

COPY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

DIONDRE CARLISLE,  
a/k/a "Slim Gz,"  
MYKAI DAVIS,  
a/k/a "Kaze,"  
RAKEEM FLOWERS,  
a/k/a "Ra Ra,"  
CESAR MUNGUIA,  
TYRONE SMITH,  
a/k/a "Gudda,"  
ISAIAH WASHINGTON,  
a/k/a "Ah-ah,"  
KEVIN WILTSHIRE,  
a/k/a "Young Bundles,"  
SAUDY GUERRERO,  
a/k/a "SG,"  
DARNELL KIDD,  
a/k/a "Donnie,"  
a/k/a "Blizz,"  
a/k/a "King Cruddy,"  
JAMES MORRIS  
a/k/a "Rich Young," and  
PAUL NEGRIN,  
  
Defendants.

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SEALED  
SUPERSEDING INDICTMENT

S2 14 Cr. 768 (VB)

COUNT ONE  
(Racketeering Conspiracy)

The Grand Jury charges:

The Enterprise

1. At all times relevant to this Superseding Indictment,  
DIONDRE CARLISLE, a/k/a "Slim Gz," MYKAI DAVIS, a/k/a "Kaze,"

RAKEEM FLOWERS, a/k/a "Ra Ra," CESAR MUNGUIA, TYRONE SMITH, a/k/a "Gudda," ISAIAH WASHINGTON, a/k/a "Ah-ah," KEVIN WILTSHIRE, a/k/a "Young Bundles," SAUDY GUERRERO, a/k/a "SG," DARNELL KIDD, a/k/a "Donnie," a/k/a "Blizz," a/k/a "King Cruddy," JAMES MORRIS, a/k/a "Rich Young," and PAUL NEGRIN, the defendants, and others known and unknown, were members and associates of Cruddy 650 ("Cruddy 650" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other activities, narcotics trafficking, murder, robberies and witness tampering. Cruddy 650 operated principally in and around the City of Yonkers, New York.

2. Cruddy 650 was founded in or about 2013 as the result of an alliance between gang members hailing from various parts of Yonkers, including Riverdale Avenue, Woodworth Avenue, Warburton Avenue, and Cottage Place Gardens. Even after the alliance, members of the gang hailing from Cottage Place Gardens continued to identify primarily as "Cruddy," while members of the gang hailing from Riverdale Avenue identified primarily as "650."

3. Cruddy 650, including its leadership, its membership, and its 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 Superseding Indictment, the Enterprise has engaged in, and its activities affected, interstate and foreign commerce.

4. DIONDRE CARLISLE, a/k/a "Slim Gz," MYKAI DAVIS, a/k/a "Kaze," RAKEEM FLOWERS, a/k/a "Ra Ra," CESAR MUNGUIA, TYRONE SMITH, a/k/a "Gudda," ISAIAH WASHINGTON, a/k/a "Ah-ah," KEVIN WILTSHIRE, a/k/a "Young Bundles," SAUDY GUERRERO, a/k/a "SG," DARNELL KIDD, a/k/a "Donnie," a/k/a "Blizz," a/k/a "King Cruddy," JAMES MORRIS, a/k/a "Rich Young," and PAUL NEGRIN, the defendants, and others known and unknown, were leaders, members, or associates of the Enterprise or otherwise directed members of the Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

#### Purposes of the Enterprise

5. The purposes of the Enterprise included the following:
- a. Preserving and protecting the power, territory, and profits of the Enterprise through murder, robberies, and other acts of violence, and threats of violence.
  - b. Promoting and enhancing the Enterprise and the activities of its members and associates.

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

d. Providing assistance to members and associates who committed crimes for and on behalf of the gang.

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

f. Enriching the members and associates of the Enterprise through the robbery of drug dealers, individuals, and commercial businesses.

g. Protecting the Enterprise and its members from detection and prosecution by law enforcement authorities through acts of intimidation and violence against potential witnesses to crimes committed by members of the Enterprise, and obstructing justice through the making of false statements to law enforcement authorities.

#### Means and Methods of the Enterprise

6. 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, attempted, and threatened to commit acts

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of violence, including murder, to protect and expand the Enterprise's criminal operations.

