

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA :
 :
-v.- :
 :
WILLIE EVANS, :
 a/k/a "Mills," :
JAMARR SIMMONS, :
 a/k/a "Show Off," :
ALBERT SHOULDERS, :
 a/k/a "Bundy," :
RANELL SLOAN, :
 a/k/a "Rah," :
DARNELL COOPER, :
 a/k/a "Jeez," :
JOSE RODRIGUEZ, :
 a/k/a "Meso," :
SYLVESTER WINT," :
 a/k/a "Vesta," :
YONETTE RESPASS, :
 a/k/a "Yonette Davis," :
 a/k/a "Star Brim," :
MARKELL BOBIAN, :
 a/k/a "Kellz," :
TIMOTHY COLEMAN, :
 a/k/a "LA," :
TYRONE ERVIN, :
 a/k/a "Shoota," :
SEAN GAMBRELL, :
 a/k/a "Kash," :
DARON GOODMAN, :
 a/k/a "Handsome," :
JAVARIS JENKINS, :
 a/k/a "JayBz," :
JERLAINE LITTLE, :
 a/k/a "Noni," :
SHAMARE REID, :
 a/k/a "Sha," :
MARKQUEL SIMMONS, :
 a/k/a "Shellz," and :
TYRIQUE SNOWDEN, :
 a/k/a "Ty," :
Defendants. :
-----X

SEALED
SUPERSEDING
INDICTMENT

S3 20 Cr. 57 (GBD)

COUNT ONE
(Racketeering Conspiracy)
(ALL DEFENDANTS)

The Grand Jury charges:

The Enterprise

1. At all times relevant to this Indictment, WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANELLE SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," YONETTE RESPASS, a/k/a "Yonette Davis," a/k/a "Star Brim," MARKELL BOBIAN, a/k/a "Kellz," TIMOTHY COLEMAN, a/k/a "LA," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," DARON GOODMAN, a/k/a "Handsome," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and TYRIQUE SNOWDEN, a/k/a "Ty," the defendants, and others known and unknown, were members and associates of the 59 Brims (the "59 Brims" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other activities, acts involving murder, robbery, fraud, and the distribution of controlled substances. The 59 Brims operated in and around Manhattan, the Bronx, Queens, and Brooklyn, New York.

2. The 59 Brims, 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 Indictment, the Enterprise was engaged in, and its activities affected, interstate and foreign commerce. WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANELL SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," YONETTE RESPASS, a/k/a "Yonette Davis," a/k/a "Star Brim," MARKELL BOBIAN, a/k/a "Kellz," TIMOTHY COLEMAN, a/k/a "LA," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," DARON GOODMAN, a/k/a "Handsome," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and TYRIQUE SNOWDEN, a/k/a "Ty," the defendants, participated in the Enterprise and participated in unlawful and other activity in furtherance of the conduct of the Enterprise's affairs.

3. Members and associates of the 59 Brims engaged in a series of violent disputes with rivals of the 59 Brims, including those within the 59 Brims who they deemed disloyal to the Enterprise. During these disputes, members and associates of the 59 Brims committed multiple murders, shootings,

robberies, and assaults against their rivals and against fellow members of the 59 Brims.

4. Members and associates of the 59 Brims sold heroin, fentanyl, crack cocaine, and marijuana in and around Manhattan, Brooklyn, Queens, and the Bronx, New York.

5. Members and associates of the 59 Brims committed and agreed, attempted, and threatened to commit acts of violence to protect and expand their narcotics business, to protect fellow members and associates of the Enterprise, to otherwise promote the standing and reputation of the 59 Brims amongst rival gangs, and to promote the standing and reputation of members of the 59 Brims. These acts of violence included acts involving murder, robbery, and assault, intended to protect the Enterprise's narcotics business, and to retaliate against members of rival gangs who had encroached on the Enterprise's narcotics business.

Purposes of the Enterprise

6. The purposes of the Enterprise included the following:

a. Preserving and protecting the power, territory, and profits of the Enterprise through acts involving murder, 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, robbery, bank fraud, access device fraud, wire fraud, and the distribution and sale of narcotics, including heroin, fentanyl, crack cocaine, and marijuana.

f. Protecting the Enterprise and its members and associates 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.

