
THE PEOPLE OF THE STATE OF NEW YORK

- against -

TERRANCE ABDUR-RAHMAN, a/k/a “T Mula Mack,”
TY-KWAN ALLEN, a/k/a “Ty,”
PATRICK BAPTISTE, a/k/a “Pat Banga,”
WILLIE BELLINGER, a/k/a “Ill Will,”
CHRISTOPHER BERKLEY, a/k/a “Shark,”
CARASHANE BRADFORD, a/k/a “Shane,”
LONDELL BREVARD,
NAQUAN BROCKINGTON, a/k/a “Tubz,”
DENZEL BROWN, a/k/a “Henny Denny,”
COREY BUMPASS, a/k/a “Cor,” a/k/a “Bump,”
LARRY BUNCE, a/k/a “Knockout,”
WILLIAM BUNCE, a/k/a “Billz,”
JOSHUA CADLE, a/k/a “Squidward,”
TIJAE CHAPPLE, a/k/a “Mula Ty,”
JUWAN ELLIS, a/k/a “Cha Cha,”
DEONDRE ELLIS-VAZQUEZ, a/k/a “Dre,”
MICHAEL ENGLISH, a/k/a “White Mike,”
DAMIAN GARCIA, a/k/a “Day Day,”
RAYMOND GARCIA, a/k/a “Ray Ray,”
JAVANN GARNES, a/k/a “J Hat”
KEITH GOODMAN, a/k/a “Inf,”
DAVON GOULDBOURNE, a/k/a “Young Hef,”
STEVEN GRANDY, a/k/a STEVEN JOSEPH,
JOHNNY GREEN, a/k/a “Jojo”
LONZELL GREEN, a/k/a “Zell Pacino,” as a juvenile offender,
ANTHONY GREGORY, a/k/a “Ant,”
ANDRE GUZMAN, a/k/a “Drizzy,”
BRIAN HARRIS, a/k/a “Snubbs,”
JALEN HARRIS, a/k/a “Fatboy,” a/k/a “J Bundles,”
TYRELL HEDGES, a/k/a “Rell,” as a juvenile offender
CHRISTOPHER HENDRICKSON, a/k/a “Noodles,”
NICHOLAS HOLDEN, a/k/a “Nick Bannon,”
DAVON JENKINS,
CHRISTOPHER JIMINEZ,
STEPHON JOHNSON, a/k/a “Steph,
MARQUIS JONES, a/k/a “Little Knockout,”

JORDAN LASTER, a/k/a “Wop,”
SHAWN LASTER, a/k/a “S Dot,”
LONNIE LESTER, a/k/a “L’s”
MICHAEL LOPEZ, a/k/a “Nino,”
JOSE MARTINEZ, a/k/a “Cuevo,”
KHALID MILLER, a/k/a “Little Monster,”
CHRISTOPHER PARKS, a/k/a “Chris Black,”
ZAIRE PERRY, a/k/a “Za,”
JORDAN PINALES, a/k/a “J.P.,”
DAVON PINKSTON, a/k/a “Pac,”
EARNEST PLEASANT, a/k/a “Monster,”
SHAVON PRATT, a/k/a “B-Mack,”
TAHEEM PRATT, a/k/a “Tata,”
DARRELL RHETT, a/k/a “D Slimes,”
DONDRE RIDDICK, a/k/a “Dre,”
ALEJANDRO RIVERA, a/k/a “Whiteboy,”
CARLOS RODRIGUEZ, a/k/a “Loso,”
ALEXIS ROLANDEDWIGE, a/k/a “B.B.,”
MARKEESE SCOTT, a/k/a “Doodie,”
CHARLES SIMMONS,
ERVIN SWAIN, a/k/a “G Baby,”
DEVANTE TAYLOR, a/k/a “Buck,”
KENNETH THOMAS,
DEONDRE TOOLE, a/k/a “Dre,”
DEVANTE WASHINGTON, a/k/a “Sleeps,”
DOMONIQUE WASHINGTON, a/k/a “Domo,”
ISAAC WATERMAN, a/k/a “Poe,”
DASHAWN WILLIAMS, a/k/a “D Live,”
DEMETRIUS WILLIAMS, a/k/a “Meetry,”
DAQUON WILLIAMS, a/k/a “Quon Goonie,”
SAMUEL WILLIAMS, a/k/a “Sambo,” a/k/a “Sammy Pastrana,”

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **WILLIE BELLINGER**, a/k/a “Ill Will,” **CARASHANE BRADFORD**, a/k/a “Shane,” **DENZEL BROWN**, a/k/a “Henny Denny,” **COREY BUMPASS**, a/k/a “Cor,” a/k/a “Bump,” **JOSHUA CADLE**, a/k/a “Squidword,” **JUWAN ELLIS**, a/k/a “Cha Cha,” **DEONDRE ELLIS-VASQUEZ**, **MICHAEL ENGLISH**, a/k/a “White Mike,” **JAVANN GARNES**, a/k/a “J Hat,” **KEITH GOODMAN**, a/k/a “Inf,” **JORDAN LASTER**, a/k/a “Wop,” **CHRISTOPHER PARKS**, a/k/a “Chris Black,” **DAVON PINKSTON**, a/k/a “Pac,” **EARNEST PLEASANT**, a/k/a “Monster,” **SHAVONN PRATT**, a/k/a “B-Mack,” **DONDRE RIDDICK**, a/k/a “Dre,” **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” **CARLOS RODRIGUEZ**, a/k/a “Loso,” **ALEXIS ROLANDEDWIGE**, a/k/a “B.B.,” **MARKEESE SCOTT**, a/k/a “Doodie,” **ERVIN SWAIN**, a/k/a “G Baby,” **KENNETH THOMAS**, **DANDRE TOOLE**, a/k/a “Dre,” and **DOMONIQUE WASHINGTON**, a/k/a “Domo,” 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 two allied Harlem street gangs: the “Make it Happen Boys,” also known as “the Ville” and “Only the Ville,” who had residential, family or social ties to the vicinity of the New York City Housing Authority’s Manhattanville Houses, located between Broadway and Amsterdam Avenue, from West 126th to West 133rd Streets in New York County, and “Money Avenue,” formerly known as the “Block Boyz,” who had residential, family or social ties to the area in the vicinity of Morningside to Manhattan Avenues, from West 115th Street to West 120th Street. These allied gang members sought to assert control over those vicinities, alone and jointly, 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 of both allied gangs, 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 “Make it Happen Boys” and “Money Avenue” gangs, and avenging acts of violence and perceived disrespect against the “Make it Happen Boys” and “Money Avenue” gang members, including, but not limited to, avenging the shooting death of Walter “Recc” Sumter, avenging numerous other shootings, physical assaults and robberies of “Make it Happen Boys” and “Money Avenue” gang members, and responding to geographic incursions and/or mocking of the “Make it Happen Boys” and “Money Avenue” gangs 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 “3 Staccs” gang associated with the New York City Housing Authority’s General Grant Houses; (2) to possess illegal firearms to assert dominance in and around the Manhattanville Houses, as well as the vicinity of Manhattan Avenue from West 115th to West 120th Streets, 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 the “Make it Happen Boys” and “Money Avenue” gangs; (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 the “Make it Happen Boys” and “Money Avenue” gangs and events occurring in and around the Manhattanville Houses and Manhattan Avenue, including, but not limited to: (a) arrests of members and associates of the “Make it Happen Boys” and “Money Avenue” gangs and rival gangs; (b) acts of violence by members and associates of the “Make it Happen Boys” and “Money Avenue” gangs against rival gang members; and (c) acts of violence committed by members of rival street gangs against members and associates of the “Make it Happen Boys” and “Money Avenue” gangs; (13) to communicate with members and associates of the two all on behalf of incarcerated members of the “Make it Happen Boys” and “Money Avenue” gangs; and (14) to

publicize and claim credit for acts of violence committed by the “Make it Happen Boys” and “Money Avenue” gangs and to publically disrespect and denigrate rival gang members over social media.

It was also part of the conspiracy for the “Make it Happen Boys” and “Money Avenue” 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 “Make it Happen Boys” and “Money Avenue” gang 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 “Make it Happen Boys” and “Money Avenue” gang members; and (d) to carry out instructions from older “Make it Happen Boys” and “Money Avenue” gang members related to aiding 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 18, 2011, defendant **CARASHANE BRADFORD**, a/k/a “Shane,” caused or permitted to be posted on Facebook a status update in part and in substance stating, “FUCK GRANT” and “MONEY AVE UP.”
2. On or about February 25, 2011, defendant **DARRELL RHETT**, a/k/a “D Slimes,” caused or permitted to be posted on Facebook a message to defendant **MICHAEL ENGLISH**, a/k/a “White Mike,” in part and substance asking defendant **ENGLISH** if he has \$200 to help purchase a .40 caliber firearm for \$450.
3. On or about February 26, 2011, in the vicinity of Saint Nicholas Avenue and West 126th Street, defendants **MICHAEL ENGLISH**, a/k/a “White Mike,” and **DARRELL RHETT**, a/k/a “D Slimes,” along with two unidentified co-conspirators, chased and shot at rival 3 Staccs gang members, striking one of them, whose identity is known to the Grand Jury.

4. On or about April 2, 2011, in a telephone call recorded by the New York City Department of Correction, defendant **MICHAEL ENGLISH**, a/k/a "White Mike," spoke with an unidentified individual, in part and substance discussing an upcoming MA party that gang members would be attending, and expressing concern that it was a set-up and that a fellow MA gang member would be killed by rival 3 Staccs gang members.
5. On or about May 1, 2011, defendant **JORDAN LASTER**, a/k/a "Wop," caused or permitted to be posted on Facebook a message to an unidentified individual, in part and substance stating, "WE SHOOT TO KILL."
6. On or about May 2, 2011, in the vicinity of Amsterdam Avenue and West 126th Street, defendant **MICHAEL LOPEZ**, a/k/a "Nino," possessed a loaded .357 Magnum caliber revolver and fired it repeatedly at rival gang members.
7. On or about May 5, 2011, defendant **CARLOS RODRIGUEZ**, a/k/a "Loso," caused or permitted to be posted on Facebook a status update in part and substance stating, "I LOVE MHB" and "FREE NINO," in reference to the arrest of defendant **MICHAEL LOPEZ**, a/k/a "Nino."

8. On or about June 3, 2011, defendant **ERNEST PLEASANT**, a/k/a “Monster,” caused or permitted to be posted on Facebook messages to an identified co-conspirator in part and in substance vowing revenge against rival 3 Staacs gang members for shooting the identified co-conspirator the previous day.
9. On or about June 7, 2011, defendants **ERNEST PLEASANT** a/k/a “Monster,” and **KHALID MILLER** a/k/a “Lil Monster,” caused or permitted to be posted on Facebook a conversation in which defendant **MILLER** in part and substance informed defendant **PLEASANT** that defendant **MILLER** had been attacked by rival gang members, to which defendant **PLEASANT** in part and substance responded, “I DON’T WANT NUFFIN HAPPENIN TO YOU MAN, IMA KILL ONE OF NIGGAS B EASY OUT THERE.”
10. On or about June 13, 2011, defendant **WILLIE BELLINGER** mailed a letter from a state correctional facility to an identified co-conspirator at 545 West 126th Street in which defendant **BELLINGER** in part and in substance stated, "THEM GRANT NIGGAS BRO THEY GETTING ON MY NERVE BRO REAL TALK" and "AYO, THIS IS BETWEEN ME AND YOU BRO DON’T TELL NOBODY THIS, LISTEN, KEEP IT REAL WITH ME BRO IF YOU REALY WANT TO CLAP, KILL, SHOOT, ONE OF THESE NIGGAS I’M WITH IT

CAUSE THEY GETTING OUT OF HAND BRO. ANYWAY BRO, WHEN I COME HOME THAT'S WORD TO EVERYTHING WE GOING TO MOB" SIGNING THE LETTER "YOUR BRO, ILL WILL."

11. On or about August 5, 2011, co-conspirator Walter "Recc" Sumter and defendant **JALEN HARRIS**, a/k/a "Fat Boy," caused or permitted to be posted on Facebook a conversation, with each other, in part and substance stating that Sumter and defendants **HARRIS, PATRICK BAPTISTE** a/k/a P Banga,"and **COREY BUMPASS**, a/k/a "Bump," should put their money together and purchase a firearm.
12. On or about August 26, 2011, defendant **TY-KWAN ALLEN**, a/k/a "Ty," caused or permitted to be posted on Facebook a status update in part and substance stating, "GRIMEY GRANT KILLA 3 STACKS MURDARA M.A. ON DECK DNT SAY U NEVER HERD OF USE," to which defendant **CARASHANE BRADFORD**, a/k/a "Shane," responded "WRD."
13. On or about September 7, 2011, defendant **TY-KWAN ALLEN**, a/k/a "Ty," caused or permitted to be posted on Facebook a status update in part and substance stating, "DON'T PUT SLIME IN YOUR NAME IF YOU DON'T LET SHIT FLY FOR THE BLOCK."

14. On or about September 10, 2011, an identified co-conspirator caused or permitted to be posted on Youtube a video in part and substance depicting defendant **JALEN HARRIS**, a/k/a “Fat Boy,” stating, “GRIP UP,” defendant **DEVANTE WASHINGTON**, a/k/a “Sleepz,” stating, “FREE D SLIMES,” defendant **COREY BUMPASS**, a/k/a “Bump,” stating, “FREE DOODIE,” and defendants **MARKEESE SCOTT**, a/k/a “Doodie,” and **KENNETH THOMAS** yelling “Mula,” while accompanied by co-conspirator Walter “Recc” Sumter and defendant **JOSHUA CADLE**, a/k/a “Squidward.”
15. On or about September 11, 2011, defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” caused or permitted to be posted on Facebook a message to defendant **MARQUIS JONES**, a/k/a “Lil Knockout,” in part and in substance stating, “WE HAD LIKE FIVE BRAWLS IN ONE DAY AND THEN WE LEFT” and “SOMEBODY CLAPPED THE CHICKEN GIRL IN THE HEAD.”
16. On or about September 12, 2011, **TY-KWAN ALLEN**, a/k/a “Ty,” caused or permitted to be posted on Facebook a status update in part and substance stating, “MONEY AVE GANG OR DON’T BANG” and “MONEY AVE UP.”

17. On or about September 13, 2011, defendant **DAVON GOULBOURNE**, a/k/a “Hef,” caused or permitted to be posted on Facebook messages to rival gang member Brian Cabrera in part and in substance bragging about the killing of Tayshana “Chicken” Murphy and stating, “THASS WHY NIGGAS FRIED THE CHICKEN,” to which Cabrera in part and substance responded, “NOW IMAAA KILL YUHH.”
18. On or about September 14, 2011, defendant **JORDAN LASTER** a/k/a “Wop,” caused or permitted to be posted on Facebook a status update in part and substance stating, “MY NIGGAS BODIED A GRANT BITCH.”
19. On or about September 14, 2011, defendant **TY-KWAN ALLEN**, a/k/a “Ty,” caused or permitted to be posted on Facebook a status update in part and substance mocking the murder of Tayshana “Chicken” Murphy and stating, “I LIKE MY CHICKEN DEEP FRIED.”
20. On or about September 28, 2011, defendant **DAVON GOULBOURNE**, a/k/a “Hef,” caused or permitted to be posted a Facebook a message to “Dre Slimes” in part and substance stating, “YESTERDAY ME AND TY POPPED IT OFF ON SUM GRANT NIGGA AND WE ALL ON CAMERA.”

21. On or about October 11, 2011, in the vicinity of 1420 Amsterdam Avenue, defendants **DAVONE JENKINS, SHAWN LASTER**, a/k/a “Dot,” and **ERVIN SWAIN**, a/k/a “G Baby,” and co-conspirator Sharae Laster possessed a loaded firearm, and defendant **LASTER** shot rival 3 Staccs gang member Trayvon Johnson.
22. On or about October 11, 2011, defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” caused or permitted to be posted on Facebook a status update in part and substance stating, “THEY LEARNED THEIR LESSON.”
23. On or about October 30, 2011, defendant **DOMINIQUE WASHINGTON**, a/k/a “Domo,” caused or permitted to be posted on Facebook a message to defendant **DAVON GOULBOURNE**, a/k/a “Hef,” in part and in substance discussing shooting at rival 3 Staacs gang members and stating “NIGGAS NOT GOIN 2 SKOOL 2MM THE GRANT NIGGAS COMIN 2 35TH & WE GONNA CLAP AT THEM.”
24. On or about November 13, 2011, defendant **JORDAN LASTER**, a/k/a “Wop,” caused or permitted to be posted on Facebook a status update in part and substance stating, “GUNS DON’T KILL PEOPLE WE KILL PEOPLE.”

25. On or about November 21, 2011, in the vicinity of Morningside Avenue and West 119th Street, defendant **DEONDRE ELLIS-VAZQUEZ**, a/k/a “Dre,” attempted to fire gunshots at a rival gang member using the same nine millimeter handgun that was used to murder Tayshana “Chicken” Murphy.
26. On or about November 21, 2011, in the vicinity of Morningside Avenue and West 122nd Street, defendants **CARASHANE BRADFORD**, a/k/a “Shane,” **COREY BUMPASS** a/k/a “Bump,” **DEONDRE ELLIS-VAZQUEZ**, a/k/a “Dre,” **KENNETH THOMAS** and **DOMINIQUE WASHINGTON** a/k/a “Domo,” and co-conspirator Walter “Recc” Sumter possessed the same loaded nine millimeter handgun which was used to shoot and kill co-conspirator Tayshana “Chicken” Murphy.
27. On or about November 21, 2011, in the vicinity of Morningside Avenue and West 119th Street, defendant **DAVON PINKSTON**, a/k/a “Pac,” repeatedly fired at a rival gang member the same loaded nine millimeter handgun that was used to shoot and kill Tayshana “Chicken” Murphy.