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 committed, conspired, attempted, and threatened to commit acts of violence, including murder, against rival gang members and other individuals adverse to the Enterprise.

d. Members and associates of the Enterprise promoted and celebrated the criminal conduct of the enterprise, namely the narcotics distribution, robberies, and firearm usage, in rap music and on social media websites such as YouTube and Facebook.

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

f. Members and associates of the Enterprise distributed controlled substances.

g. Members and associates of the Enterprise committed acts of intimidation and made threats as a means of deterring and punishing any potential witnesses to their crimes and in connection with protecting the Enterprise and its members and associates from detection and prosecution by law enforcement authorities.

h. Members and associates of the Enterprise made false statements to law enforcement authorities in connection with their efforts to obstruct justice and protect the Enterprise and its members and associates from detection and prosecution by law enforcement authorities.

The Racketeering Conspiracy

7. From at least in or about 2013, up to and including on or about the date of this Superseding Indictment, in the Southern District of New York and elsewhere, DIONDRE CARLISLE, a/k/a "Slim Gz," MYKAI DAVIS, a/k/a "Kaze," RAKEEM FLOWERS, a/k/a "Ra Ra," TYRONE SMITH, a/k/a "Gudda," KEVIN WILTSHIRE, a/k/a "Young Bundles," SAUDY GUERRERO, a/k/a "SG," DARNELL KIDD, a/k/a "Donnie," a/k/a "Blizz," a/k/a "King Cruddy," JAMES MORRIS, a/k/a "Rich Young," and PAUL NEGRIN, the defendants, and others known and unknown being persons employed by and associated with the enterprise described in paragraphs 1 through 6 of this Superseding Indictment, to wit, Cruddy 650, 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 Cruddy 650 enterprise, which was engaged in, and the activities of which affected, interstate

and foreign commerce, through a pattern of racketeering activity consisting of:

a. multiple acts involving murder, chargeable under the following provisions of state law:

i. New York Penal Law, Sections 20.00, 110.00 and 125.25 (attempted murder);

ii. New York Penal Law, Sections 105.15 and 125.25 (conspiracy to murder);

b. multiple acts involving robbery, chargeable under the following provisions of state law:

i. New York Penal Law, Sections 20.00 and 160.05, 160.10, and 160.15 (robbery);

ii. New York Penal Law, Sections 20.00, 110.00, 160.05, 160.10, and 160.15 (attempted robbery);

iii. New York Penal Law, Sections 105.15, 160.05, 160.10. and 160.15 (conspiracy to commit robbery);

c. multiple acts indictable under the following provisions of federal law:

i. 18 U.S.C. § 1344 (bank fraud);

ii. 18 U.S.C. § 1512 (witness tampering);

iii. 18 U.S.C. § 1513 (witness retaliation);

iv. 18 U.S.C. § 1952 (Hobbs Act robbery); and

d. multiple acts involving the distribution of controlled substances, including crack cocaine and marijuana, in

violation of laws of the United States, namely Title 21, United States, Code, Sections 812, 841(a)(1), 841(b)(1)(C), and 846, and Title 18, United States Code, Section 2.

8. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

#### Overt Acts

9. 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 March 31, 2013, MYKAI DAVIS, a/k/a "Kaze," the defendant, shot a member of a rival street gang in the vicinity of 119 Ludlow Street, in Yonkers, New York, and aided and abetted the same.

b. On or about March 18, 2014, SAUDY GUERRERO, a/k/a "SG," the defendant, aided and abetted by DARNELL KIDD, a/k/a "Donnie," a/k/a "Blizz," a/k/a "King Cruddy," the defendant, shot a member of a rival street gang in the vicinity of 98 Locust Hill Avenue, in Yonkers, New York.

c. On or about July 13, 2014, SAUDY GUERRERO, a/k/a "SG," the defendant, shot a member of a rival street gang in the vicinity of 119 Ludlow Street, in Yonkers, New York.



d. In or about August 2014, DARNELL KIDD, a/k/a "Donnie," and KEVIN WILTSHIRE, a/k/a "YB," the defendants, shot at rival gang members in the vicinity of Oliver Avenue in Yonkers, and aided and abetted the same.

