

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
UNITED STATES OF AMERICA :  
 :  
 - v. - :  
 :  
ELLIOT JAMES, :  
 a/k/a "L Boogie," :  
 a/k/a "Ace," :  
JAMEL DAVIS, :  
 a/k/a "Pootie," :  
TYLER MASSEY, :  
 a/k/a "Gordo," :  
DONOVAN MOSS, :  
 a/k/a "Don," :  
JONATHAN NUNEZ, :  
 a/k/a "Munna," :  
BRANDON RAMSEUR, :  
 a/k/a "BR," :  
JONATHAN REYES, :  
 a/k/a "Grillz," and :  
JAMEL SIMS, :  
 a/k/a "Jamal Brown," :  
 :  
 Defendants. :  
 :  
- - - - - X

SEALED INDICTMENT

17 Cr. \_\_\_\_ ( )

17 CRIM 111.

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2014, up to and including in or about February 2017, in the Southern District of New York and elsewhere, ELLIOT JAMES, a/k/a "L Boogie," a/k/a "Ace," JAMEL DAVIS, a/k/a "Pootie," TYLER MASSEY, a/k/a "Gordo," DONOVAN MOSS, a/k/a "Don," JONATHAN NUNEZ, a/k/a "Munna," BRANDON RAMSEUR, a/k/a "BR," JONATHAN REYES, a/k/a "Grillz," and JAMEL SIMS, a/k/a "Jamal

Brown," 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 ELLIOT JAMES, a/k/a "L Boogie," a/k/a "Ace," JAMEL DAVIS, a/k/a "Pootie," TYLER MASSEY, a/k/a "Gordo," DONOVAN MOSS, a/k/a "Don," JONATHAN NUNEZ, a/k/a "Munna," BRANDON RAMSEUR, a/k/a "BR," JONATHAN REYES, a/k/a "Grillz," and JAMEL SIMS, a/k/a "Jamal Brown," 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 substances that ELLIOT JAMES, a/k/a "L Boogie," a/k/a "Ace," JAMEL DAVIS, a/k/a "Pootie," TYLER MASSEY, a/k/a "Gordo," DONOVAN MOSS, a/k/a "Don," JONATHAN NUNEZ, a/k/a "Munna," BRANDON RAMSEUR, a/k/a "BR," JONATHAN REYES, a/k/a "Grillz," and JAMEL SIMS, a/k/a "Jamal Brown," the defendants, conspired to distribute and possess with intent to distribute were: (1) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A), and (2) mixtures and substances containing

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

OVERT ACTS

4. 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:

a. On or about July 19, 2016, ELLIOT JAMES, a/k/a "L Boogie," a/k/a "Ace," and JAMEL SIMS, a/k/a "Jamal Brown," the defendants, sold crack cocaine to a confidential informant in the Bronx, New York.

b. On or about August 16, 2016, JONATHAN REYES, a/k/a "Grillz," and BRANDON RAMSEUR, a/k/a "BR," the defendants, sold crack cocaine to a confidential informant in the Bronx, New York.

c. On or about October 19, 2016, JONATHAN NUNEZ, a/k/a "Munna," and JONATHAN REYES, a/k/a "Grillz," the defendants, sold crack cocaine to an undercover police officer in the Bronx, New York.

d. On or about November 2, 2016, ELLIOT JAMES, a/k/a "L Boogie," a/k/a "Ace," and DONOVAN MOSS, a/k/a "Don," the defendants, sold crack cocaine to an undercover police officer in the Bronx, New York.

e. On or about November 29, 2016, ELLIOT JAMES, a/k/a "L Boogie," a/k/a "Ace," and JONATHAN REYES, a/k/a "Grillz,"

the defendants, sold crack cocaine to an undercover police officer in the Bronx, New York.

f. On or about January 11, 2017, TYLER MASSEY, a/k/a "Gordo," the defendant, sold crack cocaine to an undercover police officer, in the Bronx, New York.

g. On or about February 10, 2017, JAMEL DAVIS, a/k/a "Pootie," and TYLER MASSEY, a/k/a "Gordo," the defendants, sold crack cocaine to an undercover police officer in the Bronx, New York.

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

COUNT TWO

The Grand Jury further charges:

5. From at least in or about 2014, up to and including in or about February 2017, in the Southern District of New York, ELLIOT JAMES, a/k/a "L Boogie," a/k/a "Ace," 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 conspiracy to distribute crack cocaine and marijuana charged in Count One of this Indictment, knowingly, did use and carry firearms, and, in furtherance of that crime, did possess firearms.

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

#### FORFEITURE ALLEGATION

6. As a result of committing the controlled substance offense charged in Count One of this Indictment, ELLIOT JAMES, a/k/a "L Boogie," a/k/a "Ace," JAMEL DAVIS, a/k/a "Pootie," TYLER MASSEY, a/k/a "Gordo," DONOVAN MOSS, a/k/a "Don," JONATHAN NUNEZ, a/k/a "Munna," BRANDON RAMSEUR, a/k/a "BR," JONATHAN REYES, a/k/a "Grillz," and JAMEL SIMS, a/k/a "Jamal Brown," the defendants, 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 or to facilitate the commission of the offense.

#### SUBSTITUTE ASSETS PROVISION

7. If any of the above-described forfeitable property, as a result of any act or omission of ELLIOT JAMES, a/k/a "L Boogie," a/k/a "Ace," JAMEL DAVIS, a/k/a "Pootie," TYLER MASSEY, a/k/a "Gordo," DONOVAN MOSS, a/k/a "Don," JONATHAN NUNEZ, a/k/a "Munna," BRANDON RAMSEUR, a/k/a "BR," JONATHAN REYES, a/k/a "Grillz," and JAMEL SIMS, a/k/a "Jamal Brown," 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 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

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



A handwritten signature in cursive script, reading "Preet Bharara".

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PREET BHARARA MS  
United States Attorney

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SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

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"Ace," JAMEL DAVIS, a/k/a "Pootie,"  
TYLER MASSEY, a/k/a "Gordo," DONOVAN  
MOSS, a/k/a "Don," JONATHAN NUNEZ, a/k/a  
"Munna," BRANDON RAMSEUR, a/k/a "BR,"  
JONATHAN REYES, a/k/a "Grillz," and  
JAMEL SIMS, a/k/a "Jamal Brown,"

Defendants.

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SEALED INDICTMENT

17 Cr. \_\_\_\_ ( )

(21 U.S.C. §§ 846 and 841; 18 U.S.C.  
§ 924(c))

PREET BHARARA

United States Attorney.

A TRUE BILL

person.