28. On or about December 6, 2011, defendant **DOMINIQUE WASHINGTON**, a/k/a “Domo,” and rival 3 Staccs gang member Shane Gillette caused or permitted to be posted on Facebook a conversation in which Gillette informed defendant **WASHINGTON** that he had run from his group because defendant **WASHINGTON'S** friend had a gun, to which defendant **WASHINGTON** in part and substance responded, “LMAO NAHH HE DID. YA LUCKY YA RAN 2 HE WAS GONNA SHOOT YA IN THE FACE W2 MOTHER.”
29. On or about December 8, 2011, defendants **ANTHONY GREGORY**, a/k/a “Ant,” and an identified co-conspirator caused or permitted to be posted on Facebook a conversation in which defendant **GREGORY** in part and substance discussed lending a firearm he possessed to the identified co-conspirator, who in part and substance responded that he was “BORN TO BE A GUN CLAPPER.”

30. On or about December 10, 2011, in the vicinity of Eighth Avenue and West 116th Street, defendants **COREY BUMPASS**, a/k/a “Bump,” **CARASHANE BRADFORD**, a/k/a “Shane, **JALIL CAINES**, a/k/a “Jada,” **DEONDRE ELLIS-VASQUEZ**, a/k/a “Dre,” **JAVANN GARNES**, a/k/a “J Hat,” **ERNEST PLEASANT**, a/k/a “Monster,” **KENNETH THOMAS**, co-conspirator Walter “Recc” Sumter and an identified twelve year old co-conspirator travelled to Amsterdam Avenue, between West 123rd Street and LaSalle Street, while the twelve year old co-conspirator was armed with a loaded firearm.
31. On or about December 10, 2011, in the vicinity of Amsterdam Avenue, between West 123rd Street and LaSalle Street, defendant **JAVANN GARNES**, a/k/a/ “J Hat,” attacked and struck a rival gang member.
32. On or about December 10, 2011, in the vicinity of Amsterdam Avenue and LaSalle Street, defendant **COREY BUMPASS**, a/k/a “Bump,” took a loaded handgun from an identified twelve year old co-conspirator who could not operate the handgun and fired at a rival gang member, after which defendant **BUMPASS** gave the firearm back to the twelve year old co-conspirator.

33. On or about December 10, 2011, in the vicinity of Amsterdam Avenue and West 123rd Street, **JAVANN GARNES**, a/k/a “J Hat,” impeded the police from chasing an identified twelve year old co-conspirator who ran into Morningside Park carrying the firearm used by defendant **COREY BUMPASS**, a/k/a “Bump,” to shoot at a rival gang member.
34. On or about December 11, 2011, defendant **ANTHONY GREGORY**, a/k/a “Ant,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance asking to acquire a firearm and stating, “I WANNA KILL SOME NIGGA JAYSHAWN,” to which the unidentified individual responded he would get defendant **GREGORY** a “.22.”
35. On or about December 16, 2011, co-conspirator Walter “Recc” Sumter caused or permitted to be posted on Youtube a video in part and substance insulting various rival 3 Staccs gang members, including Paul Washington and Jerome Greene, bragging about members of MA shooting at members of 3 Staccs, including co-conspirator Darrell Rhett shooting at Jerome Greene and Paul Washington, and mocking the murder of Tayshana "Chicken" Murphy.

36. On or about December 18, 2011, defendant **CARASHANE BRADFORD**, a/k/a “Shane,” caused or permitted to be posted on Facebook a status update in part and in substance stating “m.A.....MONEY AVE.....MANHATTAN AVE.....MULA... ..SLIME... ..FTW GRIMY GRANT KKKKKKKK.”
37. On or about December 24, 2011, **TERRELL BULLOCK**, a/k/a “Rell,” and an identified co-conspirator, caused or permitted to be posted on Facebook messages to defendant **NICHOLAS HOLDEN**, a/k/a “Nic Banon,” in part and substance stating that defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” had been arrested and incarcerated because rival 3 Staccs gang members were “SNITCHING,” to which defendant **HOLDEN** stated that members of MA should “TURN IT UP” on rival 3 Staccs members for doing so.
38. On or about December 24, 2011, defendant **CARASHANE BRADFORD**, a/k/a “Shane,” caused or permitted to be posted on Facebook a status update in part and in substance stating, “3STACCCS 2 NYPD KKKKKKKKKK.”
39. On or about December 26, 2011, in the vicinity of Amsterdam Avenue and West 125th Street, defendants **JORDAN LASTER**, a/k/a “Wop,” and **RAYMOND GARCIA**, a/k/a “Ray Ray,” shot at rival 3 Staccs gang members with a loaded firearm, striking another individual in the leg.

40. On or about December 27, 2011, defendant **RAYMOND GARCIA**, a/k/a “Ray Ray,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance claiming credit on behalf of himself and defendant **JORDAN LASTER**, a/k/a “Wop,” for shooting at rival 3 Staccs gang members on December 26, 2011.
41. On or about December 27, 2011, defendant **ERVIN SWAIN**, a/k/a “G Baby,” caused or permitted to be posted on Facebook a status update in part and substance stating that rival 3 Staccs gang member Paul Washington was eating in a local restaurant and opining that he should, “SMACK THE SHIT OUTTA HIM ND SPIT IN HIS FOOD.”
42. On or about December 29, 2011, defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” caused or permitted to be posted on Facebook a message to defendant **ANDRE GUZMAN**, a/k/a “Dre,” in part and substance stating that he and **TERRELL BULLOCK**, a/k/a “Rell,” and defendant **ERVIN SWAIN**, a/k/a “G Baby,” and all fired shots from loaded handguns at rival gang members, stating “YU AINT HEAR DEM THINGS BARKING LAST NIGHT?” that “ME G AND REL” shot and that “MINE AND G’S SHITTED TWICE AND RELS SHYT ONCE” to which defendant **GUZMAN** responded “LMAOO NIGGAS WAS TAMIN THEM SHITS AS A TEAM LML.”

43. On or about December 30, 2011, defendants **MICHAEL ENGLISH**, a/k/a “White Mike,” and **DOMINIQUE WASHINGTON**, a/k/a “Domo,” caused or permitted to be posted on Facebook a conversation in which defendant **WASHINGTON** in part and substance informed defendant **ENGLISH** that he and defendants **JALIL CAINES** a/k/a “Jada,” **STEPHON JOHNSON**, **KENNETH THOMAS** and **DEVANTE WASHINGTON**, a/k/a “Sleepz,” and co-conspirator Walter “Recc” Sumter and an unidentified co-conspirator had attended the party at which Sumter had been killed, to which defendant **ENGLISH** in part and in substance asked why the group, that had gone to a party in rival territory, was not larger, and to which defendant **WASHINGTON** responded, “WE HAD THE STRAP.”
44. On or about December 30, 2011, defendant **CARASHANE BRADFORD**, a/k/a “Shane,” caused or permitted to be posted on Facebook a status update in part and in substance stating, “ITS ALL FUN ND GAMES UNTIL NIGGAS GOT SHOT.”
45. On or about December 30, 2011, defendant **JORDAN LASTER**, a/k/a “Wop,” caused or permitted to be posted on Facebook a status update in part and substance stating, “NOW SHIT FOR REAL NIGGAS.”

46. On or about December 31, 2011, an identified co-conspirator caused or permitted to be posted on Facebook a video, shot by defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” the day prior, depicting **DONDRE RIDDICK**, a/k/a “Dre,” **KENNETH THOMAS**, **D'ANDRE TOOLE**, a/k/a “Dre,” **DEVANTE WASHINGTON**, a/k/a “Sleepz,” and **DOMINIQUE WASHINGTON**, a/k/a “Domo,” numerous identified co-conspirators, and Walter “Recc” Sumter insulting rival 3 Staccs gang members and praising fellow MA gang members.
47. On or about January 21, 2012, defendant **NICHOLAS HOLDEN**, a/k/a “Nic Banon,” caused or permitted to be posted on Facebook a message to defendant **ERNEST PLEASANT**, a/k/a “Monster,” in part and in substance stating, “THESE PJ NIGGAS TALKING CRAZY NOW WE GOTTA HANDLE THAT ASAP REAL TALK WE GOTTA START PLANNING NOW.”

48. On or about January 28, 2012, defendant **ANTHONY GREGORY**, a/k/a “Ant,” caused or permitted to be posted on Facebook a video in which defendants **CARASHANE BRADFORD**, a/k/a “Shane,” **TERRELL BULLOCK**, a/k/a “Rell,” **JUWAN ELLIS**, a/k/a “Cha Cha,” **MICHAEL ENGLISH**, a/k/a “White Mike,” **JALEN HARRIS**, a/k/a “Fat Boy,” **DAVON PINKSTON**, a/k/a “Pac,” and **KENNETH THOMAS** insulted rival 3 Staccs gang members, in part and substance stating that they “HAVE THE BIGGEST GUNS IN AMERICA,” and co-conspirator Walter “Recc” Sumter in part and substance stated, “TAYLON MY MAN, YOU ALREADY KNOW, RECC DA FUCKIN GOON, EVERYBODY K,” and “STOP TELLIN ON MONEY AVE, BIG GUNS ON THIS SIDE,” “FREE D-SLIMES, TELL KAREEM STOP TELLING,” “WE HAVE A GUN FOR EVERY NIGGA THAT COME OUT” and a member of the group responded “WE HAVE A GUN FOR EVERY BIGGIE YA’LL GOT” and “TELL PAUL DON’T RUN NEXT TIME” and defendant **ENGLISH** in part and substance stated, “JEROME GREENE TOO, WHY YOU ON PAPER?”

49. On or about February 4, 2012, in the vicinity of 1315 Amsterdam Avenue, defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **CARASHANE BRADFORD**, a/k/a “Shane,” **COREY BUMPASS** a/k/a “Bump,” **DAVON PINKSTON** a/k/a “Pac,” **MARKEESE SCOTT** a/k/a “Doodie,” and **ALEXIS ROLANDEDWIDGE** took a loaded firearm from defendant **ROLANDEDWIDGE’S** home and brought it to the rival Grant Houses where defendants **BRADFORD** and **SCOTT** each asked to shoot it at rival 3 Staccs gang members, after which defendant **ALLEN**, standing next to and walking with defendant **PINKSTON**, used the firearm to shoot at rival 3 Staccs members inside of the Grant Houses, striking an identified individual in the leg.
50. On or about February 6, 2012, defendants **MICHAEL ENGLISH**, a/k/a “White Mike,” and **DONDRE RIDDICK**, a/k/a “Dre,” caused or permitted to be posted on Facebook a conversation in part and substance discussing how defendants **TY-KWAN ALLEN**, a/k/a “Ty,” and **DAVON PINKSTON**, a/k/a “Pac,” shot a rival 3 Staccs gang member, but that 3 Staccs mistakenly believed that defendants **ENGLISH** and **RIDDICK** committed the shooting.

51. On or about March 8, 2012, from the vicinity of Manhattan Avenue and West 118th Street, defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **COREY BUMPASS** a/k/a “Bump,” and **DAVON PINKSTON**, a/k/a Pac,” possessed and transported a loaded firearm to the vicinity of Hancock Place and West 124th Street.
52. On or about March 8, 2012, in the vicinity Hancock Place and West 124th Street, defendant **COREY BUMPASS**, a/k/a “Bump,” accompanied by defendants **TY-KWAN ALLEN**, a/k/a “Ty,” and **DAVON PINKSTON**, a/k/a “Pac,” shot a loaded firearm repeatedly at a rival gang member, striking that rival gang member in the buttocks.
53. On or about March 8, 2012, in the vicinity of Eighth Avenue and West 123rd Street, defendant **DAVON PINKSTON**, a/k/a “Pac,” displayed a chain bearing a memorial photograph of murdered fellow gang member and co-conspirator Walter “Recc” Sumter.
54. On or about March 9, 2012, defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” caused or permitted to be posted on Facebook a status update in part and substance stating, “THEY KNOW WHAT THEY DID SO THEY KNOW WHAT’S COMING.”

55. On or about March 10, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke with defendant **CARASHANE BRADFORD**, a/k/a “Shane,” in part and substance discussing the shooting of rival 3 Staccs gang member Malik Jones and stating that they were happy he had been shot and that he was “LUCKY TO BE ALIVE,” to which defendant **BRADFORD** in part and substance responded, “I HATE THAT NIGGA DEADASS.”
56. On or about April 2, 2012, defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” caused or permitted to be posted on Facebook, a message to an unidentified individual, in part and substance discussing the purchase of a firearm.
57. On or about April 5, 2012, TERRELL BULLOCK, a/k/a “Rell,” caused or permitted to be posted on Facebook a message to defendant **DENZEL BROWN**, a/k/a “Denny,” in part and substance requesting a firearm.
58. On or about April 5, 2012, defendant **DENZEL BROWN**, a/k/a “Denny,” caused or permitted to be posted on Facebook a message to TERRELL BULLOCK, a/k/a “Rell,” in part and substance stating that he could not get a firearm for BULLOCK at the present time because the apartment that the firearm was in was locked.

59. On or about April 8, 2012, defendant **DAVON PINKSTON**, a/k/a “Pac,” caused or permitted to be posted on Facebook, a message to an unidentified individual in part and substance threatening that defendant **PINKSTON** always has a firearm available.
60. On or about April 23, 2012, defendant **ALEJANDRO RIVERA**, a/k/a “White Boy,” caused or permitted to be posted on Facebook a message to defendant **WILLIAM BUNCE**, a/k/a “Bucket,” in part and substance instructing defendant **BUNCE** to take down a Facebook post because it was “HOT” and “thAT VILLE SHIT HOT MAN THAT HOW THEY GONNA LABEL US A GANG.”
61. On or about April 29, 2012, in the vicinity of Amsterdam Avenue and West 125th Street, defendant **DAVON PINKSTON**, a/k/a “Pac,” fired shots at rival gang members, after which defendant **COREY BUMPASS**, a/k/a “Bump,” took the firearm away from the scene of the shooting and stored the firearm.
62. On or about April 29, 2012, in the vicinity of Manhattan Avenue and West 118th Street, defendants **COREY BUMPASS**, a/k/a “Bump,” **KEITH GOODMAN** a/k/a “Inf,” and **DAVON PINKSTON**, a/k/a “Pac,” possessed a loaded firearm.

63. On or about April 29, 2012, from the vicinity of Manhattan Avenue and West 118th Street, defendants **COREY BUMPASS**, a/k/a “Bump,” and **DAVON PINKSTON** a/k/a “Pac,” transported a loaded firearm to the vicinity of the Grant Houses, north of West 123rd Street between Morningside and Amsterdam Avenues.
64. On or about April 29, 2012, defendant **COREY BUMPASS**, a/k/a “Bump,” caused or permitted to be posted on Facebook inbox message to defendant **DAVON PINKSTON**, a/k/a “Pac,” in part and substance stating that he had safely brought the firearm to his home, that he could not bring it directly to defendant **PINKSTON**’s home because an unmarked police vehicle was outside, that he “CLEANED IT WIF GLOVES ON,” and that the gun had one live round remaining in it.
65. On or about May 7, 2012, defendant **DAVON PINKSTON**, a/k/a “Pac,” caused or permitted to be posted on Facebook a message to defendant **DONDRE RIDDICK**, a/k/a “Dre,” in part and in substance telling defendant **RIDDICK** that he has three bullets for a gun, stating “YO I GOT 3 CONDOMS FOR THAT BITCH BRO.”

66. On or about May 13, 2012, defendant **DAVON PINKSTON**, a/k/a “Pac,” caused or permitted to be posted on Facebook a message to defendant **DENZEL BROWN**, a/k/a “Denny,” in part and substance stating that he had done “SOME HOT SHIT,” that “TWO NIGGAS WAS HIT” and he lost a gun belonging to defendant **BROWN**.
67. On or about May 20, 2012, in the vicinity of 545 West 126th Street, defendants **BRIAN HARRIS**, a/k/a “Snubbs,” **JOSE MARTINEZ**, a/k/a “Cuevo,” and **ERVIN SWAIN**, a/k/a “G Baby,” possessed a loaded .45 caliber semiautomatic firearm, the serial number of which had been scratched off.
68. On or about May 21, 2012, defendant **JORDAN LASTER** a/k/a “Wop,” caused or permitted to be posted on Facebook a status update in part and in substance stating, “MY NAME WOP MONTANA AND I SHOOT YOU WITH THE HAMMER.”
69. On or about May 29, 2012, defendant **DASHAWN WILLIAMS** a/k/a “D-Live,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating that defendant **WILLIAMS** would be “GOING HALF HALF ON A GRIP” that he would “KEEP IN THE GARBAGE JUST IN CASE NIGGAS FRONTED.”

