

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
UNITED STATES OF AMERICA :  
 :  
 - v. - :  
 :  
MILTON CHARDON, :  
 a/k/a "Blanquito," :  
CHRISTIAN PABON, :  
 a/k/a "Banga," :  
BRYAN CASTILLO, :  
 a/k/a "True," :  
GEORGE CITRONELLE, :  
 a/k/a "CY," :  
 a/k/a "BY," :  
JEREMY ESTEVEZ, :  
 a/k/a "Jerm Racks," :  
YASMIL FERTIDES, :  
 a/k/a "Little Half," :  
SAMANTHA BATISTA, :  
NOEL MARTINEZ, :  
 a/k/a "Crazy," :  
DOMINGO TOLENTINO, :  
 a/k/a "Juvi," :  
JUAN CALDERON, :  
 a/k/a "Priva," :  
 :  
Defendants. :  
----- X

SEALED  
SUPERSEDING  
INDICTMENT  
  
S1 18 Cr. 319 (LTS)

COUNT ONE

(The 200 Enterprise Racketeering Conspiracy)

The Grand Jury charges:

THE 200 ENTERPRISE

1. From at least in or about 2014, up to and including in or about September 2018, MILTON CHARDON, a/k/a "Blanquito," CHRISTIAN PABON, a/k/a "Banga," BRYAN CASTILLO, a/k/a "True," GEORGE CITRONELLE, a/k/a "CY," a/k/a "BY," JEREMY ESTEVEZ, a/k/a "Jerm Racks," and YASMIL FERTIDES, a/k/a "Little Half," the defendants, and others known and unknown, were members and associates of the 200, a criminal organization whose members and associates engaged in, among other things, narcotics trafficking, robbery, and murder, and who operated principally in New York, New York.

2. The 200, including its leadership, membership, and associates, constituted an "enterprise," (the "200 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 200 Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the 200 Enterprise. At times relevant to this Indictment, the 200 Enterprise has engaged in, and its activities affected, interstate and foreign commerce. The defendants participated in the operation of the 200 Enterprise,

and participated in unlawful and other activities in furtherance of the conduct of the 200 Enterprise's affairs.

3. MILTON CHARDON, a/k/a "Blanquito," CHRISTIAN PABON, a/k/a "Banga," BRYAN CASTILLO, a/k/a "True," GEORGE CITRONELLE, a/k/a "CY," a/k/a "BY," JEREMY ESTEVEZ, a/k/a "Jerm Racks," and YASMIL FERTIDES, a/k/a "Little Half," the defendants, were members and associates of the 200 Enterprise who carried out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

#### PURPOSES OF THE 200 ENTERPRISE

4. The purposes of the 200 Enterprise included the following:

a. Enriching the members and associates of the 200 Enterprise through, among other things, the distribution of narcotics, including heroin, cocaine, marijuana, and oxycontin, and the commission of robberies.

b. Preserving and protecting the power of the 200 Enterprise and its members and associates through acts involving murder, other acts of violence, and threats of violence.

c. Promoting and enhancing the 200 Enterprise and the reputation and activities of its members and associates.

MEANS AND METHODS OF THE 200 ENTERPRISE

5. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of the 200 Enterprise were the following:

a. Members and associates of the 200 Enterprise committed, conspired to commit, and attempted to commit acts of violence, including murder, to protect and expand the Enterprise's criminal operations, and in connection with rivalries with members of other street gangs.

b. Members and associates of the 200 Enterprise used physical violence and threats of violence, including acts involving murder and robbery, against others, including in particular rival gang members and robbery victims.

c. Members and associates of the 200 Enterprise sold narcotics, including heroin, cocaine, marijuana, and oxycontin.

