

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

MAURICE HARTLEY,
a/k/a "Bugz,"
REGINALD SANDERS,
a/k/a "Black,"
HECTOR SANCHEZ,
a/k/a "Jabee,"
AARON CARTER,
a/k/a "Cream,"
RONALD BEASLEY,
a/k/a "Nuke,"
JONATHAN SANCHEZ,
a/k/a "Nash,"
TYVANN BARNETT,
a/k/a "Ty,"
JAVIER BENITEZ,
a/k/a "Javi,"
ALEJANDRO RODRIGUEZ,
a/k/a "Lex,"
GREGORY CARTER,
a/k/a "Fat Boy,"
RAY SANCHEZ,
FREDDIE TORRES,
a/k/a "Kiko,"
EDWARD DAVIES,
a/k/a "Yum Yum,"
LOUIS BROWN,
a/k/a "Tut,"
CHRISTOPHER SIMON,
JOHNNY INGRAM, and
MARIE PALUMBO,

Defendants.

- - - - - X

SEALED INDICTMENT

18 Cr.

18 CRIM 390

COUNT ONE

The Grand Jury charges:

OVERVIEW OF THE CONSPIRACY

1. The Hartley Drug Trafficking Organization (the "DTO") consists of a group of individuals who are engaged in heroin and fentanyl trafficking in the Bronx, New York. From at least in or about 2015, up to and including in or about June 2018, in the Southern District of New York and elsewhere, MAURICE HARTLEY, a/k/a "Bugz," REGINALD SANDERS, a/k/a "Black," HECTOR SANCHEZ, a/k/a "Jabee," AARON CARTER, a/k/a "Cream," RONALD BEASLEY, a/k/a "Nuke," JONATHAN SANCHEZ, a/k/a "Nash," TYVANN BARNETT, a/k/a "Ty," JAVIER BENITEZ, a/k/a "Javi," ALEJANDRO RODRIGUEZ, a/k/a "Lex," GREGORY CARTER, a/k/a "Fat Boy," RAY SANCHEZ, FREDDIE TORRES, a/k/a "Kiko," EDWARD DAVIES, a/k/a "Yum Yum," LOUIS BROWN, a/k/a "Tut," CHRISTOPHER SIMON, JOHNNY INGRAM, and MARIE PALUMBO, the defendants (collectively, the "Defendants"), all of whom were members of the DTO, and others known and unknown, conspired to distribute heroin and fentanyl. Over the course of those three years, the DTO is estimated to have distributed more than 100 kilograms of heroin, much of it mixed with fentanyl.

2. The DTO controlled heroin sales between 182nd Street and 184th Street in the Bronx, New York, primarily between Jerome Avenue and University Avenue (the "DTO's Drug

Territory"). As a means of marketing its heroin, and to ensure that the only heroin sold in the DTO's Drug Territory belonged to the DTO, the DTO placed "stamps" on the glassines of heroin and fentanyl that it sold to customers. Among the stamps the DTO used were "Heisenberg," "Sleepless," "Peace of Mind," "Obsession," "Fist with a Power Cord," "Sold Out," "Methadone," "Sweet Dreams," and "Hands Up."

3. Glassines marked with the DTO's stamps were recovered at the scene of at least five suspected overdose deaths in and around the DTO's Drug Territory. First, on or about September 11, 2017, an individual died of a suspected heroin overdose near the DTO's Drug Territory, and a glassine marked with the stamp "Obsession" was recovered at the scene of the overdose death. Second, on or about September 18, 2017, an individual died of a suspected heroin overdose near the DTO's Drug Territory, and a glassine marked with the stamp "Fist with a Power Cord" was recovered at the scene of the overdose death. Finally, between on or about December 12, 2017 and on or about January 2, 2018, three different individuals died of suspected heroin overdoses in a building within the DTO's Drug Territory. Glassines marked with the stamp "Hands Up" were recovered at the scene of each of these three deaths. Each time one of the DTO's stamps was recovered at the scene of an overdose death, the DTO stopped using that stamp, and started using different stamps,

such as "Sold Out," "Methadone," and "Sweet Dreams," on the glassines of heroin and fentanyl that the DTO distributed.

MEANS AND METHODS OF THE CONSPIRACY

4. Members of the DTO operated in concert to sell narcotics, employing the following means and methods, among others.

5. Members of the DTO fulfilled different roles within the DTO. Among other roles, certain of the Defendants regularly sold narcotics to retail customers in hand-to-hand drug transactions; other of the Defendants obtained wholesale supplies of drugs and supervised the preparation and packaging of heroin and fentanyl into retail distribution packages; other of the Defendants managed the distribution of retail packages to the street-level sellers.

6. MAURICE HARTLEY, a/k/a "Bugz," the defendant, supervised other members of the DTO and coordinated the supply of narcotics to other drug dealers in the DTO. HARTLEY personally supplied large quantities of heroin and fentanyl to other members of the DTO, including REGINALD SANDERS, a/k/a "Black," HECTOR SANCHEZ, a/k/a "Jabee," AARON CARTER, a/k/a "Cream," RONALD BEASLEY, a/k/a "Nuke," JONATHAN SANCHEZ, a/k/a "Nash," and TYVANN BARNETT, a/k/a "Ty," the defendants. HARTLEY also personally supplied large quantities of heroin and fentanyl to individuals, such as MARIE PALUMBO and GREGORY CARTER, a/k/a

"Fat Boy," the defendants, who transported the drugs for resale in, among other places, upstate New York and Connecticut.