70. On or about June 12, 2012, defendant **BRIAN HARRIS**, a/k/a “Snubs,” caused or permitted to be posted on Facebook a photograph of a “Decline to Prosecute” letter from the New York County District Attorney’s Office regarding a weapons possession case against himself and defendants **JOSE MARTINEZ**, a/k/a “Cuevo,” and **ERVIN SWAIN**, a/k/a “G Baby,” in part and substance stating, “D.A TELLING US WE LIEN BUT WE KNOW ITS THE TRUTH SHE SAID THE 4.5TH WAS OURS WE TOLD HER GET SOME PROOF,” AND “BITCH TRIED TO SAY THE GRIP WAS OURS NO FINGER PRINTS OOOOOOOOPS.”
71. On or about July 9, 2012, **TERRELL BULLOCK**, a/k/a “Rell,” and defendant **DAVON PINKSTON**, a/k/a “Pac,” travelled from Manhattan Avenue to the rival Grant houses while armed with a loaded firearm, which **BULLOCK** fired repeatedly at rival 3 Staccs gang members, striking an innocent bystander in the back.
72. On or about July 16, 2012, defendant **DAMIAN GARCIA**, a/k/a “Day Day,” caused or permitted to be posted on Facebook a status update in part and substance stating, “NIGGA SAID 3 STACKS CHICKEN THAT’S THAT BITCH I DON’T LIKE BANG BANG LMAO.”

73. On or about July 17, 2012, defendants **DAVON GOULBOURNE**, a/k/a “Hef,” and **KHALID MILLER**, a/k/a “Lil Monster,” caused or permitted to be posted on Facebook a conversation in which defendant **MILLER** in part and substance discussed a fight against rival gang members, to which defendant **GOULBOURNE** in part and substance responded that he wished he had been there and asked defendant **MILLER** what type of gun they currently had available.
74. On or about July 20, 2012, defendants **TY-KWAN ALLEN**, a/k/a “Ty,” and **TERRANCE ABDUR-RAHMAN**, a/k/a “Mack,” caused or permitted to be posted on Facebook a conversation in part and substance discussing a plan to acquire a firearm and ammunition.
75. On or about July 22, 2012, in a telephone call recorded by the New York City Department of Correction, **TERRELL BULLOCK**, a/k/a “Rell,” spoke with defendant **CHRISTOPHER PARKS**, a/k/a “Chris Black,” and other fellow gang members in part and substance stating that if the police had the events of July 9, 2012, on camera then defendant **DAVON PINKSTON**, a/k/a “Pac,” would have "GOT LOCKED UP TOO AS AN ACCESSORY TO ATTEMPT MURDER MY NIGGA...HE WOULD HAVE BEEN RIGHT NEXT TO ME IN THE VIDEO,” after which **BULLOCK** and defendant **PARKS** in part and substance spoke about “Pac” hiding from the police and agreed that “Pac” would not speak to the police.

76. On or about July 22, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke to defendant **DONDRE RIDDICK**, a/k/a “Dre,” who in part and in substance informed BULLOCK that he and other gang members were in the middle of an attempt to shoot rival gang members as they spoke, saying “NIGGAS ON THAT SHIT RIGHT NOW, FEEL ME?”, that “niggas got Big Bertha” and then stated that “NIGGAS IS GOING TO THE PJS” to do a shooting.
77. On or about July 22, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke to defendant **COREY BUMPASS**, a/k/a “Bump,” who in part and in substance complained that rival 3 Staccs gang members had walked through MA territory unharmed, and had taken pictures in front of defendant **CARASHANE BRADFORD’S**, a/k/a “Shane’s,” building.

78. On or about July 22, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke to defendant **SHAVON PRATT**, a/k/a “B-Mack,” who in part and substance stated that he had spoken to defendant **CHRISTOPHER PARKS**, a/k/a “Chris Black,” who had assured defendant **PRATT** that defendant **DAVON PINKSTON**, a/k/a “Pac,” “AIN’T GOING TO COURT.”
79. On or about July 22, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke with defendant **SHAVON PRATT**, a/k/a “B-Mack,” in part and substance informing him that MA possessed a gun they referred to as “BERTHA” and “DENNY’S THING” and added that the “SAME TWO NIGGAS WHO THREW IT LAST TIME IS ON THAT MISSION WITH THEM RIGHT NOW,” adding that they should go and retrieve the firearm after the “MISSION” was over, to which defendant **PRATT** in part and substance agreed.
80. On or about July 22, 2012, in the vicinity of Manhattan Avenue and West 118th Street, defendant **KEITH GOODMAN**, a/k/a “Inf,” possessed a loaded firearm.

81. On or about July 22, 2012, in the vicinity of Manhattan Avenue and West 118th Street, defendant **KEITH GOODMAN**, a/k/a “Inf,” provided a firearm to defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **COREY BUMPASS**, a/k/a “Bump,” **STEPHON JOHNSON**, **DONDRE RIDDICK**, a/k/a “Dre,” and **CHARLES SIMMONS** and other unidentified co-conspirators.
82. On or about July 22, 2012, from the vicinity of Manhattan Avenue and West 118th Street, defendant **CHARLES SIMMONS**, accompanied by defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **COREY BUMPASS**, a/k/a “Bump,” **JOSHUA CADLE**, a/k/a “Squidward,” **STEPHON JOHNSON**, and **DONDRE RIDDICK**, a/k/a “Dre,” and other unidentified co-conspirators transported a loaded firearm to the vicinity of 430 West 125th Street in the Grant Houses.
83. On or about July 22, 2012, in the vicinity of 430 West 125th Street in the Grant Houses, defendant **CHARLES SIMMONS** handed a loaded firearm to defendant **COREY BUMPASS**, a/k/a “Bump,” which defendant **BUMPASS** then repeatedly fired at a rival gang member, striking another individual in the arm.

84. On or about July 22, 2012, from the vicinity of 430 West 125th Street in the Grant Houses, defendant **JOSHUA CADLE**, a/k/a “Squidward,” transported a firearm that had just been used by defendant **COREY BUMPASS**, a/k/a “Bump,” to fire at rival 3 Staccs gang members, to the vicinity of Manhattan Avenue and West 118th Street.
85. On or about July 24, 2012, in the vicinity of Manhattan Avenue and West 118th Street, defendant **KEITH GOODMAN**, a/k/a “Inf,” possessed a loaded firearm.
86. On or about July 24, 2012, in the vicinity of Manhattan Avenue and West 118th Street, defendant **KEITH GOODMAN**, a/k/a “Inf,” provided a loaded firearm to defendants **TERRANCE ABDUR RAHMAN**, a/k/a “Mack,” **COREY BUMPASS**, a/k/a “Bump,” **JOSHUA CADLE**, a/k/a “Squidward,” **ZAIRE PERRY**, a/k/a “Za,” **MARKEESE SCOTT**, a/k/a “Doodie,” and **CHARLES SIMMONS**, a/k/a “Wave,” and an identified co-conspirator and other unidentified co-conspirators.

87. On or about July 24, 2012, from the vicinity of Manhattan Avenue and West 118th Street defendants **TERRANCE ABDUR RAHMAN**, a/k/a “Mack,” **COREY BUMPASS**, a/k/a “Bump,” **JOSHUA CADLE**, a/k/a “Squidward,” **ZAIRE PERRY**, a/k/a “Za,” **MARKEESE SCOTT**, a/k/a “Doodie,” and **CHARLES SIMMONS**, a/k/a “Wave,” and an identified co-conspirator and other unidentified co-conspirators transported a loaded firearm to the vicinity of 430 West 125th Street in the Grant Houses.
88. On or about July 24, 2012, in the vicinity of 430 West 125th Street in the Grant Houses, defendants **TERRANCE ABDUR RAHMAN**, a/k/a “Mack,” **COREY BUMPASS**, a/k/a “Bump,” **JOSHUA CADLE**, a/k/a “Squidward,” **ZAIRE PERRY**, a/k/a “Za,” **MARKEESE SCOTT**, a/k/a “Doodie,” and **CHARLES SIMMONS**, a/k/a “Wave,” and an identified co-conspirator and other unidentified co-conspirators walked through rival 3 Staccs gang territory for an extended period of time while armed with a loaded firearm, leaving only when confronted by the police.
89. On or about July 24, 2012, in the vicinity of 120th Street and Manhattan Avenue, defendant **JOSHUA CADLE**, a/k/a “Squidward” discarded a loaded firearm as he was chased by the police.

90. On or about July 25, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **SHAVON PRATT**, a/k/a “B-Mack,” spoke with TERRELL BULLOCK, a/k/a “Rell,” in part and substance informing BULLOCK that MA gang members had shot at rival gang members and stating that “YOUNG BOY” had “MADE A MOVIE,” adding that, prior to the shooting, “YOUNG BOY” and “CHRIS BLACK,” defendant **CHRISTOPHER PARKS**, had “PULLED UP, SO I’M LIKE, YO, IT’S HAPPENING,” and that “YOUNG BOY” and “Chris Black” were “TELLING ME YEAH MAN WE JUST GOT FINISHED FILMING A MOVIE ON THAT SIDE.”
91. On or about July 25, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke with defendant **SHAVON PRATT**, a/k/a “B-Mack,” who in part and in substance informed BULLOCK that defendants **COREY BUMPASS**, a/k/a “Bump,” and **CHRISTOPHER PARKS**, a/k/a “Chris Black,” had shot rival 3 Staccs gang members a few days before and stated, “THEM NIGGAS KEPT COMING THROUGH, WANNA HOLLER AT NIGGAS AND SHIT, THAT’S WHAT THEM NIGGAS GET.”

92. On or about July 27, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a "Rell," spoke to defendant **KEITH GOODMAN**, a/k/a "Inf," who in part and substance complained to BULLOCK that MA currently did not have enough firearms.
93. On or about July 27, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a "Rell," spoke to defendant **TY-KWAN ALLEN**, a/k/a "Ty," in part and substance congratulating defendant **ALLEN** for having shot rival gang members.
94. On or about July 28, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a "Rell," spoke with defendant **DAVON PINKSONTON**, a/k/a "Pac," in part and substance blaming defendant **PINKSTON** for defendant **JOSHUA CADLE**, a/k/a "Squidward," being arrested with a gun, stating that the gun "HAS OTHER CASES ON IT," and that "IT WAS BB THAT DID THAT."

95. On or about July 28, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **DAVON PINKSTON**, a/k/a “Pac,” spoke to TERRELL BULLOCK, a/k/a “Rell,” in part and substance informing BULLOCK that he had given a firearm to defendant **KEITH GOODMAN**, a/k/a “Inf,” to hide for defendant **PINKSTON**, that defendant **TY-KWAN ALLEN**, a/k/a “Ty,” currently had his own firearm, and that defendant **PINKSTON** still has one of BULLOCK’S firearms hidden for him.
96. On or about July 28, 2012, in a telephone call recorded by the New York City recorded Department of Corrections phone call, TERRELL BULLOCK spoke to defendant **KEITH GOODMAN** a/k/a “Inf,” and both expressed their concern that now that Money Avenue had lost firearms to the police, 3 Staccs gang members would be more likely to attack them, and concluded that they needed to acquire new firearms.

97. On or about July 28, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **KEITH GOODMAN**, a/k/a “Inf,” spoke to TERRELL BULLOCK, a/k/a “Rell,” and defendant **GOODMAN** in part and substance informed **BULLOCK** that defendant **JOSHUA CADLE**, a/k/a “Squidward,” was in jail because he got caught with the gun they referred to as “BIG BERTHA” and that “THEY DIDN’T EVEN GET TO MAKE THE MOVIE FIRST, IT WAS A SET UP, AND THE GUN GOT TAKEN,” complaining that the group that had lost the firearm did not shoot rival gang members before the gun was taken by the police.
98. On or about July 29, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **SHAVON PRATT**, a/k/a “B-Mack,” spoke to TERRELL BULLOCK, a/k/a “Rell,” who in part and substance complained that defendant **PRATT** had seen rival 3 Staccs gang members taking pictures of themselves in MA territory and stating that he sent “Ace” to get a gun in response, after which defendant **CHRISTOPHER PARKS**, a/k/a “Chris Black,” who defendant **PRATT** stated had access to a gun, along with fellow gang member “P.U.,” came to help.

99. On or about August 3, 2012, in the vicinity of Old Broadway and West 126th Street, an identified co-conspirator and **DASHAWN WILLIAMS**, a/k/a “D-Live,” and a group of over ten unidentified co-conspirators armed with bottles, pipes, sticks and other weapons attacked and struck individuals in a rival group of ten or more people.
100. On or about August 4, 2012, in the vicinity of Morningside Park and West 119th Street, during a celebration commemorating the homicide of co-conspirator Walter “Recc” Sumter, defendants **DENZEL BROWN** a/k/a “Denny,” **KEITH GOODMAN** a/k/a “Inf,” **DAVON PINKSTON** a/k/a “Pac,” **ERNEST PLEASANT** a/k/a “Monster,” and **ALEJANDRO RIVERA** a/k/a “White Boy,” in part and substance discussed acquiring a firearm to take to the rival Grant Houses and use to shoot a gang rival.
101. On or about August 4, 2012, in the vicinity of Morningside Park and West 119th Street, defendants **COREY BUMPASS**, a/k/a “Bump,” **KEITH GOODMAN**, a/k/a “Inf,” **CHRISTOPHER PARKS**, a/k/a “Chris Black,” **DAVON PINKSTON**, a/k/a “Pac,” **ERNEST PLEASANT**, a/k/a “Monster,” and **ALEJANDRO RIVERA**, a/k/a “White Boy,” and other unidentified co-conspirators possessed a loaded firearm.

102. On or about August 4, 2012, from the vicinity of 119th Street and Morningside Park, defendants **TERRANCE ABDUR RAHMAN**, a/k/a “Mack,” **CHRISTOPHER BERKLEY**, a/k/a “Shark,” **NAQUON BROCKINGTON**, a/k/a “Tubz,” **COREY BUMPASS**, a/k/a “Bump,” **WILLIAM BUNCE**, a/k/a “Bucket,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **JAVANN GARNES**, a/k/a “J Hat,” **DAVON GOULBOURNE**, a/k/a “Hef,” **JOHNNY GREEN**, a/k/a “Jo Jo,” **LONZELL GREEN**, a/k/a “Zel,” **ANTHONY GREGORY**, a/k/a “Ant,” **BRIAN HARRIS**, a/k/a “Snubs,” **MARQUIS JONES**, a/k/a “Lil Knockout,” **STEPHON JOHNSON**, **LONNIE LESTER**, **KHALID MILLER**, a/k/a “Lil Monster,” **ZAIRE PERRY**, a/k/a “Za,” **DAVON PINKSTON**, a/k/a “Pac,” **ERNEST PLEASANT**, a/k/a “Monster,” **TAHEEM PRATT**, a/k/a “Tah Tah,” **DONDRE RIDDICK**, a/k/a “Dre,” **ALEJANDRO RIVERA**, a/k/a “White Boy,” **MARKEESE SCOTT**, a/k/a “Doodie,” **DEMETRIOUS WILLIAMS**, a/k/a “Metri,” and **DAQUON WILLIAMS**, a/k/a “Quon,” and other unidentified co-conspirators gathered to commemorate the homicide of co-conspirator Walter “Recc” Sumter, and then travelled in a group of approximately thirty total individuals to the vicinity of 1305 Amsterdam Avenue in the Grant Houses.

103. On or about August 4, 2012, from the vicinity of Morningside Park and West 119th Street, defendants **COREY BUMPASS**, a/k/a “Bump,” **KEITH GOODMAN**, a/k/a “Inf,” **CHRISTOPHER PARKS**, a/k/a “Chris Black,” and **DAVON PINKSTON**, a/k/a “Pac,” travelled by car to Eighth Avenue and West 119th Street, received a loaded firearm from defendant **DENZEL BROWN**, a/k/a “Denny,” and returned to the vicinity of Morningside Park and West 119th Street.
104. On or about August 4, 2012, from the vicinity of Morningside Park and West 119th Street, defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **COREY BUMPASS**, a/k/a “Bump,” **KEITH GOODMAN**, a/k/a “Inf,” **CHRISTOPHER PARKS**, a/k/a “Chris Black,” **DAVON PINKSTON**, a/k/a “Pac,” **ERNEST PLEASANT**, a/k/a “Monster,” **ALEJANDRO RIVERA**, a/k/a “White Boy,” and **MARKEESE SCOTT**, a/k/a “Doodie,” and other identified and unidentified co-conspirators transported a loaded firearm to the vicinity of 1305 Amsterdam Avenue in the Grant Houses.

105. On or about August 4, 2012, in the vicinity of 1305 Amsterdam Avenue, **TERRANCE ABDUR-RAHMAN**, a/k/a “Mack,” **CHRISTOPHER BERKLEY**, a/k/a “Shark,” **NAQUAN BROCKINGTON**, a/k/a “Tubz,” **COREY BUMPASS**, a/k/a “Bump,” **WILLIAM BUNCE**, a/k/a “Bucket,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **JAVANN GARNES**, a/k/a “J Hat,” **DAVON GOULBOURNE**, a/k/a “Hef,” **JOHNNY GREEN**, a/k/a “Jo Jo,” **LONZELL GREEN**, a/k/a “Zel,” **ANTHONY GREGORY**, a/k/a “Ant,” **BRIAN HARRIS**, a/k/a “Snubs,” **MARQUIS JONES**, a/k/a “Lil Knockout,” **STEPHON JOHNSON**, **LONNIE LESTER**, **KHALID MILLER**, a/k/a “Lil Monster,” **ZAIRE PERRY**, a/k/a “Za,” **DAVON PINKSTON**, a/k/a “Pac,” **ERNEST PLEASANT**, a/k/a “Monster,” **TAHEEM PRATT**, a/k/a “Tah Tah,” **DONDRE RIDDICK**, a/k/a “Dre,” **ALEJANDRO RIVERA**, a/k/a “White Boy,” **MARKEESE SCOTT**, a/k/a “Doodie,” **DEMETRIOUS WILLIAMS**, a/k/a “Metri,” and **DAQUON WILLIAMS**, a/k/a “Quon,” and other identified and unidentified co-conspirators, entered the Grant Houses from the south and assaulted the first male individual they encountered, at which time defendant **PLEASANT** struck that individual with a closed fist knocking the individual to the ground, defendant **SCOTT**

struck that individual with a bicycle and defendant **PINKSTON** repeatedly shot that individual with a loaded firearm.