e. In or about the summer of 2014, DIONDRE CARLISLE, a/k/a "Slim Gz," and JAMES MORRIS, a/k/a "Rich Young," the defendants, and others known and unknown, robbed a marijuana dealer at gunpoint in Yonkers, New York, and aided and abetted the same.

f. In or about September 2014, RAKEEM FLOWERS, a/k/a "Ra Ra," and KEVIN WILTSHIRE, a/k/a "Young Bundles," the defendants, and others known and unknown, attempted to rob at gunpoint a marijuana dealer in the vicinity of Beech Street in Yonkers, New York, and aided and abetted the same.

g. On or about October 10, 2014, MYKAI DAVIS, a/k/a "Kaze," and JAMES MORRIS, a/k/a "Rich Young," the defendants, and others known and unknown, participated in a robbery at a branch of Chase Bank located at 92 Main Street in Yonkers, New York, and aided and abetted the same.

h. On or about October 12, 2014, MYKAI DAVIS, a/k/a "Kaze," the defendant, and others known and unknown, participated in a robbery at a delicatessen located at 131 Yonkers Avenue, in Yonkers, New York, and aided and abetted the same.

i. On or about October 14, 2014, RAKEEM FLOWERS, a/k/a "Ra Ra," and KEVIN WILTSHIRE, a/k/a "Young Bundles," the defendants, and others known and unknown, participated in a gunpoint robbery at a grocery store located at 323 Warburton Avenue, in Yonkers, New York, and aided and abetted the same.

j. On or about October 14, 2014, MYKAI DAVIS, a/k/a "Kaze," and KEVIN WILTSHIRE, a/k/a "Young Bundles," the defendants, and others known and unknown, participated in a gunpoint robbery at a branch of Webster Bank located at 760 McLean Avenue in Yonkers, New York, and aided and abetted the same.

k. On or about October 23, 2014, DIONDRE CARLISLE, a/k/a "Slim Gz," RAKEEM FLOWERS, a/k/a "Ra Ra," and JAMES MORRIS, a/k/a "Rich Young," the defendants, and others known and unknown, participated in a robbery at a restaurant located at 93 Riverdale Avenue in Yonkers, New York, and aided and abetted the same.

l. On or about October 24, 2014, MYKAI DAVIS, a/k/a "Kaze," the defendant, and others known and unknown, participated in a gunpoint robbery at a delicatessen located at 76 Ravine Avenue in Yonkers, New York, and aided and abetted the same.

m. On or about October 25, 2014, MYKAI DAVIS, a/k/a "Kaze," and KEVIN WILTSHIRE, a/k/a "Young Bundles," the

defendants, and others known and unknown, participated in a gunpoint robbery at a delicatessen located at 51 Garfield Street in Yonkers, New York, and aided and abetted the same.

n. On or about October 27, 2014, DIONDRE CARLISLE, a/k/a "Slim Gz," and KEVIN WILTSHIRE, a/k/a "Young Bundles," the defendants, and others known and unknown, participated in a robbery at a branch of Citibank located at 86 Main Street in Yonkers, New York, and aided and abetted the same.

o. On or about November 3, 2014, DIONDRE CARLISLE, a/k/a "Slim Gz," the defendant, and others known and unknown, attempted to rob an employee of a branch of Chase Bank located at 47 South Broadway in Yonkers, New York.

p. On or about November 4, 2014, RAKEEM FLOWERS, a/k/a "RaRa" and TYRONE SMITH, a/k/a "Gudda," the defendants, and others known and unknown, threatened to injure an individual in retaliation for that individual's having provided information to law enforcement authorities about criminal activity by members of Cruddy 650.

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

COUNT TWO  
(Firearms Offense)

The Grand Jury further charges:

10. From at least in or about 2013 up to and including on or about the date of this Superseding Indictment, in the

Southern District of New York and elsewhere, DIONDRE CARLISLE, a/k/a "Slim Gz," MYKAI DAVIS, a/k/a "Kaze," RAKEEM FLOWERS, a/k/a "Ra Ra," KEVIN WILTSHIRE, a/k/a "Young Bundles," SAUDY GUERRERO, a/k/a "SG," DARNELL KIDD, a/k/a "Donnie," a/k/a "Blizz," a/k/a "King Cruddy," JAMES MORRIS, a/k/a "Rich Young," and PAUL NEGRIN, the defendants, during and in relation to a crime of violence and a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the racketeering conspiracy charged in Count One of this Superseding Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, some of which firearms were discharged.

