

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
VANCE COLLINS, :
a/k/a "Big AK," and :
:
RAMON RAMIREZ, :
a/k/a "Obendy," :
:
Defendants. :
:
- - - - - X

SEALED INDICTMENT

19 Cr.

19 CRIM 395

COUNT ONE

(Murder-for-Hire Conspiracy)

The Grand Jury charges:

1. From at least in or about 2017 through in or about 2018, in the Southern District of New York and elsewhere, VANCE COLLINS, a/k/a "Big AK," and RAMON RAMIREZ, a/k/a "Obendy," the defendants, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to travel in and cause another to travel in interstate and foreign commerce, and to use and cause another to use a facility of interstate and foreign commerce, with intent that a murder be committed in violation of the laws of a State and the United States as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, to wit, COLLINS and RAMIREZ agreed to pay someone to murder an

individual believed to be having an affair with RAMIREZ's wife.

(Title 18, United States Code, Sections 1958.)

COUNT TWO
(Murder-for-Hire)

The Grand Jury charges:

2. In or about late 2017, in the Southern District of New York and elsewhere, VANCE COLLINS, a/k/a "Big AK," and RAMON RAMIREZ, a/k/a "Obendy," the defendants, did travel in and cause another person to travel in interstate and foreign commerce, and did use and cause another person to use a facility of interstate and foreign commerce, with intent that a murder be committed in violation of the laws of a State and the United States as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, and aided and abetted the same, to wit, COLLINS and RAMIREZ agreed to pay someone to murder an individual believed to be having an affair with RAMIREZ's wife.

(Title 18, United States Code, Sections 1958 and 2.)

FOREFEITURE ALLEGATION

3. As a result of committing the offenses alleged in Counts One and Two of this Indictment, VANCE COLLINS, a/k/a "Big AK," and RAMON RAMIREZ, a/k/a "Obendy," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to 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 that the defendants personally obtained.

SUBSTITUTE ASSETS PROVISION


4. 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) 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, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


GEOFFREY S. BERMAN *MS*
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

VANCE COLLINS, a/k/a "Big AK," and
RAMON RAMIREZ, a/k/a "Obendy,"

Defendants.

INDICTMENT

19 Cr.

(18 U.S.C. §§ 1958 and 2.)

GEOFFREY S. BERMAN
United States Attorney


Foreperson