106. On or about August 4, 2012, in the vicinity of 1305 Amsterdam Avenue, defendant **DAVON PINKSTON**, a/k/a “Pac,” handed a firearm to defendant **COREY BUMPASS**, a/k/a “Bump,” who gave it to co-conspirator EDWARD CARTER, a/k/a “Malik,” who concealed it in a bag and fled to towards Manhattan Avenue.

107. On or about August 4, 2012, in the vicinity of Amsterdam Avenue and West 116th Street, co-conspirator EDWARD CARTER, a/k/a “Malik,” and defendant **DAVON PINKSTON**, a/k/a “Pac,” switched shirts for the purpose of concealing their identities.

108. On or about August 5, 2012, defendant **DAVON GOULBOURNE**, a/k/a “Hef,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance discussing shooting a firearm at rival 3 Staacs gang members the previous day, stating “LOL IT WAS RECC DAY BRO . ITS ONLY RIGHT . NOBODYYY AINT CARE IF THEY GOT KNOCKED . WE WAS SAUCED AND SMACKED OHDEE BUGGIN . HAD ALL THE VILLE NIGGAS ON DECK LIKE 25 OF DEM.”

109. On or about August 5, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke to defendant **SHAVON PRATT**, a/k/a “B-Mack,” who in part and substance informed BULLOCK that August 4, 2012, had been a memorial barbeque for slain MA gang member and co-conspirator Walter “Recc” Sumter, that members of MA had shot at rival gang members that day, that defendant **PRATT** had acquired a new firearm, which had now been lost to the police, that defendant **COREY BUMPASS**, a/k/a “Bump,” and others had been arrested, that defendant **BUMPASS** was responsible for losing the firearm, and that defendant **CHRISTOPHER PARKS**, a/k/a “Chris Black,” is mad at defendant **BUMPASS** for losing the firearm, because if it had not been lost, defendant **PARKS** wanted the firearm.

110. On or about August 5, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke to defendant **SHAVON PRATT**, a/k/a “B-Mack,” who in part and substance informed BULLOCK that defendant **DENZEL BROWN**, a/k/a “Denny,” was upset at the recent loss of firearms by MA gang members, including two specific firearms which had been lost by defendant **COREY BUMPASS**, a/k/a “Bump.”

111. On or about August 5, 2012, defendant **DAQUON WILLIAMS**, a/k/a “Quon,” caused or permitted to be posted on Facebook a message to defendant **DAMIAN GARCIA**, a/k/a “Day Day,” in part and substance stating that he and other gang members had “MOBBED TO GRANT WITH M.A AND LIT THAT SHIT UP THEN ME NTUBBY WAS RUNNIN NEXT THINK I KNOW WE C LIKE 30 GRANT NIGGAS CHASIN US.”
112. On or about August 6, 2012, in a telephone call recorded by the New York City Department of Correction, **TERRELL BULLOCK**, a/k/a “Rell,” spoke to defendant **KEITH GOODMAN**, a/k/a “Inf,” who in part and substance stated that he still had **BULLOCK’s** .25 caliber and nine millimeter firearms.
113. On or about August 6, 2012, in a telephone call recorded by the New York City Department of Correction, **TERRELL BULLOCK**, a/k/a “Rell,” spoke to defendant **KEITH GOODMAN**, a/k/a “Inf,” who in part and substance informed **BULLOCK** that MA “got the victory” by shooting a “TOP 5” rival 3 Staccs gang member, but complained that defendant **COREY BUMPASS**, a/k/a “Bump,” had now lost two of MA’s firearms and that defendant **EDWARD CARTER**, a/k/a “Malik,” had been arrested with the firearm used in the shooting on August 4, 2012; two developments about which "B-MACK AND THEM" were upset.

114. On or about August 6, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke to defendant **KEITH GOODMAN**, a/k/a “Inf,” who in part and substance informed BULLOCK that MA was going to be indicted and arrested as a group, and that the police had witnesses to and evidence of beatings, shootings, firearms possession and that this was “FUCKING GANG ACTIVITY BROTHER.”
115. On or about August 7, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke to defendant **SHAVON PRATT**, a/k/a “B-Mack,” who in part and substance informed BULLOCK that he was still upset with defendant **COREY BUMPASS**, a/k/a “Bump,” for losing an MA firearm, that defendant **DAVON PINKSTON**, a/k/a “Pac,” had shot a person in the Grant Houses, and that defendant **PRATT** had acquired another firearm that he believed had been used in a shooting because of the cheap price, stating that anyone from the Grant Houses needed to “GET IT” even “IF THEY DON’T FUCK WITH THE 3 STACCS NIGGAS, FUCK IT, THEY STILL FROM THE OPPOSITE SIDE” and “THEM NIGGAS CAN’T LIVE IN THERE...OPPRESS THEM NIGGAS, FUCK THAT, KNOW WHAT I MEAN?”

116. On or about August 10, 2012, in a telephone call recorded by the New York City Department of Correction, TERRELL BULLOCK, a/k/a “Rell,” spoke to defendant **DAVON PINKSTON**, a/k/a “Pac,” in part and substance congratulating him for having shot a rival gang member, to which defendant **PINKSTON** in part and substance responded it was a “BIG HOMIE” so 3 Staccs must be very upset, and BULLOCK then in part and substance instructed defendant **PINKSTON** to make sure BULLOCK’s .25 caliber handgun was safe, acknowledged that defendant **KEITH GOODMAN**, a/k/a “Inf,” was partially at fault for the loss of the firearm and informed defendant **PINKSTON** that individuals from “Taino” know it was defendant **PINKSTON** who had shot at them earlier.

117. On or about August 11, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **ERNEST PLEASANT**, a/k/a “Monster,” spoke to an unidentified coconspirator in part and substance claiming that he had led the way to the assault on August 4, 2012.

118. On or about August 12, 2012, defendant **DAMIAN GARCIA**, a/k/a “Day Day,” caused or permitted to be posted on Facebook a message to defendant **RAYMOND GARCIA**, a/k/a “Ray Ray,” in part and substance stating that he and defendants **ALEJANDRO RIVERA**, a/k/a “White Boy,” and **DASHAWN WILLIAMS**, a/k/a “D-Live,” and an identified co-conspirator had been shot at by rival 3 Staccos members, to which defendant **RAYMOND GARCIA** in part and substance responded, “DAM YA NIGGAS SHOULD START CLAPPING AFTER THAT SHIT” and suggesting that defendant **RAYMOND GARCIA** ask “THE MA NIGGAS” for a gun, to which defendant **RAYMOND GARCIA** in part and substance responded that he would be shooting in retaliation later that night.
119. On or about August 14, 2012, in a telephone call recorded by the New York City Department of Correction, **TERRELL BULLOCK**, a/k/a “Rell,” spoke to defendant **SHAVON PRATT**, a/k/a “B-Mack,” who in part and substance informed **BULLOCK** that he and fellow gang members had acquired two new nine millimeter firearms.
120. On or about August 14, 2012, in the vicinity of Amsterdam Avenue and West 126th Street, defendants **DASHAWN WILLIAMS**, a/k/a “D-Live,” and **SAMUEL WILLIAMS**, a/k/a “Sammy,” possessed a metal pipe, while fleeing the scene of a large gang fight.

121. On or about August 16, 2012, defendant **DAVON GOULBOURNE**, a/k/a “Hef,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance asking to borrow a firearm, which he referred to as a “POCKET ROCKET” and “THE GRIP,” to which the individual in part and substance responded that he would give a firearm to defendant **GOULBOURNE**, stating, “WE GOING TO PULL UP TO GRANT U BETTER HIT SOMETHIN WRDD.”
122. On or about August 30, 2012, defendant **ALEJANDRO RIVERA**, a/k/a “White Boy,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance seeking to acquire firearms and ammunition -- specifically a .38 caliber Taurus firearm.
123. On or about August 30, 2012, defendant **RAYMOND GARCIA**, a/k/a “Ray Ray,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance stating that defendant **GARCIA** was returning to the neighborhood, but had to fight an older gang member, defendant **BRIAN HARRIS**, a/k/a “Snubs,” because he had been responsible, along with defendant **NAQUON BROCKINGTON**, a/k/a “Tubz,” for breaking defendant **HARRIS’S** firearm, and that defendant **GARCIA** had two firearms in the recent past.

124. On or about August 31, 2012, defendant **DOMINIQUE WASHINGTON**, a/k/a “Domo,” and defendant **DEONDRE ELLIS-VASQUEZ**, a/k/a “Dre,” caused or permitted to be posted on Facebook messages in part and in substance discussing chipping in money to purchase a .380 caliber firearm.
125. On or about September 2, 2012, in a telephone call recorded by the New York City Department of Correction, **TERRELL BULLOCK**, a/k/a “Rell,” spoke to defendant **SHAVON PRATT**, a/k/a “B-Mack,” who in part and substance informed **BULLOCK** that he had sold a firearm, that he had used to shoot at another person, to someone else.
126. On or about September 4, 2012, **TAHEEM PRATT** caused or permitted to be posted on Facebook a message to defendant **ERVIN SWAIN**, a/k/a “G Baby,” in part and in substance offering a “FRESH” firearm for sale for \$175 and informing him that it was loaded, stating “IT GOT 6 BITCHES IN IT ALREADY TOO.”
127. On or about September 4, 2012, defendant **ERVIN SWAIN**, a/k/a “G Baby,” caused or permitted to be posted on Facebook a message to an unidentified individual stating in part and substance stating that he wanted to purchase a firearm and “FOOD,” or ammunition, and that he wanted to see a picture sent to his phone of the gun, but that the seller should “SEND A PICTURE TO MY PHONE THEN DELETE IT.”

128. On or about September 6, 2012, defendant **DAVON PINKSTON**, a/k/a “Pac,” caused or permitted to be posted on Facebook a message to rival gang member defendant Taylonn Murphy Jr. in part and in substance threatening Murphy and 3 Staccs gang member Paul Washington stating, “WRD 2 IMA KILL U LIL BAM TELL PAULIE I’M LOOKIN FOR HIS PUSSY ASS TO.”
129. On or about September 23, 2012, in a telephone call recorded by the New York City Department of Correction, defendant **ERNEST PLEASANT**, a/k/a “Monster,” spoke to an unidentified individual in part and substance stating that he had “BEEN HAVING NIGHTMARES ABOUT THE FEDS ARRESTING THE TEAM.”
130. On or about September 26, 2012, in a telephone call recorded by the New York City Department of Correction, **TERRELL BULLOCK**, a/k/a “Rell,” spoke to defendant **CHRISTOPHER PARKS**, a/k/a “Chris Black,” who provided **BULLOCK** with his own address and defendant **DAVON PINKSTON’s**, a/k/a “Pac’s,” address so that **BULLOCK** could send letters to them.

131. On or about September 27, 2012, inside the NYPD 26th Precinct, while seated in a holding cell with his brother, defendant **RAYMOND GARCIA**, a/k/a “Ray Ray,” defendant **DAMIAN GARCIA**, a/k/a “Day Day,” carved the words “DAY DAY RAY RAY MHB” into a precinct cell wall.
132. On or about November 6, 2012, defendant **DASHAWN WILLIAMS**, a/k/a “D-Live,” caused or permitted to be posted on Facebook a status update in part and substance stating, “WHERE GRANT NIGGAS AT WHEN WE COME THROUGH ON 25TH SCREAMING WEEDOO!!!!”
133. On or about November 13, 2012, defendant **JORDAN PINALES**, a/k/a “J.P.,” caused or permitted to be posted on Facebook a status update entitled, “team full of shooters,” attaching a photograph depicting gang members, including defendant **WILLIE BELLINGER**, to which defendant **BELLINGER** in part and substance commented, “VILLE ON DA SCENE U C DA GUN BOY.”
134. On or about November 23, 2012, an identified co-conspirator caused or permitted to be posted on Facebook a message to defendant **ALEJANDRO RIVERA**, a/k/a “White Boy,” in part and substance asking to hold a “GRIP,” to which defendant **RIVERA** in part and substance responded, “I DON’T KNOW WHAT U TALKING ABOUT, COME SEE ME OUTSIDE.”

135. On or about November 23, 2012, defendant an identified co-conspirator caused or permitted to be posted on Facebook a message to defendant **ANTHONY GREGORY**, a/k/a “Ant,” in part and substance stating, “**IMA POP SOMEBODY BEFORE I DIE AND NOT GET CAUGHT...LOL A GRANT NIGGA, I WANNA CLAP BAM N MURK,**” to which defendant **GREGORY** in part and substance responded, “**WERDDDD, AND TRIGGA...I WANNA CLAP HIM CAUSE HE A SNITCH.**”
136. On or about December 11, 2012, in the vicinity of 550 West 125th Street, defendants **NAQUAN BROCKINGTON**, a/k/a “Tubz,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **TYRELL HEDGES**, a/k/a “Rell,” **DAVON JENKINS** and **DAQUON WILLIAMS**, a/k/a “Quon,” and identified and unidentified co-conspirators filmed themselves walking through rival gang territory in the Grant houses, while brandishing canes and padlocks, which was later posted online by defendant **DASHAWN WILLIAMS**, a/k/a “D-Live.”
137. On or about December 30, 2012, defendant **D’ANDRE TOOLE**, a/k/a “Dre,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance stating, “**2DAY THE DAY MY SON DIED I’M WIT MY RYDAS.**”

138. On or about December 30, 2012, an identified co-conspirator, a/k/a “Cho Cho,” caused or permitted to be posted on Facebook a message to defendant **TIJAE CHAPPLE**, a/k/a “Ty,” in part and substance stating that on the anniversary of the homicide of co-conspirator Walter “Recc” Sumter he and fellow gang members needed to “turn shit up for Recc,” to which defendant **CHAPPLE** in part and substance responded, “ME AND DOODIE UP TOMORROW,” following which defendant **CHAPPLE** was stopped in the vicinity of where defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” had shot a rival gang member.
139. On or about December 30, 2012, inside of 545 West 126th Street, defendants **WILLIAM BUNCE**, a/k/a “Bucket,” **STEVEN GRANDY**, **TASHEEM GREEN**, **ALEJANDRO RIVERA**, a/k/a “White Boy,” and **DEVANTE TAYLOR**, a/k/a “Buck,” and unidentified co-conspirators gathered in the lobby and left together through a back entrance on the night of the anniversary of the homicide of co-conspirator Walter “Recc” Sumter, prior to a shooting of a rival gang member by defendant **JUWAN ELLIS**, a/k/a “Cha Cha.”

140. On or about December 30, 2012, in the vicinity of 3170 Broadway, defendants **LARRY BUNCE**, a/k/a “Knockout,” **WILLIAM BUNCE**, a/k/a “Bucket,” **TIJAE CHAPPLE**, a/k/a “T’y,” **JOSE MARTINEZ**, a/k/a “Cuevo,” and numerous identified and unidentified co-conspirators, travelled from the Manhattanville Houses to the Grant Houses on the anniversary of co-conspirator Walter “Recc” Sumter’s homicide, where they taunted and threatened rival 3 Staccs gang members, immediately prior to defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” shooting a rival gang member.
141. On or about December 30, 2012, defendants **JUWAN ELLIS**, a/k/a “Cha Cha,” **DONDRE RIDDICK**, a/k/a “Dre,” and **D’ANDRE TOOLE**, a/k/a “Dre,” transported a loaded firearm to the vicinity of the rival Grant Houses and defendants **RIDDICK** and **TOOLE** waited in front of the Grant Houses as defendant **ELLIS** shot at rival 3 Staccs gang members.
142. On or about December 30, 2012, in the vicinity of Amsterdam Avenue and West 125th Street, defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” shot at rival gang members repeatedly with a loaded firearm, striking an individual whose identity is known to the Grand Jury.

143. On or about December 30, 2012, defendant **D'ANDRE TOOLE**, a/k/a "Dre," disposed of the firearm used by defendant **JUWAN ELLIS**, a/k/a "Cha Cha," to shoot rival gang members in the vicinity of Amsterdam Avenue and West 125th Street, and wiped the gun down in an attempt to remove forensic evidence.
144. On or about December 30, 2012, in the vicinity of Old Broadway and West 126th Street, defendant **D'ANDRE TOOLE**, a/k/a "Dre," transported a ski mask worn by defendant **JUWAN ELLIS**, a/k/a "Cha Cha," during the shooting of a rival gang member.
145. On or about December 30, 2012, in the vicinity of Old Broadway and West 126th Street, defendant **JUWAN ELLIS**, a/k/a "Cha Cha," discarded the jacket he had worn as he shot a rival gang member and then ran in the direction of the Manhattanville Houses with defendants **DONDRE RIDDICK**, a/k/a "Dre," and **D'ANDRE TOOLE**, a/k/a "Dre."