THE RACKETEERING VIOLATION

6. From at least in or about 2014, up to and including in or about September 2018, in the Southern District of New York and elsewhere, MILTON CHARDON, a/k/a "Blanquito," CHRISTIAN PABON, a/k/a "Banga," BRYAN CASTILLO, a/k/a "True," GEORGE CITRONELLE, a/k/a "CY," a/k/a "BY," JEREMY ESTEVEZ, a/k/a "Jerm Racks," and YASMIL FERTIDES, a/k/a "Little Half," the defendants, and others known and unknown, being persons employed by and associated with the 200 Enterprise described in Paragraphs 1 through 5 of this

Indictment, 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 200 Enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity consisting of multiple acts involving:

a. Murder, chargeable under the following provisions of state law: New York Penal Law, Section 125.25 (murder), 105.15 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

b. Robbery, chargeable under the following provisions of state law: New York Penal Law, Sections 160.00, 160.05, 160.10, 160.15 (robbery), 105.05, 105.10 (conspiracy), 110.00 (attempt), and 20.00 (aiding and abetting);

c. Multiple acts indictable under Title 18, United States Code, Sections 1951 and 2 (robbery affecting interstate commerce); and

d. Multiple offenses involving the distribution of controlled substances, including heroin, cocaine, marijuana, and oxycontin, chargeable under Title 21, United States Code, Sections 812, 841(a)(1), and 846, and Title 18, United States Code, Section 2.

7. It was a part and object 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 200 Enterprise.

Notice of Special Sentencing Factors

8. On or about October 2, 2014, in the Southern District of New York, CHRISTIAN PABON, a/k/a "Banga," the defendant, and others known and unknown, knowingly murdered and aided and abetted the murder of Orlando Rivera in the vicinity of 1653 Saint Nicholas Avenue, New York, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (i) with intent to cause the death of another person, PABON caused the death of Orlando Rivera, and aided and abetted the same; and (ii) under circumstances evincing a depraved indifference to human life, PABON recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Rivera, 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:

9. At all times relevant to this Indictment, the 200, as described in paragraphs 1 through 5 of Count One of this Indictment, which are repeated and incorporated by reference as

though fully set forth herein, including its leadership, members, and associates, constituted an enterprise (the "200 Enterprise") as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals engaged in, and the activities of which affected, interstate and foreign commerce. The 200 Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the 200 Enterprise.

10. At all relevant times to this Indictment, the 200 Enterprise, 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, acts involving robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code Sections 1951 and 2, and offense involving narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846.

11. On or about October 2, 2014, in the Southern District of New York, CHRISTIAN PABON, a/k/a "Banga," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 200 Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the 200 Enterprise, an enterprise engaged in racketeering activity, as

described above, knowingly murdered and aided and abetted the murder of Orlando Rivera in the vicinity of 1653 Saint Nicholas Avenue, New York, New York, in violation of New York Penal Law, Sections 125.25 and 20.00, in that, (i) with intent to cause the death of another person, PABON caused the death of Orlando Rivera, and aided and abetted the same; and (ii) under circumstances evincing a depraved indifference to human life, PABON recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Rivera, and aided and abetted the same.

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

**COUNT THREE**  
**(Murder with a Firearm)**

The Grand Jury further charges:

12. On or about October 2, 2014, in the Southern District of New York, CHRISTIAN PABON, a/k/a "Banga," the defendant, and others known and unknown, 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 Two of this Indictment, willfully and knowingly did use and carry a firearm, and, in furtherance of such crime of violence, did possess a firearm, and in the course of that crime of violence 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), and did aid and abet the same, to wit, PABON shot and killed and aided and abetted the shooting and killing of Orlando Rivera in the vicinity of 1653 Saint Nicholas Avenue, New York, New York.

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

COUNT FOUR  
(Attempted Murder in Aid of Racketeering)

The Grand Jury further charges:

13. At all times relevant to this Indictment, the 200, as described in paragraphs 1 through 5 of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise (the "200 Enterprise"), as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals engaged in, and the activities of which affected, interstate and foreign commerce. The 200 Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the 200 Enterprise.

14. At all relevant times to this Indictment, the 200 Enterprise, 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, acts

involving robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code Sections 1951 and 2, and offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846.

15. On or about December 17, 2015, in the Southern District of New York, MILTON CHARDON, a/k/a "Blanquito," and YASMIL FERTIDES, a/k/a "Little Half," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 200 Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the 200 Enterprise, an enterprise engaged in racketeering activity, as described above, attempted to murder an individual, and aided and abetted the same, to wit, YASMIL FERTIDES shot at and attempted to murder an individual, and CHARDON aided and abetted the same, in the vicinity of the intersection of Sickles Street and Sherman Avenue in New York, New York, in violation of New York Penal Law, Sections 125.25, 110.00, and 20.00.

