

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

RAYVON BECTON, a/k/a “Ray Cash,”
KEVIN BOWMAN, a/k/a “Boogs,”
JAVONE BROWN, a/k/a “Fly Von,”
BRIAN CABRERA, a/k/a “Pumpa,”
QUINTELL CAMPBELL, a/k/a “Quin,”
JOHNNY CARATE, a/k/a “Johnny 6,”
ENRIQUE COLLAZO, a/k/a “Ricky,”
MAURICE CULP, a/k/a “Mo Hicks,”
JAMES CUMMINGS,
RALPHIE GARCIA,
SHANE GILLETTE, a/k/a “A.K.,”
JEROME GREENE, a/k/a “Merk,”
KAREEM HENDRICKS, a/k/a “Reem,”
TERRIL HOLMES, a/k/a “50,”
SABIO IGLESIA, a/k/a “Sabo,”
KHALIF ISAAC, a/k/a “Leaf Ski,”
DION JOHNSON, a/k/a “Dion Santana,”
TRAYVON JOHNSON, a/k/a “Trigga,”
MALIK JONES, a/k/a “Nitty,”
TERRANCE MILTON, a/k/a “T-Money,”
TAYLONN MURPHY, a/k/a “Bam Bam,”
GABRIEL NEGRON, a/k/a “Turtle,”
ROBERT NELSON, a/k/a “Poopah,”
LANCE OWENS, a/k/a “Luda,”
SEAN PAGAN, as a juvenile offender,
JAVON PETERSON, a/k/a “J Burns,”
EARL PIERCE, a/k/a “Ski Beazy,”
ERIC PIERCE, a/k/a “Bullet,”
STEVEN REYNOSO,
JERRY ROBINSON, a/k/a “Ant Live,”
TROY SAUNDERS, a/k/a “Timmy,”
LEQUINT SINGLETON, a/k/a “L Money,”
LAMONT SWINTON, a/k/a “Mont,”
TRAVON THOMPSON, a/k/a “Trey,”
MOISES TORRES,
PAUL WASHINGTON, a/k/a “Paulie,”

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants **KEVIN BOWMAN**, a/k/a “Boogs,” **JAVONE BROWN**, a/k/a “Fly Von,” **BRIAN CABRERA**, a/k/a “Pumpa,” **QUINTELL CAMPBELL**, a/k/a “Quin,” **JOHNNY CARATE**, a/k/a “Johnny 6,” **MAURICE CULP**, a/k/a “Moe Hicks,” **JAMES CUMMINGS**, **SHANE GILLETTE**, a/k/a “A.K.,” **JEROME GREENE**, a/k/a “Merk,” **KAREEM HENDRICKS**, a/k/a “Reem,” **SABIO IGLESIA**, a/k/a “Sabo,” **MALIK JONES**, a/k/a “Nitty,” **TERRANCE MILTON**, a/k/a “T-Money,” **TAYLONN MURPHY**, a/k/a “Bam Bam,” **GABRIEL NEGRON**, a/k/a “Turtle,” **LANCE OWENS**, a/k/a “Luda,” **EARL PIERCE**, **ERIC PIERCE**, a/k/a “Bullet,” **TROY SAUNDERS**, a/k/a “Timmy,” **LEQUINT SINGLETON**, **LAMONT SWINTON**, a/k/a “Mont” and **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CONSPIRACY IN THE FIRST DEGREE**, in violation of Penal Law § 105.17, committed as follows:

The defendants, in the County of New York and elsewhere, during the period of time from on or about January 1, 2010 to on or about the date of this indictment, with intent that conduct constituting the crime of **MURDER IN THE SECOND DEGREE** be performed, said crime being a class “A” felony, being over eighteen years of age, agreed with each other, and with others, and with one or more persons under sixteen years of age, to engage in and cause the performance of such conduct.

THE CONSPIRACY

During the period of this conspiracy, the defendants were members of the Harlem street gang “3 Staccs,” who had residential, family or social ties to the vicinity of the New York City Housing Authority’s General Grant Houses, located between Broadway and Morningside Avenue, and West 123rd to West 125th Streets in New York County. These gang members sought to assert control over that vicinity by engaging in acts of retaliatory gun violence and physical assaults, and by threats of violence, including, but not limited to, shootings, stabbings, slashings, assaults, gang assaults, robberies, and firearms possession.

The defendants, and other members and associates both known and unknown to the Grand Jury, were parties to (1) an agreement to kill members of rival street gangs from other housing developments and neighborhoods in Harlem; (2) an agreement to acquire and possess illegal firearms and ammunition, and (3) an agreement to physically assault rival gang members and others in large groups with the intent to cause serious physical injury. The defendants entered into these agreements for the purpose of protecting their territory, demonstrating their geographical dominance over rivals both inside and outside of their territory, enhancing their status both within and without the 3 Staccs gang, and avenging acts of violence and perceived disrespect against the 3 Staccs gang members, including, but not limited to, avenging the shooting death of Tayshana “Chicken” Murphy, avenging numerous other shootings, physical assaults and robberies of 3 Staccs gang members, and

responding to geographic incursions and/or mocking of the 3 Staccs gang by rival gang members over social media.

It was part of said conspiracy for defendants (1) to attempt to kill members of rival street gangs, in particular, but not exclusively, members of the Make it Happen Boys (“M.H.B.”) and Money Avenue gangs (“M.A.”), associated with the Manhattanville Houses and Manhattan Avenue, respectively; (2) to possess illegal firearms to assert dominance in and around the General Grant Houses, and to discourage and repel incursions by rival street gangs; (3) to discourage members and associates from cooperating with law enforcement; (4) to buy and sell illegal firearms and ammunition and to facilitate street-level gun violence; (5) to engage in acts of retaliatory violence, including shootings, stabbings, slashings and beatings; (6) to protect their territory and members from threats and acts of physical violence by members of rival street gangs; (7) to demonstrate their dominance over rival street gangs, (8) to facilitate and assist in incursions into the territory of rival street gangs; (9) to enhance their status within and without 3 Staccs; (10) to compete with rival street gangs; (11) to provide each other with intelligence about police activity and enforcement efforts; (12) to keep incarcerated members informed of the activities of 3 Staccs and events occurring in and around the General Grant Houses, including, but not limited to: (a) arrests of members and associates of both the 3 Staccs gang and rival gangs; (b) acts of violence by members and associates of 3 Staccs against rival gang members; and (c) acts of violence committed by members of rival street gangs

against members and associates of 3 Staccs; (13) to communicate with members and associates of 3 Staccs on behalf of incarcerated members of 3 Staccs; and (14) to publicize and claim credit for acts of violence committed by 3 Staccs and to publically disrespect and denigrate rival gang members over social media.

It was also part of the conspiracy for the 3 Staccs gang members in their late teens and early twenties to identify and cultivate young recruits between the ages of 10 and 14 years old, in part by promising social and economic benefits and encouraging these pre-teen gang recruits (a) to become new 3 Staccs members; (b) to engage in acts of gun violence and physical violence against rival gang members; (c) to possess, carry, or otherwise assist in transporting illegal firearms for 3 Staccs members; and (d) to carry out instructions from older 3 Staccs members related to aiding 3 Staccs gang members in the commission of shootings, stabbings, slashings, beatings, and in the acquisition and possession of illegal firearms, ammunition and other weapons to be used in acts of gang violence.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about January 1, 2010, to on or about the date of this indictment, the following overt acts, among others, were committed in New York County (unless otherwise stated):

1. On or about January 27, 2010, inside of 55 LaSalle Place, defendants **PAUL WASHINGTON**, a/k/a “Paulie,” and **SABIO IGLESIA**, a/k/a “Sabo,” possessed a loaded .25 caliber firearm from which the firing pin had been removed.
2. On or about March 21, 2010, in the vicinity of Old Broadway and West 131st Street, defendants **MALIK JONES**, a/k/a “Nitty,” and **MAURICE CULP**, a/k/a “Mo Hicks,” possessed an inoperable firearm.
3. On or about January 19, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook a message to defendant **SEAN PAGAN** in part and substance stating that defendant **HENDRICKS** could help with defendant **PAGAN’S** request to be initiated into 3 Staccs.
4. On or about February 4, 2011, defendant **TROY SAUNDERS**, a/k/a “Timmy,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “DIS SHYT IS CRITICAL WID DESE VILLE NIGGAS” and that defendant **RALPHIE GARCIA** had gone to the Manhattanville Houses and shot at rival MHB gang members.

5. On or about February 26, 2011, in a telephone call recorded by the New York City Department of Correction, after an unidentified individual informed defendant **LEQUINT SINGLETON**, a/k/a “L-Money,” that defendant **KAREEM HENDRICKS**, a/k/a “Reem,” had been shot by rival MA gang members, defendant **SINGLETON** in part and substance responded that he would retaliate against whoever shot defendant **HENDRICKS**, and that “THEY GUNNING MY NIGGAS DOWN, I SWEAR TO GOD I CAN’T WAIT TIL I GET HOME.”
6. On or about February 26, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook a picture with the caption “GOD WAS ON MY SIDE LAST NIGHT COULD HAVE LOST MY LEGG SMH!” and after an unidentified individual commented “is that a bullet hole?” to which defendant **HENDRICKS** in part and substance responded, “NAHHG MAN NICCAS HIT ME W DA 38.”
7. On or about February 26, 2011, in a telephone call recorded by the New York City Department of Correction, defendant **LEQUINT SINGLETON**, a/k/a “L-Money,” spoke with an unidentified individual, in part and substance stating that he would attack any person from “THE BLOCK THAT SHOT KAREEM” either inside or outside of Department of Corrections facilities.

8. On or about February 26, 2011, in a telephone call recorded by the New York City Department of Correction, an unidentified individual spoke with defendant **LEQUINT SINGLETON**, a/k/a “L-Money,” in part and substance informing him that defendant **KAREEM HENDRICKS**, a/k/a “Reem,” had been shot by rival MA gang members.
9. On or about February 26, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance stating that defendant **HENDRICKS** had been shot with a bullet “MEANT FOR” himself or defendants **PAUL WASHINGTON**, a/k/a “Paulie,” or **JEROME GREENE**, a/k/a Merk,” and that it had been “MA NICCAS 116TH N MORNINGSIDE” that had shot him.
10. On or about February 26, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance stating that defendant **HENDRICKS** knew who shot him, and so that when he recovered those “NICCAS ON THE DA PLATE.”

11. On or about February 27, 2011, in a telephone call recorded by the New York City Department of Correction, defendants **MALIK JONES**, a/k/a “Nitty,” and **JERRY ROBINSON**, a/k/a “Ant Live,” engaged in a conversation in part and substance discussing the shootings of defendants **PAUL WASHINGTON**, a/k/a “Paulie,” and **KAREEM HENDRICKS**, a/k/a “Reem.”
12. On or about March 2, 2011, in a telephone call recorded by the New York City Department of Correction defendant **MALIK JONES**, a/k/a “Nitty,” spoke with defendant **MAURICE CULP**, a/k/a “Mo Hicks,” in part and substance thanking defendant **CULP** for providing him with commissary money and discussing the shootings of defendants **PAUL WASHINGTON**, a/k/a “Paulie,” and **KAREEM HENDRICKS**, a/k/a “Reem,” and stating that defendants **JONES** and **CULP**, and other 3 Staccs gang members needed to shoot or otherwise attack rival MA gang members.
13. On or about March 2, 2011, in a telephone call recorded by the New York City Department of Correction, defendant **MALIK JONES**, a/k/a “Nitty,” spoke with defendant **JERRY ROBINSON**, a/k/a “Ant Live,” in part and substance attempting to identify the person who had shot defendant **KAREEM HENDRICKS**, a/k/a “Reem.”

14. On or about March 3, 2011, in a telephone call recorded by the New York City Department of Correction, defendant **MAURICE CULP**, a/k/a “Mo Hicks,” spoke with defendant **MALIK JONES**, a/k/a “Nitty,” in part and substance stating that members of 3 Staccs were “MOBBING” and that they “WANTED TO HOLD THE HAMMER” and were going to “TAKE AN MA TRIP” during which they would shoot rival gang members, and that “NIGGAS IS GETTING HIT, I’M NOT PLAYING,” to which defendant **JONES** responded that defendant **CULP** and others should “MAKE SURE YOU CAN DO THAT.”
15. On or about March 27, 2011, defendant **TAYLONN MURPHY**, a/k/a “Bam,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance informing the individual that he had shot at rival gang members and stating, “I CLAPPED AT YOUR MAN SALENDINE THEM TND NIGGAS THEM ND THE M.A. NIGGAS ON 25TH AND 7TH LAST WEEKEND” AND THAT “WORD AROUND HARLEM IS THEY WANT MY HEAD.”
16. On or about April 7, 2011, defendant **TAYLONN MURPHY**, a/k/a “Bam,” caused or permitted to be posted on Facebook a status update in part and in substance stating, “I SHOT AT SOME NIGGAS ND ALL THAT.”

17. On or about April 12, 2011, defendant **TAYLONN MURPHY**, a/k/a “Bam,” caused or permitted to be posted on Facebook a message to Walter Sumter, a/k/a “Recc,” in part and substance stating, “M.A. TO THIS DICK NIGGA THIS 3STACKS BAM THE NIGGA THAT ALMOST FLOCKA UR BITCH ASS ON 25TH AND 7TH ALL Y’ALL SMD!” and “SCREAM M.A. K GET SHOT IN BROAD DAY.”
18. On or about May 1, 2011, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance discussing getting shot at the previous day.
19. On or about May 1, 2011, an identified 3 Staccs co-conspirator caused or permitted to be posted on Facebook a photograph of several 3 Staacs gang members displaying 3 Staacs gang signs, tagging defendants **KEVIN BOWMAN**, a/k/a “Boogs,” **MAURICE CULP**, a/k/a “Mo Hicks,” **TAYLONN MURPHY**, a/k/a “Bam,” **ROBERT NELSON**, a/k/a “Pooh Pah,” **JAVON PETERSON** a/k/a “J Burns,” **PAUL WASHINGTON**, a/k/a “Paulie,” and several other individuals.

20. On or about May 4, 2011, defendant **LANCE OWENS**, a/k/a “Luda,” mailed a letter to defendant **TAYLONN MURPHY**, a/k/a “Bam,” in part and substance informing defendant **MURPHY** that defendant **OWENS** would attack and kill rival gang members when he was released from jail, stating “NIGGAS IS GETTING PETERROLLED ON MY GORILLA SHIT,” and “2011 SUMMER IS MINE, MY NIGGA, NIGGAS IS GETTING BODIED.”
21. On or about May 14, 2011, defendant **TAYLONN MURPHY**, a/k/a “Bam,” uploaded, to the website worldstarhiphop.com, a video of himself assaulting an unidentified individual.
22. On or about May 28, 2011, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a message to Davon de Vega, a person defendant **PETERSON** later assaulted on October 5, 2011, in part and substance threatening “WE GOIN KILL YA PUSSY NIGGAS TONIGHT.”
23. On or about June 2, 2011, inside Morningside Park in the vicinity of Morningside Avenue and West 118th Street, defendant **GABRIEL NEGRON**, a/k/a “Turtle,” shot a rival MA gang member, in the face and buttocks, as co-conspirator Carl Jones and an unidentified individual stood next to defendant **NEGRON**.

24. On or about June 2, 2011, inside Morningside Park in the vicinity of Morningside Avenue and West 118th Street, defendant **GABRIEL NEGRON**, a/k/a “Turtle,” handed co-conspirator Carl Jones the firearm which defendant **NEGRON** had just used to shoot a rival MA gang, and which Jones then carried away from the scene of the shooting.
25. On or about June 3, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance bragging about the shooting of a rival gang member by defendant **GABRIEL NEGRON**, a/k/a “Turtle,” stating "MAN DOWN."
26. On or about June 3, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook, a message to an unidentified individual in part and substance asking the individual to get defendant **HENDRICKS** a gun by tomorrow because “NIGGAS WAS FOLLOWING ME” to which the individual responded that it wasn’t a problem and that he will give the gun to defendant **HENDRICKS** as soon as possible.
27. On or about June 3, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook, a message to an unidentified individual in part and substance stating that people are in hiding because 3 Staccs “GOT A MAN DOWN” on “MA.”