146. On or about December 30, 2012, in the vicinity of 1420 Amsterdam Avenue, two identified co-conspirators approached defendant **ALEJANDRO RIVERA**, a/k/a “White Boy,” who opened a locked door in the Manhattanville Houses for defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” to provide access to 1420 Amsterdam Avenue, immediately after defendant **ELLIS** shot a rival gang member, and escorted defendant **ELLIS** to a floor within 1420 Amsterdam Avenue as the police approached.
147. On or about December 30, 2012, inside of 545 West 126th Street, defendants **WILLIAM BUNCE**, a/k/a “Bucket,” **STEVEN GRANDY** and **MARQUIS JONES**, a/k/a “Lil Knockout,” congregated in the building lobby after defendant **ALEJANDRO RIVERA**, a/k/a “White Boy,” let defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” into the building and escorted **ELLIS** into an elevator inside the building, after defendant **ELLIS** had shot a rival gang member.
148. On or about December 31, 2012, after he had been stopped by the police following the shooting of rival 3Staccs gang member Shane Gillette, defendant **D’ANDRE TOOLE**, a/k/a “Dre,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance stating, “SUMTHING HAPPEN YESTERDAY WEN I WAS WIT THE RYDAS ALMOST GOT KNOCK.”

149. On or about December 31, 2012, defendants **WILLIAM BUNCE**, a/k/a “Buckett,” and **LONZELL GREEN**, a/k/a “Zell,” caused or permitted to be posted on Facebook a conversation in part and substance discussing their satisfaction with the December 30, 2012 shooting of rival 3Staccs gang member Shane Gillette, with defendant **BUNCE** stating, “YEAH IT WAS AK THT GOT HIT,” to which an identified co-conspirator in part and substance responded, “AHHHHHHHHH ! THEM NIGGAS NEED 2 STOP PLAYING GORILLA BEFORE THEY GIT IT W/ A BANNANNA CLIP,” to which defendant **BUNCE** in part and substance responded, “LMAOO,” and to which an identified co-conspirator in part and substance responded, “DEADASS BRO.”
150. On or about January 1, 2013, defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance claiming responsibility for shooting two members of the rival 3 Staccs gang on December 30, 2012.
151. On or about January 6, 2013, in the vicinity of Amsterdam Avenue and West 126th Street defendants **WILLIAM BUNCE**, a/k/a “Bucket,” and **DAVANTE TAYLOR**, a/k/a “Buck,” and identified and unidentified co-conspirators fought with a group of gang rivals and then fled towards the Manhattanville Houses when confronted by the police.

152. On or about January 6, 2013, defendants **BRIAN HARRIS**, a/k/a “Snubs,” and **ALEJANDRO RIVERA**, a/k/a “White Boy,” caused or permitted to be posted on Facebook a conversation in part and in substance discussing assaulting rival gang member Javon Peterson, with defendant **RIVERA** in part and substance stating, “LOL SMOKE THAT NIGGA.”
153. On or about January 6, 2013, in the vicinity of 1385 Amsterdam Avenue, co-conspirator Taylor Bunce and defendants **WILLIAM BUNCE**, a/k/a “Bucket,” **ANTHONY GREGORY**, a/k/a “Ant,” **DAVANTE TAYLOR**, “Buck,” and an identified co-conspirator were arrested fleeing the scene of a large gang fight, in which defendant Bunce discarded an air pistol while fleeing.
154. On or about January 13, 2013, defendants **DONDRE RIDDICK**, a/k/a “Dre” and **D'ANDRE TOOLE**, a/k/a “Dre” caused or permitted to be posted on Facebook a conversation in part and substance discussing their concern that defendant **CHARLES SIMMONS**, a/k/a “Wave,” may have been arrested because the police found defendant **SIMMONS's** fingerprints on a firearm that was recovered by the police following the December 30, 2012 shooting of rival 3Staccs gang member Shane Gilette, committed by defendant **JUWAN ELLIS**, a/k/a “Cha Cha.”

155. On or about January 13, 2013, defendants **DONDRE RIDDICK**, a/k/a “Dre” and **D'ANDRE TOOLE**, a/k/a “Dre” caused or permitted to be posted on Facebook a conversation in part and substance discussing the fact that defendant **CHARLES SIMMONS**'s, a/k/a “Wave's,” fingerprints could not be on the firearm since defendant **SIMMONS** did not touch the firearm on the night of the shooting, and because defendant **TOOLE** wiped the gun down multiple times after defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” committed the shooting.
156. On or about January 13, 2013, defendants **D'ANDRE TOOLE**, a/k/a “Dre” and a fellow co-conspirator Cameron Bowen caused or permitted to be posted on Facebook a conversation in part and substance discussing the arrest of defendant **CHARLES SIMMONS**, a/k/a “Wave,” and their concern that defendant **SIMMONS** was arrested because the police found defendant **SIMMONS**'s fingerprints on a firearm that was recovered by the police following the December 30, 2012 shooting of rival 3 Staccs gang member Shane Gillette, committed by defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” to which defendant **TOOLE** in part and substance responded that the police could not have found defendant **SIMMONS**'s fingerprints on the gun because defendant **SIMMONS** was not the last person to touch the gun, and to

which Bowen added that he did not remember observing defendant **SIMMONS** touching the gun on the night of the shooting.

157. On or about January 14, 2013, defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” caused or permitted to be posted on Facebook a message to rival 3Staccs gang member Carl Jones in part and in substance stating, “SUCK MY DICK U MAD I SHOOT A.K.”
158. On or about January 17, 2013, defendant **CHARLES SIMMONS**, a/k/a “Wave,” caused or permitted to be posted on Facebook messages to defendant **DONDRE RIDDICK**, a/k/a “Dre,” in part and in substance stating that he has been criminally charged for a shooting incident from the summer, but that there is no evidence against him and that he does not think anyone is “SNITCHING,” but that the police know that defendant **COREY BUMPASS**, a/k/a “Bump,” is the shooter and that defendant **BUMPASS** had a firearm referred to as “BIG BERTHA.”
159. On or about January 18, 2013, an identified co-conspirator caused or permitted to be posted on Facebook a message to defendant **LONZELL GREEN**, a/k/a “Zell,” in part and in substance stating that rival 3 Staccs gang member Jerry Robinson tried to cut the identified co-conspirator’s face but missed and cut his coat.

160. On or about January 19, 2013, an identified co-conspirator caused or permitted to be posted on Facebook a message to defendant **ANTHONY GREGORY**, a/k/a “Ant,” in part and in substance stating that he is going to kill rival gang member defendant Jerry Robinson because he cut defendant the identified co-conspirator’s coat, stating, “**I**MA KILL ANT LIVE BRO WORD TOO MY MOTHER,” to which defendant **GREGORY** in part and in substance responded, “**W**ERDDX I’M NOT LETTING NO GRANT NIGGAS LIVE NO MORE.”
161. On or about January 20, 2013, defendant **ANTHONY GREGORY**, a/k/a “Ant,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “I’M NOT LETTING GRANT NIGGAS LIVE NO MORE.”
162. On or about February 4, 2013, defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “I’M GOING TO GET A PISTOL AND GO OVER THERE.”

163. On or about February 9, 2013, an identified co-conspirator caused or permitted to be posted on Facebook a video depicting MA gang members and associates, including himself, defendant **DOMINIQUE WASHINGTON**, a/k/a “Domo,” and a second identified co-conspirator in part and substance claiming credit for robbing a rival gang member of an expensive jacket and mocking rival gang members for the robbery.
164. On or about February 9, 2013, an identified co-conspirator caused or permitted to be posted on Facebook a message to defendant **ANDRE GUZMAN**, a/k/a “Dre,” in part and substance stating that there were going to be problems following the February 9, 2013 shooting of defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” committed by rival 3 Staccs gang members.
165. On or about February 9, 2013, defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” caused or permitted to be posted on Facebook a message to defendant **LARRY BUNCE**, a/k/a “Knockout,” in part and in substance discussing the February 9, 2013 shooting of defendant **RODRIGUEZ** committed by members of the rival 3Staccs gang, after which defendant **BUNCE** encouraged defendant **RODRIGUEZ** to avoid cooperating with the police.

166. On or about February 9, 2013, defendant **DASHAWN WILLIAMS**, a/k/a “D-Live,” caused or permitted to be posted on Facebook a conversation with an identified co-conspirator in part and in substance discussing travelling to the Grant Houses to retaliate for the February 9, 2013 shooting of defendant **CARLOS RODRIGUEZ**, a/k/a “Loso.”
167. On or about February 9, 2013, defendant **DASHAWN WILLIAMS**, a/k/a “D-Live,” caused or permitted to be posted on Facebook a message to a large number of fellow co-conspirators in part and substance stating that he was disappointed that someone had sold a gun to someone other than defendant **WILLIAMS** and that “IMA USE THAT MONEY TO BUY THE STRAP I SWEAR TO GOD.”

168. On or about February 9, 2013, defendant **TERRENCE ABDUR-RAHMAN**, a/k/a “Mack,” caused or permitted to be posted on Facebook a message to defendants **NAQUAN BROCKINGTON**, a/k/a “Tubz,” **WILLIAM BUNCE**, a/k/a “Bucket,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **TYNELL SHAW**, a/k/a “Ty,” **DASHAWN WILLIAMS**, a/k/a “D-Live,” and **DAQUON WILLIAMS**, a/k/a “Quon,” and other identified and unidentified co-conspirators in part and in substance stating that himself and fellow MA gang members should not go fight rival 3 Staacs gang members without a gun, stating “IF NIQQAS DNT GOTTA GRIP WE MIND AS WELL NOT GO CUZ SOMEBODY GONE DIE.”

169. On or about February 9, 2013, defendant **DASHAWN WILLIAMS**, a/k/a “D-Live,” caused or permitted to be posted on Facebook a message to defendants **TERRENCE ABDUR-RAHMAN**, a/k/a “Mack,” **NAQUAN BROCKINGTON**, a/k/a “Tubz,” **WILLIAM BUNCE**, a/k/a “Bucket,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA JR.**, a/k/a “Ray Ray,” **TYNELL SHAW**, a/k/a “Ty,” and **DAQUON WILLIAMS**, a/k/a “Quon,” and other identified and unidentified co-conspirators in part and in substance discussing MA gang members putting their money together to purchase a large firearm, stating “NFSBUT EVERYBODY WANNA BUY 2013 BIGGIES AND SHIT WHAT NIGGAS

NEED TO DO IS PUT ALL OUR MONEY TOGETHER AND BUY A BIG ASS
GUN.”

170. On or about February 9, 2013, defendant **BRIAN HARRIS**, a/k/a “Snubs” caused or permitted to be posted on Facebook a message to defendant **LONZELL GREEN**, a/k/a “Zell,” in part and in substance stating that defendant **GREEN** should give to defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” the coat that was stolen from rival 3 Staccs gang member Sean Pagan because defendant **RODRIGUEZ** was shot in retaliation for the theft of Pagan’s coat.
171. On or about February 10, 2013, defendant **LONZELL GREEN**, a/k/a “Zell,” caused or permitted to be posted on Facebook a message to an identified co-conspirator in part and substance stating that he was in possession of a winter coat that two other identified co-conspirators got for defendant **GREEN** after identified co-conspirators stole it from a rival 3Staccs gang member Sean Pagan.

172. On or about February 13, 2013, defendant **LARRY BUNCE**, a/k/a “Knockout,” caused or permitted to be posted on Facebook a message to defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” in part and substance inquiring as to whether or not defendant **RODRIGUEZ** was “SNITCHING” on the person who had shot defendant **RODRIGUEZ** in the leg, to which defendant **RODRIGUEZ** in part and substance responded that he would not and did not do that.
173. On or about March 6, 2013, defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” caused or permitted to be posted on Facebook a message to defendant **BRIAN HARRIS**, a/k/a “Snubs,” in part and in substance taking responsibility for the December 30, 2012 shooting of rival 3 Staccs gang member Shane Gilette, and defendant **HARRIS** then in part and substance claimed responsibility for breaking Gilette's nose.
174. On or about March 15, 2013, inside of 100 Centre Street, defendant **JUWAN ELLIS**, a/k/a “Cha Cha,” in part and in substance stated to a rival gang member, “I SHOT YOUR BOY AK AND I’M GONNA KILL YOU NEXT.”
175. On or about March 20, 2013, defendant **DEVANTE TAYLOR**, a/k/a “Buck,” caused or permitted to be posted on Facebook a message to an unidentified co-conspirator stating in part and in substance “IMAM GIVE YU THE 20\$\$ FRIDAY FOR THE GRIP.”

176. On or about March 31, 2013, defendant **RAYMOND GARCIA**, a/k/a “Ray Ray,” caused or permitted to be posted on Facebook a message to defendant **TAHEEM PRATT**, a/k/a “Tah Tah,” in part and in substance stating, “NIGGAS FROM EA FRONTED AND WE HAD TO PUT IN THE WORK.”
177. On or about March 31, 2013, inside of 95 Old Broadway defendants **CHRISTOPHER BERKLEY**, a/k/a “Shark,” **NAQUON BROCKINGTON**, a/k/a “Tubz,” **WILLIAM BUNCE**, a/k/a “Bucket,” **TIJAE CHAPPLE**, a/k/a “Ty,” **LONZELL GREEN**, a/k/a “Zell,” **TYRELL HEDGES**, a/k/a “Rell,” **JORDAN LASTER**, a/k/a “Wop,” **KHALID MILLER**, a/k/a “Lil Monster,” **ZAIRE PERRY**, a/k/a “Za,” **DAQUON WILLIAMS**, a/k/a “Quon,” **DASHAWN WILLIAMS**, a/k/a “D-Live,” and **DEMETRIUS WILLIAMS**, a/k/a “Metri,” and numerous unidentified co-conspirators attacked, punched, kicked and stomped a rival gang member, and defendant **BUNCE** stabbed that rival gang member with a knife in the arm and the chest.
178. On or about May 2, 2013, defendant **ZAIRE PERRY**, a/k/a “Za,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance discussing contributing \$150 to purchase a gun with a fellow gang member.

179. On or about May 2, 2013, defendant **ZAIRE PERRY**, a/k/a “Za,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance stating, “YOU POPPING, I’M SHOOTING.”
180. On or about May 13, 2013, defendant **DENZEL BROWN**, a/k/a “Denny,” caused or permitted to be posted on Facebook a message to **TERRELL BULLOCK**, a/k/a “Rell,” in part and substance asking if **BULLOCK** had defendant **BROWN’S** gun, to which **BULLOCK** in part and substance responded that defendant **COREY BUMPASS**, a/k/a “Bump,” had it and would bring it to **BULLOCK** the next day.
181. On or about May 13, 2013, defendant **STEPHON JOHNSON** caused or permitted to be posted on Facebook a message to defendant **MARKEESE SCOTT**, a/k/a “Doodie,” in part and in substance stating that he had a firearm.
182. On or about May 17, 2013, defendant **JOHNNY GREEN**, a/k/a “JoJo,” caused or permitted to be posted on Facebook a message to defendant **MARKEESE SCOTT**, a/k/a “Doodie,” in part and in substance telling defendant **SCOTT** that he had a .22 caliber revolver firearm.

183. On or about May 22, 2013, defendant **SHAVON PRATT**, a/k/a “B-Mack,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance asking that individual for bullets for a gun, stating “YO WATS GUD BLOOD I NEED SOME FOOD FOR DA PLATY.”
184. On or about June 8, 2013, an identified co-conspirator caused or permitted to be posted on Facebook a message to defendant **ZAIRE PERRY**, a/k/a “Za,” attaching a photograph of the co-conspirator holding a firearm in one hand and pointing the firearm at his other hand which was displaying a rival 3 Staacs gang sign.
185. On or about June 9, 2013, defendant **LONZELL GREEN**, a/k/a “Zell,” caused or permitted to be posted on Facebook a message to defendant **MARKEESE SCOTT**, a/k/a “Doodie,” in part and in substance stating that members of the Grant Houses were out in front of his building.
186. On or about June 14, 2013, defendant **MARKEESE SCOTT** caused or permitted to be posted a Facebook status update photograph depicting himself wearing a "RIP RECC" placard and stating "3STACCZ 6IG K."

187. On or about June 22, 2013, in the vicinity of Amsterdam Avenue and West 126th Street **DEMETRIUS WILLIAMS**, a/k/a “Metri,” and **SAMUEL WILLIAMS**, a/k/a “Sammy,” and numerous identified and unidentified co-conspirators taunted a large group of rival gang members, and defendant **WILLIAMS** swung a metal pipe at the rival gang members.
188. On or about June 23, 2013, defendant **DAVON GOULBOURNE**, a/k/a “Hef,” caused or permitted to be posted on Facebook a photograph displaying defendants **DAVON GOULBOURNE**, a/k/a “Hef,” **ZAIRE PERRY**, a/k/a “Za,” and **CHARLES SIMMONS**, a/k/a “Wave,” and an identified co-conspirator and unidentified co-conspirators, with the identified co-conspirator depicted with a firearm sticking out of his pants pocket.
189. On or about July 4, 2013, in the vicinity of Morningside Park and West 118th Street, defendant **TYRELL HEDGES**, a/k/a “Rell,” possessed a loaded firearm, which he fired in the direction of rival gang members and then pointed at a uniformed police sergeant.