7. Other members of the DTO handled many of the day-to-day drug trafficking operations. For example, JAVIER BENITEZ, a/k/a "Javi," ALEJANDRO RODRIGUEZ, a/k/a "Lex," RAY SANCHEZ, FREDDIE TORRES, a/k/a "Kiko," EDWARD DAVIES, a/k/a "Yum Yum," LOUIS BROWN, a/k/a "Tut," CHRISTOPHER SIMON, and JOHNNY INGRAM, the defendants, engaged in regular, street-level, hand-to-hand sales of heroin and fentanyl on behalf of the DTO.

STATUTORY ALLEGATIONS

8. From at least in or about 2015, up to and including in or about June 2018, in the Southern District of New York and elsewhere, MAURICE HARTLEY, a/k/a "Bugz," REGINALD SANDERS, a/k/a "Black," HECTOR SANCHEZ, a/k/a "Jabee," AARON CARTER, a/k/a "Cream," RONALD BEASLEY, a/k/a "Nuke," JONATHAN SANCHEZ, a/k/a "Nash," TYVANN BARNETT, a/k/a "Ty," JAVIER BENITEZ, a/k/a "Javi," ALEJANDRO RODRIGUEZ, a/k/a "Lex," GREGORY CARTER, a/k/a "Fat Boy," RAY SANCHEZ, FREDDIE TORRES, a/k/a "Kiko," EDWARD DAVIES, a/k/a "Yum Yum," LOUIS BROWN, a/k/a "Tut," CHRISTOPHER SIMON, JOHNNY INGRAM, and MARIE PALUMBO, 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.

9. It was a part and an object of the conspiracy that MAURICE HARTLEY, a/k/a "Bugz," REGINALD SANDERS, a/k/a "Black," HECTOR SANCHEZ, a/k/a "Jabee," AARON CARTER, a/k/a "Cream," RONALD BEASLEY, a/k/a "Nuke," JONATHAN SANCHEZ, a/k/a "Nash," TYVANN BARNETT, a/k/a "Ty," JAVIER BENITEZ, a/k/a "Javi," ALEJANDRO RODRIGUEZ, a/k/a "Lex," GREGORY CARTER, a/k/a "Fat Boy," RAY SANCHEZ, FREDDIE TORRES, a/k/a "Kiko," EDWARD DAVIES, a/k/a "Yum Yum," LOUIS BROWN, a/k/a "Tut," CHRISTOPHER SIMON, JOHNNY INGRAM, and MARIE PALUMBO, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

10. The controlled substances that MAURICE HARTLEY, a/k/a "Bugz," REGINALD SANDERS, a/k/a "Black," HECTOR SANCHEZ, a/k/a "Jabee," AARON CARTER, a/k/a "Cream," RONALD BEASLEY, a/k/a "Nuke," JONATHAN SANCHEZ, a/k/a "Nash," TYVANN BARNETT, a/k/a "Ty," JAVIER BENITEZ, a/k/a "Javi," ALEJANDRO RODRIGUEZ, a/k/a "Lex," GREGORY CARTER, a/k/a "Fat Boy," RAY SANCHEZ, FREDDIE TORRES, a/k/a "Kiko," EDWARD DAVIES, a/k/a "Yum Yum," LOUIS BROWN, a/k/a "Tut," CHRISTOPHER SIMON, JOHNNY INGRAM, and MARIE PALUMBO, the defendants, conspired to distribute and possess with intent to distribute were (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section

841(b)(1)(A); and (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

11. As a result of committing the controlled substance offense alleged in Count One of this Indictment, MAURICE HARTLEY, a/k/a "Bugz," REGINALD SANDERS, a/k/a "Black," HECTOR SANCHEZ, a/k/a "Jabee," AARON CARTER, a/k/a "Cream," RONALD BEASLEY, a/k/a "Nuke," JONATHAN SANCHEZ, a/k/a "Nash," TYVANN BARNETT, a/k/a "Ty," JAVIER BENITEZ, a/k/a "Javi," ALEJANDRO RODRIGUEZ, a/k/a "Lex," GREGORY CARTER, a/k/a "Fat Boy," RAY SANCHEZ, FREDDIE TORRES, a/k/a "Kiko," EDWARD DAVIES, a/k/a "Yum Yum," LOUIS BROWN, a/k/a "Tut," CHRISTOPHER SIMON, JOHNNY INGRAM, and MARIE PALUMBO, 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 offense 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 offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

12. 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;

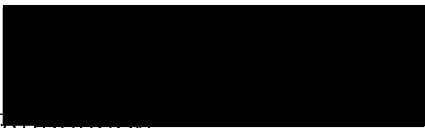
(d) has been substantially diminished in value;


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.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

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(Title 21, United States Code, Section 846.)

GEOFFREY S. BERMAN
United States Attorney.

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person.