(Title 18, United States Code,  
Sections 1959(a)(5) and 2.)

COUNT FIVE  
(Firearms Offense)

The Grand Jury further charges:

16. On or about December 17, 2015, in the Southern District of New York, MILTON CHARDON, a/k/a "Blanquito," and YASMIL

FERTIDES, a/k/a "Little Half," 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 violent crime in aid of racketeering charged in Count Four 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 use, carrying, and possession of a firearm, which was brandished and discharged.

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

**COUNT SIX**  
**(Attempted Assault with a Dangerous Weapon in Aid of  
Racketeering)**

The Grand Jury further charges:

17. At all times relevant to this Indictment, the 200, as described in paragraphs 1 through 5 of Count One of this Indictment, which are repeated and incorporated by reference as though fully set forth herein, including its leadership, members, and associates, constituted an enterprise (the "200 Enterprise"), as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals engaged in, and the activities of which affected, interstate and foreign commerce. The 200 Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the 200 Enterprise.

18. At all relevant times to this Indictment, the 200 Enterprise, 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, acts involving robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code Sections 1951 and 2, and offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 812, 841, and 846.

19. On or about November 21, 2016, in the Southern District of New York, GEORGE CITRONELLE, a/k/a "CY," a/k/a "BY," the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 200 Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the 200 Enterprise, an enterprise engaged in racketeering activity, as described above, attempted to assault multiple individuals with a dangerous weapon; and aided and abetted the same, to wit, CITRONELLE shot at the victims of a robbery that CITRONELLE carried out with other 200 members and associates, in the vicinity of the intersection of Academy Street and Nagle Avenue

in New York, New York, in violation of New York Penal Law, Sections 120.05, 110.00, and 20.00.

(Title 18, United States Code,  
Sections 1959(a)(6) and 2.)

**COUNT SEVEN**  
**(Firearms Offense)**

The Grand Jury further charges:

20. On or about November 21, 2016, in the Southern District of New York, GEORGE CITRONELLE, a/k/a "CY," a/k/a "BY," 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 violent crime in aid of racketeering charged in Count Six 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 use, carrying, and possession of a firearm, which was brandished and discharged.

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

**COUNT EIGHT**  
**(Narcotics Conspiracy)**

The Grand Jury further charges:

21. Between in or about 2011 and in or about 2018, in the Southern District of New York and elsewhere, MILTON CHARDON, a/k/a "Blanquito," GEORGE CITRONELLE, a/k/a "CY," a/k/a "BY," and YASMIL FERTIDES, a/k/a "Little Half," the defendants, and others known and unknown, did combine, conspire, confederate, and agree

together and with each other to violate the narcotics laws of the United States.

22. It was a part and object of the conspiracy that MILTON CHARDON, a/k/a "Blanquito," GEORGE CITRONELLE, a/k/a "CY," a/k/a "BY," and YASMIL FERTIDES, a/k/a "Little Half," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1).

23. The controlled substances that MILTON CHARDON, a/k/a "Blanquito," and GEORGE CITRONELLE, a/k/a "CY," a/k/a "BY," the defendants, conspired to distribute and possess with intent to distribute were: 500 grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B); and mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

24. The controlled substances that YASMIL FERTIDES, a/k/a "Little Half," the defendant, conspired to distribute and possess with intent to distribute were: 1 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); 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); and mixtures and substances

containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

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

COUNT NINE  
(Hobbs Act Robbery Conspiracy)

The Grand Jury further charges:

25. Between in or about 2011 and in or about 2018, in the Southern District of New York and elsewhere, MILTON CHARDON, a/k/a "Blanquito," YASMIL FERTIDES, a/k/a "Little Half," SAMANTHA BATISTA, NOEL MARTINEZ, a/k/a "Crazy," DOMINGO TOLENTINO, a/k/a "Juvi," and JUAN CALDERON, a/k/a "Priva," the defendants, and others known and unknown, unlawfully 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).