190. On or about July 28, 2013, defendants **WILLIAM BUNCE**, a/k/a “Bucket,” and **ANTHONY GREGORY**, a/k/a “Ant,” caused or permitted to be posted on Facebook a conversation in part and in substance discussing an unidentified co-conspirator getting a “45” firearm, that defendant **GREGORY** will look for a “22” caliber firearm, purchasing a “380” caliber firearm with other gang members, and that defendant **GREGORY** does not want to share a firearm because “THE FIRST THING MY POPS TOLD DONT SHARE GUNS.”
191. On or about July 29, 2013, defendant **WILLIAM BUNCE**, a/k/a “Bucket,” caused or permitted to be posted on Facebook a message to defendant **DAVANTE TAYLOR**, a/k/a “Buck,” in part and in substance instructing defendant **TAYLOR** to tell an unidentified individual to bring a firearm to the Manhattanville Houses, and that defendant **ALEJANDRO RIVERA**, a/k/a “White Boy,” is going to purchase a “380 AN IM BUYING THE 25” CALIBER FIREARM.
192. On or about July 30, 2013, defendants **LARRY BUNCE**, a/k/a “Knockout,” **ALEJANDRO RIVERA**, a/k/a “White Boy,” and **JORDAN PINALES**, a/k/a “J.P.,” attacked, punched and slashed a rival gang member, leaving that person with a large slash to that person’s face.

193. On or about August 6, 2013, inside of 545 West 126th Street, defendant **JOSE MARTINEZ**, a/k/a "Cuevo," gave a bicycle to defendant **DAVANTE TAYLOR**, a/k/a "Buck," prior to defendant **TAYLOR** leaving that location with defendant **ANTHONY GREGORY**, a/k/a "Ant."

194. On or about August 6, 2013, inside of 545 West 126th Street, defendants **ANTHONY GREGORY**, a/k/a "Ant," and **DAVANTE TAYLOR**, a/k/a "Buck," briefly entered a Manhattanville Houses stairwell that defendant **WILLIE BELLINGER** had just emerged from, moments prior to defendants **BELLINGER, GREGORY, TAYLOR** and other co-conspirators travelling toward the Grant Houses where defendant **GREGORY** shot a rival 3 Staccs gang member.

195. On or about August 6, 2013, defendants **ALEJANDRO RIVERA** a/k/a "White Boy," and **WILLIE BELLINGER**, accompanied defendants **DAMIAN GARCIA**, a/k/a "Day Day," **RAYMOND GARCIA**, a/k/a "Ray Ray," **ANTHONY GREGORY**, a/k/a "Ant Live," **DAVANTE TAYLOR**, a/k/a "Buck and **DEMETRIOUSWILLIAMS**, a/k/a "Metri," from the Manhattanville Houses toward the Grant Houses, where defendant **RIVERA** stopped and waited in the vicinity of Old Broadway and West 126th Street while defendants **BELLINGER, DAMIAN GARCIA, RAYMOND GARCIA, GREGORY, TAYLOR,** and **WILLIAMS** continued to the Grant Houses, where defendant **GREGORY** shot a member of the rival 3 Staccs gang.
196. On or about August 6, 2013, in the vicinity of 550 West 125th Street, defendants **DAMIAN GARCIA**, a/k/a "Day Day," **RAYMOND GARCIA**, a/k/a "Ray Ray," **ANTHONY GREGORY**, a/k/a "Ant," **DAVANTE TAYLOR**, a/k/a "Buck," and **DEMETRIOUS WILLIAMS**, a/k/a "Metri," approached rival 3 Staccs gang members, and defendant **GREGORY** repeatedly shot at and struck a rival 3 Staccs gang member with a loaded firearm.

197. On or about August 6, 2013, from the vicinity of 550 West 125th Street, after a rival gang member had been shot, defendants **DAMIAN GARCIA**, a/k/a "Day Day," **RAYMOND GARCIA**, a/k/a "Ray Ray," **ANTHONY GREGORY**, a/k/a "Ant," **DAVANTE TAYLOR**, a/k/a "Buck," and **DEMETRIOUSWILLIAMS**, a/k/a "Metri," ran back towards where defendant **ALEJANDRO RIVERA**, a/k/a "White Boy," was waiting for them at Old Broadway and West 126th Street.
198. On or about August 7, 2013, defendant **DEVANTE TAYLOR**, a/k/a "Buck," caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance stating, "I'LL GIVE U AIPHONE JAILBROKEN FOR ANY GRIP" and "SEND ME A PIC OF IT HOW MANY BULLETS."
199. On or about August 11, 2013, in the vicinity of Old Broadway and West 126th Street, defendant an identified co-conspirator pointed what appeared to be a firearm at rival gang members while accompanied by defendant **DASHAWN WILLIAMS**, a/k/a "D-Live," and numerous identified and unidentified co-conspirators, while an identified co-conspirator threw an object at rival gang members.

200. On or about August 18, 2013, defendant **DEONDRE ELLIS-VAZQUEZ**, a/k/a “Dre,” caused or permitted to be posted on Facebook a message to defendant **JOSHUA CADLE**, a/k/a “Squidward,” in part and in substance discussing killing rival 3 Staacs gang member Trayvon Johnson stating, “WE TO THIS PROGRAM TOMORROW IN KILL THIS TRIGGA NIGGA.”
201. On or about August 25, 2013, in the vicinity of Amsterdam Avenue and West 125th Street, defendants **JOSHUA CADLE**, a/k/a Squidward,” **DONDRE RIDDICK**, a/k/a “Dre,” and **DOMINIQUE WASHINGTON**, a/k/a “Domo,” took a taxicab to the Grant Houses to confront and taunt rival 3 Staccs gang members.
202. On or about August 28, 2013, in the vicinity of Amsterdam Avenue and West 125th Street, defendant **JOSHUA CADLE**, a/k/a “Squidward,” possessed a loaded firearm and fired multiple gunshots at rival 3 Staccs gang members.
203. On or about August 30, 2013, defendant **ALEJANDRO RIVERA**, a/k/a White Boy,” caused or permitted to be posted on Facebook a message to an unidentified individual seeking to acquire a firearm and ammunition.

204. On or about August 30, 2013, defendant **DEMETRIOUSWILLIAMS**, a/k/a “Metri,” caused or permitted to be posted on Facebook a message to defendant **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” in part and in substance stating that he knew someone selling a “38 revolver Taurus he said its new he never used it” and the cost was \$500, to which defendant **RIVERA** responded that the price was too high and that he would also need ammunition.
205. On or about September 6, 2013, from the vicinity of 545 West 126th Street in the Manhattanville Houses, defendants **WILLIE BELLINGER, DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **BRIAN HARRIS**, a/k/a “Snubs,” **MARQUIS JONES**, a/k/a “Lil Knockout,” **ALEJANDRO RIVERA**, a/k/a “White Boy,” **DEVANTE TAYLOR**, a/k/a “Buck,” **DASHAWN WILLIAMS**, a/k/a “D-Live,” and **DEMETRIUS WILLIAMS**, a/k/a “Metri,” and numerous identified and unidentified co-conspirators travelled to a store on the north side of 125th Street, across from rival gang territory in the Grant Houses.

206. On or about September 6, 2013, from the vicinity of the north side of 125th Street and Old Broadway, defendants **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **MARQUIS JONES**, a/k/a “Lil Knockout,” **DEVANTE TAYLOR**, a/k/a “Buck,” **DASHAWN WILLIAMS**, a/k/a “D-Live,” and **DEMETRIUS WILLIAMS**, a/k/a “Metri,” transported a loaded firearm to the south side of the street, to the vicinity of the Grant Houses, as defendants **WILLIE BELLINGER**, **BRIAN HARRIS**, a/k/a “Snubs,” **ALEJANDRO RIVERA**, a/k/a “White Boy,” and numerous identified and unidentified co-conspirators remained on the north side of the street observing events on the south side of the street.

207. On or about September 6, 2013, in the vicinity 550 West 125th Street, defendants **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **MARQUIS JONES**, a/k/a “Lil Knockout,” **DEVANTE TAYLOR**, a/k/a “Buck,” **DASHAWN WILLIAMS**, a/k/a “D-Live,” and **DEMETRIUS WILLIAMS**, a/k/a “Metri,” entered the Grant Houses near 550 West 125th Street in possession of a loaded firearm and shot and struck a rival 3 Staccs gang member.

208. On or about September 6, 2013, in the vicinity of 545 West 126th Street, defendant **ALEJANDRO RIVERA**, a/k/a “White Boy,” changed his clothing before and after the shooting of a rival 3 Staccs gang member in the Grant Houses.
209. On or about September 6, 2013, in the vicinity of Old Broadway and West 125th Street, defendant **ANTHONY GREGORY**, a/k/a “Ant,” switched clothing with defendant **MARQUIS JONES**, a/k/a “Lil Knockout,” after the shooting of a rival 3 Staccs gang member as they returned to the north side of 125th Street where defendants **GERALD ALVAREZ**, a/k/a “Jet,” **WILLIE BELLINGER**, **JONATHAN CLOUTIER**, a/k/a “J.C.,” **BRIAN HARRIS**, a/k/a “Snubs,” and **ALEJANDRO RIVERA**, a/k/a “White Boy,” were waiting.
210. On or about September 7, 2013, defendant **DAMIAN GARCIA**, a/k/a “Day Day,” caused or permitted to be posted on Facebook a message to an identified co-conspirator in part and substance stating, “I LET IT GO AT GRANT TODAY” and, when asked by the identified co-conspirator if he had hit anyone, defendant **GARCIA** in part and substance responded, “I DON’T EVEN KNOW, FUCK IT THOUGH, AT LEAST HE KNOW WHO SHOT AT HIM.”

211. On or about September 18, 2013, defendant **DEMETRIOUS WILLIAMS**, a/k/a “Metri,” caused or permitted to be posted on Facebook a message to defendant **SAMUEL WILLIAMS**, a/k/a “Sammy,” in part and in substance stating, “PULL UP TO MY SCHOOL TOMORROW IGT IMA HAVE THE STRAP.”
212. On or about October 13, 2013, an identified co-conspirator caused or permitted to be posted on Facebook a message to defendant **DAVON PINKSTON**, a/k/a “Pac,” in part and in substance asking defendant **PINKSTON** if he had money to contribute towards purchasing a firearm, stating, “YOO YU GOT \$40 TAH PIT IN FAH AH STRAP ??”
213. On or about November 7, 2013, defendants an identified co-conspirator and **WILLIAM BUNCE**, a/k/a “Bucket,” caused or permitted to be posted on Facebook a conversation in part and in substance discussing rival 3 Staacs gang member Carl Jones shooting of defendant **CARLOS RODRIGUEZ**, a/k/a “Loso.”
214. On or about November 8, 2013, in the vicinity of 1402 Clay Avenue in the Bronx, defendants **LONZELL GREEN**, a/k/a “Zell,” **MARQUIS JONES**, a/k/a “Lil Knockout,” and an identified co-conspirator possessed a loaded nine millimeter handgun.

215. On or about November 9, 2013, defendants **WILLIAM BUNCE**, a/k/a “Bucket,” and **DASHAWN WILLIAMS**, a/k/a “D-Live,” caused or permitted to be posted on Facebook a conversation in part and substance discussing several firearms including a nine millimeter firearm and a .25 caliber firearm.
216. On or about January 17, 2014, defendants **RAYMOND GARCIA**, a/k/a “Ray Ray,” **DEVANTE TAYLOR**, a/k/a “Buck,” **DAQUON WILLIAMS**, a/k/a “Quon,” **DASHAWN WILLIAMS**, a/k/a “D-Live,” and **DEMETRIUS WILLIAMS**, a/k/a “Metri,” and an co-conspirator robbed a rival 3 Staccs gang member of a coat and then caused or permitted to be posted on Facebook a video showing the group bragging about the robbery, destroying the coat and threatening the rival gang member, in part and substance stating, “WE KNOW WHERE YOU LIVE, AND WE GOT YOUR HOUSE KEYS, STOP FRONTING.”
217. On or about February 5, 2014, defendant **STEPHON JOHNSON** caused or permitted to be posted on Facebook a status update in part and substance stating, "R.I.P TO MY BRO WALTER & FREE THE SLIMESS."

218. On or about February 17, 2014, defendant **STEPHON JOHNSON** caused or permitted to be posted on Facebook a status update in part and substance stating, "UNTIL YOU SHOOT A NIGGA YOU DON'T KNOW HOW IT FEEL."
219. On or about February 28, 2014, defendant **STEPHON JOHNSON** caused or permitted to be posted on Facebook a status update in part and in substance stating, "HOW A PUSSY NIGGA KILL A REAL NIGGA R.I.P RECC THOUGH."
220. On or about March 3, 2014, defendant **KENNETH THOMAS** caused or permitted to be posted on Facebook a status update in part and in substance stating, "YOU KILLED MY HOMIE BACK IN 2012. FUCK YA TRUCE!!!"
221. On or about April 2, 2014, defendant **DEVANTE TAYLOR**, a/k/a "Buck," caused or permitted to be posted on Facebook a status update in part and in substance stating that rival gang members were speaking to the police, followed by a photograph of himself and unidentified co-conspirators making insulting gestures in front of the Douglas Houses entrance sign, and the caption "LMFAO FREE MY GUY DLIVE THOUGH."

222. On or about April 3, 2014, defendant **ALEJANDRO RIVERA**, a/k/a “White Boy,” caused or permitted to be posted on Facebook a status update in part and substance stating, “AT LONG AS THOSE KIDS STILL SCREAM MY NAME WHEN I COME OUTSIDE THAT ALL I CARE ABOUT THAT MAKE ME PROUD.”
223. On or about April 23, 2014, defendant **NICHOLAS HOLDEN**, a/k/a “Nic Banon,” caused or permitted to be displayed on Facebook a photograph of himself and defendant **JAVANN GARNES**, a/k/a “J Hat,” and an unidentified co-conspirator in which defendant **HOLDEN** and the unidentified co-conspirator are wearing shirts indicating membership in MA and commemorating the death of co-conspirator Walter “Recc” Sumter, and defendant **GARNES** is wearing a placard with similar writing and photographs.

SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRANCE ABDUR-RAHMAN**, a/k/a “T Mula Mack,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **DAVON GOULDBOURNE**, a/k/a “Young Hef,” **ANTHONY GREGORY**, a/k/a “Ant,” **STEPHON JOHNSON**, a/k/a “Steph,” **SHAWN LASTER**, a/k/a “S Dot,” **MICHAEL LOPEZ**, a/k/a “Nino,” **ZAIRE PERRY**, a/k/a “Za Slimes,” **DARRELL RHETT**, a/k/a “D Slimes,” **CHARLES SIMMONS**, **DEVANTE TAYLOR**, a/k/a “Buck,” **DASHAWN WILLIAMS**, a/k/a “D Live,” and **DEMETRIUS WILLIAMS**, a/k/a “Meetry,” 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 **TY-KWAN ALLEN**, a/k/a “Ty,” **PATRICK BAPTISTE**, a/k/a “Pat Banga,” **WILLIE BELLINGER**, a/k/a “Ill Will,” **CARASHANE BRADFORD**, a/k/a “Shane,” **LONDELL BREVARD**, **DENZEL BROWN**, a/k/a “Henny Denny,” **COREY BUMPASS**, a/k/a “Cor,” a/k/a “Bump,” **JOSHUA CADLE**, a/k/a “Squidword,” **JUWAN ELLIS**, a/k/a “Cha Cha,” **DEONDRE ELLIS-VASQUEZ**, **MICHAEL ENGLISH**, a/k/a “White Mike,” **JAVANN GARNES**, a/k/a “J Hat,” **KEITH GOODMAN**, a/k/a “Inf,” **STEVEN GRANDY**, a/k/a “Stephen Joseph,” a/k/a “Randy Grandy,” **JOHNNY GREEN**, a/k/a “Jojo,” **ANDRE GUZMAN**, a/k/a “Drizzy,” **BRIAN HARRIS**, a/k/a “Snubs,” **JALEN HARRIS**, a/k/a “Fatboy,” a/k/a “J Bundles,” **NICHOLAS HOLDEN**, a/k/a “Nick Bannon,” **DAVON JENKINS**, **JORDAN LASTER**, a/k/a “Wop,” **JOSE MARTINEZ**, a/k/a “Cuevo,” **CHRISTOPHER PARKS**, a/k/a “Chris Black,” **DAVON PINKSTON**, a/k/a “Pac,” **EARNEST PLEASANT**, a/k/a “Monster,” **SHAVONN PRATT**, a/k/a “B-Mack,” **TAHEEM PRATT**, a/k/a “Tata,” **DONDRE RIDDICK**, a/k/a “Dre,” **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” **CARLOS RODRIGUEZ**, a/k/a “Loso,” **ALEXIS ROLANDEDWIGE**, a/k/a “B.B.,” **MARKEESE SCOTT**, a/k/a “Doodie,” **ERVIN SWAIN**,

a/k/a “G Baby,” **KENNETH THOMAS, DANDRE TOOLE**, a/k/a
“Dre,” **DEVANTE WASHINGTON**, a/k/a “Sleeps,” **DOMONIQUE
WASHINGTON**, a/k/a “Domo,” and **ISAAC WATERMAN**, a/k/a “Poe,”
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:

224. On or about October 10, 2010, in the vicinity of 49 West 119th Street, defendant **STEVEN GRANDY**, possessed a loaded Taurus .38 caliber revolver.
225. On or about May 8, 2011, in the vicinity of 162 West 125th Street, defendant **PATRICK BAPTISTE**, a/k/a “P Banga,” possessed a loaded .380 caliber firearm.
226. On or about August 11, 2011, defendant **ISAAC WATERMAN**, a/k/a “Po,” caused or permitted to be posted on Facebook a status update in part and substance entitled “DA RYDAS VILLE ^^” and including a photograph depicting defendant **WATERMAN** and various MHB gang members.
227. On or about September 11, 2011, defendant **ISAAC WATERMAN**, a/k/a “Po,” caused or permitted to be posted on Facebook a status update in part and substance stating, “IT GOT CRAZY TONIGHT. MAN, IT’S GONNA BE WAR 24 7 NOW. FUCK IT.”
228. On or about September 12, 2011, defendant **NAQUON BROCKINGTON**, a/k/a “Tubz,” caused or permitted to be posted on Facebook a message to an unknown individual in part and in substance discussing the gang rivalry between MHB and 3 Staccs members from the Grant Houses and the killing of Tayshana “Chicken” Murphy and asking, “OHH U KNO WE GOT MAD BEEF WITH GRANT RITE?”