(Title 18, United States Code, Sections  
924(c)(1)(A)(iii) and 2.)

COUNT THREE

(Murder in Aid of Racketeering Activity)

The Grand Jury further charges:

11. At all times relevant to this Indictment, Cruddy 650, as more fully described in Paragraphs One through Six of Count One of this Superseding Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), namely the Cruddy 650 Enterprise, 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.

12. At all times relevant to this Indictment, the above-described Enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder and robbery in violation of the laws of New York State, acts indictable under 18 U.S.C. §1951, and acts involving drug trafficking in violation of 21 U.S.C. §§ 841 and 846.

13. On or about May 26, 2014, in the Southern District of Florida and elsewhere, KEVIN WILTSHIRE, a/k/a "YB," the defendant, and others known and unknown, for the purpose of gaining entrance to and maintaining and increasing position in Cruddy 650, an enterprise engaged in racketeering activity, as described above, intentionally and knowingly murdered, and aided and abetted the murder of Andre Folsom, that is, while acting from a premeditated design to effect the death of a human being, and while perpetrating an act imminently dangerous to another and evincing a depraved mind regardless of human life, WILTSHIRE did unlawfully kill a human being, Folsom, in the vicinity of 6294 Forrest Hill Boulevard, Greenacres, Florida, and did aid

and abet the same, in violation of Florida Statutes, Sections 777.011, 782.04(1)(a), and 782.04 (2).

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

COUNT FOUR  
(Firearms Offense)

The Grand Jury further charges:

14. On or about May 26, 2014, in the Southern District of New York and elsewhere, KEVIN WILTSHIRE, a/k/a "YB," the defendant, during and in relation to 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 Three of this Superseding Indictment, willfully and knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which firearm was discharged, and in the course of that crime 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(a), to wit, WILTSHIRE caused the death of Andre Folsom by shooting Folsom in the vicinity of 294 Forrest Hill Boulevard, Greenacres, Florida, and aiding and abetting the same.

(Title 18, United States Code, Sections  
924(c)(1)(A)(iii), 924(j), and 2.)

COUNT FIVE  
(Hobbs Act Robbery Conspiracy)

The Grand Jury further charges:

15. From at least in or about 2013, up to and including on or about the date of this Superseding Indictment, in the Southern District of New York and elsewhere, DIONDRE CARLISLE, a/k/a "Slim Gz," MYKAI DAVIS, a/k/a "Kaze," RAKEEM FLOWERS, a/k/a "Ra Ra," CESAR MUNGUIA, ISAIAH WASHINGTON, a/k/a "Ah-ah," KEVIN WILTSHIRE, a/k/a "Young Bundles," SAUDY GUERRERO, a/k/a "SG," DARNELL KIDD, a/k/a "Donnie," a/k/a "Blizz," a/k/a "King Cruddy," and JAMES MORRIS, a/k/a "Rich Young," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, CARLISLE, DAVIS, FLOWERS, MUNGUIA, WASHINGTON, WILTSHIRE, GUERRERO, KIDD, MORRIS, and others known and unknown, agreed to rob businesses and drug dealers that transacted in interstate commerce.

(Title 18, United States Code, Section 1951.)

COUNT SIX  
(Firearms Offense)

The Grand Jury further charges:

16. From at least in or about 2013, up to and including on or about the date of this Superseding Indictment, in the Southern District of New York and elsewhere, DIONDRE CARLISLE, a/k/a "Slim Gz," MYKAI DAVIS, a/k/a "Kaze," RAKEEM FLOWERS, a/k/a "Ra Ra," CESAR MUNGUIA, KEVIN WILTSHIRE, a/k/a "Young Bundles," SAUDY GUERRERO, a/k/a "SG," DARNELL KIDD, a/k/a "Donnie," a/k/a "Blizz," a/k/a "King Cruddy," and JAMES MORRIS, a/k/a "Rich Young," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the robbery conspiracy charged in Count Five of this Superseding Indictment, knowingly did use and carry firearms, and in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, which firearms were brandished.

