

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

:
: SEALED INDICTMENT

- v. -

:
: 20 Cr.

KENNETH SPEARMAN,
a/k/a "Big Man,"
a/k/a "Big Fella,"
a/k/a "Friend,"

SHELDON CLARK,
a/k/a "Sal,"

ERIC GRANT,
a/k/a "E,"

SIRON STAFFORD,
a/k/a "Sherm,"

CAMERON FRANCIS,
a/k/a "Cam,"

ISAIAH LEDGISTER,
a/k/a "Pooch,"

TRISTAN OLIVER,
a/k/a "Jay,"

JOSEPH CAMPBELL,
a/k/a "JoJo,"

ERIC GASTON,
HARVEY FOSTER,
a/k/a "Fresh,"

MAURICE WOMACK,
a/k/a "Moe,"

REGINALD CLAXTON,
a/k/a "Dread,"
a/k/a "Reggie,"

LAVELLE MAITLAND,
a/k/a "Vee," and

RAY BOYD,
a/k/a "Mustafa,"

Defendants.

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20 CRIM 631

COUNT ONE
(Narcotics Conspiracy)

The Grand Jury charges:

1. From in or about November 2019 up to and including in or

about November 2020, in the Southern District of New York and elsewhere, KENNETH SPEARMAN, a/k/a "Big Man," a/k/a "Big Fella," a/k/a "Friend," SHELDON CLARK, a/k/a "Sal," ERIC GRANT, a/k/a "E," SIRRON STAFFORD, a/k/a "Sherm," CAMERON FRANCIS, a/k/a "Cam," ISAIAH LEDGISTER, a/k/a "Pooch," TRISTAN OLIVER, a/k/a "Jay," JOSEPH CAMPBELL, a/k/a "JoJo," ERIC GASTON, HARVEY FOSTER, a/k/a "Fresh," MAURICE WOMACK, a/k/a "Moe," REGINALD CLAXTON, a/k/a "Dread," a/k/a "Reggie," LVELLE MAITLAND, a/k/a "Vee," and RAY BOYD, a/k/a "Mustafa," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that KENNETH SPEARMAN, a/k/a "Big Man," a/k/a "Big Fella," a/k/a "Friend," SHELDON CLARK, a/k/a "Sal," ERIC GRANT, a/k/a "E," SIRRON STAFFORD, a/k/a "Sherm," CAMERON FRANCIS, a/k/a "Cam," ISAIAH LEDGISTER, a/k/a "Pooch," TRISTAN OLIVER, a/k/a "Jay," JOSEPH CAMPBELL, a/k/a "JoJo," ERIC GASTON, HARVEY FOSTER, a/k/a "Fresh," MAURICE WOMACK, a/k/a "Moe," REGINALD CLAXTON, a/k/a "Dread," a/k/a "Reggie," LVELLE MAITLAND, a/k/a "Vee," and RAY BOYD, a/k/a "Mustafa," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that KENNETH SPEARMAN, a/k/a

"Big Man," a/k/a "Big Fella," a/k/a "Friend," SHELDON CLARK, a/k/a "Sal," ERIC GRANT, a/k/a "E," SIRRON STAFFORD, a/k/a "Sherm," CAMERON FRANCIS, a/k/a "Cam," ISAIAH LEDGISTER, a/k/a "Pooch," TRISTAN OLIVER, a/k/a "Jay," JOSEPH CAMPBELL, a/k/a "JoJo," ERIC GASTON, HARVEY FOSTER, a/k/a "Fresh," MAURICE WOMACK, a/k/a "Moe," REGINALD CLAXTON, a/k/a "Dread," a/k/a "Reggie," LAVELLE MAITLAND, a/k/a "Vee," and RAY BOYD, a/k/a "Mustafa," the defendants, conspired to distribute and possess with intent to distribute was 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Section 841(b)(1)(A).

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

COUNT TWO
(Conspiracy to Commit Hobbs Act Robbery)

The Grand Jury further charges:

4. On or about November 3, 2020, in the Southern District of New York and elsewhere, CAMERON FRANCIS, a/k/a "Cam," the defendant, and others known and unknown, knowingly did 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), to wit, FRANCIS and others agreed to rob at gunpoint an individual attempting to purchase narcotics and a

firearm from FRANCIS in New York, New York.

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

COUNT THREE
(Hobbs Act Robbery)

The Grand Jury further charges:

5. On or about November 3, 2020, in the Southern District of New York and elsewhere, CAMERON FRANCIS, a/k/a "Cam," the defendant, 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, FRANCIS and others robbed at gunpoint an individual attempting to purchase narcotics and a firearm from FRANCIS in New York, New York.

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

COUNT FOUR
(Firearms Use, Carrying, and Possession)

The Grand Jury further charges:

6. On or about November 3, 2020, in the Southern District of New York, CAMERON FRANCIS, a/k/a "Cam," 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 Hobbs Act robbery charged in Count 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, during the robbery charged in Count Three of this Indictment.

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

FORFEITURE ALLEGATIONS

7. As a result of committing the offense alleged in Count One of this Indictment, KENNETH SPEARMAN, a/k/a "Big Man," a/k/a "Big Fella," a/k/a "Friend," SHELDON CLARK, a/k/a "Sal," ERIC GRANT, a/k/a "E," SIRRON STAFFORD, a/k/a "Sherm," CAMERON FRANCIS, a/k/a "Cam," ISAIAH LEDGISTER, a/k/a "Pooch," TRISTAN OLIVER, a/k/a "Jay," JOSEPH CAMPBELL, a/k/a "JoJo," ERIC GASTON, HARVEY FOSTER, a/k/a "Fresh," MAURICE WOMACK, a/k/a "Moe," REGINALD CLAXTON, a/k/a "Dread," a/k/a "Reggie," LAVELLE MAITLAND, a/k/a "Vee," and RAY BOYD, a/k/a "Mustafa," 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.

8. As a result of committing the offense alleged in Counts Two and Three of this Indictment, CAMERON FRANCIS, a/k/a "Cam," the defendant, 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.

Substitute Assets Provision

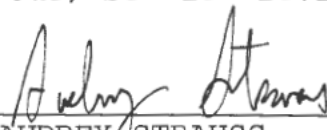
9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- 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), Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant 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


AUDREY STRAUSS
Acting United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(18 U.S.C. §§ 1951, 924(c), and 2; 21
U.S.C. § 846.)

AUDREY STRAUSS

Acting United States Attorney


Foreperson