

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
 :
 - v. - :
 :
 CARLOS LAUREANO, :
 a/k/a "Gordo," and :
 NNANDI BEN-JOCHANNAN, :
 a/k/a "BJ," :
 :
 Defendants. :
----- X

SEALED
INDICTMENT

22 Cr.

22 CRIM 058

COUNT ONE

The Grand Jury charges:

1. On or about August 12, 2014, in the Southern District of New York, CARLOS LAUREANO, a/k/a "Gordo," and NNANDI BEN-JOCHANNAN, a/k/a "BJ," the defendants, willfully and knowingly, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, a conspiracy to distribute and possess with intent to distribute mixtures and substances containing a detectable amount of heroin, and mixtures and substances containing a detectable amount of marijuana, did use and carry a firearm, and, in furtherance of such drug trafficking crime, did possess a firearm, and in the course thereof did cause the death of a person through the use of a firearm, which killing was murder as defined in Title 18, United States Code, Section 1111(a), and did aid and abet the

same, to wit, LAUREANO and BEN-JOCHANNAN shot and killed Luis Perez in the vicinity of 501 West 147th Street, in New York, New York, and did aid and abet the same.

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

COUNT TWO

The Grand Jury further charges:

2. On or about August 12, 2014, in the Southern District of New York and elsewhere, while engaged in an offense punishable under Section 841(b)(1)(A) of Title 21, United States Code, namely, a conspiracy to distribute and possess with the intent to distribute one kilogram and more of mixtures and substances containing a detectable amount of heroin and mixtures and substances containing a detectable amount of marijuana, CARLOS LAUREANO, a/k/a "Gordo," and NNANDI BEN-JOCHANNAN, a/k/a "BJ," the defendants, intentionally and knowingly killed and counseled, commanded, induced, procured, and caused the intentional killing of Luis Perez and such killing resulted, and did aid and abet the same, to wit, LAUREANO and BEN-JOCHANNAN shot and killed Luis Perez in the vicinity of 501 West 147th Street, in New York, New York, and did aid and abet the same.

(Title 21, United States Code, Section 848(e)(1)(A); Title 18,
United States Code, Section 2.)

COUNT THREE

The Grand Jury further charges:

3. From at least in or about 2018, up to and including in or about 2021, in the Southern District of New York and elsewhere, CARLOS LAUREANO, a/k/a "Gordo," the defendant, 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.

4. It was a part and an object of the conspiracy that CARLOS LAUREANO, a/k/a "Gordo," the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

5. The controlled substances that CARLOS LAUREANO, a/k/a "Gordo," the defendant, conspired to distribute and possess with the 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); and (ii) 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 FOUR

The Grand Jury further charges:

6. From at least in or about 2018, up to and including in or about 2021, in the Southern District of New York and elsewhere, CARLOS LAUREANO, a/k/a "Gordo," the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the offense charged in Count Three of this Indictment, knowingly did use and carry firearms, and in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

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

SPECIAL FINDINGS AS TO CARLOS LAUREANO AND NNANDI BEN-JOCHANNAN
REGARDING THE MURDER OF LUIS PEREZ

7. Counts One and Two of this Indictment are realleged and incorporated by reference as though fully set forth herein. As to Counts One and Two of the Indictment, alleging the murder of Luis Perez, CARLOS LAUREANO, a/k/a "Gordo," and NNANDI BEN-JOCHANNAN, a/k/a "BJ," 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)); and

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 Luis Perez died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)).

(Title 18, United States Code, Section 3591(a)(2)(D).)

FORFEITURE ALLEGATIONS

8. As a result of committing the controlled substance offense charged in Count Three of this Indictment, CARLOS LAUREANO, a/k/a "Gordo," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the 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 charged in Count Three of this Indictment.

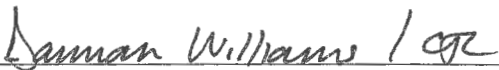
SUBSTITUTE ASSETS PROVISION

9. If any of the above-described forfeitable property, as a result of an act or omission of CARLOS LAUREANO, a/k/a "Gordo," the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)


DAMIAN WILLIAMS
United States Attorney

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Defendants.

SEALED INDICTMENT

22 Cr.
(18 U.S.C. §§ 924(c), 924(j), and 2; and
21 U.S.C. §§ 846 and 848(e).)

DAMIAN WILLIAMS
United States Attorney