Means and Methods of the Enterprise

7. 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 of violence, including acts involving murder, to protect and expand the Enterprise's criminal operations, and against rival gang members.

b. Members and associates of the Enterprise used threats of violence and physical violence against other members and associates of the Enterprise 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 acts involving murder and robbery against rival gang members and other individuals.

d. Members and associates of the Enterprise promoted and celebrated, in music and on social media, the criminal conduct of the Enterprise, namely narcotics distribution, acts involving violence, and the use of firearms.

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

f. Members and associates of the Enterprise distributed controlled substances, including heroin, fentanyl, crack cocaine, and marijuana.

g. Members and associates of the Enterprise committed bank fraud and wire fraud by depositing checks containing false information into bank accounts controlled by members and associates of the Enterprise and transferring money from those bank accounts and committed access device fraud by using credit and debit cards belonging to others.

The Racketeering Conspiracy

8. From at least in or about 2011, up to and including February 2020, in the Southern District of New York and elsewhere, WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANELLE SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," YONETTE RESPASS, a/k/a "Yonette Davis," a/k/a "Star Brim," MARKELL BOBIAN, a/k/a "Kellz," TIMOTHY COLEMAN, a/k/a "LA," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," DARON GOODMAN, a/k/a "Handsome," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and TYRIQUE SNOWDEN, a/k/a "Ty," the defendants, and others known and unknown, being persons employed by and associated with the Enterprise described in paragraphs 1 through 7 of this Indictment, namely, the 59 Brims, which enterprise engaged in, and the activities of which affected, interstate and foreign commerce, 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 59 Brims through a pattern of racketeering

activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of:

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

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

c. multiple acts indictable under Title 18, United States Code, Section 1951 (relating to Hobbs Act robbery);

d. multiple acts indictable under Title 18, United States Code, Sections 1029 (access device fraud), 1343 (wire fraud), and 1344 (bank fraud); and

e. multiple offenses involving the distribution of controlled substances, including, heroin, fentanyl, 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)(A), 841(b)(1)(C), 841(b)(1)(D), and 846, and Title 18, United States Code, Section 2.

9. 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.

Notice of Special Sentencing Factors

10. From at least in or about 2011, up to and including in or about February 2020, in the Southern District of New York and elsewhere, WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANELL SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," MARKELL BOBIAN, a/k/a "Kellz," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and TYRIQUE SNOWDEN, a/k/a "Ty," 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.

11. It was a part and an object of the conspiracy that WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANELL SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," MARKELL BOBIAN, a/k/a "Kellz," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and

TYRIQUE SNOWDEN, a/k/a "Ty," 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).

12. The controlled substances that WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANELLE SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," MARKELL BOBIAN, a/k/a "Kellz," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and TYRIQUE SNOWDEN, a/k/a "Ty," the defendants, conspired to distribute and possess with intent to distribute were: (i) 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); (ii) 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 (iii) 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), all in violation of Title 21, United States Code, Section 846.

13. On or about January 11, 2020, in the Southern District of New York, JAMARR SIMMONS, a/k/a "Show Off," and DARON GOODMAN, a/k/a "Handsome," the defendants, knowingly murdered and aided and abetted the murder of Jason Parris in the vicinity of 1441 Watson Avenue in the Bronx, New York, in violation of New York Penal Law, Sections 125.25, 125.27, and 20.00, in that, (i) with intent to cause the death of another person, JAMARR SIMMONS and GOODMAN caused the death of Parris, and aided and abetted the same, and (ii) under circumstances evincing a depraved indifference to human life, JAMARR SIMMONS and GOODMAN recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Parris, and aided and abetted the same.