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

COUNT TEN  
(Hobbs Act Robbery)

The Grand Jury further charges:

26. On or about November 8, 2016, in the Southern District of New York, SAMANTHA BATISTA, NOEL MARTINEZ, a/k/a "Crazy," and DOMINGO TOLENTINO, a/k/a "Juvi," the defendants, and others known

and unknown, knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), 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), and did aid and abet the same, to wit, the defendants robbed a marijuana dealer, at 510 West 188th Street, Apartment 31, New York, New York.

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

**COUNT ELEVEN**  
**(Firearms Offense)**

The Grand Jury further charges:

27. On or about November 8, 2016, in the Southern District of New York, SAMANTHA BATISTA, NOEL MARTINEZ, a/k/a "Crazy," and DOMINGO TOLENTINO, a/k/a "Juvi," 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 charged in Count Ten 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 use, carrying, and possession of a firearm, which was brandished and discharged.

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



COUNT TWELVE  
(Narcotics Conspiracy)

The Grand Jury further charges:

28. Between in or about 2011 and in or about 2018, in the Southern District of New York and elsewhere, SAMANTHA BATISTA, NOEL MARTINEZ, a/k/a "Crazy," and DOMINGO TOLENTINO, a/k/a "Juvi," the defendants, and others known and unknown, did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

29. It was a part and object of the conspiracy that SAMANTHA BATISTA, NOEL MARTINEZ, a/k/a "Crazy," and DOMINGO TOLENTINO, a/k/a "Juvi," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1).

30. The controlled substance that SAMANTHA BATISTA, NOEL MARTINEZ, a/k/a "Crazy," and DOMINGO TOLENTINO, a/k/a "Juvi," the defendants, conspired to distribute and possess with intent to distribute was mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

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

COUNT THIRTEEN  
(Pharmacy Burglary Conspiracy)

The Grand Jury further charges:

28. Between in or about 2011 and in or about 2018, in the Southern District of New York and elsewhere, MILTON CHARDON, a/k/a "Blanquito," YASMIL FERTIDES, a/k/a "Little Half," DOMINGO TOLENTINO, a/k/a "Juvi," and JUAN CALDERON, a/k/a "Priva," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Section 2118(b) of Title 18, United States Code.

29. It was a part and an object of the conspiracy that MILTON CHARDON, a/k/a "Blanquito," YASMIL FERTIDES, a/k/a "Little Half," DOMINGO TOLENTINO, a/k/a "Juvi," and JUAN CALDERON, a/k/a "Priva," the defendants, and others known and unknown, would and did, without authority, enter, attempt to enter, and remain in, the business premises and property of a person registered with the Drug Enforcement Administration under Section 302 of the Controlled Substances Act, with the intent to steal materials and compounds containing a quantity of a controlled substance, the replacement cost of which to the registrant was \$500 and more, and that the person who would and did engage in such entry and attempted such entry and did remain in such premises and property would and did use a facility in interstate commerce to facilitate

such entry and attempt to enter and to facilitate remaining in such premises and property, in violation of 18 U.S.C. § 2118(b).

Overt Acts

30. 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 October 8, 2016, MILTON CHARDON, a/k/a "Blanquito," and JUAN CALDERON, a/k/a "Priva," the defendants, and co-conspirators not named herein, burglarized a pharmacy in the vicinity of 1985 University Avenue in the Bronx, New York, and stole controlled substances and cash.

b. On or about June 15, 2017, YASMIL FERTIDES, a/k/a "Little Half," and JUAN CALDERON, a/k/a "Priva," the defendants, and co-conspirators not named herein, attempted to burglarize a pharmacy in the vicinity of 4781 Broadway in New York, New York.

c. On or about October 10, 2016, MILTON CHARDON, a/k/a "Blanquito," DOMINGO TOLENTINO, a/k/a "Juvi," and JUAN CALDERON, a/k/a "Priva," the defendants, and co-conspirators not named herein, forcibly entered a commercial establishment in the vicinity of 212 Nagle Avenue, New York, New York, in an attempt to enter and burglarize an adjacent pharmacy.

(Title 18, United States Code, Section 2118(d).)

