

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v.-

JOSE HERNANDEZ,
a/k/a "Cheerio,"
a/k/a "Bheerio,"
CHRISTOPHER LAWRENCE,
a/k/a "Hood,"
a/k/a "H.O.,"
a/k/a "Peanut,"
LUIS AVILES,
a/k/a "Toby,"
GERALDO BUSANET,
a/k/a "Bunazie,"
SAMMUEL CABAN,
a/k/a "Sammy,"
JASON DAVENPORT,
a/k/a "Jay,"
JAMER DAVIS,
a/k/a "J-Rock,"
JERRELL FULCHER,
a/k/a "Relly,"
a/k/a "Butta,"
RICO GONZALEZ,
CLARENCE GRANDY,
a/k/a "Butta,"
TITO LLANES,
a/k/a "Reek,"
BENJAMIN LUCRE,
a/k/a "Gotti,"
DERRICK RICHARDSON,
a/k/a "Fazo,"
PARIS ROBERTS,
a/k/a "Rambo,"
ROCKY SANCHEZ,
EDWIN SANTANA,
a/k/a "E.B.,"
a/k/a "Fat,"
a/k/a "Defat,"
LARRY SMITH,
a/k/a "Scrap,"

:
: SEALED
: INDICTMENT

:
: 18 Cr. ____

: **18 CRIM 420**

"Doughboy," DYLAN WILLIAMS, a/k/a "Rock," a/k/a "Rockyo," JAMES WILSON, a/k/a "Gotti," ROBERT WRIGHT, a/k/a "Rob Santana," 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 an object of the conspiracy that JOSE HERNANDEZ, a/k/a "Cheerio," a/k/a "Bheerio," CHRISTOPHER LAWRENCE, a/k/a "Hood," a/k/a "H.O.," a/k/a "Peanut," LUIS AVILES, a/k/a "Toby," GERALDO BUSANET, a/k/a "Bunazie," SAMMUEL CABAN, a/k/a "Sammy," JASON DAVENPORT, a/k/a "Jay," JAMER DAVIS, a/k/a "J-Rock," JERRELL FULCHER, a/k/a "Relly," a/k/a "Butta," RICO GONZALEZ, CLARENCE GRANDY, a/k/a "Butta," TITO LLANES, a/k/a "Reek," BENJAMIN LUCRE, a/k/a "Gotti," DERRICK RICHARDSON, a/k/a "Fazo," PARIS ROBERTS, a/k/a "Rambo," ROCKY SANCHEZ, EDWIN SANTANA, a/k/a "E.B.," a/k/a "Fat," a/k/a "Defat," LARRY SMITH, a/k/a "Scrap," SHAHIEME SMITH, a/k/a "Mills," a/k/a "Ira," ISAAC SOLER, a/k/a "Doughboy," DYLAN WILLIAMS, a/k/a "Rock," a/k/a "Rockyo," JAMES WILSON, a/k/a "Gotti," and ROBERT WRIGHT, a/k/a "Rob Santana," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21 United States Code, Section 841(a)(1).

3. The controlled substance that JOSE HERNANDEZ, a/k/a "Cheerio," a/k/a "Bheerio," CHRISTOPHER LAWRENCE, a/k/a "Hood," a/k/a "H.O.," a/k/a "Peanut," LUIS AVILES, a/k/a "Toby," GERALDO BUSANET, a/k/a "Bunazie," SAMMUEL CABAN, a/k/a "Sammy, JASON DAVENPORT, a/k/a "Jay," JAMER DAVIS, a/k/a "J-Rock," JERRELL FULCHER, a/k/a "Relly," a/k/a "Butta," RICO GONZALEZ, CLARENCE GRANDY, a/k/a "Butta," TITO LLANES, a/k/a "Reek," BENJAMIN LUCRE, a/k/a "Gotti," DERRICK RICHARDSON, a/k/a "Fazo," PARIS ROBERTS, a/k/a "Rambo," TYQUAN SAMEDI, a/k/a "Tyqui," ROCKY SANCHEZ, EDWIN SANTANA, a/k/a "E.B.," a/k/a "Fat," a/k/a "Defat," LARRY SMITH, a/k/a "Scrap," SHAHIEME SMITH, a/k/a "Mills," a/k/a "Ira," ISAAC SOLER, a/k/a "Doughboy," DYLAN WILLIAMS, a/k/a "Rock," a/k/a "Rockyo," JAMES WILSON, a/k/a "Gotti," and ROBERT WRIGHT, a/k/a "Rob Santana," the defendants, conspired to distribute and possess with the 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 cocaine," in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

COUNT TWO

The Grand Jury further charges:

4. From at least in or about 2014, up to and including in or about June 2018, in the Southern District of New York and

elsewhere, JOSE HERNANDEZ, a/k/a "Cheerio," a/k/a "Bheerio," CHRISTOPHER LAWRENCE, a/k/a "Hood," a/k/a "H.O.," a/k/a "Peanut," BENJAMIN LUCRE, a/k/a "Gotti," EDWIN SANTANA, a/k/a "E.B.," a/k/a "Fat," a/k/a "Defat," LARRY SMITH, a/k/a "Scrap," ISAAC SOLER, a/k/a "Doughboy," and DYLAN WILLIAMS, a/k/a "Rock," a/k/a "Rockyo," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the offense charged in Count One of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the same.

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

FORFEITURE ALLEGATIONS

5. As a result of committing the controlled substance offense charged in Count One of this Indictment, JOSE HERNANDEZ, a/k/a "Cheerio," a/k/a "Bheerio," CHRISTOPHER LAWRENCE, a/k/a "Hood," a/k/a "H.O.," a/k/a "Peanut," LUIS AVILES, a/k/a "Toby," GERALDO BUSANET, a/k/a "Bunazie," SAMMUEL CABAN, a/k/a "Sammy," JASON DAVENPORT, a/k/a "Jay," JAMER DAVIS, a/k/a "J-Rock," JERRELL FULCHER, a/k/a "Relly," a/k/a "Butta," RICO GONZALEZ, CLARENCE GRANDY, a/k/a "Butta," TITO LLANES, a/k/a "Reek," BENJAMIN LUCRE, a/k/a "Gotti," DERRICK RICHARDSON, a/k/a "Fazo," PARIS ROBERTS, a/k/a "Rambo," ROCKY SANCHEZ, EDWIN SANTANA,

a/k/a "E.B.," a/k/a "Fat," a/k/a "Defat," LARRY SMITH, a/k/a "Scrap," SHAHIEME SMITH, a/k/a "Mills," a/k/a "Ira," ISAAC SOLER, a/k/a "Doughboy," DYLAN WILLIAMS, a/k/a "Rock," a/k/a "Rockyo," JAMES WILSON, a/k/a "Gotti," and ROBERT WRIGHT, a/k/a "Rob Santana," 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 the defendant obtained directly or indirectly as a result of the offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense charged in Count One of this Indictment.

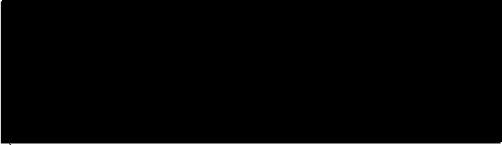
SUBSTITUTE ASSETS PROVISION

6. 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 21 U.S.C.
§ 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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Defendants.

SEALED INDICTMENT


18 Cr. ____ ()

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

GEOFFREY S. BERMAN

United States Attorney.

A TRUE BILL



Foreperson.