14. On or about September 28, 2019, in the Southern District of New York, WILLIE EVANS, a/k/a "Mills," and JAMARR SIMMONS, a/k/a "Show Off," the defendants, knowingly murdered and aided and abetted the murder of Bradford Mensah in the vicinity of Crotona Park in the Bronx, New York, in violation of New York Penal Law, Sections 125.25, 125.27, and 20.00, in that, (i) with intent to cause the death of another person, EVANS and JAMARR SIMMONS caused the death of Mensah, and aided and abetted the same, and (ii) under circumstances evincing a depraved indifference to human life, EVANS and JAMARR SIMMONS recklessly engaged in conduct which created a grave risk of death to

another person, and thereby caused the death of Mensah, and aided and abetted the same.

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

COUNT TWO
(Murder in Aid of Racketeering)
(J. SIMMONS and GOODMAN)

The Grand Jury further charges:

15. At all times relevant to this Indictment, the 59 Brims, as described in paragraphs 1 through 7 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, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that 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.

16. At all times relevant to this Indictment, the 59 Brims, 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 and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code,

Sections 1029, 1343, and 1344, and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

17. On or about January 11, 2020, in the Southern District of New York, JAMARR SIMMONS, a/k/a "Show Off," and DARON GOODMAN, a/k/a "Handsome," the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 59 Brims, and for the purpose of gaining entrance to and maintaining and increasing position in the 59 Brims, an enterprise engaged in racketeering activity, as described above, knowingly murdered and aided and abetted the murder of Jason Parris in the vicinity of 1441 Webster Avenue in the Bronx, New York, in violation of New York Penal Law, Sections 125.25, 125.27, and 20.00, in that, (i) with intent to cause the death of another person, JAMARR SIMMONS and GOODMAN caused the death of Parris, and aided and abetted the same, and (ii) under circumstances evincing a depraved indifference to human life, JAMARR SIMMONS and GOODMAN recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Parris, and aided and abetted the same.

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

COUNT THREE

(Use of a Firearm in Furtherance of the January 11, 2020 Murder
of Jason Parris)

(J. SIMMONS and GOODMAN)

The Grand Jury further charges:

18. On or about January 11, 2020, in the Southern District of New York, JAMARR SIMMONS, a/k/a "Show Off," and DARON GOODMAN, a/k/a "Handsome," the defendants, and others known and unknown, during and in relation to a crime of violence for which they 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, JAMARR SIMMONS and GOODMAN shot and killed Jason Parris, and aided and abetted the shooting and killing of Parris, in the vicinity of 1441 Webster Avenue in the Bronx, New York.

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

COUNT FOUR
(Murder in Aid of Racketeering)
(EVANS and J. SIMMONS)

The Grand Jury further charges:

19. At all times relevant to this Indictment, the 59 Brims, as described in paragraphs 1 through 7 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, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that 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.

20. At all times relevant to this Indictment, the 59 Brims, 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 and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1029, 1343, and 1344, and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

21. On or about September 28, 2019, in the Southern District of New York, WILLIE EVANS, a/k/a "Mills," and JAMARR SIMMONS, a/k/a "Show Off," the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 59 Brims, and for the purpose of gaining entrance to and maintaining and increasing position in the 59 Brims, an enterprise engaged in racketeering activity, as described above, knowingly murdered and aided and abetted the murder of Bradford Mensah in the vicinity of Crotona Park in the Bronx, New York, in violation of New York Penal Law, Sections 125.25, 125.27, and 20.00, in that, (i) with intent to cause the death of another person, EVANS and JAMARR SIMMONS caused the death of Mensah, and aided and abetted the same, and (ii) under circumstances evincing a depraved indifference to human life, EVANS and JAMARR SIMMONS recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused the death of Mensah, and aided and abetted the same.

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

COUNT FIVE

(Use of a Firearm in Furtherance of the September 28, 2019
Murder of Bradford Mensah)
(EVANS and J. SIMMONS)

The Grand Jury further charges:

22. On or about September 28, 2019, in the Southern District of New York, WILLIE EVANS, a/k/a "Mills," and JAMARR SIMMONS, a/k/a "Show Off," 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 murder in aid of racketeering charged in Count Four 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, EVANS and JAMARR SIMMONS shot and killed Bradford Mensah, and aided and abetted the shooting and killing of Mensah, in the vicinity of Crotona Park in the Bronx, New York.