28. On or about June 3, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook a status update in part and substance stating, “FREE DA LIL HOMIE SPUNK!”
29. On or about June 4, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook, a message to an unidentified individual in part and substance asking if that individual could keep a gun in her apartment for the night.
30. On or about June 4, 2011, after being asked if he had been shot at, defendant **TAYLONN MURPHY**, a/k/a “Bam,” caused or permitted to be posted on Facebook a reply to an unidentified individual, in part and substance stating, “IM GOOD BRO THEY SHOT ND MISS WE SHOOT TO KILL.”
31. On or about June 5, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance offering to trade a “.22 long nose” firearm for a different firearm.
32. On or about June 5, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance asking that individual to “HOLD THE HAMMER” for the night.

33. On or about June 6, 2011, defendant **BRIAN CABRERA**, a/k/a “Pumpa,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “GUUU LOOKS FOR TELLINN ME” that someone was going to attack defendant **CABRERA’S** friend and threatening, “NOW IMAA REALII KILL SOMEONE.”
34. On or about June 7, 2011, defendant **LANCE OWENS**, a/k/a “Luda,” mailed a letter to defendant **TAYLONN MURPHY**, a/k/a “Bam,” in part and substance stating that he had engaged in a large number of fights in juvenile detention, and “I POPPED SO MANY BOTTLES IN HERE I LOST COUNT.”
35. On or about June 10, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook an inbox message to an unidentified individual in part and substance asking the individual to try and set up “Mike Slimes” for defendant **HENDRICKS** in retaliation for defendant **HENDRICKS** having been shot, that defendant **HENDRICKS** "WANTS A MAN DOWN," “I WANNA KILL DIS NICCA DEAD ASS” and “DIS MIKE SLIMES NICCA GOTTA DIE.”
36. On or about June 18, 2011, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a status update in part and substance stating, “FUCKE MA EVERYTHING KILLA.”

37. On or about June 24, 2011, defendant **TRAVON THOMPSON**, a/k/a “Trey,” caused or permitted to be posted on Facebook a photograph of himself displaying 3 Staacs gang signs.
38. On or about June 27, 2011, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” caused or permitted to be posted on Facebook a message to defendant **BRIAN CABRERA**, a/k/a “Pumpa,” in part and substance stating that rival gang members had shot in the air at 3 Staccs gang members, to which defendant **CABRERA** in part and substance responded, “IMAM REALL SHOW THESE LIL NIKKAS A LESSON WERT2 3STACKS IM NOT PLAYINN.”
39. On or about June 28, 2011, defendant **KHALIF ISAAC**, a/k/a “K Leaf Ski,” caused or permitted to be posted on Facebook a message to defendant **BRIAN CABRERA**, a/k/a “Pumpa,” in part and in substance discussing purchasing a firearm, stating “MY BOI I GOT 50 CASH FOR U RITE NOW...NO MORE THAN 60 THO CUZ I’M DOWN RITE NOW BRO.”
40. On or about June 30, 2011, in a telephone call recorded by the New York City Department of Correction, defendant **GABRIEL NEGRON**, a/k/a “Turtle,” was informed by an unidentified individual that defendants **PAUL WASHINGTON**, a/k/a “Paulie,” and **MAURICE CULP**, a/k/a “Mo Hicks,” had “JUMPED” rival gang members.

41. On or about July 17, 2011, defendant **TRAVON THOMPSON**, a/k/a “Trey,” caused or permitted to be posted on Facebook a status update in part and substance affirming his allegiance to 3 Staccs and advocating the release from prison of defendant **GABRIEL NEGRON**, a/k/a “Turtle,” who was incarcerated for shooting a rival MA gang member, stating, "3 STACCS FOR REAL" and "FREE TURTLE."
42. On or about July 24, 2011, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a status update in part and substance stating, “FREE GRIMEY GRANT 3SOE IF U NOT DWN U K EVERYTHING KILLA SHOUT OUT TO MY GUY PAULY HE BE BAK THIS MONTH CUMIN UP.”
43. On or about August 16, 2011, defendant **KEVIN BOWMAN**, a/k/a “Boogs,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance discussing possessing firearms, referring to guns as "SPEAKERS THAT ARE GONNA HAMMER," and stating that they were "AT HIS LADY'S PLACE" and not his own.
44. On or about August 20, 2011, defendant **BRIAN CABRERA**, a/k/a “Pumpa,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance asking to borrow the individual’s firearm.

45. On or about August 21, 2011, in the vicinity of Amsterdam Avenue and West 125th Street defendant **EARL PIERCE**, a/k/a “Skee Beezy,” in part and substance stated, “FUCK MANHATTANVILLE, SOMEONE IS GOING TO DIE TONIGHT!” and threw a glass bottle at a rival gang member.
46. On or about August 21, 2011, defendant **BRIAN CABRERA**, a/k/a “Pumpa,” caused or permitted to be posted on Facebook a message to defendant **TROY SAUNDERS**, a/k/a “Timmy,” in part and substance bragging about a fight that occurred between 3 Staccs and MA.
47. On or about August 21, 2011, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a status update in part and substance stating “FUK MA EVERYTHING KILLA.”
48. On or about August 22, 2011 in a telephone call recorded by the New York City Department of Correction, defendant **EARL PIERCE**, a/k/a “Skee Beezy,” spoke with an unidentified individual in part and substance stating that he “HAD BEEF” with “THE MANHATTANVILLE BOYS” and that he had swung razor blades at MHB gang members during a fight and hit one with a razor, which he discarded before he was arrested by police.
49. On or about August 23, 2011 in a telephone call recorded by the New York City Department of Correction, defendant **EARL PIERCE**, a/k/a “Skee Beezy,” spoke with an unidentified individual, in part and substance asking for the phone number for defendant **KEVIN BOWMAN**, a/k/a “Boogs.”

50. On or about August 24, 2011, defendant **TAYLONN MURPHY**, a/k/a “Bam,” caused or permitted to be posted on Facebook a status update in part and substance stating, “MONEY AVE KILLER SENDING BULLETS TO THEY LIVER!”
51. On or about August 24, 2011, in a telephone call recorded by the New York City Department of Correction, defendant **EARL PIERCE**, a/k/a “Skee Beezy,” spoke with an unidentified individual, in part and substance threatening to harm rival MHB gang member, Christopher Hendrickson, a/k/a “Noodles,” stating “IT'S OVER FOR NOODLES.”
52. On or about August 27, 2011, defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” caused or permitted to be posted on Facebook a message to defendant **BRIAN CABRERA**, a/k/a “Pumpa,” in part and substance asking what he did last night, to which defendant **CABRERA** in part and substance responded that he beat the shit out of “HIM” and had “HIM” gushing blood.

53. On or about August 27, 2011, in a telephone call recorded by the New York City Department of Correction defendant **SABIO IGLESIA**, a/k/a “Sabo,” spoke with defendant **KEVIN BOWMAN**, a/k/a “Boogs,” in part and substance discussing the shooting of identified 3 Staccs co-conspirator “Cito,” with defendant **IGLESIA** stating, “YO WAIT TIL I GET HOME BOOGA LUV, I SWEAR TO GOD WE TURN EVERYTHING UP MY NIGGA,” to which defendant **BOWMAN** in part and substance responded, “HELL YEAH, I ALREADY KNOW,” to which defendant **IGLESIA** in part and substance replied, “EVERYTHING, NIGGAS IS PLAYING UNFAIR MY NIGGA, AND WE THE ONLY ONES THAT REALLY PLAY FAIR...NO MY NIGGA, NO MORE SON.”
54. On or about August 27, 2011, in a telephone call recorded by the New York City Department of Correction, defendant **SABIO IGLESIA**, a/k/a “Sabo,” spoke with defendants **KEVIN BOWMAN**, a/k/a “Boogs,” **MALIK JONES**, a/k/a “Nitty,” **ERIC PIERCE**, a/k/a “Bullet,” and **JERRY ROBINSON**, a/k/a “Ant Live,” and other unidentified individuals, in part and substance stating that when he got home we was "HITTING 1315 HEADQUARTERS" and attacking rival gangs both "DOWNTOWN" and "TO THE EAST," and advising that "PEOPLE HAVE TO DIE" and the "MISSION ISN'T COMPLETE" until "THE TWINS" and the "MAN DOWNTOWN" have been killed.

55. On or about August 27, 2011, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” caused or permitted to be posted on Facebook a status update in part and substance stating, “POLICE KEEP HARASSING ME CUZ IM THUGGIN 2 HARD AINT NO CONTROLLING ME IM DOWN WITH 3STACCS!!!!!”
56. On or about August 28, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook, a message to defendant **TROY SAUNDERS**, a/k/a “Timmy,” in part and substance stating, no “VILLE NIGGA” is good, “NO TALKING WE KILLING HIM,” that they also have to beat up “JP” and that “HE GONNA DIE I SWEAR” and “HE SAID HE GONNASKAK ME KUZ I SHOT AT THEM.”
57. On or about September 2, 2011, defendant **SEAN PAGAN** caused or permitted to be posted on Facebook a message to defendant **RALPHIE GARCIA** in part and substance stating, “WHEN WE GOING TO M.A.? I GOTTA PUT IN THT WORK.”
58. On or about September 8, 2011, in the vicinity of 1315 Amsterdam Avenue, defendants **KEVIN BOWMAN**, a/k/a “Boogs,” **RALPHIE GARCIA**, **SABIO IGLESIA**, a/k/a “Sabo,” **EARL PIERCE**, a/k/a “Skee Beezy,” **NICHOLAS RAMIREZ**, **STEVEN REYNOSO**, **LAMOUNT SWINTON**, a/k/a “Mont,” and **PAUL WASHINGTON**, a/k/a “Paulie,” possessed a loaded .40 caliber firearm.

59. On or about September 9, 2011, 3 Staccs gang member Antoine Nicholson, a/k/a "Lights," caused or permitted to be posted on Facebook, messages to defendant **TROY SAUNDERS**, a/k/a "Timmy," in part and substance informing him that defendant **RALPHIE GARCIA** got arrested with the firearm that they had gone to "Money Ave" with.
60. On or about September 9, 2011, defendant **BRIAN CABRERA**, a/k/a "Pumpa," caused or permitted to be posted on Facebook, messages to defendant **KHALIF ISAAC**, a/k/a "K Leaf Ski," in part and substance informing him that defendant **RALPHIE GARCIA** and three other 3 Staccs gang members were arrested and that the police found the gun.
61. On or about September 11, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a message to defendant **TROY SAUNDERS**, a/k/a "Timmy," in part and substance stating that defendant **GARCIA** "TOOK THAT CHARGE" in relation to the .40 caliber handgun found by the police on September 8, 2011, and that defendant **SAUNDERS** should tell defendants **KEVIN BOWMAN**, a/k/a "Boogs," and **PAUL WASHINGTON**, a/k/a "Paulie," that defendant **GARCIA** had taken the charge so they would remain at liberty, and that defendant **GARCIA** had led the police to believe that the gun was related only to defendant **GARCIA**, and that defendant **GARCIA** would only have to do a short amount of jail time in a

juvenile facility because of his age and criminal record, and to "MAKE SURE TO TELL BOOGS AND PAULIE THOSE ITZACT WORDS."

62. On or about September 11, 2011, defendant **KHALIF ISAAC**, a/k/a "K Leaf Ski," caused or permitted to be posted on Facebook message to defendant **PAUL WASHINGTON**, a/k/a "Paulie," in part and substance stating, "WHO THE FUCK SHOT CHICKEN CAUSE THEY DEAD."
63. On or about September 11, 2011, defendant **BRIAN CABRERA**, a/k/a "Pumpa," caused or permitted to be posted on Facebook, a message to an unidentified individual in part and substance stating, those "VILLE NIKKAS" are dead.
64. On or about September 11, 2011, in a telephone call recorded by the New York City Department of Correction, an unidentified individual spoke with defendant **KAREEM HENDRICKS**, a/k/a "Reem," in part and substance informing him that Tayshana Murphy been shot and killed by rival MHB gang members.
65. On or about September 16, 2011, in a telephone call recorded by the New York City Department of Correction, defendant **KAREEM HENDRICKS**, a/k/a "Reem," spoke with an unidentified individual in part and substance stating that he would attack members of a rival gang in retaliation for the murder of Tayshana Murphy, but that he might not be able "TO GET TO THEM" because they were in "PROTECTIVE CUSTODY."

66. On or about September 17, 2011, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a status update in part and substance stating, “MHB KKKK.”
67. On or about September 20, 2011, defendants **ROBERT NELSON**, a/k/a “Pooh Pah,” and **MAURICE CULP**, a/k/a “Mo Hicks,” caused or permitted to be posted on Facebook a conversation in which defendant **NELSON** explained that it was not he but defendant **ERIC PIERCE**, a/k/a “Bullet,” who had sold defendant **CULP’S** gun without defendant **CULP’S** permission, and defendant **NELSON** added that defendant **PIERCE** would get another gun to replace it and that defendant **NELSON** had told defendant **PIERCE** “NOW WE DOWN A HAMMER” to which defendant **CULP** responded “WE DON’T HAVE NOTHING RIGHT NOW, THAT’S CRAZY.”
68. On or about October 1, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a status update in part and substance bragging that he and defendant **QUINTELL CAMPBELL**, a/k/a “Quin,” just shot at MA, stating “ME AND QUINTELL CAMPBELL JUST POPPED ON DA M.A NIGGA THEY NOT READY FOR ME OR MY BRO ITS QUIET FOR MONEY AVE SILENT AND ALL.”

69. On or about October 2, 2011, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a status update in part and substance stating, “3STACCS WE AIN PLAYING GAMES WIT DESE NIGGAS LOCKED UP WE GOIN BRING THE PAIN TO THESE NIGGAS LETTING OFF SHOTS I GOT AIM FOR THESE NIGGAS HEADSHOTS IMA LEAVE A STAIN IN U NIGGA...IF YOU WANT BEEF WE EMPTYING DEM CLIPS RUNNING FROM THE D’S AND MY TEAM MOVIN QUICK.”
70. On or about October 14, 2011, in a telephone call recorded by the New York City Department of Correction, defendant **JAVONE BROWN**, a/k/a “Fly Von,” spoke with defendant **SABIO IGLESIA**, a/k/a “Sabo,” in part and substance stating that he would take revenge for the shooting of defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” now that the person he believed had shot defendant **JOHNSON** was in jail with him, stating in part and substance "TELL TRIGGA I GOT THAT LITTLE NIGGA."
71. On or about October 27, 2011, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” caused or permitted to be posted on Facebook a status update in part and substance stating, “LIVE BY THE GUN DIE BY THE GUN.”

72. On or about November 11, 2011, defendant **TAYLONN MURPHY**, a/k/a “Bam,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance discussing “DA GOONIE RECC” in which the other individual informed defendant **MURPHY** that “DA GOONIE RECC” was insulting the memory of Tayshana Murphy and defendant **MURPHY** responded “MONEY AVE THEY DEAD ITS ON SIGHT BEEF” and “HE DEAD HOW YOU KNOW HIM.”
73. On or about November 16, 2011, in the vicinity of 3170 Broadway, defendant **JOHNNY CARATE**, a/k/a “Johnny 6,” and an identified 3 Staccs co-conspirator attacked and stomped a rival gang member.
74. On or about November 16, 2011, defendant **KEVIN BOWMAN**, a/k/a “Boogs,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance threatening to kill a rival gang member and "PUT A SMILEY ON HIS FACE."
75. On or about November 20, 2011, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” caused or permitted to be posted on Facebook an a message to the mother of a rival gang member, in part and substance, in response to the mother’s request to stop the gang violence, stating “I WONT BE DISRESPECTFUL BUT THAT’S NEVA GUNNA HAPPENED ITS ONLY GUNNA END ONE WAY N I SEE UR PICS SO I NOE WAT SIDE U ON SO TELL THEM 2 GRIP UP DON’T SLIP UP.”

76. On or about November 20, 2011, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a status update in part and substance stating, “WHY NEGGAS VIOLATING MY SET LIKE WE DONT GIVE IT UP NEGGAS SEE US ALL THE TIME AND DONT SAY NUFFIN PUSSC LIL HOMIES ND FOR THE LEADERS OF YOUR CREW BRING YOURSELF CAUSE YOUR LIL MAN DONT NOE HOW TO FINISH A GROWN MAN JOB LIL RIDERS SUCH MY DILLA M.A KILLA.”
77. On or about November 26, 2011, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” caused or permitted to be posted on Facebook a status update in part and substance stating, “I TALK MA SHIT CUZ I WALK MA SHIT N EVER SINCE CHICKEN DIED THE 45 IS WAT I’M WALKIN WITH!!!!”
78. On or about December 11, 2011, defendants **SHANE GILLETTE**, a/k/a “A.K.,” and an identified 3 Staccs co-conspirator caused or permitted to be posted on Facebook a conversation in part and substance discussing plans to go "SHOOTING AT THE VILLE."
79. On or about December 17, 2011, defendant **SHANE GILLETTE**, a/k/a “A.K.,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “IMAM TRY 2 SAVE 4 A HAMMER.”