COUNT FOURTEEN  
(Narcotics Conspiracy)

The Grand Jury further charges:

31. Between in or about 2011 and in or about 2018, in the Southern District of New York and elsewhere, MILTON CHARDON, a/k/a "Blanquito," YASMIL FERTIDES, a/k/a "Little Half," DOMINGO TOLENTINO, a/k/a "Juvi," and JUAN CALDERON, a/k/a "Priva," the defendants, and others known and unknown, did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

32. It was a part and object of the conspiracy that MILTON CHARDON, a/k/a "Blanquito," YASMIL FERTIDES, a/k/a "Little Half," DOMINGO TOLENTINO, a/k/a "Juvi," and JUAN CALDERON, a/k/a "Priva," the defendants, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of 21 U.S.C. § 841(a)(1).

33. The controlled substance that MILTON CHARDON, a/k/a "Blanquito," YASMIL FERTIDES, a/k/a "Little Half," DOMINGO TOLENTINO, a/k/a "Juvi," and JUAN CALDERON, a/k/a "Priva," the defendants, conspired to distribute and possess with intent to distribute was mixtures and substances containing oxycodone, in violation of Title 21, United States Code, Section 841(b)(1)(C).

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

SPECIAL FINDINGS AS TO CHRISTIAN PABON

34. Counts Two and Three of the Indictment are realleged and incorporated by reference as though fully set forth herein. As to Counts Two and Three of the Indictment, alleging the murder of Orlando Rivera, CHRISTIAN PABON, a/k/a "Banga," the defendant:

a. was 18 years of age or older at the time of the offenses; and

b. intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and Orlando Rivera died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)).

FORFEITURE ALLEGATIONS

35. As a result of committing the racketeering offense alleged in Count One of this Indictment, MILTON CHARDON, a/k/a "Blanquito," CHRISTIAN PABON, a/k/a "Banga," BRYAN CASTILLO, a/k/a "True," GEORGE CITRONELLE, a/k/a "CY," a/k/a "BY," JEREMY ESTEVEZ, a/k/a "Jerm Racks," YASMIL FERTIDES, a/k/a "Little Half," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963:

a. any interest 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);

b. 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

c. 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).

36. As a result of committing the narcotics offenses alleged in Counts Eight, Twelve, and Fourteen of this Indictment, MILTON CHARDON, a/k/a "Blanquito," GEORGE CITRONELLE, a/k/a "CY," a/k/a "BY," YASMIL FERTIDES, a/k/a "Little Half," SAMANTHA BATISTA, NOEL MARTINEZ, a/k/a "Crazy," DOMINGO TOLENTINO, a/k/a "Juvi," and JUAN CALDERON, a/k/a "Priva," 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 defendants obtained directly or indirectly as a result of the offense 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 alleged in Count Three of this Indictment.

37. As a result of committing the robbery and burglary offenses alleged in Counts Nine, Ten, and Thirteen of this Indictment, MILTON CHARDON, a/k/a "Blanquito," YASMIL FERTIDES, a/k/a "Little Half," SAMANTHA BATISTA, NOEL MARTINEZ, a/k/a "Crazy," DOMINGO TOLENTINO, a/k/a "Juvi," and JUAN CALDERON, a/k/a "Priva," the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any property constituting, or derived from, proceeds traceable to such offenses.

Substitute Assets Provision

38. 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

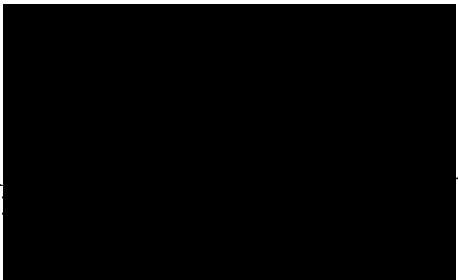
e) has been commingled with other property

which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m) to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

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

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*Geoffrey S. Berman*  
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GEOFFREY S. BERMAN *ms*  
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. -

MILTON CHARDON, et al.  
Defendants.

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SEALED SUPERSEDING INDICTMENT

S1 18 Cr. 319 (LTS)

(18 U.S.C. §§ 1951, 1959, 1962, 924(c),  
924(j), 2118(d), and 2;  
21 U.S.C. § 846.)

GEOFFREY S. BERMAN  
United States Attorney.

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 BILL

Foreperson.

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