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

COUNT SIX
(Attempted Murder and Assault with a Dangerous Weapon in Aid of
Racketeering)
(JENKINS)

The Grand Jury further charges:

23. At all times relevant to this Indictment, the 59 Brims, as described in paragraphs 1 through 7 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, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that 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.

24. At all times relevant to this Indictment, the 59 Brims, 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 and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1029, 1343, and 1344, and offenses involving the

distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

25. On or about September 2, 2019, in the Southern District of New York, JAVARIS JENKINS, a/k/a "JayBz," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 59 Brims, and for the purpose of gaining entrance to and maintaining and increasing position in the 59 Brims, an enterprise engaged in racketeering activity, as described above, knowingly attempted to murder an individual and assaulted that individual with a dangerous weapon, and aided and abetted the same, to wit, JENKINS shot a rival gang member in the Bronx, New York, in violation of New York Penal Law Sections 125.25, 120.10, 120.05, 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and 2.)

COUNT SEVEN

**(Use of a Firearm in Furtherance of the September 2, 2019
Attempted Murder and Assault with a Dangerous Weapon)
(JENKINS)**

The Grand Jury further charges:

26. On or about September 2, 2019, in the Southern District of New York, JAVARIS JENKINS, a/k/a "JBs," 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, attempted murder and assault with a dangerous weapon in

aid of racketeering, as 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
(Attempted Murder and Assault with a Dangerous Weapon in Aid of Racketeering)
(WINT and REID)

The Grand Jury further charges:

27. At all times relevant to this Indictment, the 59 Brims, as described in paragraphs 1 through 7 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, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that 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.

28. At all times relevant to this Indictment, the 59 Brims, 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 and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1029, 1343, and 1344, and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

29. On or about August 24, 2019, in the Southern District of New York, SYLVESTER WINT, a/k/a "Vesta," and SHAMARE REID, a/k/a "Sha," the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 59 Brims, and for the purpose of gaining entrance to and maintaining and increasing position in the 59 Brims, an enterprise engaged in racketeering activity, as described above, knowingly attempted to murder individuals and assaulted those individuals with dangerous weapons, and aided and abetted the same, to wit, WINT and REID shot rival gang members in the Bronx, New York, in violation of New York Penal Law Sections 125.25, 120.10, 120.05, 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and 2.)

COUNT NINE

**(Use of a Firearm in Furtherance of the August 24, 2019
Attempted Murder and Assault with a Dangerous Weapon)
(WINT and REID)**

The Grand Jury further charges:

30. On or about August 24, 2019, in the Southern District of New York, SYLVESTER WINT, a/k/a "Vesta," and SHAMARE REID, a/k/a "Sha," 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, attempted murder and assault with a dangerous weapon in aid of racketeering, as charged in Count Eight 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 TEN

**(Maiming and Assault with a Dangerous Weapon in Aid of
Racketeering)
(J. SIMMONS, SHOULDERS, WINT, RESPASS, and REID)**

The Grand Jury further charges:

31. At all times relevant to this Indictment, the 59 Brims, as described in paragraphs 1 through 7 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, as that term

is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that 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.

32. At all times relevant to this Indictment, the 59 Brims, 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 and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1029, 1343, and 1344, and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

33. On or about August 8, 2019, in the Southern District of New York, JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," SYLVESTER WINT, a/k/a "Vesta," YONETTE RESPASS, a/k/a "Yonette Davis," a/k/a "Star Brim," and SHAMARE REID, a/k/a "Sha," the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 59 Brims, and for the purpose of gaining entrance to and maintaining and increasing position

in the 59 Brims, an enterprise engaged in racketeering activity, as described above, knowingly maimed and assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, JAMARR SIMMONS, SHOULDERS, WINT, RESPASS, and REID slashed an individual in the face, in violation of New York Penal Law Sections 120.10, 120.05, and 20.00.

(Title 18, United States Code, Sections 1959(a)(2), (a)(3) and 2.)