80. On or about December 23, 2011, in the vicinity of Amsterdam Avenue and West 125th Street, defendants **SABIO IGLESIA**, a/k/a “Sabo,” **ROBERT NELSON**, a/k/a “Pooh Pah,” **STEVEN REYNOSO** and **LEQUINT SINGLETON**, a/k/a “L-Money,” along with other 3 Staccs co-conspirators, attacked and repeatedly punched, kicked and stomped on a rival gang member, then threw a bottle at a rival gang member, and then fled into the Grant Houses.
81. On or about December 23, 2011, defendant **SHANE GILLETTE**, a/k/a “A.K.,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “BE THERE LYK MONDAY SO HAVE DA HAMMER WE OUT 2 DA VILLIE.”
82. On or about December 29, 2011, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, "ME AND BAM AND T-MONEY THREW BITCHES IN THE GRAVEYARD FOR REAL.”
83. On or about December 30, 2011, in the immediate aftermath of the shooting death of rival MA gang member Walter Sumter, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a status update in part and substance stating, "NIGGAS DIE EVERY DAY.”

84. On or about December 30, 2011, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” caused or permitted to be posted on Facebook, a status update in part and substance stating that all the members of 3 Staccs are continuing Tayshana “Chicken” Murphy’s name and they will rep for her in any fashion and in whatever they do.
85. On or about December 31, 2011, in the vicinity of Amsterdam Avenue and West 125th Street, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” disrupted vehicular traffic fleeing from P.O. Anthony Diliberto, while holding his waistband.
86. On or about December 31, 2011, defendant **SHANE GILLETTE**, a/ka/ “A.K.,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating that he had told rival gang members “U GONNA END UP LYK REC” in reference to the murder of rival MA gang member WALTER SUMTER.
87. On or about January 5, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” spoke with an unidentified individual in part and substance stating that "ONCE WE TAKE DOWN ONE FROM YOUR BLOCK, WE'LL BE GOOD" and that "NIGGAS IS TRYING TO BE LEGENDARY."

88. On or about January 8, 2012, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a status update in part and substance stating, “MY NIGGAS IS WILDING AIN’T SHOWING NOE RESPECT, FRONT ON A 3STACKS NIGGA ITS GONNA BE R.I.P YOUR SET.”
89. On or about January 9, 2012, following the homicide of rival MA gang member Walter Sumter, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” caused or permitted to be posted on Facebook a message to an unidentified rival in part and in substance stating, , “NOW . . . YALL . . . NOE . . . HOW . . WE . . FEEL . . DON’T . . FOR . . GET . . TO . . GET . . ME . . A . . CHAIN.”
90. On or about January 9, 2012, defendant **MAURICE CULP**, a/k/a “Mo Hicks,” caused or permitted to be posted on Facebook a status update in part and substance stating, “FOR ALL YOU LIL DUM ASS GRANT NIGGAS THE COBS IS ON FB...SO WHY THE FUCK ARE YALL PUTTING SHIT UP ABOUT BEEF ON FB!!!”
91. On or about January 21, 2012, defendant **JAVONE BROWN**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a message to rival gang member “Kenny Montana” in part and substance stating, “YO U JACKIN GRANT K? CANT WAIT TO SEE YOU ITS ON SITE RNS U DEAD.”

92. On or about February 2, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke with defendant **SABIO IGLESIA**, a/k/a “Sabo,” in part and substance stating that we was going to attack a rival Money Avenue gang member in Riker's Island infirmary.
93. On or about February 10, 2012, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a status update in part and substance stating, “IM TIRED OF NIGGAS JACKING 3STACKS K YOU DONT LIKE THE MOVEMENT THEN TRY TO COME AND TAKE OVER OUR ORGANIZATION AND WATCH WAT THE OUTCOME BE!! STACK CITY BITCH!!!”
94. On or about February 12, 2012, defendant **LANCE OWENS**, a/k/a “Luda,” mailed a letter to defendant **TAYLONN MURPHY**, a/k/a “Bam,” in part and substance stating that, while in jail, defendant **OWENS** had “BEAT UP THE MARQUISE NIGGA FROM M.A. & SPIT ON HIM,” that “WAS GONE POKE” a person named Darrell, and that “ME AND MY SON" defendant **GABRIEL NEGRON**, a/k/a “Turtle,” were “THE ONLY NIGGAS IN HERE PUTTIN IN WORK FOR THE BLOCK.”

95. On or about February 17, 2012, in a telephone call recorded by the New York City Department of Correction, defendants **PAUL WASHINGTON**, a/k/a “Paulie,” and **TERRANCE MILTON**, a/k/a “T-Money,” engaged in a conversation in part and substance discussing the fact that 3 Staccs gang members had a gun available to use in case anyone attacked or otherwise disrespected them, in response to defendant **MILTON** stating that his concern that “THE BLOCK IS DRY.”
96. On or about February 21, 2012, in the vicinity of 550 West 125th Street, defendant **TERRANCE MILTON**, a/k/a “T-Money,” accompanied and surrounded by defendants **JEROME GREENE**, a/k/a “Merk,” **DION JOHNSON**, **TAYLON MURPHY**, a/k/a “Bam,” **ERIC PIERCE**, a/k/a “Bullet,” and **LEQUINT SINGLETON**, a/k/a “L-Money,” as well as numerous other 3 Staccs co-conspirators, fired a handgun at rival gang members and then fled with the handgun into 550 West 125th Street.
97. On or about March 9, 2012, defendant **KHALIF ISAAC**, a/k/a “K Leaf Ski,” caused or permitted to be posted on Facebook, a message to defendant **QUINTELL CAMPBELL**, a/k/a “Quin,” in part and substance asking him what happened to Nitty, to which defendant **CAMPBELL** in part and substance responded that he was shot in the butt by MA.

98. On or about March 9, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” spoke with defendant **KEVIN BOWMAN**, a/k/a “Boogs,” in part and substance stating that defendant **HENDRICKS** would retaliate for the shooting of defendant **MALIK JONES**, a/k/a “Nitty,” when defendant **HENDRICKS** returned from jail, after which they discussed efforts to identify the shooter of defendant **JONES**.
99. On or about March 9, 2012, defendant **QUINTELL CAMPBELL**, a/k/a “Quin,” caused or permitted to be posted on Facebook a message to defendant **KHALIF ISAAC**, a/k/a “K Leaf Ski,” in part and substance discussing how defendant **MALIK JONES**, a/k/a “Nitty” was shot in the buttocks by MA.
100. On or about March 15, 2012, defendant **KHALIF ISAAC**, a/k/a “K Leaf Ski,” caused or permitted to be posted on Facebook a message to defendant **ERIC PIERCE**, a/k/a “Bullet,” in part and substance asking him for a gun.
101. On or about March 18, 2012, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a message to defendant **ENRIQUE COLLAZO**, a/k/a “Ricky,” in part and substance discussing how he shot at rival gang members the night that defendant **MALIK JONES**, a/k/a “Nitty,” was shot, stating “THE NIGHT BROOK NITTY GOT SHOT I POPED ON ONE OF THEM IN FRONT OF MY GRANDMOTHER BUILDING!”

102. On or about March 24, 2012, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a message to defendant **TROY SAUNDERS**, a/k/a “Timmy,” in part and substance stating, “WE COULD RUN THROUGH THE VILLE SHIT I GOT THE GRIP AND THE LIL BILLY NIGGA HAVING A COOKOUT.”
103. On or about April 5, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **KAREEM HENDRICKS**, a/k/a “Reem,” spoke to an unidentified individual in part and substance stating, “YOU ALREADY KNOW WHEN I COME HOME IT’S TIME TO GUNS IT DOWN.”
104. On or about April 7, 2012, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, "3 STACCS DID NOT GET INDICTED," and claiming that he was "A TOP 5 SHOOTER" in 3 Staccs.
105. On or about April 7, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **TERRANCE MILTON**, a/k/a “T-Money,” spoke with defendant **JEROME GREENE**, a/k/a “Merk,” who in part and substance complained that there were not enough 3 staccs members around the Grant Houses, stating, “BOOG, SAB, BAM, PAULIE, POOPA, JOEY, VAUGHN AND OTHERS” were incarcerated and that "THE BLOCK IS EMPTY," after which they discussed whether an indictment of 3 Staccs as a group had led to the arrest of many of their fellow gang members.

106. On or about April 7, 2012, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a status update in part and substance bragging about the “3 staccs” gang not having been indicted.
107. On or about April 7, 2012, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a message, to an unidentified individual, in part and substance stating, "3 STACCS DID NOT GET INDICTED" and that he was "A TOP 5 SHOOTER" in 3 Staccs.
108. On or about April 8, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **TERRANCE MILTON**, a/k/a “T-Money,” spoke to defendant **JEROME GREENE**, a/k/a “Merk,” who in part and substance stated that he, defendant **KEVIN BOWMAN**, a/k/a “Boogs,” and other members of 3 Staccs had a .22 caliber gun, in case there are any "SITUATIONS" that they need to handle.
109. On or about April 13, 2012, defendant **MALIK JONES**, a/k/a “Nitty/Brook-Nitty,” caused or permitted to be posted on Facebook a photograph of several 3 Staacs gang members displaying 3 Staacs gang signs, tagging defendants **MALIK JONES**, a/k/a “Nitty/Brook-Nitty,” **JERRY ROBINSON**, a/k/a “Ant Live,” **MAURICE CULP**, a/k/a “Mo Hicks,” and other persons.

110. On or about April 16, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **TERENCE MILTON**, a/k/a “T-Money,” spoke with an unidentified individual in part and substance stating that there would be violence against other gangs when he returned from jail.
111. On or about April 17, 2012 in a telephone call recorded by the New York City Department of Correction, defendant **TERENCE MILTON**, a/k/a “T-Money,” spoke to defendant **LEQUINT SINGLETON**, a/k/a “L-Money,” who in part and substance stated that he had beaten up rival gang member “Monster,” to which defendant **MILTON** in part and substance responded, “WHEN I COME HOME WE GONNA CATCH A RECC ON THEM.”
112. On or about April 29, 2012, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” caused or permitted to be posted on Facebook a message to rival MA gang member Davon Pinkston in part and substance mocking rival MA gang member Walter Sumter's death.
113. On or about May 13, 2012, in front of 1305 Amsterdam Avenue, defendants **SABIO IGLESIA**, a/k/a “Sabo,” and **LEQUINT SINGLETON**, a/k/a “L-Money,” assaulted an unidentified individual, with defendant **IGLESIA** punching the individual in the back of the head, knocking him to the pavement, and defendant **SINGLETON** striking the individual with a metal trash can, rendering him unconscious.

114. On or about May 21, 2012, defendant **SHANE GILLETTE**, a/k/a “A.K.,” caused or permitted to be posted on Facebook a message to defendant **ERIC PIERCE**, a/k/a “Bullet,” in part and substance informing defendant **PIERCE** that defendant **ROBERT NELSON**, a/k/a “Pooh Pah,” had left a gun in front of 550 West 125th Street, but that the police had not found that gun.
115. On or about June 20, 2012, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a status update in part and in substance stating, “GUNS AND BULLET, 3STACKS TO THE FULLEST!!!!!!”
116. On or about June 23, 2012, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a status update in part and substance stating, “IMA SHOW YOU WAT MY GUN A DOO BUT IF YOU IN MY HOOD THEN WERE YOU THINK YOU RUNNIN TO?”

117. On or about June 28, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **GABRIEL NEGRON**, a/k/a “Turtle,” spoke to defendant **TERRANCE MILTON**, a/k/a “T-Money,” who in part and substance informed defendant **NEGRON** that defendant **PAUL WASHINGTON**, a/k/a “Paulie,” was also in Riker’s Island with defendant **NEGRON**. Defendant **NEGRON** then spoke to an unidentified individual in part and substance discussing arranging visits from fellow gang members “NITTY, MO, AND CHARLES,” and stating that he was up to “JUST REGULAR SHIT FOR US 3 STACCS NIGGAS.”
118. On or about June 28, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **GABRIEL NEGRON**, a/k/a “Turtle,” spoke to an unidentified individual in part and substance stating that he had fought with rival gang members while in jail and that he had heard that defendant **TAYLONN MURPHY**, a/k/a “Bam,” was knocking people out and putting them in the hospital. Defendant **NEGRON** then spoke to defendant **MURPHY** who in part and substance stated, “I GOT CAUGHT WITH BULLETS AND SHIT.”

119. On or about July 10, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **GABRIEL NEGRON**, a/k/a “Turtle,” spoke with an unidentified individual in part and substance stating that he would “TAKE ONE FOR THE GANGSTERS” and that he “LOVED THE HOOD.”
120. On or about July 10, 2012, an identified 3 Staccs co-conspirator caused or permitted to be posted on Facebook a message, to defendant **ERIC PIERCE**, a/k/a “Bullet,” in part and substance accusing defendant **PIERCE** of letting that co-conspirator get shot at without helping that co-conspirator.
121. On or about July 21, 2012, in a telephone call recorded by the New York City Department of Correction, defendants **GABRIEL NEGRON**, a/k/a “Turtle,” and **SABIO IGLESIA**, a/k/a “Sabo,” in part and substance discussed the placement of police resources in and around 3 Staccs territory and its impact on 3 Staccs gang activity, stating that rival gang members had been coming to the Grant Houses recently and that “THESE NIGGAS GOT HEARTS OUT OF NOWHERE,” and expressing their disappointment that fellow gang members were not fighting enough against gang rivals, with defendant **NEGRON** in part and substance stating that he had been putting in work since “I’M YAY HIGH, I WAS DOIN THIS 9, 8 YEARS OLD, YOU HEAR ME?”

122. On or about July 22, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **GABRIEL NEGRON**, a/k/a “Turtle,” spoke to defendant **PAUL WASHINGTON**, a/k/a “Paulie,” in part and substance discussing the fact that 3 Staccs was getting attacked by gang rivals and “GETTING BURNT,” and referring to defendants **ERIC PIERCE**, a/k/a “Bullet,” and **TAYLON MURPHY**, a/k/a “Bam,” as his "RIGHT HAND MEN" and said they “NEED TO SNAP THE FUCK OUT OF IT BECAUSE THEY ARE NOT MY RIGHT HAND FOR NO REASON.”
123. On or about July 22, 2012, in the vicinity of 550 West 125th Street, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” and two other identified 3 Staccs co-conspirators possessed a loaded firearm.
124. On or about July 24, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **GABRIEL NEGRON**, a/k/a “Turtle,” spoke to an unidentified individual who in part and substance stated that “M.A. CAME OVER HERE SHOOTING,” to which defendant **NEGRON** in part and substance responded, “YEAH, WE WAS SPEAKING IN CODE” about that “CAUSE I DON’T LIKE SAYING THEIR NAME ON THE PHONE,” and after which defendant **NEGRON** was informed that “Lequint” had “FOUGHT WITH THE VILLE” and been hit with a scooter in the face.

125. On or about August 3, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **GABRIEL NEGRON**, a/k/a “Turtle,” spoke to defendant **PAUL WASHINGTON**, a/k/a “Paulie,” in part and substance questioning why defendant **WASHINGTON** had let “MERK AND BULLET” get jumped without helping, to which defendant **WASHINGTON** in part and substance responded, “I RAN TO GET A WEAPON” and “STOP TALKING LIKE I DON’T PUT IN THIS OVERTIME,” and “MY TEAM LOSING BUT WE CAN STILL COME BACK AND WIN.”
126. On or about August 3, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” spoke to defendant **GABRIEL NEGRON**, a/k/a “Turtle,” in part and substance stating that he had acquired a firearm with which to help defendant **JEROME GREENE**, a/k/a “Merk,” and that they would have to be smart with that weapon so as to not lose it to the police.
127. On or about August 9, 2012, in a telephone call recorded by the New York City Department of Correction, defendants **SABIO IGLESIA**, a/k/a “Sabo,” and **KEVIN BOWMAN**, a/k/a “Boogs,” engaged in a conversation in part and substance agreeing that an identified 3 Staccs co-conspirators should be punished or kicked out of 3 Staccs for stealing from a fellow 3 Staccs gang member.

