including 2016, in violation of Title 21, United States Code,

Section 846, knowingly did use and carry a firearm, and in furtherance of such crimes, did possess a firearm, and in the course thereof did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111, and did aid and abet the same, to wit, WILLIAMS shot and killed Rasheed Barton, and aided and abetted the same, in the vicinity of East 174th Street and Bronx River Avenue, in the Bronx, New York,

(Title 18, United States Code, Sections 924(j) and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

17. As a result of committing the offense alleged in Count One of this Indictment, LAMAR WILLIAMS, a/k/a "Black," a/k/a "Little Black," a/k/a "Chase Money Marz," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, (i) any interests acquired and maintained in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1); (ii) any interest in, security of, claims against, and property and contractual rights of any kind affording a source of influence over, the enterprise which the defendant has established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to

forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); and (iii) any property constituting and derived from any proceeds which the defendant obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

Substitute Assets Provision

18. 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 18, United States Code, Section 1963(m), and 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 1963;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



A handwritten signature in cursive script, appearing to read "Damian Willams", written over a horizontal line.

DAMIAN WILLAMS
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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- v. -

LAMAR WILLIAMS, a/k/a "Black,"
a/k/a "Little Black,"
a/k/a "Chase Money Marz,"

Defendant.

SEALED INDICTMENT

22 Cr. ()

(Title 18, United States Code,
Sections 1962(d), 1959(a), 924(j))

DAMIAN WILLIAMS