COUNT ELEVEN
(Attempted Murder and Assault with a Dangerous Weapon in Aid of Racketeering)
(JENKINS)

The Grand Jury further charges:

34. At all times relevant to this Indictment, the 59 Brims, as described in paragraphs 1 through 7 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, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that 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.

35. At all times relevant to this Indictment, the 59 Brims, 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 and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1029, 1343, and 1344, and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

36. On or about August 1, 2019, in the Southern District of New York, JAVARIS JENKINS, a/k/a "JayBz," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 59 Brims, and for the purpose of gaining entrance to and maintaining and increasing position in the 59 Brims, an enterprise engaged in racketeering activity, as described above, knowingly attempted to murder individuals and assaulted those individuals with a dangerous weapon, and aided and abetted the same, to wit, JENKINS shot at rival gang members in the Bronx, New York, in violation of New York Penal Law Sections 125.25, 120.14, 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and 2.)

COUNT TWELVE

(Use of a Firearm in Furtherance of the August 1, 2019 Attempted
Murder and Assault with a Dangerous Weapon)
(JENKINS)

The Grand Jury further charges:

37. On or about August 1, 2019, in the Southern District of New York, JAVARIS JENKINS, a/k/a "JayBz," 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, attempted murder and assault with a dangerous weapon in aid of racketeering, as charged in Count Eleven 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 THIRTEEN

(Attempted Murder and Assault with a Dangerous Weapon in Aid of
Racketeering)
(J. SIMMONS, ERVIN, and GAMBRELL)

The Grand Jury further charges:

38. At all times relevant to this Indictment, the 59 Brims, as described in paragraphs 1 through 7 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, as that term

is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that 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.

39. At all times relevant to this Indictment, the 59 Brims, 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 and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1029, 1343, and 1344, and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

40. On or about May 21, 2019, in the Southern District of New York, JAMARR SIMMONS, a/k/a "Show Off," TYRONE ERVIN, a/k/a "Shoota," and SEAN GAMBRELL, a/k/a "Kash," the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 59 Brims, and for the purpose of gaining entrance to and maintaining and increasing position in the 59 Brims, an enterprise engaged in racketeering activity, as described above,

knowingly attempted to murder individuals and assaulted individuals with a dangerous weapon, and aided and abetted the same, to wit, JAMARR SIMMONS, ERVIN, GAMBRELL and others robbed at gunpoint individuals who were playing a dice game and shot at the individuals while robbing them in the vicinity of Davidson Avenue in the Bronx, New York, in violation of New York Penal Law Sections 125.25, 120.14, 110.00, and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and 2.)

COUNT FOURTEEN

**(Use of a Firearm in Furtherance of the May 21, 2019 Attempted Murder and Assault with a Dangerous Weapon)
(J. SIMMONS, ERVIN, and GAMBRELL)**

The Grand Jury further charges:

41. On or about May 21, 2019, in the Southern District of New York, JAMARR SIMMONS, a/k/a "Show Off," TYRONE ERVIN, a/k/a "Shoota," and SEAN GAMBRELL, a/k/a "Kash," 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, attempted murder and assault with a dangerous weapon in aid of racketeering, as charged in Count Thirteen 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 FIFTEEN

(Attempted Murder and Assault with a Dangerous Weapon in Aid of Racketeering)

(J. SIMMONS and COLEMAN)

The Grand Jury further charges:

42. At all times relevant to this Indictment, the 59 Brims, as described in paragraphs 1 through 7 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, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that 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.

43. At all times relevant to this Indictment, the 59 Brims, 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 and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1029, 1343, and 1344, and offenses involving the

distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

44. On or about March 30, 2019, in the Southern District of New York, JAMARR SIMMONS, a/k/a "Show Off," and TIMOTHY COLEMAN, a/k/a "LA," the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 59 Brims, and for the purpose of gaining entrance to and maintaining and increasing position in the 59 Brims, an enterprise engaged in racketeering activity, as described above, knowingly attempted to murder an individual and assaulted that individual with a dangerous weapon, and aided and abetted the same, to wit, JAMARR SIMMONS and COLEMAN stabbed a rival gang member in the Bronx, New York, in violation of New York Penal Law Sections 125.25, 120.10, 120.05, 110.00 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), (a)(5), and 2.)