128. On or about August 12, 2012, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a status update in part and substance bragging about 3 staccs' possession of a gun, stating "3 STACCS GOT A STRAP."
129. On or about August 16, 2012, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance offering to sell .22 caliber ammunition.
130. On or about August 17, 2012, defendant **LEQUINT SINGLETON**, a/k/a “L-Money,” possessed a razor blade in the vicinity of Amsterdam Avenue and West 125th Street.
131. On or about September 23, 2012, in the vicinity of 550 West 125th Street, defendants **JAMES CUMMINGS**, **SABIO IGLESIA**, a/k/a “Sabo,” **KHALIF ISAAC**, a/k/a “K Leaf Ski,” **TAYLONN MURPHY**, a/k/a “Bam,” **ERIC PIERCE**, a/k/a “Bullet,” **LEQUINT SINGLETON**, a/k/a “L-Money,” and an unidentified co-conspirator accompanied defendant **PIERCE**, who appeared to possess a firearm, as the group walked from the Grant Houses in the direction of the Manhattanville Houses.

132. On or about October 3, 2012, defendant **TROY SAUNDERS**, a/k/a “Timmy,” caused or permitted to be posted on Facebook messages to rival gang member Dashawn Williams in part and substance complaining that Williams’ fellow gang members were talking to the police and stating, “CANT JACK YALL GANGSTAS WEN YALL SNITCHINU REALLY MAKING YASELF LOOK BAD.”
133. On or about October 5, 2012, in the vicinity of West 125th Street, between Amsterdam and Morningside Avenues, defendants **TRAYVON JOHNSON**, a/k/a “Trigga,” and **BRIAN CABRERA**, a/k/a “Pumpa,” assaulted a rival gang member, beating that rival gang member with his own skateboard.
134. On or about October 6, 2012, co-conspirator Carl Jones and defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” caused or permitted to be posted on Facebook messages in part and in substance discussing an assault of a rival gang member the previous day by defendant **JOHNSON** and defendant **BRIAN CABRERA**, a/k/a “Pumpa.”
135. On or about October 20, 2012, defendant **KEVIN BOWMAN**, a/k/a “Boogs,” caused or permitted to be posted on Facebook a status update in part and substance stating, "3 STACCS UP."

136. On or about December 9, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke to defendant **SABIO IGLESIA**, a/k/a “Sabo,” in part and substance complaining about the seizure of guns during the execution of a search warrant.
137. On or about December 11, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke with an unidentified individual in part and substance stating, “I’M STRAIGHT ON MY 3 STACCS SHIT.”
138. On or about December 11, 2012, in the vicinity of Broadway and West 125th Street, defendant **LEQUINT SINGLETON**, a/k/a “L-Money,” chased a group of rival MHB gang members out of the Grant Houses.
139. On or about December 16, 2012, co-conspirator Carl Jones caused or permitted to be posted on Facebook a message to defendant **TERRANCE MILTON**, a/k/a ‘T-Money,” in part and substance noting that defendant **BRIAN CABRERA**, a/k/a “Pumpa,” was fine following an assault, but stating, "SOMEONE HAD TO DIE" in revenge.

140. On or about December 16, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke to defendants **TERRANCE MILTON**, a/k/a “T-Money,” and **SABIO IGLESIA**, a/k/a “Sabo,” and defendant **MILTON** in part and substance informed defendant **MURPHY** that defendant **BRIAN CABRERA**, a/k/a “Pumpa,” had been attacked and stated, “NIGGAS TRIED TO KILL THAT NIGGA,” and added that it had been unwise for defendant **CABRERA** to “GO TO PARTIES OFF THE BLOCK, NO GUN.”
141. On or about December 16, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke to an unidentified individual, who in part and substance informed defendant **MURPHY** that defendants **BRIAN CABRERA**, a/k/a “Pumpa,” and **SEAN PAGAN** had been stabbed by rival gang members, to which defendant **MURPHY** in part and substance responded, “YA’LL GOT TO HURRY UP AND GET ME HOME.”
142. On or about December 17, 2012, following the slashing of defendant **BRIAN CABRERA**, a/k/a “Pumpa,” defendant **ROBERT NELSON**, a/k/a “Poo Pah,” caused or permitted to be posted on Facebook a message to co-conspirator Carl Jones in part and substance asking, “WASSUP WITH BRIAN?” to which co-conspirator Jones in part and substance responded, “HE GUD BUT IT LOOKS UGLY SUMBODY GOTTA DIE.”

143. On or about December 24, 2012, defendant **KEVIN BOWMAN**, a/k/a “Boogs,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating that he was the “WILDEST NIGGA” in Grant.
144. On or about December 30, 2012, in the vicinity of 3170 Broadway, defendants **SHANE GILETTE**, a/k/a “A.K.” and co-conspirator Dakwone Nicholson and other unidentified co-conspirators chased rival gang members from the Grant Houses, and defendant **GILETTE** threw a bottle at those rival gang members.
145. On or about December 31, 2012, defendant **SHANE GILETTE**, a/k/a “A.K.,” caused or permitted to be posted on Facebook a message in part and substance stating that the bullet with which he was shot "WAS MEANT FOR ANY ONE OF US."
146. On or about December 31, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke to an unidentified individual who in part and substance informed defendant **MURPHY** that “AK GOT SHOT IN THE LEGS IN MANHATTANVILLE,” to which defendant **MURPHY** in part and substance responded, “THEM NIGGAS GOT TO SNAP OUT OF IT” and “THEY KEEP PLAYING AROUND AND SOMEONE IS GOING TO END UP IN A BOX, THAT’S IT.”

147. On or about December 31, 2012, defendant **JAVON PETERSON**, a/k/a “J BURNS,” caused or permitted to be posted on Facebook a message to an unidentified individual, in part and substance informing that individual that defendant **SHANE GILLETTE**, a/k/a “A.K.” got shot in the foot.
148. On or about January 1, 2013, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke to an unidentified individual who in part and substance informed defendant **MURPHY** that the people who had shot “AK” “WASN’T JUST FROM MANHATTANVILLE, MANHATTANVILLE WIND UP HAVING SOME MA, PEOPLE FROM MA WITH THEM,” to which defendant **MURPHY** in part and substance responded, “THEY WAS WAITING FOR ME TO BE LOCKED UP” to “SHOOT SOMEONE.”
149. On or about January 5, 2013, co-conspirator Javon Frye caused or permitted to be posted on Facebook a message to defendant **TERRIL HOLMES**, a/k/a “50,” and other unknown persons, in part and in substance stating that rival MHB gang members came to the Grant Houses that morning and that someone gave Frye a firearm which caused rival MHB gang members William Bunce and Raymond Garcia to run away from him.
150. On or about January 6, 2013, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a status update in part and substance stating, "ITS WAR TODAY, WE OUT TO THE VILLE."

151. On or about January 6, 2013, defendant **JAVON PETERSON**, a/k/a “J Burns,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance informing that individual that he and fellow 3 Staacs gang members were going to go to the Manhattanville Houses to retaliate for a fellow gang member being shot, stating, “ITS WAR TODAY I AINT GONE LIE IM BOUT TO GO OUTSIDE AND FROUP UP N WE OUT TO DHA VILLE.”
152. On or about January 8, 2013, defendant **SHANE GILLETTE**, a/k/a “A.K.,” caused or permitted to be posted on Facebook a message, to defendant **DAVELL JACKSON**, in part and substance asking him and other 3 Staccs gang members to take revenge for the shooting of defendant **GILLETTE** and stating “I WANT ONE OF THEM DEAD.”
153. On or about January 10, 2013, in front of 1315 Amsterdam Avenue, defendants **MAURICE CULP**, a/k/a “Mo Hicks,” **MALIK JONES**, a/k/a “Nitty,” and **RANDY NEGRON** assaulted an unidentified individual, punching him and stomping and kicking him repeatedly after he was forced to the ground.
154. On or about January 11, 2013, defendant **KEVIN BOWMAN**, a/k/a “Boogs,” caused or permitted to be posted on Facebook a message to defendant **MALIK JONES**, a/k/a “Nitty,” in part and substance stating that defendant **JONES** should be careful because the police were looking for him.

155. On or about January 12, 2013, in the vicinity of Amsterdam Avenue and West 125th Street, defendant **JAVON PETERSON**, a/k/a “J Burns,” and over six additional identified and unidentified co-conspirators attacked rival gang members, after which an identified 3 Staccs co-conspirator in part and substance stated, “THE MANHATTANVILLE GUYS CAME TO GRANT.”
156. On or about January 16, 2013, inside of 430 West 125th Street, defendant **TRAVON THOMPSON**, a/k/a “Trey,” displayed what appeared to be a firearm in the hallway just outside of an elevator to co-conspirator Carl Jones and defendants **MALIK JONES**, a/k/a “Nitty,” and **JAVON PETERSON**, a/k/a “J Burns.”
157. On or about January 16, 2013, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke with defendant **TERRANCE MILTON**, a/k/a “T-Money,” in part and substance stating, "YOU KNOW HOW THIS GANG GOES" and indicating that he was going to attack a rival gang member in jail.
158. On or about January 17, 2013, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke with an unidentified individual in part and substance stating that 3 Staccs was "KILLING MAD NIGGAS" and asking the individual to send defendant **MURPHY** gang pictures but advising the individual to cross out all of the gang references, so that the material would be allowed in Riker's Island.

159. On or about January 17, 2013, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke to defendant **JAMES CUMMINGS**, who in part and substance stated that he and other 3 Staccs gang members had beaten up a rival gang member, after which defendant **MURPHY** in part and substance asked defendant **CUMMINGS** and “BULLET” to come visit him in jail.
160. On or about January 17, 2013, in the vicinity of Morningside Avenue and West 126th Street, defendant **SHANE GILLETTE**, a/k/a “A.K.,” and a group of more than three unidentified co-conspirators attacked a rival gang member, and defendant **GILLETTE** swung a metal pipe at a rival gang member.

161. On or about January 19, 2013, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke with an unidentified individual who in part and substance informed defendant **MURPHY** that co-conspirator Carl Jones had told the individual that defendant **MURPHY'S** mother had stated "THEM TWO NIGGAS FROM THE VILLE HAVE GOT TO GO," with which defendant **MURPHY** agreed, and after which the unidentified individual described a fight in a club the night before between “Sabo” and a rival gang member named “BB” to which defendant **MURPHY** in part and substance responded that he “loved this little nigga James” because defendant **JAMES CUMMINGS** had visited defendant **MURPHY** in jail, given defendant **MURPHY** jail commissary money, and because defendant **CUMMINGS** was “RUNNING DOWN ON NIGGAS FOR CHICKEN.”
162. On or about January 19, 2013, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke with an unidentified individual in part and substance informing the individual that he had sent defendant **JEROME GREENE**, a/k/a “Merk,” a letter from jail which contained information which defendant **MURPHY** could not discuss in a recorded phone call.

163. On or about January 24, 2013, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke with an unidentified individual, in part and substance stating that he sent a letter full of incriminating or "GREASY" details to defendant **JEROME GREENE**, a/k/a “Merk,” that he wants all of 3 Staccs to read and trying to learn if a rival gang member named "Whiteboy" is currently in jail.
164. On or about January 25, 2013, defendant **SHANE GILLETTE**, a/k/a “A.K.,” caused or permitted to be posted on Facebook a message to defendant **RALPHIE GARCIA** in part and substance agreeing with him to “MOB” to “THE VILLE,” to which defendant **GARCIA** in part and substance responded, “M.A. TO THIS DICK MURDER VILLE TO MY NUTS.”
165. On or about January 26, 2013 in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke to defendant **JEROME GREENE**, a/k/a “Merk,” in part and substance informing defendant **GREENE** that he had sent him a letter, to which defendant **GREENE** in part and substance responded they could not talk freely on the phone since “THEY REALLY ON US,” and defendants **MURPHY** and **GREENE** discussed the fact that law enforcement was trying to connect the two of them to one another.

166. On or about February 2, 2013 in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke to defendant **SABIO IGLESIA**, a/k/a “Sabo,” in part and substance informing defendant **IGLESIA** that he had beaten up a rival gang member in the medical section of Riker’s Island for mocking the death of Tayshana “Chicken” Murphy.
167. On or about February 3, 2013, defendant **TROY SAUNDERS** a/k/a “Timmy,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance discussing “MOBBING OUT” together along with members of the Pologrounds Houses against members of the Manhattanville Houses.
168. On or about February 4, 2013, in a multi-person Facebook message, defendants **ERIC PIERCE**, a/k/a “Bullet,” and **SHANE GILLETTE**, a/k/a “A.K.,” caused or permitted to be posted on Facebook messages in part and substance mocking the death of rival MA gang member Walter Sumter, stating, "RECC SLEEP IN PISS" AND "RECC K."
169. On or about February 5, 2013, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” caused or permitted to be posted on Facebook a status update in part and substance stating, “FUCC THT NIGGA RECC AKA WALTER HE DEAD ND HE CAN SUCC A DEAD NIGGA DICCC...FREE MA SON TURTLLE LURT.”

170. On or about February 8, 2013, defendant **SEAN PAGAN**, caused or permitted to be posted on Facebook a message to defendant **TERRIL HOLMES**, a/k/a "50," in part and substance asking defendant **HOLMES** and fellow 3 Staccs gang members to join him in fighting rival gang members and to "COME TO 1315 RIGHT NOW WITH."
171. On or about February 9, 2013, defendant **SEAN PAGAN** caused or permitted to be posted on Facebook a message to co-conspirator Tommy Reyes in part and substance informing Reyes that he was jumped while he was mobbing with fellow 3 Staccs gang members, and discussing retaliating by shooting someone from MHB or MA.
172. On or about February 9, 2013, defendant **MALIK JONES**, a/k/a "Nitty," caused or permitted to be posted on Facebook a message to defendant **PAUL WASHINGTON**, a/k/a "Paulie," in part and substance stating that defendant **WASHINGTON** should bring a firearm to defendant **JONES** the next day.
173. On or about February 9, 2013, defendant **MAURICE CULP**, a/k/a "Mo Hicks," caused or permitted to be posted on Facebook a message to defendant **PAUL WASHINGTON**, a/k/a "Paulie," in part and substance asking defendant **WASHINGTON** for a firearm.

174. On or about February 9, 2013, defendant **MALIK JONES**, a/k/a "Nitty," caused or permitted to be posted on Facebook a message to defendant **PAUL WASHINGTON**, a/k/a "Paulie," in part and substance instructing defendant **WASHINGTON** to bring a firearm to 1305 Amsterdam.
175. On or about February 9, 2013, defendants **MAURICE CULP**, a/k/a "Mo Hicks," **MALIK JONES**, a/k/a "Nitty," and an identified 3 Staccs co-conspirator escorted defendants **TERRIL HOLMES**, a/k/a "50," **SEAN PAGAN**, **TROY SAUNDERS** a/k/a "Timmy," **PAUL WASHINGTON**, a/k/a "Paulie," and co-conspirator Carl Jones and an unidentified co-conspirator to the Manhattanville Houses, during a blizzard, in possession of a loaded firearm, whereupon defendants **HOLMES**, **PAGAN**, **SAUNDERS** and **WASHINGTON** and co-conspirator Jones and an unidentified co-conspirator entered the Manhattanville Houses in possession of a loaded firearm.

176. On or about February 9, 2013, after MHB and MA gang members bragged about robbing and assaulting defendant **SEAN PAGAN** on public Facebook postings, defendants **TERRIL HOLMES**, a/k/a “50,” **PAGAN**, **TROY SAUNDERS** a/k/a “Timmy,” and **PAUL WASHINGTON**, a/k/a “Paulie,” and co-conspirator Carl Jones and an unidentified co-conspirator entered the Manhattanville Houses, during a blizzard, in possession of a loaded firearm, walked through the Manhattanville Houses for an extended period of time until encountering a rival gang member, whose identity is known to the Grand Jury, and shot said rival MHB gang member.
177. On or about February 9, 2013, immediately after defendants **TERRIL HOLMES**, a/k/a “50,” **SEAN PAGAN**, **TROY SAUNDERS**, a/k/a “Timmy,” and **PAUL WASHINGTON**, a/k/a “Paulie,” and co-conspirator Carl Jones shot a rival MHB gang member inside of the Manhattanville Houses, defendant **SAUNDERS** and co-conspirator Jones met defendants **MAURICE CULP**, a/k/a “Mo Hicks,” and an identified 3 Staccs co-conspirator in the vicinity of Amsterdam Avenue and West 125th Street, and ran back to the Grant Houses with them.