(Title 18, United States Code,  
Sections 924(c)(1)(A)(ii) and 2.)

COUNT SEVEN  
(Bank Robbery)

The Grand Jury further charges:

17. On or about October 27, 2014, in the Southern District of New York, DIONDRE CARLISLE, a/k/a "Slim Gz," ISAAH WASHINGTON, a/k/a "Ah-ah," and KEVIN WILTSHIRE, a/k/a "Young



Bundles," the defendants, by force and violence, and by intimidation, did knowingly take, and attempt to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and did aid and abet the same, to wit, WASHINGTON, aided and abetted by CARLISLE and WILTSHIRE, robbed a branch of Citibank located at 86 Main Street in Yonkers, New York.

(Title 18, United States Code, Sections 2113(a) and 2.)

COUNT EIGHT  
(Attempted Bank Robbery)

The Grand Jury further charges:

18. On or about November 3, 2014, in the Southern District of New York, DIONDRE CARLISLE, a/k/a "Slim Gz," the defendant, by force and violence, and by intimidation, did knowingly and willfully attempt to take from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and did aid and abet the same, to wit, CARLISLE planned the robbery of a Chase Bank branch located at 47 South Broadway in Yonkers, New York, and

took substantial steps towards carrying out that robbery.

(Title 18, United States Code,  
Sections 2113(a) and 2.)

COUNT NINE  
(Witness Tampering)

The Grand Jury further charges:

19. On or about November 4, 2014, in the Southern District of New York, RAKEEM FLOWERS, a/k/a "Ra Ra," and TYRONE SMITH, a/k/a "Gudda," the defendants, did knowingly attempt to engage in conduct, which would have caused bodily injury to a person, and did threaten to do so, with the intent to retaliate against that person for information given by that person to a law enforcement officer relating to the commission of a Federal offense, namely the attempted bank robbery charged in Count Eight of this Superseding Indictment, and did aid and abet the same.

(Title 18, United States Code,  
Sections 1513(b)(2) and 2.)

FORFEITURE ALLEGATION AS TO COUNT ONE

20. The allegations contained in Count One of this Superseding Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963. Pursuant to Rule 32.2 of the Federal Rules of Criminal

Procedure, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of any defendant's conviction under Count One of this Superseding Indictment.

21. DIONDRE CARLISLE, a/k/a "Slim Gz," MYKAI DAVIS, a/k/a "Kaze," RAKEEM FLOWERS, a/k/a "Ra Ra," TYRONE SMITH, a/k/a "Gudda," KEVIN WILTSHIRE, a/k/a "Young Bundles," SAUDY GUERRERO, a/k/a "SG," DARNELL KIDD, a/k/a "Donnie," a/k/a "Blizz," a/k/a "King Cruddy," JAMES MORRIS, a/k/a "Rich Young," and PAUL NEGRIN, the defendants:

a. have acquired and maintained interests 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);

b. have an interest in, security of, claim against, and property and contractual rights which afford a source of influence over, the enterprise named and described herein which the defendants 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/or

c. have property constituting and derived from proceeds obtained, directly and indirectly, from the aforesaid 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).

22. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a) include the amount of gross proceeds received by the defendants derived from racketeering activities as alleged in Count One of this Superseding Indictment.

23. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

#### Substitute Assets Provision

24. If any of the property described above as subject to forfeiture, 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 18 U.S.C. § 1963(m), and 28 U.S.C. § 2461, to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Section 1963.)

[REDACTED]  
Foreperson  
[REDACTED]

Preet Bharara  
PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

DIONDRE CARLISLE, et al.,

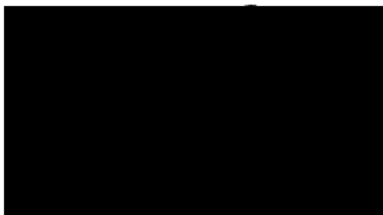
Defendants.

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SUPERSEDING INDICTMENT

S2 14 Cr. 768 (VB)

(18 U.S.C. §§ 924(c), 924(j), 1513,  
1951, 1959, 1962, 2113 and 2)



Foreperson.



PREET BHARARA

United States Attorney.

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