COUNT SIXTEEN
(Assault with a Dangerous Weapon in Aid of Racketeering)
(LITTLE)

The Grand Jury further charges:

45. At all times relevant to this Indictment, the 59 Brims, as described in paragraphs 1 through 7 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, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that 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.

46. At all times relevant to this Indictment, the 59 Brims, 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 and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1029, 1343, and 1344, and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

47. On or about December 6, 2018, in the Southern District of New York, JERLAINE LITTLE, a/k/a "Noni," the defendant, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 59 Brims, and for the purpose of gaining entrance to and maintaining and increasing position in the 59 Brims, an enterprise engaged in racketeering activity, as described above,

knowingly assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, LITTLE and others pistol-whipped an individual while robbing the individual at gunpoint in the Bronx, New York, in violation of New York Penal Law Sections 120.05 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3) and 2.)

COUNT SEVENTEEN

**(Use of a Firearm in Furtherance of the December 6, 2018 Assault
with a Dangerous Weapon)
(LITTLE)**

The Grand Jury further charges:

48. On or about December 6, 2018, in the Southern District of New York, JERLAINE LITTLE, a/k/a "Noni," the defendant, during and in relation to a crime of violence for which she may be prosecuted in a court of the United States, namely, assault with a dangerous weapon in aid of racketeering, as charged in Count Sixteen 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.

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

COUNT EIGHTEEN

(Assault with a Dangerous Weapon in Aid of Racketeering)
(J. SIMMONS, BOBIAN, ERVIN, GAMBRELL, LITTLE, and M. SIMMONS)

The Grand Jury further charges:

49. At all times relevant to this Indictment, the 59 Brims, as described in paragraphs 1 through 7 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, as that term is defined in Title 18, United States Code, Section 1959(b)(2), that is, an association in fact of individuals that 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.

50. At all times relevant to this Indictment, the 59 Brims, 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 and robbery, in violation of New York Penal Law, acts indictable under Title 18, United States Code, Section 1951, acts indictable under Title 18, United States Code, Sections 1029, 1343, and 1344, and offenses involving the distribution of controlled substances, in violation of Title 21, United States Code, Sections 812, 841, and 846.

51. On or about November 29, 2018, in the Southern District of New York, JAMARR SIMMONS, a/k/a "Show Off," MARKELL BOBIAN, a/k/a "Kellz," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," JERLAINE LITTLE, a/k/a "Noni," and MARKQUEL SIMMONS, a/k/a "Shellz," the defendants, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the 59 Brims, and for the purpose of gaining entrance to and maintaining and increasing position in the 59 Brims, an enterprise engaged in racketeering activity, as described above, knowingly assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, JAMARR SIMMONS, BOBIAN, ERVIN, GAMBRELL, LITTLE, and MARKQUEL SIMMONS and others pistol-whipped an individual while robbing the individual at gunpoint in the Bronx, New York, in violation of New York Penal Law Sections 120.05 and 20.00.

(Title 18, United States Code, Sections 1959(a)(3) and 2.)

COUNT NINETEEN

**(Use of a Firearm in Furtherance of the November 29, 2018
Assault with a Dangerous Weapon)**

(J. SIMMONS, BOBIAN, ERVIN, GAMBRELL, LITTLE, and M. SIMMONS)

The Grand Jury further charges:

52. On or about November 29, 2018, in the Southern District of New York, JAMARR SIMMONS, a/k/a "Show Off," MARKELL BOBIAN, a/k/a "Kellz," TYRONE ERVIN, a/k/a "Shoota," SEAN

GAMBRELL, a/k/a "Kash," JERLAINE LITTLE, a/k/a "Noni," and MARKQUEL SIMMONS, a/k/a "Shellz," 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, assault with a dangerous weapon in aid of racketeering, as charged in Count EIGHTEEN 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.