178. On or about February 9, 2013, defendant **PAUL WASHINGTON**, a/k/a "Paulie," caused or permitted to be posted on Facebook a message to defendant **MALIK JONES**, a/k/a "Nitty," in part and substance stating that defendant **WASHINGTON** planned to turn himself into the police, regarding a recent shooting.
179. On or about February 9, 2013, an identified 3 Staccs co-conspirator caused or permitted to be posted on Facebook a message to defendant **TROY SAUNDERS**, a/k/a "Timmy," in part and substance asking what happened to co-conspirator Carl Jones and whose biggie jacket was stolen, to which defendant **SAUNDERS** in part and substance responded that he wants to talk to the identified 3 Staccs co-conspirator in person about co-conspirator Jones and informed the identified 3 Staccs co-conspirator that defendant **PAGAN'S** jacket was stolen.
180. On or about February 9, 2013 in a telephone call recorded by the New York City Department of Correction, defendant **JERRY ROBINSON**, a/k/a "Ant Live," spoke to defendant **MALIK JONES**, a/k/a "Nitty," who in part and substance informed defendant **ROBINSON** that "Pac Slime" had been the person who shot defendant **JONES** and "scooter," after which defendant **JONES** in part and substance responded that he would "JUMP A TURNSTILE" so he could go to jail and confront the person who had shot him.

181. On or about February 9, 2013, defendant **TROY SAUNDERS**, a/k/a “Timmy,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance discussing plans to go “MOBBING” together.
182. On or about February 11, 2013, in a telephone call recorded by the New York City Department of Correction, defendant **TAYLONN MURPHY**, a/k/a “Bam,” spoke to defendant **JEROME GREENE**, a/k/a “Merk,” in part and substance advising defendant **GREENE** to watch out over the “LITTLE RIDERS,” to which defendant **GREENE** responded that he had to speak to defendant **MURPHY** in person and not over a recorded phone call.
183. On or about February 13, 2013, defendant **LANCE OWENS**, a/k/a “Luda,” mailed a letter to defendant **TAYLONN MURPHY**, a/k/a “Bam,” in part and substance stating, “I’M SCARED THAT WHEN I GO HOME I FUCK AROUND AND GET LOCKED UP AGAIN 4 MURDERING ONE OF THESE NIGGAS BECAUSE I FEEL A WAY ABOUT WHAT NIGGAS DID TO MY SIS AND I FEEL NIGGAS SHOULDA BEEN LAYED DOWN OFF DAT, YOU KNOW IF I WAS HOME SOMEBODY WOULD’VE GOT ZIPPED UP WORD TO MY MOMS.”
184. On or about February 23, 2013, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a message to defendant **SEAN PAGAN** in part and substance stating, “I GOT SOMETHING FOR SALE FOR U... ONLY U..DONT LET NO BODY TELL U LET U BORROW IT OR NOTHING ... 38.”

185. On or about February 23, 2013, defendant **KEVIN BOWMAN**, a/k/a “Boogs,” caused or permitted to be posted on Facebook a photograph of himself and others entitled “SOME OF THE 3 STACC BOYS.”
186. On or about February 25, 2013, inside of a grocery store in the vicinity of Old Broadway and West 126th Street, defendants **BRIAN CABRERA**, a/k/a “Pumpa,” **SHANE GILLETTE**, a/k/a “A.K.,” **DION JOHNSON**, **SEAN PAGAN**, **JAVON PETERSON**, a/k/a “J Burns,” and **PAUL WASHINGTON**, a/k/a “Paulie,” assaulted two rival MHB gang members.
187. On or about April 4, 2013, defendants **JAVON PETERSON**, a/k/a “J Burns,” and **TROY SAUNDERS**, a/k/a “Timmy,” caused or permitted to be posted on Facebook a conversation in part and substance discussing the recent arrests and indictments of gang members from the Taft and Johnson Houses on the East side of Harlem involved in similar gang activity, stating "WE'RE NEXT" and "WE'RE READY FOR IT."
188. On or about April 27, 2013, in the vicinity of 430 West 125th Street, defendants **SHANE GILLETTE**, a/k/a “A.K.,” **ROBERT NELSON**, a/k/a “Pooh Pah,” **LANCE OWENS**, a/k/a “Luda,” and **TROY SAUNDERS**, a/k/a “Timmy,” and three identified 3 Staccs co-conspirators attacked a rival gang member.

189. On or about April 27, 2013, defendants **TROY SAUNDERS**, a/k/a “Timmy,” and **BRIAN CABRERA**, a/k/a “Pumpa,” caused or permitted to be posted on Facebook messages in part and substance discussing “MOBBING” to the Manhattanville Houses with defendants **ENRIQUE COLLAZO**, a/k/a “Ricky,” **JAMES CUMMINGS**, **TERRIL HOLMES**, a/k/a “50,” **LANCE OWENS**, a/k/a “Luda,” **JAVON PETERSON**, a/k/a/ “J Burns,” and **TRAYVON JOHNSON**, a/k/a “Trigga,” and co-conspirator Antoine Nicholson and other unidentified co-conspirators.
190. On or about April 29, 2013, defendant **TROY SAUNDERS**, a/k/a “Timmy,” caused or permitted to be posted on Facebook a message to defendant **ENRIQUE COLLAZO**, a/k/a “Ricky,” in part and substance stating that defendant **SAUNDERS** and other fellow gang members “BE PUTTIN IN TOO MUCH WORK.”
191. On or about May 4, 2013, defendant **QUINTELL CAMPBELL**, a/k/a “Quin,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating that he wants to go after persons from the St. Nicholas and Lincoln houses for stabbing him.
192. On or about May 10, 2013, in the vicinity of Amsterdam Avenue and West 125th Street, defendant **JAMES CUMMINGS**, attacked a rival gang member with a trash can, and in part and substance stated “I’M IN A GANG, AND THAT GUY ASKED ME IF I WANTED TO DIE TODAY.”

193. On or about June 12, 2013, in the vicinity of 430 West 125th Street, defendants **JAMES CUMMINGS** and **JEROME GREENE**, a/k/a “Merk,” and numerous unidentified co-conspirators attacked rival gang member who had entered into the Grant Houses.
194. On or about June 12, 2013, in front of 360 West 125th Street, defendant **TRAVON THOMPSON**, a/k/a “Trey,” while running from the scene of a gang attack involving approximately ten to fifteen gang members, possessed a gravity knife.
195. On or about July 5, 2013, in the vicinity of Saint Nicholas Avenue and West 127th Street, defendants **QUINTELL CAMPBELL**, a/k/a “Quin,” and **TRAVON THOMPSON**, a/k/a “Trey,” and an unidentified co-conspirator, travelled from the Grant Houses to rival gang territory, at which point defendant **CAMPBELL**, shot a rival gang member in the buttocks with a firearm recovered three days later from fellow gang member defendant **JAMES CUMMINGS**.
196. On or about July 5, 2013, in the vicinity of Tiemann Place and Broadway, defendant **TAYLONN MURPHY**, a/k/a “Bam,” asked an individual if he was from the Manhattanville Houses, and when the individual responded affirmatively, defendants **MURPHY**, **STEVEN REYNOSO**, and **MOISES TORRES**, and 3 Staccs co-conspirator Ian Rueda, forcibly stole property from and attacked and beat that individual.

197. On or about July 8, 2013, from the vicinity of 1315 Amsterdam Avenue, defendant **JAMES CUMMINGS**, escorted by defendants **SABIO IGLESIA**, a/k/a “Sabo,” and two identified 3 Staccs co-conspirators, transported a loaded firearm to the vicinity of the Manhattanville Houses, shortly after which defendant **CUMMINGS** fired shots at the Manhattanville Houses, using the same firearm that defendants **QUINTELL CAMPBELL**, a/k/a “Quin,” and **TRAVON THOMPSON**, a/k/a “Trey,” and an unidentified co-conspirator had used on July 5, 2013.
198. On or about July 10, 2013, inside a car in the vicinity of Broadway and West 125th Street, defendants **MAURICE CULP**, a/k/a “Mo Hicks,” **JACOB MILLER** and **JERRY ROBINSON**, a/k/a “Ant Live,” possessed two razor blades.
199. On or about July 13, 2013, in the vicinity of 550 West 125th Street, defendants **JEROME GREENE**, a/k/a “Merk,” **SABIO IGLESIA**, a/k/a “Sabo,” **ROBERT NELSON**, a/k/a “Pooh Pah,” **ERIC PIERCE**, a/k/a “Bullet,” **LEQUINT SINGLETON**, a/k/a “L-Money,” and **PAUL WASHINGTON**, a/k/a “Paulie,” attacked rival gang members, by throwing bottles and other implements at them.

200. On or about July 13, 2013, inside of 1315 Amsterdam Avenue, following a fight with rival gang members on West 125th Street, defendant **SABIO IGLESIA**, a/k/a “Sabo,” attacked and beat an unidentified resident of the Grant Houses.
201. On or about July 17, 2013, inside of 550 West 125th Street, defendant **JEROME GREENE**, a/k/a “Merk,” possessed letters from defendant **TAYLONN MURPHY**, a/k/a “Bam,” in part and substance stating that defendant **MURPHY** believed defendant **SEAN PAGAN** was “SNITCHING,” and that defendants **GREENE** and **MURPHY**, and other 3 Staccs gang members needed to “KILL HIM.”
202. On or about July 24, 2013, defendant **TROY SAUNDERS**, a/k/a “Timmy,” and an unknown person caused or permitted to be posted on Facebook messages in part and in substance discussing how many years in state prison persons indicted in a recent Manhattan District Attorney’s Office gang conspiracy case were receiving and how the feud between Grant Houses and Manhattanville Houses is similar to the feud between the Johnson Houses and the Taft Houses, which had led to a large number of arrests and indictments.
203. On or about August 13, 2013, defendant **QUINTELL CAMPBELL**, a/k/a “Quin,” caused or permitted to be posted on Facebook a conversation with co-conspirator Carl Jones in part and substance discussing the shooting of defendant **LEQUINT SINGLETON**, a/k/a “L Money.”

204. On or about August 25, 2013, in the vicinity of Amsterdam Avenue and West 126th Street, defendants **MAURICE CULP**, a/k/a “Mo Hicks,” and **KAREEM HENDRICKS**, a/k/a “Reem,” aided by numerous unidentified co-conspirators, trapped three rival MA gang members in a taxi cab and slashed two them repeatedly across the face, neck and upper body with razor blades.
205. On or about August 28, 2013, in the vicinity of Amsterdam Avenue and West 125th Street, defendants **JAMES CUMMINGS**, **DION JOHNSON**, **LANCE OWENS**, a/k/a “Luda,” **JAVON PETERSON**, a/k/a “J Burns,” and **PAUL WASHINGTON**, a/k/a “Paulie,” and other unidentified co-conspirators attempted to chase and attack a rival gang member who had just fired multiple gunshots at them.
206. On or about September 6, 2013, in the vicinity of 550 West 125th Street, defendants, **TAYLONN MURPHY**, a/k/a “Bam,” and **PAUL WASHINGTON**, a/k/a “Paulie,” and additional identified and unidentified 3 Staccs co-conspirators confronted rival gang members with large sticks and other implements, after which an identified 3 Staccs co-conspirator was shot by a rival gang member.

207. On or about September 24, 2013, defendant **ERIC PIERCE**, a/k/a “Bullet,” caused or permitted to be posted on Facebook a video in which in part and substance he identifies himself as “BULLET” and “3 STACCS” and refers to “VILLE NIGGAS RUNNING” from him in front of a police precinct, and calls them “PUSSIES.”
208. On or about September 24, 2013, in the vicinity of Amsterdam Avenue and West 125th Street, defendant **LEQUINT SINGLETON**, a/k/a “L-Money,” and other unidentified co-conspirators ripped pieces of wood and construction materials from the ground in the Grant Houses and attacked rival gang members.
209. On or about October 19, 2013, in the vicinity of Morningside Avenue and West 126th Street, defendants **JAVONE BROWN**, a/k/a “Fly Von,” **BRIAN CABRERA**, a/k/a “Pumpa,” **JOHNNY CARATE**, a/k/a “Johnny 6,” **TERRANCE MILTON**, a/k/a “T-Money,” **JAVON PETERSON**, a/k/a “J Burns,” **ERIC PIERCE**, a/k/a “Bullet,” **JERRY ROBINSON**, a/k/a “Ant Live,” **LEQUINT SINGLETON**, a/k/a “L-Money,” and **LAMONT SWINTON**, a/k/a “Mont,” transported a firearm from the Grant Houses and defendant **SWINTON**, surrounded by unidentified co-conspirators, fired shots at rival gang members across the street, after which the group ran towards the Grant Houses.

210. On or about October 19, 2013, in the vicinity of Morningside Avenue and West 126th Street, defendant **LAMONT SWINTON**, a/k/a “Mont,” discarded a firearm he had just used to shoot at rival gang members, and an unidentified co-conspirator removed the gun from that location before the police arrived by concealing it in a bag and walking away.
211. On or about October 20, 2013, defendant **TROY SAUNDERS**, a/k/a “Timmy,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating that “JBurns” was locked up for reckless endangerment because “THEY WAS TRYNA SCORE AT THE SCRILLA NIGGAS” and that he is in the booking with “L’S” and “L-MONEY” and possibly “PUMPA.”
212. On or about November 14, 2013, in the vicinity of 3170 Broadway, defendants **JEROME GREENE**, a/k/a “Merk,” **TAYLONN MURPHY**, a/k/a “Bam,” and **MOISES TORRES** possessed a loaded firearm.
213. On or about December 16, 2013, in the vicinity of Amsterdam Avenue and West 125th Street, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” walked through and disrupted oncoming traffic, while possessing a razor blade, about which he in part and substance stated to a police officer, “YOU KNOW I NEED THIS.”

214. On or about January 17, 2014, in the vicinity of Old Broadway and West 125th Street, defendants **BRIAN CABRERA**, a/k/a “Pumpa,” **DION JOHNSON**, **TERRENCE MILTON**, a/k/a “T-Money,” **ROBERT NELSON**, a/k/a “Pooh Pah,” and **JAVON PETERSON**, a/k/a “J Burns,” and an identified 3 Staccs co-conspirator stabbed and assaulted a rival MHB gang member, whose identity is known to the Grand Jury.
215. On or about January 27, 2014, in the vicinity of Old Broadway and West 126th Street, defendants **TERRANCE MILTON**, a/k/a “T-Money,” and **TAYLONN MURPHY**, a/k/a “Bam,” assaulted a rival MHB gang member, whose identity is known to the Grand Jury, slashing his neck with a blade.
216. On or about February 1, 2014, in the vicinity of West 125th to 126th Streets on Amsterdam Avenue, defendant **PAUL WASHINGTON**, a/k/a “Paulie,” smashed a barber shop window with a golf club after being attacked by rival gang members in that barber shop, and later in part and substance stated to a police officer, “YOU KNOW I’M ONE OF THE ORIGINAL 3 STACCS MEMBERS.”
217. On or about April 2, 2014, defendant **SEAN PAGAN** caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “RIP CHICKEN, WE ALL BOUT CHICKEN, NOT GONE STOP TILL A VILLE NIGGA MISSING,” accompanied by a picture of a person running from a gun.

218. On or about May 9, 2014, in the vicinity of Morningside Avenue and West 123rd Street, defendants **SHANE GILLETTE**, a/k/a “A.K.,” **TERRIL HOLMES**, a/k/a “50,” **LANCE OWENS**, a/k/a “Luda,” and **TRAVON THOMPSON**, a/k/a “Trey,” possessed a loaded Smith & Wesson .38 caliber revolver as they chased rival MA gang members.

SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRIL HOLMES**, a/k/a “50,” **JAVON PETERSON**, a/k/a “J Burns” and **TRAVON THOMPSON**, a/k/a “Trey,” of the crime of **CONSPIRACY IN THE SECOND DEGREE**, in violation of Penal Law § 105.15, committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about January 1, 2010, to on or about the date of this indictment, with intent that conduct constituting the crime of **MURDER IN THE SECOND DEGREE** be performed, said crime being a class “A” felony, agreed with one or more persons to engage in and cause the performance of such conduct.

DESCRIPTIVE LANGUAGE AND OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from about January 1, 2010, to on or about the date of this indictment, certain overt acts, among others, were committed in New York County (unless otherwise stated). The descriptive language and overt acts stated in Count One above are incorporated herein by reference and are not repeated.

THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, accuses the defendants **RAYVON BECTON**, a/k/a “Ray Cash,” **KEVIN BOWMAN**, a/k/a “Boogs,” **JAVONE BROWN**, a/k/a “Fly Von,” **BRIAN CABRERA**, a/k/a “Pumpa,” **QUINTELL CAMPBELL**, a/k/a “Quin,” **JOHNNY CARATE**, a/k/a “Johnny 6,” **ENRIQUE COLLAZO**, a/k/a “Ricky,” **MAURICE CULP**, a/k/a “Moe Hicks,” **JAMES CUMMINGS**, **RALPHIE GARCIA**, **SHANE GILETTE**, a/k/a “A.K.,” **JEROME GREENE**, a/k/a “Merk,” **KAREEM HENDRICKS**, a/k/a “Reem,” **SABIO IGLESIA**, a/k/a “Sabo,” **KHALIF ISAAC**, a/k/a “Leaf Ski,” **MALIK JONES**, a/k/a “Nitty,” **TERRANCE MILTON**, a/k/a “T-Money,” **TAYLONN MURPHY**, a/k/a “Bam Bam,” **GABRIEL NEGRON**, a/k/a “Turtle,” **ROBERT NELSON**, a/k/a “Poopah,” **LANCE OWENS**, a/k/a “Luda,” **EARL PIERCE**, **ERIC PIERCE**, a/k/a “Bullet,” **JERRY ROBINSON**, a/k/a “Ant Live,” **TROY SAUNDERS**, a/k/a “Timmy,” **LEQUINT SINGLETON**, **LAMONT SWINTON**, a/k/a “Mont,” **MOISES TORRES** and **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CONSPIRACY IN THE THIRD DEGREE**, in violation of Penal Law § 105.13, committed as follows:

The defendants, in the County of New York and elsewhere, during the period of time from on or about January 1, 2010 to on or about the date of this indictment, with intent that conduct constituting the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** be performed, said crime being a

class “C” felony, being over eighteen years of age, agreed with each other, and with others, and with one or more persons under sixteen years of age, to engage in and cause the performance of such conduct.

DESCRIPTIVE LANGUAGE AND OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from about January 1, 2010, to on or about the date of this indictment, certain overt acts, among others, were committed in New York County (unless otherwise stated). The descriptive language and overt acts stated in Count One above are incorporated herein by reference and are not repeated. In addition:

219. On or about August 29, 2010, defendant **JERRY ROBINSON**, a/k/a “Ant Live,” caused or permitted to be posted on Facebook a photograph of himself holding a firearm.

220. On or about November 14, 2010, defendant **JERRY ROBINSON**, a/k/a “Ant Live,” caused or permitted to be posted on Facebook a status update in part and substance stating, “I LOVE MY NIGGAS WORD TO LIFE . . . NIGGAS WAS READY TO MOB ALL THE BAY TO THA BX FROM THA GRIMEY . . . I LOVE MY TEAM ILL DIE FOR MY NIGGAS . . . 3STACCS GFC THA FUCC UP.”

221. On or about January 13, 2011, in the vicinity of Amsterdam Avenue and La Salle Street, defendant **RAYVON BECTON**, a/k/a “Ray Cash,” possessed a loaded 9 millimeter semiautomatic firearm.

222. On or about February 12, 2011, defendant **RAYVON BECTON**, a/k/a “Ray Cash,” caused or permitted to be posted on Facebook status update in part and in substance stating, “3 STACKS TO THE DEATH OF ME.”
223. On or about April 17, 2011, defendant **JERRY ROBINSON**, a/k/a “Ant Live,” caused or permitted to be posted on Facebook a status update in part and substance stating “4 SUM REASON I FEEL LIKE POPPING THT BOTTLE ON SUMBODY...PLEZZ LET A MA NIGGA FRONT TODAY,” to which an unidentified individual commented “U SHOULDN’T POST SHIT LIKE THAT CAUSE U LETTING NIGGAS KNOW WAT U GOIN TO DO U DON’T WANT PEOPLE KNOWIN CAUSE IF SOMEONE GETS SHOT IT GOIN TO COME BACK TO U,” to which defendant **ROBINSON** in part and in substance replied, “I DON’T CARE, FUCC MA.”
224. On or about April 20, 2011, defendant **ENRIQUE COLLAZO**, a/k/a “Ricky,” caused or permitted to be posted on Facebook a conversation with an unidentified individual in which the individual sent defendant **COLLAZO** a picture of a gun and defendant **COLLAZO** in part and substance stated, “U SHOULD GIVE THAT TO ME I’M TRYING TO GET ONE TOO.”
225. On or about April 20, 2011, defendant **ROBERT NELSON**, a/k/a “Pooh Pah,” caused or permitted to be posted on Facebook a status update in part and substance stating “M.A. TO THIS DICK 3 STACKS THE FUCK UP EHHHHH!!!! I’M 4REAL ABOUT MY 3STACKS SHIT.”

226. On or about May 13, 2011, defendant **RAYVON BECTON**, a/k/a “Ray Cash,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating that the firearms he had purchased had worked perfectly.
227. On or about May 28, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “WE DON’T DO SHELLS WE STRAIGHT SMACKING NIGGAS WIF DA GRIP WE A NIGGA TO KNOW WE NOT SCARED SO WHEN HE GET OUT DA HOSPITAL HE GONNA HAVE A FEAR IN HIS HEART.”
228. On or about June 23, 2011, **RAYVON BECTON**, a/k/a “Ray Cash,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance attempting to acquire a firearm and ammunition.
229. On or about June 27, 2011, defendant **RAYVON BECTON**, a/k/a “Ray Cash,” caused or permitted to be posted on Facebook a status update in part and substance affirming his allegiance to 3 Staccs, stating, “I REP MY BLOCK HARD.”
230. On or about August 8, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook messages to a female named Juicy Linay Dawson in part and substance stating that he is sixteen, a 3 Staccs member, that he sells drugs, that he’s the gun boy for Grant, and that any girl who wants to be with him has to be ready to hold a hammer because he is the shooter.

231. On or about August 16, 2011, defendant **ROBERT NELSON**, a/k/a “Pooh Pah,” caused or permitted to be posted on Facebook a photograph displaying a picture of numerous 3 Staccs gang members with the caption “3S.OE.”
232. On or about August 27, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance, stating “IMA MURDER JEAN AND I NEVER BEEN MORE SERIOUS” because “HE BAKKED OUT THE GUN ON ME AND HE SHOT CITO HE THINK HE A KILLER NOW IM GONNA BODY HIM I PUT THAT ON MY GRANDMOTHER.”
233. On or about August 28, 2011, defendant **JERRY ROBINSON**, a/k/a “Ant Live,” caused or permitted to be posted on Facebook a status update in part and substance stating, “TOOLS ON DECC, HOME DEPO NIGGA.”
234. On or about September 1, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating that defendant **GARCIA** liked that the other individual had purchased a shotgun and that defendant **GARCIA**, as well as the other individual, had shot at rival gang members.
235. On or about September 11, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook, a message Brandy Garcia in part and substance stating that he was arrested because he was caught with a .40 caliber firearm.

236. On or about September 12, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook, a status update in part and substance stating, “THE STREETS TURNED ME INTO A COLD BLOOD PERSON ITS JUST TIME FOR NIGGAS TO DIE BOTTOM LINE I DO ANYTHING FOR ME ND MY BRO/SISTAS REALTEE.”
237. On or about October 14, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “I ALMOST GOT SHOT U KNOW THAT BUT INSTEAD IT HIT MY SON TRIGGA.”
238. On or about December 9, 2011, defendants **RALPHIE GARCIA**, a/k/a “Ralphie, and an identified 3 Staccs co-conspirator caused or permitted to be posted on Facebook messages in part and substance discussing the identified 3 Staccs co-conspirator purchasing a firearm for a quantity of money, to which defendant **GARCIA** responded, “DONT MAKE THEM BRING THE GUN FOR NOTHING U GOT 80 RIGHT?”
239. On or about December 9, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a message to an identified 3 Staccs co-conspirator in part and substance asking the identified 3 Staccs co-conspirator if he has bullets for a .22 caliber firearm, stating “U GOT 22 SHELLS?”

240. On or about December 27, 2011, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook, a status update in part and substance stating, "OMG, I WISH THE VILLE NIGGAS STOP ASKING IF I'M GOING TO THE LOUNGE LIKE THEY DON'T BE TRYING TO KILL ME EVERY DAY. LMAO. NIGGAS WANT YOUR HEAD EVERYWHERE. SMH. WHAT THE FUCK YOU BE DOING?"
241. On or about February 18, 2012, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a status update about a rival gang member in part and substance stating, "I TRIED TO KILL THE CAMERON NIGGA YESTERDAY HE LUCKY POPEYES GOT 2 DOORS."
242. On or about February 20, 2012, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook, a message to an unidentified individual in part and substance stating that he has a .38 caliber firearm and he is ready for any violence that might come his way.
243. On or about February 21, 2012, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance that he has been shot at on three separate occasions and is tired of being jumped.
244. On or about March 9, 2012, defendant **JERRY ROBINSON**, a/k/a "Ant Live," caused or permitted to be posted on Facebook a status update in part and substance stating, "MY NIGGAZ IS GRAVEYARD BOYS WE PUT PEOPLE IN CASKETS FOR REAL...3SO.E."

245. On or about March 9, 2012, defendant **JERRY ROBINSON**, a/k/a “Ant Live,” caused or permitted to be posted on Facebook a status update in part and substance stating, “IDK BOUT NOBODY ELSE BUT ME & MY NIGGAS ARE GRAVEYARD BOYZ FORREAL WE ALWAYS PUTTING BITCHES IN CASKETS EHH# REG GRANT SHIT 3 .S.O.E.”
246. On or about March 15, 2012, defendant **KHALIF ISAAC**, a/k/a “K Leaf Ski,” caused or permitted to be posted on Facebook a status update in part and substance stating, “GRANT Is 3STACKS BLOCC !!! POINT BALNK PERIOD OTHER GRANT RESIDANTS WHO DNT LIKE IT....DO SOMETHING.”
247. On or about March 18, 2012, defendant **ENRIQUE COLLAZO**, a/k/a “Ricky,” caused or permitted to be posted on Facebook a message to defendant **RALPHIE GARCIA** in part and substance stating, "I'M ON MY GUNBOY SHIT FOR REAL NOW."
248. On or about March 27, 2012, in the vicinity of Amsterdam Avenue and West 125th Street, defendants **ENRIQUE COLLAZO**, a/k/a “Ricky,” and **ROBERT NELSON**, a/k/a “Pooh Pah,” engaged in a 3 Staccs gang-related handshake.
249. On or about April 12, 2012, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a status update in part and substance stating that he doesn’t trust anyone and only trusts the firearm in his pocket.

250. On or about July 28, 2012, defendant **ROBERT NELSON**, a/k/a “Pooh Pah,” caused or permitted to be posted on Facebook a message to co-conspirator Carl Jones in part and substance stating, “ME ND BRIAN TURN IT UP ON THA VILLE NIGGAS YESTERDAY.”
251. On or about July 30, 2012, defendant **ENRIQUE COLLAZO**, a/k/a “Ricky,” caused or permitted to be posted on Facebook a message to co-conspirator Carl Jones in part and substance stating that they wanted to acquire a firearm and reassuring him that they could discuss this because "THE FEDS CAN'T SEE THE INBOX" on Facebook.
252. On or about January 2, 2013, defendant **ENRIQUE COLLAZO**, a/k/a “Ricky,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance inquiring about the cost of purchasing a firearm and a winter coat, stating, “HOW MUCH FOR THAT GUN AND THAT RED BIGGIE?”
253. On or about January 6, 2013, co-conspirator Carl Jones caused or permitted to be posted on Facebook a message to defendant **ROBERT NELSON**, a/k/a “Pooh Pah,” in part and in substance discussing fellow 3Staac gang members who are about to go to the Manhattanville Houses, stating “THEY ALL ON DA AVE THEY JUST CALLED ME THEY BOUT TO MOB OUT TO THE VILLE,” to which defendant **NELSON** in part and substance responded, “I SO IF ANYTHING HIT ME UP.”

254. On or about January 18, 2013, defendant **JERRY ROBINSON**, a/k/a “Ant Live,” and other 3 Staccs gang members attacked a rival gang member with a blade, cutting that rival gang member’s jacket.
255. On or about February 23, 2013, defendant **RALPHIE GARCIA** caused or permitted to be posted on Facebook a status update in part and substance stating, “TRUST NOBODY BUT THE 38 THAT KEEPS MY POCKET WARM!”
256. On or about March 8, 2013, in front of 1345 Amsterdam Avenue, defendant **ENRIQUE COLLAZO**, a/k/a “Ricky,” and other unidentified co-conspirators robbed a rival MHB gang member, whose identity is known to the Grand Jury, after that individual stated he was from the Manhattanville Houses.
257. On or about March 17, 2013, defendant **ROBERT NELSON**, a/k/a “Pooh Pah,” caused or permitted to be posted on Facebook a status update in part and substance discussing a photograph of himself inside of the rival Manhattanville and stating, “JUST ANOTHER DAY IN THE VILLE YOU KNOW HOW THAT GO 3SO.E.”

258. On or about April 19, 2013, an unidentified co-conspirator caused or permitted to be posted on Facebook a message to defendant **ENRIQUE COLLAZO**, a/k/a “Ricky,” in part and in substance stating the co-conspirator had just bought brass knuckles and that the co-conspirator’s friend had given him a firearm, and posting a photograph of a firearm, to which defendant **COLLAZO** in part and substance responded, “U SHOULD GIVE THAT TOO ME IM TRYING TO GET ONE IM ABOUT TO COME SEE U.”
259. On or about May 10, 2013, co-conspirator Onix Pantoja caused or permitted to be posted on Facebook a message to defendant **ENRIQUE COLLAZO**, a/k/a “Ricky,” in part and substance indicating that he wanted to go to the Manhattanville Houses and stating, “WE’RE GONNA KILL THEM, THAT’S A FACT.”
260. On or about May 10, 2013, defendant **ENRIQUE COLLAZO**, a/k/a “Ricky,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance discussing going to the Manhattanville Houses to kill rival MHB gang members.
261. On or about June 9, 2013, in the vicinity of Amsterdam Avenue and West 125th Street, during a large gang fight, defendant **ROBERT NELSON**, a/k/a “Pooh Pah,” in part and substance shouted, “THIS SHIT IS ON TONIGHT!”

FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRIL HOLMES**, a/k/a “50,” **JAVON PETERSON**, a/k/a “J Burns” and **TRAVON THOMPSON**, a/k/a “Trey,” of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law § 105.15, committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about January 1, 2010, to on or about the date of this indictment, with intent that conduct constituting the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE** be performed, said crime being a class “C” felony, agreed with one or more persons to engage in and cause the performance of such conduct.

DESCRIPTIVE LANGUAGE AND OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from about January 1, 2010, to on or about the date of this indictment, certain overt acts, among others, were committed in New York County (unless otherwise stated). The descriptive language and overt acts stated in Counts One and Three above, and incorporated by reference therein, are incorporated herein by reference and are not repeated.

FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, accuses the defendants **RAYVON BECTON**, a/k/a “Ray Cash,” **KEVIN BOWMAN**, a/k/a “Boogs,” **JAVONE BROWN**, a/k/a “Fly Von,” **BRIAN CABRERA**, a/k/a “Pumpa,” **QUINTELL CAMPBELL**, a/k/a “Quin,” **JOHNNY CARATE**, a/k/a “Johnny 6,” **ENRIQUE COLLAZO**, a/k/a “Ricky,” **MAURICE CULP**, a/k/a “Moe Hicks,” **JAMES CUMMINGS**, **RALPHIE GARCIA**, **SHANE GILETTE**, a/k/a “A.K.,” **JEROME GREENE**, a/k/a “Merk,” **KAREEM HENDRICKS**, a/k/a “Reem,” **SABIO IGLESIA**, a/k/a “Sabo,” **KHALIF ISAAC**, a/k/a “Leaf Ski,” **TRAYVON JOHNSON**, a/k/a “Trigga,” **MALIK JONES**, a/k/a “Nitty,” **TERRANCE MILTON**, a/k/a “T-Money,” **TAYLONN MURPHY**, a/k/a “Bam Bam,” **GABRIEL NEGRON**, a/k/a “Turtle,” **ROBERT NELSON**, a/k/a “Poopah,” **LANCE OWENS**, a/k/a “Luda,” **EARL PIERCE**, **ERIC PIERCE**, a/k/a “Bullet,” **STEVEN REYNOSO**, **JERRY ROBINSON**, a/k/a “Ant Live,” **TROY SAUNDERS**, a/k/a “Timmy,” **LEQUINT SINGLETON**, **LAMONT SWINTON**, a/k/a “Mont,” **MOISES TORRES** and **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CONSPIRACY IN THE THIRD DEGREE**, in violation of Penal Law § 105.13, committed as follows:

The defendants, in the County of New York and elsewhere, during the period of time from on or about January 1, 2010, to on or about the date of this indictment, with intent that conduct constituting the crime of **GANG ASSAULT IN THE**

FIRST DEGREE be performed, said crime being a class “B” felony, being over eighteen years of age, agreed with each other, and with others, and with one or more persons under sixteen years of age, to engage in and cause the performance of such conduct.

DESCRIPTIVE LANGUAGE AND OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from about January 1, 2010, to on or about the date of this indictment, certain overt acts, among others, were committed in New York County (unless otherwise stated). The descriptive language and overt acts stated in Counts One and Three above are incorporated herein by reference and are not repeated. In addition:

262. On or about October 18, 2011, defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” caused or permitted to be posted on Facebook a status update in part and substance stating, "I ALREADY SHOWED I'D DIE FOR THIS SHIT."
263. On or about July 17, 2012, defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” caused or permitted to be posted on Facebook a message to rival MA gang member Davon Pinkston, in part and substance taunting Pinkston that defendant **JOHNSON** was in MA territory with other 3 Staccs members and no MA members were present to defend their territory.
264. On or about July 22, 2012, inside of a McDonald's restaurant, in the vicinity of Broadway and West 125th Street, defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” robbed an identified individual.

265. On or about August 5, 2012, defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” caused or permitted to be posted on Facebook a message, to a rival gang member, in part and substance threatening, "I'M GOING TO LAY ONE OF YOU DOWN."
266. On or about January 7, 2013, defendant **DION JOHNSON**, caused or permitted to be posted on Facebook a status update in part and substance stating, “3SOE THE SQUAD AND WE SOME SAVAGES SKURRRRRRTTT!!!!”
267. On or about January 17, 2013, defendant **DION JOHNSON**, caused or permitted to be posted on Facebook, messages to a fellow 3 Staccs gang member in part and substance asking that gang member if that gang member had a firearm to which the fellow 3 Staccs gang member responded “YEAH.”
268. On or about January 17, 2013, defendant **DION JOHNSON**, caused or permitted to be posted on Facebook a message to an unknown person in part and in substance discussing a firearm.
269. On or about February 9, 2013, in the vicinity of Old Broadway and West 126th Street, co-conspirator Carl Jones was caught running from the Manhattanville Houses in possession of a firearm moments after the shooting of a rival gang member whose identity is known to the Grand Jury.

270. On or about March 14, 2013, inside of 2005 Madison Avenue, defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” entered a school located at that address unlawfully, while armed with two razor blades concealed in his clothing.

SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRIL HOLMES**, a/k/a “50,” **DION JOHNSON**, a/k/a “Dion Santana,” **JAVON PETERSON**, a/k/a “J Burns” and **TRAVON THOMPSON**, a/k/a “Trey,” of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law § 105.15, committed as follows:

The defendants, in the County of New York and elsewhere, during the period from on or about January 1, 2010, to on or about the date of this indictment, with intent that conduct constituting the crime of **GANG ASSAULT IN THE FIRST DEGREE** be performed, said crime being a class “B” felony, agreed with one or more persons to engage in and cause the performance of such conduct.

DESCRIPTIVE LANGUAGE AND OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from about January 1, 2010, to on or about the date of this indictment, certain overt acts, among others, were committed in New York County (unless otherwise stated). The descriptive language and overt acts stated in Counts One, Three and Five above, and

incorporated by reference therein, are incorporated herein by reference and are not repeated.

SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **MAURICE CULP**, a/k/a “Moe Hicks,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(1)(b), committed as follows:

The defendant, in the County of New York, on or about March 21, 2010, possessed a loaded firearm with the intent to use the same unlawfully against another person.

EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant, **MAURICE CULP**, a/k/a “Moe Hicks,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(3), committed as follows:

The defendants, in the County of New York, on or about March 21, 2010, possessed a loaded firearm, said possession not being in the defendant’s home or place of business.

NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **KEVIN BOWMAN**, a/k/a “Boogs, **SABIO IGLESIA**, a/k/a “Sabo,” **EARL PIERCE**, **STEVEN REYNOSO**, **LAMONT SWINTON**, a/k/a “Mont,” and **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(1)(b), committed as follows:

The defendants, in the County of New York, on or about September 8, 2011, possessed a loaded firearm with the intent to use the same unlawfully against another person.

TENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants, **KEVIN BOWMAN**, a/k/a “Boogs, **SABIO IGLESIA**, a/k/a “Sabo,” **EARL PIERCE**, **STEVEN REYNOSO**, **LAMONT SWINTON**, a/k/a “Mont,” and **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(3), committed as follows:

The defendants, in the County of New York, on or about September 8, 2011, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

ELEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **RALPHIE GARCIA** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(1)(b), committed as follows:

The defendant, in the County of New York, on or about September 8, 2011, possessed a loaded firearm on school grounds with the intent to use the same unlawfully against another person.

TWELTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **RALPHIE GARCIA** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(3), committed as follows:

The defendant, in the County of New York, on or about September 8, 2011, possessed a loaded firearm on school grounds, said possession not being in the defendant's home or place of business.

THIRTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JOHNNY CARATE**, a/k/a “Johnny 6,” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF GANG ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws §§ 110/120.07, committed as follows:

The defendant, in the County of New York, on or about November 16, 2011, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person while aided by two or more persons actually present.

FOURTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **SABIO IGLESIA**, a/k/a “Sabo,” **ROBERT NELSON**, a/k/a “Poopah,” **STEVEN REYNOSO**, and **LEQUINT SINGLETON** of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF GANG ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws §§ 110/120.07, committed as follows:

The defendants, in the County of New York, on or about December 23, 2011, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person while aided by two or more persons actually present.

FIFTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **TERRANCE MILTON**, a/k/a “T-Money” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Laws §§ 110/265.03(1)(b), committed as follows:

The defendant, in the County of New York, on or about February 21, 2012, attempted to possess a loaded firearm with the intent to use the same unlawfully against another person.

SIXTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **TERRANCE MILTON**, a/k/a “T-Money” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Laws §§ 110/265.03(3), committed as follows:

The defendants, in the County of New York, on or about February 21, 2012, attempted to possess a loaded firearm, said possession not being in the defendant’s home or place of business.

SEVENTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(1)(b), committed as follows:

The defendant, in the County of New York, on or about July 22, 2012, possessed a loaded firearm with the intent to use the same unlawfully against another person.

EIGHTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(3), committed as follows:

The defendant, in the County of New York, on or about July 22, 2012, possessed a loaded firearm, said possession not being in the defendant’s home or place of business.

NINETEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” of the crime of **ROBBERY IN THE THIRD DEGREE**, in violation of Penal Law § 160.05, committed as follows:

The defendant, in the County of New York, on or about July 22, 2012, forcibly stole property from another individual.

TWENTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks,” and **MALIK JONES**, a/k/a “Nitty,” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF GANG ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws §§ 110/120.07, committed as follows:

The defendants, in the County of New York, on or about January 10, 2013, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person while aided by two or more persons actually present.

TWENTY-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks,” and **MALIK JONES**, a/k/a “Nitty,” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE SECOND DEGREE**, in violation of Penal Laws §§ 110/120.05(1), committed as follows:

The defendants, in the County of New York, on or about January 10, 2013, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person.

TWENTY-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks,” and **MALIK JONES**, a/k/a “Nitty,” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE SECOND DEGREE**, in violation of Penal Laws §§ 110/120.05(2), committed as follows:

The defendants, in the County of New York, on or about January 10, 2013, with intent to cause physical injury to another person, attempted to cause physical injury to another person by means of a dangerous instrument.

TWENTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks,” **TERRIL HOLMES**, a/k/a “50,” **MALIK JONES**, a/k/a “Nitty,” **SEAN PAGAN**, and **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF MURDER IN THE SECOND DEGREE**, in violation of Penal Laws §§ 110/125.25(1), committed as follows:

The defendants, in the County of New York, on or about February 9, 2013, with intent to cause the death of another person, attempted to cause the death of another person.

TWENTY-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks,” **MALIK JONES**, a/k/a “Nitty” and **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws §§ 110/120.10(1), committed as follows:

The defendants, in the County of New York, on or about February 9, 2013, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person by means of a deadly weapon.

TWENTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks,” **MALIK JONES**, a/k/a “Nitty” and **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF GANG ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws §§ 110/120.07, committed as follows:

The defendants, in the County of New York, on or about February 9, 2013, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person while aided by two or more persons actually present.

TWENTY-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks,” **MALIK JONES**, a/k/a “Nitty” and **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(1)(b), committed as follows:

The defendants, in the County of New York, on or about February 9, 2013, possessed a loaded firearm with the intent to use the same unlawfully against another person.

TWENTY-SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks,” **MALIK JONES**, a/k/a “Nitty” and **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(3), committed as follows:

The defendants, in the County of New York, on or about February 9, 2013, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

TWENTY-EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRIL HOLMES**, a/k/a “50,” and **SEAN PAGAN** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(1)(b), committed as follows:

The defendants, in the County of New York, on or about February 9, 2013, possessed a loaded firearm on school grounds with the intent to use the same unlawfully against another person.

TWENTY-NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRIL HOLMES**, a/k/a “50,” and **SEAN PAGAN** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(3), committed as follows:

The defendants, in the County of New York, on or about February 9, 2013, possessed a loaded firearm on school grounds, said possession not being in the defendants’ home or place of business.

THIRTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” of the crime of **BURGLARY IN THE THIRD DEGREE**, in violation of Penal Law § 140.20, committed as follows:

The defendant, in the County of New York, on or about March 14, 2013, knowingly entered and remained unlawfully inside of a school building located at 2005 Madison Avenue with the intent to commit a crime therein.

THIRTY-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **TRAYVON JOHNSON**, a/k/a “Trigga,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law § 265.02(1), committed as follows:

The defendant, in the County of New York, on or about March 14, 2013, possessed a dangerous instrument with the intent to use the same unlawfully against another.

THIRTY-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **QUINTELL CAMPBELL**, a/k/a “Quin,” and **TRAVON THOMPSON**, a/k/a “Trey,” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF MURDER IN THE SECOND DEGREE**, in violation of Penal Laws §§ 110/125.25(1), committed as follows:

The defendants, in the County of New York, on or about July 5, 2013, with intent to cause the death of another person, attempted to cause the death of another person.

THIRTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **QUINTELL CAMPBELL**, a/k/a “Quin,” and **TRAVON THOMPSON**, a/k/a “Trey,” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws §§ 110/120.10(1), committed as follows:

The defendants, in the County of New York, on or about July 5, 2013, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person by means of a deadly weapon.

THIRTY-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **QUINTELL CAMPBELL**, a/k/a “Quin,” and **TRAVON THOMPSON**, a/k/a “Trey,” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF GANG ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws §§ 110/120.07, committed as follows:

The defendants, in the County of New York, on or about July 5, 2013, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person while aided by two or more persons actually present.

THIRTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **QUINTELL CAMPBELL**, a/k/a “Quin,” and **TRAVON THOMPSON**, a/k/a “Trey,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(1)(b), committed as follows:

The defendants, in the County of New York, on or about July 5, 2013, possessed a loaded firearm with the intent to use the same unlawfully against another person.

THIRTY-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **QUINTELL CAMPBELL**, a/k/a “Quin,” and **TRAVON THOMPSON**, a/k/a “Trey,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(3), committed as follows:

The defendants, in the County of New York, on or about July 5, 2013, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

THIRTY-SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TAYLONN MURPHY**, a/k/a “Bam Bam,” **STEVEN REYNOSO**, and **MOISES TORRES** of the crime of **ROBBERY IN THE SECOND DEGREE**, in violation of Penal Law § 160.10(1), committed as follows:

The defendants, in the County of New York, on or about July 5, 2013, forcibly stole property from another individual while aided by another person actually present.

THIRTY-EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TAYLONN MURPHY**, a/k/a “Bam Bam,” **STEVEN REYNOSO**, and **MOISES TORRES** of the crime of **ROBBERY IN THE SECOND DEGREE**, in violation of Penal Law § 160.10(2)(a), committed as follows:

The defendants, in the County of New York, on or about July 5, 2013, forcibly stole property from another individual and, in the course of the commission of the crime and in the immediate flight therefrom, caused physical injury to another person who was not a participant in the crime.

THIRTY-NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JAMES CUMMINGS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(1)(b), committed as follows:

The defendant, in the County of New York, on or about July 8, 2013, possessed a loaded firearm with the intent to use the same unlawfully against another person.

FORTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JAMES CUMMINGS** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(3), committed as follows:

The defendant, in the County of New York, on or about July 8, 2013, possessed a loaded firearm, said possession not being in the defendant's home or place of business.

FORTY-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **MAURICE CULP**, a/k/a “Moe Hicks,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law § 265.02(1), committed as follows:

The defendant, in the County of New York, on or about July 10, 2013, possessed a dangerous instrument with the intent to use the same unlawfully against another.

FORTY-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **MAURICE CULP**, a/k/a “Moe Hicks,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law § 265.02(1), committed as follows:

The defendant, in the County of New York, on or about July 10, 2013, possessed a dangerous instrument with the intent to use the same unlawfully against another.

FORTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JERRY ROBINSON**, a/k/a “Ant Live,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE**, in violation of Penal Law § 265.01(2), committed as follows:

The defendant, in the County of New York, on or about July 10, 2013, possessed a dangerous instrument with the intent to use the same unlawfully against another.

FORTY-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JERRY ROBINSON**, a/k/a “Ant Live,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE**, in violation of Penal Law § 265.01(2), committed as follows:

The defendant, in the County of New York, on or about July 10, 2013, possessed a dangerous instrument with the intent to use the same unlawfully against another.

FORTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks” and **KAREEM HENDRICKS**, a/k/a “Reem,” of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of Penal Law § 120.10(1), committed as follows:

The defendants, in the County of New York, on or about August 25, 2013, with intent to cause serious physical injury to another person, caused serious physical injury to another person by means of a dangerous instrument.

FORTY-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks” and **KAREEM HENDRICKS**, a/k/a “Reem,” of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of Penal Law § 120.10(1), committed as follows:

The defendants, in the County of New York, on or about August 25, 2013, with intent to cause serious physical injury to another person, caused serious physical injury to another person by means of a dangerous instrument.

FORTY-SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **MAURICE CULP**, a/k/a “Moe Hicks” of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of Penal Law § 120.10(2), committed as follows:

The defendant, in the County of New York, on or about August 25, 2013, with intent to disfigure another person seriously and permanently caused serious such injury to another person by means of a dangerous instrument.

FORTY-EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **MAURICE CULP**, a/k/a “Moe Hicks” of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of Penal Law § 120.10(2), committed as follows:

The defendant, in the County of New York, on or about August 25, 2013, with intent to disfigure another person seriously and permanently caused serious such injury to a second person by means of a dangerous instrument.

FORTY-NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks” and **KAREEM HENDRICKS**, a/k/a “Reem,” of the crime of **GANG ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws § 120.07, committed as follows:

The defendants, in the County of New York, on or about August 25, 2013, with intent to cause serious physical injury to another person, caused serious physical injury to another person while aided by two or more persons actually present.

FIFTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **MAURICE CULP**, a/k/a “Moe Hicks” and **KAREEM HENDRICKS**, a/k/a “Reem,” of the crime of **GANG ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws § 120.07, committed as follows:

The defendants, in the County of New York, on or about August 25, 2013, with intent to cause serious physical injury to another person, caused serious physical injury to another person while aided by two or more persons actually present.

FIFTY-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **JAVONE BROWN**, a/k/a “Fly Von,” **BRIAN CABRERA**, a/k/a “Pumpa,” **JOHNNY CARATE**, a/k/a “Johnny 6,” **JEROME GREENE**, a/k/a “Merk,” **TERRANCE MILTON**, a/k/a “T-Money,” **ERIC PIERCE**, a/k/a “Bullet,” **JAVON PETERSON**, a/k/a “J Burns,” **LEQUINT SINGLETON**, and **LAMONT SWINTON**, a/k/a “Mont” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF MURDER IN THE SECOND DEGREE**, in violation of Penal Laws §§ 110/125.25(1), committed as follows:

The defendants, in the County of New York, on or about October 19, 2013, with intent to cause the death of another person, attempted to cause the death of another person.

FIFTY-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **JAVONE BROWN**, a/k/a “Fly Von,” **BRIAN CABRERA**, a/k/a “Pumpa,” **JOHNNY CARATE**, a/k/a “Johnny 6,” **JEROME GREENE**, a/k/a “Merk,” **TERRANCE MILTON**, a/k/a “T-Money,” **ERIC PIERCE**, a/k/a “Bullet,” **JAVON PETERSON**, a/k/a “J Burns,” **LEQUINT SINGLETON**, and **LAMONT SWINTON**, a/k/a “Mont” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws §§ 110/120.10(1), committed as follows:

The defendants, in the County of New York, on or about October 19, 2013, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person by means of a deadly weapon.

FIFTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **JAVONE BROWN**, a/k/a “Fly Von,” **BRIAN CABRERA**, a/k/a “Pumpa,” **JOHNNY CARATE**, a/k/a “Johnny 6,” **JEROME GREENE**, a/k/a “Merk,” **TERRANCE MILTON**, a/k/a “T-Money,” **ERIC PIERCE**, a/k/a “Bullet,” **JAVON PETERSON**, a/k/a “J Burns,” **LEQUINT SINGLETON**, and **LAMONT SWINTON**, a/k/a “Mont” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF GANG ASSAULT IN THE FIRST DEGREE**, in violation of Penal Laws §§ 110/120.07, committed as follows:

The defendants, in the County of New York, on or about October 19, 2013, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person while aided by two or more persons actually present.

FIFTY-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **JAVONE BROWN**, a/k/a “Fly Von,” **BRIAN CABRERA**, a/k/a “Pumpa,” **JOHNNY CARATE**, a/k/a “Johnny 6,” **JEROME GREENE**, a/k/a “Merk,” **TERRANCE MILTON**, a/k/a “T-Money,” **ERIC PIERCE**, a/k/a “Bullet,” **JAVON PETERSON**, a/k/a “J Burns,” **LEQUINT SINGLETON**, and **LAMONT SWINTON**, a/k/a “Mont” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Laws §§ 110/265.03(1)(b), committed as follows:

The defendants, in the County of New York, on or about October 19, 2013, attempted to possess a loaded firearm with the intent to use the same unlawfully against another person.

FIFTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **JAVONE BROWN**, a/k/a “Fly Von,” **BRIAN CABRERA**, a/k/a “Pumpa,” **JOHNNY CARATE**, a/k/a “Johnny 6,” **JEROME GREENE**, a/k/a “Merk,” **TERRANCE MILTON**, a/k/a “T-Money,” **ERIC PIERCE**, a/k/a “Bullet,” **JAVON PETERSON**, a/k/a “J Burns,” **LEQUINT SINGLETON**, and **LAMONT SWINTON**, a/k/a “Mont” of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Laws §§ 110/265.03(3), committed as follows:

The defendants, in the County of New York, on or about October 19, 2013, attempted to possess a loaded firearm, said possession not being in the defendants’ home or place of business.

FIFTY-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law § 265.02(1), committed as follows:

The defendant, in the County of New York, on or about December 16, 2013, possessed a dangerous instrument with the intent to use the same unlawfully against another.

FIFTY-SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **PAUL WASHINGTON**, a/k/a “Paulie,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law § 265.02(1), committed as follows:

The defendant, in the County of New York, on or about February 1, 2014, possessed a dangerous instrument with the intent to use the same unlawfully against another.

FIFTY-EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **SHANE GILLETTE**, a/k/a “A.K.,” **TERRIL HOLMES**, a/k/a “50,” **LANCE OWENS**, a/k/a “Luda,” and **TRAVON THOMPSON**, a/k/a “Trey,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(1)(b), committed as follows:

The defendants, in the County of New York, on or about May 9, 2014, possessed a loaded firearm with the intent to use the same unlawfully against another person.

FIFTY-NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **SHANE GILLETTE**, a/k/a “A.K.,” **TERRIL HOLMES**, a/k/a “50,” **LANCE OWENS**, a/k/a “Luda,” and **TRAVON THOMPSON**, a/k/a “Trey,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law § 265.03(3), committed as follows:

The defendants, in the County of New York, on or about May 9, 2014, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW
YORK

-against-

MAURICE CULP,

Defendant.

SPECIAL INFORMATION
(CPL §200.60(2) relating to the
Ind. filed herewith.)

I, Cyrus R. Vance, Jr., District Attorney for the County of New York, by this information, accuse the defendant of two counts of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law §265.02(1) in that:

The defendant on or about March 20, 2007, in the Supreme Court of the State of New York, was duly convicted of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF ROBBERY IN THE SECOND DEGREE**, in violation of Penal Law §§110/160.10(1).

Dated: New York, New York
May 30, 2014

CYRUS R. VANCE, JR.
District Attorney

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW
YORK

-against-

TRAYVON JOHNSON,

Defendant.

SPECIAL INFORMATION
(CPL §200.60(2) relating to the
Ind. filed herewith.)

I, Cyrus R. Vance, Jr., District Attorney for the County of New York, by this information, accuse the defendant of two counts of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law §265.02(1) in that:

The defendant on or about February 21, 2013, in the Supreme Court of the State of New York, was duly convicted of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE FIRST DEGREE**, in violation of Penal Law §§110/120.10(1).

Dated: New York, New York
May 30, 2014

CYRUS R. VANCE, JR.
District Attorney

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW
YORK

-against-

PAUL WASHINGTON,

Defendant.

SPECIAL INFORMATION
(CPL §200.60(2) relating to the
Ind. filed herewith.)

I, Cyrus R. Vance, Jr., District Attorney for the County of New York, by this information, accuse the defendant of two counts of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of Penal Law §265.02(1) in that:

The defendant on or about October 16, 2012, in the Criminal Court of the City of New York, County of New York, was duly convicted of the crime of **ASSAULT IN THE THIRD DEGREE**, in violation of Penal Law § 120.00(1).

Dated: New York, New York
May 30, 2014

CYRUS R. VANCE, JR.
District Attorney

**FULLY SUPERSEDES INDICTMENTS 3698/2013, 3827/2013, 1003/2014 & 1539/2014
PARTIALLY SUPERSEDES INDICTMENT 4677/2013
DOCKETS 2013NY021242, 2013NY094825 & 2014NY036742**

No.

THE PEOPLE OF THE STATE OF NEW YORK

-against-

RAYVON BECTON, a/k/a “Ray Cash,”
KEVIN BOWMAN, a/k/a “Boogs,”
JAVONE BROWN, a/k/a “Fly Von,”
BRIAN CABRERA, a/k/a “Pumpa,”
QUINTELL CAMPBELL, a/k/a “Quin,”
JOHNNY CARATE, a/k/a “Johnny 6,”
ENRIQUE COLLAZO, a/k/a “Ricky,”
MAURICE CULP, a/k/a “Mo Hicks,”
JAMES CUMMINGS,
RALPHIE GARCIA,
SHANE GILLETTE, a/k/a “A.K.,”
JEROME GREENE, a/k/a “Merk,”
KAREEM HENDRICKS, a/k/a “Reem,”
TERRIL HOLMES, a/k/a “50,”
SABIO IGLESIA, a/k/a “Sabo,”
KHALIF ISAAC, a/k/a “Leaf Ski,”
DION JOHNSON, a/k/a “Dion Santana,”
TRAYVON JOHNSON, a/k/a “Trigga,”
MALIK JONES, a/k/a “Nitty,”
TERRANCE MILTON, a/k/a “T-Money,”
TAYLONN MURPHY, a/k/a “Bam Bam,”
GABRIEL NEGRON, a/k/a “Turtle,”
ROBERT NELSON, a/k/a “Poopah,”
LANCE OWENS, a/k/a “Luda,”
SEAN PAGAN, as a juvenile offender,
JAVON PETERSON, a/k/a “J Burns,”
EARL PIERCE, a/k/a “Ski Beazy,”

ERIC PIERCE, a/k/a “Bullet,”
STEVEN REYNOSO,
JERRY ROBINSON, a/k/a “Ant Live,”
TROY SAUNDERS, a/k/a “Timmy,”
LEQUINT SINGLETON, a/k/a “L Money,”
LAMONT SWINTON, a/k/a “Mont,”
TRAVON THOMPSON, a/k/a “Trey,”
MOISES TORRES,
PAUL WASHINGTON, a/k/a “Paulie,”

Defendants.

CONSPIRACY IN THE FIRST DEGREE, P.L. §105.17 – defs. BOWMAN, BROWN, CABRERA, CAMPBELL, CARATE, CULP, CUMMINGS, GILETTE, GREENE, HENDRICKS, IGLESIA, JONES, MILTON, MURPHY, NEGRON, OWENS, EARL PIERCE, ERIC PIERCE, SAUNDERS, SINGLETON, SWINTON, and WASHINGTON

CONSPIRACY IN THE SECOND DEGREE, P.L. §105.15 – defs. HOLMES, PETERSON, and THOMPSON

CONSPIRACY IN THE THIRD DEGREE, P.L. §105.13 – defs. BECTON (2 counts), BOWMAN (2 counts), BROWN (2 counts), CABRERA (2 counts), CAMPBELL (2 counts), CARATE (2 counts), COLLAZO (2 counts), CULP (2 counts), CUMMINGS (2 counts), GARCIA (2 counts), GILETTE (2 counts), GREENE (2 counts), HENDRICKS (2 counts), IGLESIA (2 counts), ISAAC (2 counts), T. JOHNSON, JONES (2 counts), MILTON (2 counts), MURPHY (2 counts), NEGRON (2 counts), NELSON (2 counts), OWENS (2 counts), EARL PIERCE (2 counts), ERIC PIERCE (2 counts), REYNOSO, ROBINSON (2 counts), SAUNDERS (2 counts), SINGLETON (2 counts), SWINTON (2 counts), TORRES (2 counts) and WASHINGTON (2 counts)

CONSPIRACY IN THE FOURTH DEGREE, P.L. §105.10(1) – defs. HOLMES (2 counts), D. JOHNSON, PETERSON (2 counts) and THOMPSON (2 counts)

AN ATTEMPT TO COMMIT THE CRIME OF MURDER IN THE SECOND DEGREE, P.L. §§110/125.25(1) – defs. BROWN (1 count), CABRERA (1 count), CAMPBELL (1 count), CARATE (1 count), CULP (1 count), GREENE (1 count), HOLMES as Juvenile Offender (1 count), JONES (1 count) MILTON (1 count), PAGAN as Juvenile Offender (1 count), PETERSON (1 count), PIERCE (1 count) SINGLETON (1 count), SWINTON (1 count), THOMPSON (1 count), and WASHINGTON (1 count)

ASSAULT IN THE FIRST DEGREE, P.L. §120.10(1) – defs. CULP (1 count), HENDRICKS (1 count)

ASSAULT IN THE FIRST DEGREE, P.L. §120.10(2) – def. CULP (1 count)

GANG ASSAULT IN THE FIRST DEGREE, P.L. §120.07 – defs. CULP (1 count), HENDRICKS (1 count)

AN ATTEMPT TO COMMIT THE CRIME OF GANG ASSAULT IN THE FIRST DEGREE, P.L. §§110/120.07 – defs.), BROWN (1 count), CABRERA (1 count), CAMPBELL (1 count), CARATE (2 counts), CULP (2 counts), GREENE (1 count), HOLMES, as a juvenile offender (1 count), IGLESIAS (1 count), JONES (2 counts), MILTON (1 count), NELSON (1 count), PAGAN, as a juvenile offender (1 count), PETERSON (1 count), PIERCE (1 count) REYNOSO (1 count), SINGLETON (2 counts), SWINTON (1 count), THOMPSON (1 count) and WASHINGTON (1 count)

AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE FIRST DEGREE, P.L. §§110/120.10(1) – defs. BROWN (1 count), CABRERA (1 count), CAMPBELL (1 count), CARATE (1 count), CULP (1 count), GREENE (1 count), HOLMES as a juvenile offender, (1 count), JONES (1 count), MILTON (1 count), PAGAN as a juvenile offender (1 count), PETERSON (1 count), PIERCE (1 count), SINGLETON (1 count), SWINTON (1 count) THOMPSON (1 count), and WASHINGTON (1 count)

CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, P.L. §265.03(1)(b), an armed felony – defs. BOWMAN (1 Count), CAMPBELL (1 Count), CUMMINGS (1 Count), Culp (1 Count), GARCIA as a Juvenile Offender (1 count), GILETTE (1 Count) HOLMES as a Juvenile Offender (1 Count), HOLMES (1 Count), IGLESIA (1 Count), JONES (1 Count), OWENS (1 Count), PAGAN as a Juvenile Offender (1

count), EARL PIERCE (1 Count), REYNOSO (1 Count), SWINTON (1 Count), THOMPSON (2 Counts), and WASHINGTON (3 Counts)
CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, P.L. §265.03(3), an armed felony – defs. BOWMAN (1 Count), CAMPBELL (1 Count), Culp (1 Count), CUMMINGS (1 Count), GARCIA as a Juvenile Offender (1 count), GILETTE (1 Count), HOLMES as a Juvenile Offender (1 Count), HOLMES (1 Count), IGLESIA (1 Count), JONES (1 Count), OWENS (1 Count), PAGAN as a Juvenile Offender (1 count), EARL PIERCE (1 Count), REYNOSO (1 Count), SWINTON (1 Count), THOMPSON (2 Counts), and WASHINGTON (3 Counts)
ROBBERY IN THE SECOND DEGREE, P.L. § 160.10(1) – defs. MURPHY (1 Count), REYNOSO (1 Count) and TORRES (1 Count).
ROBBERY IN THE SECOND DEGREE, P.L. § 160.10(2)(a) – defs. MURPHY (1 Count), REYNOSO (1 Count) and TORRES (1 Count)
AN ATTEMPT TO COMMIT THE CRIME OF CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, P.L. §§110/265.03(1)(b) – defs. BROWN (1 Count), CABRERA (1 Count), CARATE (1 Count), CULP (1 Count), GREENE (1 Count), MILTON (2 Counts), PETERSON (1 Count), PIERCE (1 Count) SINGLETON (1 Count), and SWINTON (1 Count).
AN ATTEMPT TO COMMIT THE CRIME OF CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, P.L. §§110/265.03(3) – defs. BROWN (1 Count), CABRERA (1 Count), CARATE (1 Count), CULP (1 Count), GREENE (1 Count), MILTON (2 Counts), PIERCE (1 Count), PETERSON (1 Count), SINGLETON (1 Count), and SWINTON (1 Count).
AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE SECOND DEGREE, P.L. § 120.05(1) – defs. CULP (1 Count) and JONES (1 Count).
AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE SECOND DEGREE, P.L. §120.05(2) – defs. CULP (1 Count) and JONES (1 Count).
CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE, P.L. § 265.02(1) – defs. CULP (2 Counts) T. JOHNSON (2 Counts), and WASHINGTON (2 Counts).
BURGLARY IN THE THIRD DEGREE, P.L. § 140.20 – def. T. JOHNSON (1 Count)
CRIMINAL POSSESSION OF A WEAPON IN THE FOURTH DEGREE, P.L. § 265.01(2) – def. ROBINSON (2 Counts).

CYRUS R. VANCE, JR, District Attorney

A True Bill

Foreman

ADA ANDREW WARSHAWER
VIOLENT CRIMINAL ENTERPRISES UNIT