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

COUNT TWENTY

(Narcotics Conspiracy)

(EVANS, J. SIMMONS, SHOULDERS, SLOAN, COOPER, RODRIGUEZ, WINT, BOBIAN, ERVIN, GAMBRELL, JENKINS, LITTLE, REID, M. SIMMONS, and SNOWDEN)

The Grand Jury further charges:

53. From at least in or about 2011, up to and including February 2020, in the Southern District of New York and elsewhere, WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANELLE SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," MARKELL BOBIAN, a/k/a "Kellz," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a

"Shellz," and TYRIQUE SNOWDEN, a/k/a "Ty," 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.

54. It was a part and an object of the conspiracy that WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANELL SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," MARKELL BOBIAN, a/k/a "Kellz," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and TYRIQUE SNOWDEN, a/k/a "Ty," 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).

55. The controlled substances that WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANELL SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," MARKELL BOBIAN, a/k/a "Kellz," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and TYRIQUE SNOWDEN,

a/k/a "Ty," the defendants, conspired to distribute and possess with intent to distribute were: (i) 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); (ii) 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); (iii) 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); and (iv) 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 TWENTY ONE

**(Possession of a Firearm During a Drug Trafficking Crime)
(EVANS, J. SIMMONS, SHOULDERS, SLOAN, COOPER, RODRIGUEZ, WINT,
BOBIAN, ERVIN, GAMBRELL, JENKINS, LITTLE, REID, M. SIMMONS, and
SNOWDEN)**

The Grand Jury further charges:

56. Between in or about 2016 and February 2020, in the Southern District of New York and elsewhere, WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANELLE SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," MARKELL BOBIAN, a/k/a "Kellz," TYRONE ERVIN, a/k/a

"Shoota," SEAN GAMBRELL, a/k/a "Kash," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and TYRIQUE SNOWDEN, a/k/a "Ty," the defendants, during and in relation to a drug trafficking offense for which they may be prosecuted in a court of the United States, namely, the conspiracy to distribute and possess with intent to distribute controlled substances as charged in Count Twenty of this Indictment, knowingly did use and carry a firearm, and in furtherance of such drug trafficking offense, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

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

COUNT TWENTY TWO
(Trafficking in Firearms)
(WINT)

The Grand Jury further charges:

57. From at least in or about January 2019 up to and including in or about September 2019, in the Southern District of New York and elsewhere, SYLVESTER WINT, a/k/a "Vesta," the defendant, not being a licensed importer, licensed manufacturer, and licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully and knowingly engage in the business of dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, and aided and abetted the same,

to wit, WINT made an unauthorized sale of multiple firearms that had been transported in interstate commerce, including at a location in the Bronx, New York.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)

COUNT TWENTY THREE
(Attempted Hobbs Act Robbery)
(SNOWDEN)

The Grand Jury further charges:

58. On or about August 28, 2019, in the Southern District of New York and elsewhere, TYRIQUE SNOWDEN, a/k/a "Ty," the defendant, and others known and unknown, attempted 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, SNOWDEN attempted to commit an armed robbery of an individual believed to be engaged in narcotics trafficking in the Bronx, New York and aided and abetted the same.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT TWENTY FOUR

(Use of a Firearm in Furtherance of the August 24, 2019
Attempted Hobbs Act Robbery)
(SNOWDEN)

The Grand Jury further charges:

59. On or about August 28, 2019, in the Southern District of New York and elsewhere, TYRIQUE SNOWDEN, the defendant, and others known and unknown, during and in relation to a crime of violence which he may be prosecuted in a court of the United States, namely, the attempted Hobbs Act robbery charged in Count Twenty Three 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.)

SPECIAL FINDINGS WITH RESPECT TO CERTAIN DEFENDANTS

60. 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 Jason Parris, JAMARR SIMMONS, a/k/a "Show Off," and DARON GOODMAN, a/k/a "Handsome," the defendants:

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

b. intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United States Code, Section 3591(a)(2)(B));

d. 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 Martinez died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)); and

e. in the commission of the offenses, knowingly created a grave risk of death to one and more persons in addition to the victim of the offenses (Title 18, United States Code, Section 3592(c)(5).

61. Counts Four and Five of the Indictment are realleged and incorporated by reference as though fully set forth herein. As to Counts Four and Five of the Indictment, alleging the murder of Bradford Mensah, WILLIE EVANS, a/k/a "Mills," and JAMARR SIMMONS, a/k/a "Show Off," the defendants:

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

b. intentionally killed the victim (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of the victim (Title 18, United

States Code, Section 3591(a)(2)(B));

d. 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 Martinez died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)); and

e. in the commission of the offenses, knowingly created a grave risk of death to one and more persons in addition to the victim of the offenses (Title 18, United States Code, Section 3592(c)(5)).

FORFEITURE ALLEGATIONS

62. As a result of committing the offense alleged in Count One of this Indictment, WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANEL SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," YONETTE RESPASS, a/k/a "Yonette Davis," a/k/a "Star Brim," MARKELL BOBIAN, a/k/a "Kellz," TIMOTHY COLEMAN, a/k/a "LA," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," DARON GOODMAN, a/k/a "Handsome," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and TYRIQUE SNOWDEN, a/k/a "Ty," the defendants, shall forfeit to the United States,

pursuant to Title 18, United States Code, Section 1963, any and all interests the defendants acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendant established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, from the racketeering activity alleged in Count One of this Indictment, 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.

63. As a result of committing the offense charged in Count Twenty of this Indictment, WILLIE EVANS, a/k/a "Mills," JAMARR SIMMONS, a/k/a "Show Off," ALBERT SHOULDERS, a/k/a "Bundy," RANEL SLOAN, a/k/a "Rah," DARNELL COOPER, a/k/a "Jeez," JOSE RODRIGUEZ, a/k/a "Meso," SYLVESTER WINT, a/k/a "Vesta," MARKELL BOBIAN, a/k/a "Kellz," TYRONE ERVIN, a/k/a "Shoota," SEAN GAMBRELL, a/k/a "Kash," JAVARIS JENKINS, a/k/a "JayBz," JERLAINE LITTLE, a/k/a "Noni," SHAMARE REID, a/k/a "Sha," MARKQUEL SIMMONS, a/k/a "Shellz," and TYRIQUE SNOWDEN, a/k/a "Ty," 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 that the defendant personally obtained.

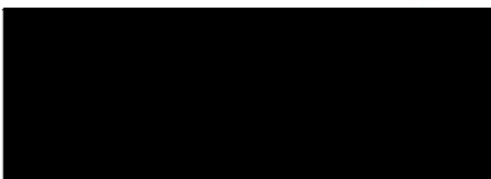
Substitute Assets Provision

64. If any of the property described above as subject to forfeiture, as a result of any act or omission of the above-named 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), 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, Sections 981 and 1963;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



Geoffrey S. Berman

GEOFFREY S. BERMAN *rs*
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

WILLIE EVANS, a/k/a "Mills," JAMARR
SIMMONS, a/k/a "Show Off," ALBERT
SHOULDERS, a/k/a "Bundy," RANELL SLOAN,
a/k/a "Rah," DARNELL COOPER, a/k/a
"Jeez," JOSE RODRIGUEZ, a/k/a "Meso,"
SYLVESTER WINT, a/k/a "Vesta," YONETTE
RESPASS, a/k/a "Yonette Davis," a/k/a
"Star Brim," MARKELL BOBIAN, a/k/a
"Kellz," TIMOTHY COLEMAN, a/k/a "LA,"
TYRONE ERVIN, a/k/a "Shoota," SEAN
GAMBRELL, a/k/a "Kash," DARON GOODMAN,
a/k/a "Handsome," JAVARIS JENKINS, a/k/a
"JayBz," JERLAINE LITTLE, a/k/a "Noni,"
SHAMARE REID, a/k/a "Sha," MARKQUEL
SIMMONS, a/k/a "Shellz," and TYRIQUE
SNOWDEN, a/k/a "Ty,"

Defendants.

SEALED
SUPERSEDING INDICTMENT

S3 20 Cr. 57 (GBD)

(18 U.S.C. §§ 922, 924(c), 924(j), 1959,
1962, and 2; 21 U.S.C. § 846.)

GEOFFREY S. BERMAN