229. On or about October 18, 2011, defendant **ISAAC WATERMAN**, a/k/a “Po,” caused or permitted to be posted on Facebook a status update in part and substance stating, “VILLE UP OR DIE.”
230. On or about October 21, 2011, defendant **ISAAC WATERMAN**, a/k/a “Po,” caused or permitted to be posted on Facebook a message to an identified co-conspirator in part and substance asking if defendant **DEVANTE WASHINGTON**, a/k/a “Sleepz,” had “CLIPS” to which an identified co-conspirator in part and substance responded, “YOO HE SAID 350 FOR DA SLIME.”
231. On or about October 29, 2011, defendant **ANDRE GUZMAN**, a/k/a “Dre,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance seeking to purchase a firearm.
232. On or about November 9, 2011, defendant **TAHEEM PRATT**, a/k/a “Tah Tah,” caused or permitted to be posted on Facebook a status update in part and substance stating, “VILLE UP.”
233. On or about November 14, 2011, defendant **ANDRE GUZMAN**, a/k/a “Dre,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance seeking to purchase a firearm.

234. On or about November 29, 2011, defendant **ISAAC WATERMAN**, a/k/a “Po,” and an identified co-conspirator caused or permitted to be posted on Facebook a conversation in which an identified co-conspirator in part and substance informed defendant **WATERMAN** that he would purchase a firearm on behalf of defendant **WATERMAN**, to which defendant **WATERMAN** agreed.
235. On or about December 28, 2011, defendant **PATRICK BAPTISTE**, a/k/a “P Banga,” caused or permitted to be posted on Facebook a status update in part and substance stating that he had “DREAMED OF BLOWING UP GRANT” and then “SHOOTING EVERYONE IN THE AMBULANCES.”
236. On or about January 21, 2012, defendant **JALEN HARRIS**, a/k/a “Fat Boy,” caused or permitted to be posted on Facebook a message to rival 3 Staccs gang member Paul Washington in part and substance stating, “RECC DIED N PEACE CHICKEN DIED N FRIED GREASE.”
237. On or about February 2, 2012, defendant **PATRICK BAPTISTE**, a/k/a “P Banga,” caused or permitted to be posted on Facebook a status update in part and in substance stating, “BOUT 2 THRASH THESE 2 STACK NIGGAZ.”

238. On or about March 13, 2012, in the vicinity of Broadway and West 126th Street, defendants **STEVEN GRANDY, CHRISTOPHER HENDRICKSON**, a/k/a “Noodles,” **CHRISTOPHER JIMINEZ** and an identified co-conspirator attacked rival gang members and attempted to drag one of them out of a moving car.
239. On or about April 28, 2012, defendant **KHALID MILLER**, a/k/a “Lil Monster,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance informing the individual that he has a firearm but needs bullets, stating “I GOT DA 40 I NEED BULLETS.”
240. On or about May 11, 2012, defendant **NAQUON BROCKINGTON**, a/k/a “Tubz,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance offering to shoot rival gang members for the unidentified individual “CAUSE I DON’T LIKE THEM NIGGAS ANYWAY.”
241. On or about July 21, 2012, defendant **KHALID MILLER**, a/k/a “Lil Monster,” caused or permitted to be posted on Facebook a message to defendant **WILLIAM BUNCE**, a/k/a “Bucket,” in which defendant **MILLER** in part and in substance stated that he wanted “STATIC” with “EVERYTHING MOVING IN GRANT” and that he hoped someone from Grant had been shot.

242. On or about July 28, 2012, defendant **LONNIE LESTER** and **KHALID MILLER**, a/k/a “Lil Monster,” caused or permitted to be posted on Facebook a conversation in which defendant **LESTER** in part and substance informed defendant **MILLER** that August 4th would be “Recc Day” in commemoration of the murder of deceased gang member and co-conspirator Walter “Recc” Sumter, to which defendant **MILLER** in part and substance responded that he would attend “Recc Day” and use a firearm to take revenge on rival gang members in the Grant Houses.
243. On or about August 1, 2012, defendant **TAHEEM PRATT** caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance seeking to acquire a firearm.
244. On or about August 4, 2012, defendant **KHALID MILLER**, a/k/a “Lil Monster,” caused or permitted to be posted on Facebook a message to defendant **MARQUIS JONES**, a/k/a “Lil Knockout,” in part and substance stating that he would be attending a party in commemoration of the murder of WALTER SUMTER, and stating “IM GHETTIN SOME THANNNGS 2DAY 4 MY BOYYYYYYYYY BUT NIKKAZ SAID WE HAVIN AH PARADE THREW GRANT LMAOOOO.”

245. On or about August 16, 2012, defendant **JOSE MARTINEZ**, a/k/a “Cuevo,” caused or permitted to be posted on Facebook a status update in part and substance stating that he had a firearm and had used it on rival 3 Staccs gang members.
246. On or about August 17, 2012, defendant **JOSE MARTINEZ**, a/k/a “Cuevo,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating that he had a gun and “WHO SAID I’M NOT DOING NUFFIN WIT IT ASK THE 3 STACKS NIGGAS WAS UP.”
247. On or about August 30, 2012, defendant **BRIAN HARRIS**, a/k/a “Snubs,” caused or permitted to be posted on Facebook a message to defendant **NICHOLAS HOLDEN**, a/k/a “Nic Banon,” in part and in substance stating, “WHY MY BOY MONST JUST CAUGHT THE KNOCKOUT ON BAM NIGGA LIKE AH AH HE LAID THE HOMIE DOWN RIP RECC,” to which defendant **HOLDEN** in part and substance responded, “WORD I’M BOUT 2 BE ON DECK.”
248. On or about September 4, 2012, defendant **TAHEEM PRATT** caused or permitted to be posted on Facebook a message to rival 3 Staccs gang member Trayvon Johnson in part and in substance informing Johnson that he believed Johnson was “SNITCHING” and “WEN I CATCH YU IMA KILL YU SO B STRAP YU GOT NOBODY FOR ME NIGGA CAUSE IM A REAL

NIGGA...GET YA GUNS UP PUSSY” and “CAN’T WAIT TOO I SEE ANY OF YU
NIGGA IM DUMPING ON SITE SOME BODY GOT TO DIE!!!!!!!!!!!!”

249. On or about October 23, 2012, inside of 545 West 126th Street, defendant **LONDELL BREVARD** possessed a firearm.
250. On or about November 2, 2012, inside of 1430 Amsterdam Avenue, defendant **ISAAC WATERMAN**, a/k/a “Po,” possessed a loaded Taurus .357 Magnum caliber revolver.
251. On or about December 29, 2012, defendant **WILLIAM BUNCE**, a/k/a “Bucket” caused or permitted to be posted on Facebook a message to an identified co-conspirator in part and in substance inquiring who had a particular firearm, to which the identified co-conspirator in part and substance responded that the firearm was located in the River Park Towers.
252. On or about December 31, 2012, defendants **WILLIAM BUNCE**, a/k/a “Buckett,” and **LONZELL GREEN**, a/k/a “Zell,” caused or permitted to be posted on Facebook a conversation in part and substance discussing their satisfaction with the December 30, 2012 shooting of rival 3Staccs gang member Shane Gillette, with defendant **BUNCE** stating, “YEAH IT WAS AK THT GOT HIT,” to which defendant **TYNELL SHAW**, a/k/a “Ty,” in part and substance responded, “AHHHHHHHHH ! THEM NIGGAS NEED 2 STOP PLAYING GORILLA BEFORE THEY GIT IT W/ A

BANNANNA CLIP,” to which defendant **BUNCE** in part and substance responded, “LMAOO,” and to which defendant **SHAW** in part and substance responded, “DEADASS BRO.”

253. On or about January 6, 2013, in the vicinity of Amsterdam Avenue and West 126th Street defendants **WILLIAM BUNCE**, a/k/a “Bucket,” and **DAVANTE TAYLOR**, a/k/a “Buck,” and identified and unidentified co-conspirators fought with a group of gang rivals and then fled towards the Manhattanville Houses when confronted by the police.

254. On or about January 6, 2013, defendants **LARRY BUNCE**, a/k/a “Knockout,” and **BRIAN HARRIS**, a/k/a “Snubs,” caused or permitted to be posted on Facebook a conversation in part and substance discussing assaulting rival 3 Staccs gang member Javon Peterson in school, and noting that defendant **AUSTIN ROME**, a/k/a “Stackz,” is going to “HELP OUT.”

255. On or about January 17, 2013, defendant **JOSE MARTINEZ**, a/k/a “Cuevo,” caused or permitted to be posted on Facebook a message in part and in substance asking defendant **DEONDRE ELLIS-VASQUEZ**, a/k/a “Dre,” if defendant **ELLIS-VASQUEZ** is purchasing a firearm, to which defendant **ELLIS-VASQUEZ** in part and substance responded that someone was recently arrested with a firearm but that he has more firearms.

256. On or about January 18, 2013, defendant **DARRIN WEBSTER** caused or permitted to be posted on Facebook a message to defendant **TIJAE CHAPPLE**, a/k/a “Ty,” in part and in substance stating that rival 3 Staccs gang member Terrance Milton took out a firearm during a large group fight.
257. On or about February 20, 2013, in the vicinity of Amsterdam Avenue and West 128th Street, defendants **NAQUON BROCKINGTON**, a/k/a “Tubz,” **BRIAN HARRIS**, a/k/a “Snubs,” **DAVON JENKINS**, **JOSE MARTINEZ**, a/k/a “Cuevo,” and **JORDAN PINALES**, a/k/a “J.P.,” directed gang hand signs and taunts at a large group of rival gang members while accompanied by unidentified co-conspirators, and began to fight with the rival group before being disrupted by the police.
258. On or about February 25, 2013, in the vicinity of 1420 Amsterdam Avenue, defendant **ANDRE GUZMAN**, a/k/a “Dre,” and unidentified co-conspirators attacked and repeatedly stomped on rival 3 Staccs gang member Shane Gillette, shortly after Gillette punched defendant **GUZMAN** in the face and knocked him down in front of defendant **LARRY BUNCE**, a/k/a “Knockout.”

259. On or about February 26, 2013, defendant **ANDRE GUZMAN**, a/k/a “Dre,” caused or permitted to be posted on Facebook a message to defendant **JORDAN PINALES**, a/k/a “J.P.,” in part and in substance stating that defendant **GUZMAN** and other MHB gang members “tried to kill” rival 3 Staccs gang member Shane Gillette and that fellow MHB gang members took Gillette’s jacket, to which defendant **PINALES** in part and in substance responded that MHB gang members could beat up another rival gang member tomorrow.

260. On or about February 26, 2013, defendant **ANDRE GUZMAN**, a/k/a “Dre,” caused or permitted to be posted on Facebook a message to defendant **JORDAN PINALES**, a/k/a “J.P.,” in part and substance stating, “WE TRIED TO KILL AK” and “U NO I HAD TO GET MY PAYBACK ON HIM”, then stated that “HE IN DA HOSPITAL I THINK, LIKE WE HAD HIM ON THE FLOOR N ALL FOR A GOOD 5 MIN...WE GOT HIM SO GOOD NIGGA NONE OF US COULD BREATHE WEN WE WAS DONE LML” and that they had taken “AK’s” Pelle Pelle coat.

261. On or about April 1, 2013, defendant **WILLIAM BUNCE**, a/k/a “Bucket,” caused or permitted to be posted on Facebook a message to defendant **MARQUIS JONES**, a/k/a “Lil Knockout,” in part and in substance stating, “we killed them lmao,” to which defendant **JONES** in part and substance responded, “LMFAOO EA NIGGAS,” and defendant **BUNCE** in part and substance replied, “BUT YEO IF ANYBODY ASK I WAS ON 135 AN S.NICK WE WASN’T IN THE VILLE.”
262. On or about April 1, 2013, defendant **WILLIAM BUNCE**, a/k/a “Bucket,” caused or permitted to be posted on Facebook a message to defendant **JOHNNY GREEN**, a/k/a “Jo Jo,” in part and substance stating that defendant **BUNCE** had stabbed someone in the arm and chest during a fight on March 31, 2013 inside of 95 Old Broadway.
263. On or about May 14, 2013, defendant **WILLIAM BUNCE**, a/k/a “Bucket,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance stating that he was about to purchase a firearm.
264. On or about May 15, 2013, inside of 608 West 135th Street, defendant **NICHOLAS HOLDEN**, a/k/a “Nic Banon,” possessed a loaded firearm and t-shirts commemorating the homicide of co-conspirator Walter “Recc” Sumter, as well as a t-shirt reading “Mula Gang” in reference to the Money Avenue gang.

265. On or about June 11, 2013, defendants **WILLIAM BUNCE**, a/k/a “Bucket,” and **DAVANTE’ TAYLOR**, a/k/a “Buck,” caused or permitted to be posted on Facebook a conversation in part and in substance discussing buying and selling firearms.
266. On or about July 31, 2013, an unidentified co-conspirator caused or permitted to be posted on Facebook a message to defendant **BRIAN HARRIS**, a/k/a “Snubs,” in part and in substance informing him that an identified individual “CAME TO THE HOOD STABBING NIGGAS,” that defendant **WILLIAM BUNCE**, a/k/a “Bucket,” was about to stab a rival gang member and that defendant **JOSE MARTINEZ**, a/k/a “Cuevo,” was stabbed twice in the back.
267. On or about September 22, 2013, defendant **MARQUIS JONES**, a/k/a “Lil Knockout,” caused or permitted to be posted on Facebook a message to defendant **WILLIAM BUNCE**, a/k/a “Bucket,” in part and in substance stating, “NIGGA GOT THE STRAP WITH 2 FULLY LOADED CLIPS,” to which defendant **BUNCE** in part and substance responded, “IMA TAKE THEM SHITS.”

268. On or about November 3, 2013, in the vicinity of 545 West 126th Street, defendant **STEVEN GRANDY** possessed a boxcutter.
269. On or about November 9, 2013, in the vicinity of 1294 Morris Avenue in the Bronx, defendant **JOSE MARTINEZ**, a/k/a “Cuevo,” and multiple unidentified co-conspirators possessed a loaded firearm.
270. On or about November 14, 2013, defendant **WILLIAM BUNCE**, a/k/a “Bucket,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and in substance discussing purchasing a firearm for a quantity of money, stating, “THE GRIP THE NIGGA SAID HE WANT 200.”
271. On or about February 13, 2014, defendant **NAQUON BROCKINGTON**, a/k/a “Tubz,” caused or permitted to be posted on Facebook a message in part and substance threatening an unidentified individual, “EVERY TIME I SEE YOU I’M KNOCKING YOU OUT, THAT’S WHAT WE NIGGAS DO ON THE REGULAR.”

272. On or about March 8, 2014, defendant **LARRY BUNCE**, a/k/a “Knockout,” attacked an individual inside of the Manhattanville Houses, knocking that person unconscious and then directing other MHB gang members to continue assaulting that individual, breaking his jaw and rupturing his liver, after which defendants **NAQUAN BROCKINGTON**, a/k/a “Tubz,” and **JORDAN PINALES**, a/k/a “J.P.,” paused and stood over the unconscious victim.
273. On or about April 2, 2014, defendant **WILLIAM BUNCE**, a/k/a “Bucket,” caused or permitted to be posted on Facebook a profile picture of himself making a hand gesture indicating shooting rival 3 Staccs gang members.
274. On or about April 2, 2014, defendant **WILLIAM BUNCE**, a/k/a “Bucket,” caused or permitted to be posted on Facebook a status update in part and substance stating “FREE THE VILLE,” accompanied by a picture of a gun shooting a police officer.
275. On or about April 23, 2014, defendant **KHALID MILLER**, a/k/a “Lil Monster,” caused or permitted to be posted on Facebook a status update attaching a photograph depicting a "RIP RECC" placard and stating "HAPPY BIRTHDAY BROSKII, WE MISS YOU MAN #MONEYAVE2 THEVILLE SHIT AINT BEEN THE SAME BRO, YOU GONE BE IN MY HEART TIL MY VEINS BLOW #RIPRECC," followed by the "GANG" image spelled out in pictures.

276. On or about May 1, 2014, defendant **KHALID MILLER**, a/k/a “Lil Monster,” caused or permitted to be posted on Facebook a photograph depicting himself displaying a gang sign and reading, "IF HE AINT #OTV THEN HE CANT HANG OUT" and "GANG" spelled out in pictures.

FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRANCE ABDUR-RAHMAN**, a/k/a “T Mula Mack,” **NAQUAN BROCKINGTON**, a/k/a “Tubz,” **WILLIAM BUNCE**, a/k/a “Billz,” **TIJAE CHAPPLE**, a/k/a “Mula Ty,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **DAVON GOULDBOURNE**, a/k/a “Young Hef,” **ANTHONY GREGORY**, a/k/a “Ant,” **STEPHON JOHNSON**, a/k/a “Steph,” **SHAWN LASTER**, a/k/a “S Dot,” **MICHAEL LOPEZ**, a/k/a “Nino,” **KHALID MILLER**, a/k/a “Little Monster,” **ZAIRE PERRY**, **DARRELL RHETT**, a/k/a “D Slimes,” a/k/a “Za Slimes,” **CHARLES SIMMONS**, **DEVANTE TAYLOR**, a/k/a “Buck,” **DASHAWN WILLIAMS**, a/k/a “D Live,” and **DEMETRIUS WILLIAMS**, a/k/a “Meetry,” 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 **TY-KWAN ALLEN**, a/k/a “Ty,” **PATRICK BAPTISTE**, a/k/a “Pat Banga,” **WILLIE BELLINGER**, a/k/a “Ill Will,” **CHRISTOPHER BERKLEY**, a/k/a “Shark,” **CARASHANE BRADFORD**, a/k/a “Shane,” **LONDELL BREVARD**, **DENZEL BROWN**, a/k/a “Henny Denny,” **COREY BUMPASS**, a/k/a “Cor,” a/k/a “Bump,” **LARRY BUNCE**, a/k/a “Knockout,” **JOSHUA CADLE**, a/k/a “Squidword,” **JUWAN ELLIS**, a/k/a “Cha Cha,” **DEONDRE ELLIS-VASQUEZ**, **MICHAEL ENGLISH**, a/k/a “White Mike,” **JAVANN GARNES**, a/k/a “J Hat,” **KEITH GOODMAN**, a/k/a “Inf,” **STEVEN GRANDY**, a/k/a “Stephen Joseph,” a/k/a “Randy Grandy,” **JOHNNY GREEN**, a/k/a “Jojo,” **ANDRE GUZMAN**, a/k/a “Drizzy,” **BRIAN HARRIS**, a/k/a “Snubs,” **JALEN HARRIS**, a/k/a “Fatboy,” a/k/a “J Bundles,” **CHRISTOPHER HENDRICKSON**, a/k/a “Noodles,” **NICHOLAS HOLDEN**, a/k/a “Nick Bannon,” **DAVON JENKINS**, **CHRISTOPHER JIMINEZ**, **JORDAN LASTER**, a/k/a “Wop,” **JOSE MARTINEZ**, a/k/a “Cuevo,” **CHRISTOPHER PARKS**, a/k/a “Chris Black,” **JORDAN PINALES**, a/k/a “J.P.,” **DAVON PINKSTON**, a/k/a “Pac,” **EARNEST PLEASANT**, a/k/a “Monster,” **SHAVONN PRATT**, a/k/a “B-Mack,” **TAHEEM PRATT**, a/k/a “Tata,” **DONDRE**

RIDDICK, a/k/a “Dre,” **ALEJANDRO RIVERA**, a/k/a “Whiteboy,”
CARLOS RODRIGUEZ, a/k/a “Loso,” **ALEXIS ROLANDEDWIGE**,
a/k/a “B.B.,” **MARKEESE SCOTT**, a/k/a “Doodie,” **ERVIN SWAIN**,
a/k/a “G Baby,” **KENNETH THOMAS**, **DANDRE TOOLE**, a/k/a
“Dre,” **DEVANTE WASHINGTON**, a/k/a “Sleeps,” **DOMONIQUE**
WASHINGTON, a/k/a “Domo,” and **ISAAC WATERMAN**, a/k/a “Poe”
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:

277. On or about April 4, 2011, defendant **LARRY BUNCE**, a/k/a “Knockout,” caused or permitted to be posted on Facebook a status update in part and in substance stating, “VILLE UPP HOE!!!”
278. On or about May 10, 2012, defendant **LARRY BUNCE**, a/k/a “Knockout,” caused or permitted to be posted on Facebook a status update in part and in substance stating, “SHOOT AT US, NO REPORT, SHOOT AT THEM THEY GOING TO COURT.”
279. On or about July 8, 2012, into a bench inside of the 26th Precinct, defendant **LARRY BUNCE** a/k/a “Knockout,” carved the letters “KO” “MHB” and “VILLE.”
280. On or about August 7, 2012, inside of a Dominos Pizza store in the vicinity of 125th Street and Broadway, defendants **LARRY BUNCE**, a/k/a “Knockout,” **CHRISTOPHER HENDRICKSON**, a/k/a “Noodles,” and **CHRISTOPHER JIMINEZ** attacked, stomped on and slashed a rival 3 Staccs gang member.
281. On or about December 15, 2012, in the vicinity of Morningside Avenue and West 123rd Street, defendant **SAMUEL WILLIAMS**, a/k/a “Sammy,” and a number of other MHB gang members slashed and cut two rival 3 Staccs gang members, causing serious physical injury.

282. On or about December 15, 2012, defendant **SAMUEL WILLIAMS**, a/k/a “Sammy,” caused or permitted to be posted on Facebook a status update in part and in substance stating, “NOW SEAN AND BRIAN KNOW WHAT’S UP, 3 STACCS K.”
283. On or about January 10, 2013, defendant **JORDAN PINALES**, a/k/a “J.P.,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “I WANT TO KILL ONE OF THEM.”
284. On or about January 17, 2013, in the vicinity of Morningside Avenue and West 126th Street, defendant **CHRISTOPHER BERKLEY**, a/k/a “Shark,” and a group of more than three co-conspirators attacked a rival gang member.
285. On or about February 9, 2013, following the shooting of defendant **CARLOS RODRIGUEZ**, a/k/a “Loso,” defendant **SAMUEL WILLIAMS**, a/k/a “Sammy,” caused or permitted to be posted on Facebook a status update in part and substance stating, “4 TIMES? DAMN NOW SOMEBODY GOTTA GET HURT REAL BAD.”
286. On or about March 1, 2013, defendant **JORDAN PINALES**, a/k/a “J.P.,” caused or permitted to be posted on Facebook a status update that in part and substance stating, “FULL CLIP IN MY HAMMER!”

287. On or about March 3, 2013, defendant **LARRY BUNCE**, a/k/a “Knockout,” caused or permitted to be posted on Facebook a message to rival 3 Staccs gang member Shane Gilette in part and in substance taunting Gilette that he had been beaten to the point that he needed to be hospitalized in a fight that had occurred on February 25, 2013, during which Gilette’s gang had abandoned him, and stating, “YALL NIGGAS TRIED TO COME THROUGH 6 DEEP N WAT HAPPEN LMAOO NIGGAS BEAT DOGG SHIT OUT OF U.”
288. On or about April 1, 2013, defendant **SAMUEL WILLIAMS**, a/k/a “Sammy,” caused or permitted to be posted on Facebook a message to an unidentified individual in part and substance stating, “I GOT STATIC WITH THE EA NIGGA NOW CAUSE WE SMOKED THEM LAST NIGHT.”
289. On or about April 1, 2013, defendant **SAMUEL WILLIAMS**, a/k/a “Sammy,” caused or permitted to be posted on Facebook a message to rival gang member “Seany Banks” in part and in substance threatening, “I SEE IM GON HAVE TO KILL YOU” because “U A FUCKING SNITCH” and “WATCH WHEN I CATCH YOU, YOU GON BE BREATHING OUT A TUBE.”
290. On or about August 7, 2013, in the vicinity of Old Broadway and West 126th Street, defendant **JORDAN PINALES**, a/k/a “J.P.,” possessed a box cutter, while taunting a group of rival 3 Staccs gang members.

SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRANCE ABDUR-RAHMAN**, a/k/a “T Mula Mack,” **NAQUAN BROCKINGTON**, a/k/a “Tubz,” **WILLIAM BUNCE**, a/k/a “Billz,” **TIJAE CHAPPLE**, a/k/a “Mula Ty,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **DAVON GOULDBOURNE**, a/k/a “Young Hef,” **ANTHONY GREGORY**, a/k/a “Ant,” **STEPHON JOHNSON**, a/k/a “Steph,” **SHAWN LASTER**, a/k/a “S Dot,” **MICHAEL LOPEZ**, a/k/a “Nino,” **KHALID MILLER**, a/k/a “Little Monster,” **ZAIRE PERRY**, a/k/a “Za Slimes,” **DARRELL RHETT**, a/k/a “D Slimes,” **CHARLES SIMMONS**, **DEVANTE TAYLOR**, a/k/a “Buck,” **DASHAWN WILLIAMS**, a/k/a “D Live,” **DAQUON WILLIAMS**, a/k/a “Quon Goonie,” **DEMETRIUS WILLIAMS**, a/k/a “Meetry,” and **SAMUEL WILLIAMS**, a/k/a “Sambo,” a/k/a “Sammy Pastrana,” 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 **MICHAEL LOPEZ**, a/k/a “Nino,” 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 defendant, in the County of New York, on or about May 2, 2011, with intent to cause the death of another person, attempted to cause the death of another person.

EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **MICHAEL LOPEZ**, a/k/a “Nino,” 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 defendant, in the County of New York, on or about May 2, 2011, 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.

NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DAVON JENKINS** and **ERVIN SWAIN**, a/k/a “G Baby,” 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 11, 2011, attempted to possess 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 **DAVON JENKINS** and **ERVIN SWAIN**, a/k/a “G Baby,” 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 11, 2011, attempted to possess 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 defendants **DAVON PINKSTON**, a/k/a “Pac,” and **DEONDRE ELLIS-VAZQUEZ**, 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 November 21, 2011, with intent to cause the death of another person, attempted to cause the death of another person.

TWELTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DAVON PINKSTON**, a/k/a “Pac,” and **DEONDRE ELLIS-VAZQUEZ**, 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 November 21, 2011, 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.

THIRTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DAVON PINKSTON**, a/k/a “Pac,” and **DEONDRE ELLIS-VAZQUEZ**, 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 November 21, 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 **DAVON PINKSTON**, a/k/a “Pac,” and **DEONDRE ELLIS-VAZQUEZ**, 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 November 21, 2011, possessed a loaded firearm with the intent to use the same unlawfully against another person.

FIFTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DAVON PINKSTON**, a/k/a “Pac,” and **DEONDRE ELLIS-VAZQUEZ**, 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 November 21, 2011, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

SIXTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JAVANN GARNES**, a/k/a “J Hat,” 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 December 10, 2011, attempted to possess a loaded firearm with the intent to use the same unlawfully against another person.

SEVENTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JAVANN GARNES**, a/k/a “J Hat,” 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 11, 2011, attempted to possess a loaded firearm, said possession not being in the defendants’ home or place of business.

EIGHTEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **RAYMOND GARCIA**, a/k/a “Ray Ray,” and **JORDAN LASTER**, a/k/a “Wop,” 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 December 26, 2011, with intent to cause the death of another person, attempted to cause the death of another person.

NINETEENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **RAYMOND GARCIA**, a/k/a “Ray Ray,” and **JORDAN LASTER**, a/k/a “Wop,” 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 December 26, 2011, 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.

TWENTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JORDAN LASTER**, a/k/a “Wop,” 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 December 26, 2011, possessed a loaded firearm with the intent to use the same unlawfully against another person.

TWENTY-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JORDAN LASTER**, a/k/a “Wop,” 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 December 26, 2011, possessed a loaded firearm, said possession not being in the defendant’s home or place of business.

TWENTY-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **RAYMOND GARCIA**, a/k/a “Ray Ray,” 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 December 26, 2011, possessed a loaded firearm on school grounds with the intent to use the same unlawfully against another person.

TWENTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **RAYMOND GARCIA**, a/k/a “Ray Ray,” 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 December 26, 2011, possessed a loaded firearm on school grounds, said possession not being in the defendant’s home or place of business.

TWENTY-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “TY,” **CARASHANE BRADFORD**, a/k/a “Shane,” **DAVON PINKSTON**, a/k/a “Pac,” **ALEXIS ROLANDEDWIGE**, a/k/a “B.B.,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 4, 2012, with intent to cause the death of another person, attempted to cause the death of another person.

TWENTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “TY,” **CARASHANE BRADFORD**, a/k/a “Shane,” **DAVON PINKSTON**, a/k/a “Pac,” **ALEXIS ROLANDEDWIGE**, a/k/a “B.B.,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 4, 2012, 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-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “TY,” **CARASHANE BRADFORD**, a/k/a “Shane,” **DAVON PINKSTON**, a/k/a “Pac,” **ALEXIS ROLANDEDWIGE**, a/k/a “B.B.,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 4, 2012, 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-SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “TY,” **CARASHANE BRADFORD**, a/k/a “Shane,” **DAVON PINKSTON**, a/k/a “Pac,” **ALEXIS ROLANDEDWIGE**, a/k/a “B.B.,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 4, 2012, possessed a loaded firearm with the intent to use the same unlawfully against another person.

TWENTY-EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “TY,” **CARASHANE BRADFORD**, a/k/a “Shane,” **DAVON PINKSTON**, a/k/a “Pac,” **ALEXIS ROLANDEDWIGE**, a/k/a “B.B.,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 4, 2012, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

TWENTY-NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “Ty,” and **DAVON PINKSTON**, a/k/a “Pac,” 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 March 8, 2012, with intent to cause the death of another person, attempted to cause the death of another person.

THIRTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “Ty,” and **DAVON PINKSTON**, a/k/a “Pac,” 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 March 8, 2012, 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-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “Ty,” and **DAVON PINKSTON**, a/k/a “Pac,” 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 March 8, 2012, 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-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “Ty,” and **DAVON PINKSTON**, a/k/a “Pac,” 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 March 8, 2012, possessed a loaded firearm with the intent to use the same unlawfully against another person.

THIRTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “Ty,” and **DAVON PINKSTON**, a/k/a “Pac,” 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 8, 2012, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

THIRTY-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **DAVON PINKSTON**, a/k/a “Pac,” 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 defendant, in the County of New York, on or about April 29, 2012, with intent to cause the death of another person, attempted to cause the death of another person.

THIRTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **DAVON PINKSTON**, a/k/a “Pac,” 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 defendant, in the County of New York, on or about April 29, 2012, 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-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **DAVON PINKSTON**, a/k/a “Pac,” 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 April 29, 2012, possessed a loaded firearm with the intent to use the same unlawfully against another person.

THIRTY-SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **DAVON PINKSTON**, a/k/a “Pac,” 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 April 29, 2012, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

THIRTY-EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **BRIAN HARRIS**, a/k/a “Snubbs,” **JOSE MARTINEZ**, a/k/a “Cuevo,” and **ERVIN SWAIN**, “a/k/a G Baby,” 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 20, 2012, possessed a loaded firearm with the intent to use the same unlawfully against another person.

THIRTY-NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **BRIAN HARRIS**, a/k/a “Snubbs,” **JOSE MARTINEZ**, a/k/a “Cuevo,” and **ERVIN SWAIN**, “a/k/a G Baby,” 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 20, 2012, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

FORTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **DAVON PINKSTON**, a/k/a “Pac,” 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 defendant, in the County of New York, on or about July 9, 2012, with intent to cause the death of another person, attempted to cause the death of another person.

FORTY-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **DAVON PINKSTON**, a/k/a “Pac,” of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of Penal Law § 120.10(1), committed as follows:

The defendant, in the County of New York, on or about July 9, 2012, with intent to cause serious physical injury to another person, caused serious physical injury to another person by means of a deadly weapon.

FORTY-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **DAVON PINKSTON**, a/k/a “Pac,” 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 9, 2012, possessed a loaded firearm with the intent to use the same unlawfully against another person.

FORTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **DAVON PINKSTON**, a/k/a “Pac,” 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 9, 2012, possessed a loaded firearm, said possession not being in the defendant’s home or place of business.

FORTY-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **KEITH GOODMAN**, a/k/a “Inf,” **STEPHON JOHNSON**, a/k/a “Steph,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 22, 2012, with intent to cause the death of another person, attempted to cause the death of another person.

FORTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **KEITH GOODMAN**, a/k/a “Inf,” **STEPHON JOHNSON**, a/k/a “Steph,” and **MARKEESE SCOTT**, a/k/a “Doodie,” of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of Penal Law § 110/120.10(1), committed as follows:

The defendants, in the County of New York, on or about July 22, 2012, with intent to cause serious physical injury to another person, caused serious physical injury to another person by means of a deadly weapon.

FORTY-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **KEITH GOODMAN**, a/k/a “Inf,” **STEPHON JOHNSON**, a/k/a “Steph,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 July 22, 2012, 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.

FORTY-SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **KEITH GOODMAN**, a/k/a “Inf,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 22, 2012, possessed a loaded firearm with the intent to use the same unlawfully against another person.

FORTY-EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TY-KWAN ALLEN**, a/k/a “Ty,” **KEITH GOODMAN**, a/k/a “Inf,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 22, 2012, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

FORTY-NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **STEPHON JOHNSON**, a/k/a “Steph,” 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 22, 2012, possessed a loaded firearm on school grounds with the intent to use the same unlawfully against another person.

FIFTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **STEPHON JOHNSON**, a/k/a “Steph,” 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 22, 2012, possessed a loaded firearm on school grounds, said possession not being in the defendant’s home or place of business.

FIFTY-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **KEITH GOODMAN**, a/k/a “Inf,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 24, 2012, possessed a loaded firearm with the intent to use the same unlawfully against another person.

FIFTY-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **KEITH GOODMAN**, a/k/a “Inf,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 24, 2012, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

FIFTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRANCE ABDUR-RAHMAN**, a/k/a “T-Mula Mack,” **DAVON GOULDBOURNE**, a/k/a “Young Hef,” **STEPHON JOHNSON**, a/k/a “Steph,” **ZAIRE PERRY**, and **CHARLES SIMMONS** 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 24, 2012, possessed a loaded firearm on school grounds with the intent to use the same unlawfully against another person.

FIFTH-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRANCE ABDUR-RAHMAN**, a/k/a “T-Mula Mack,” **DAVON GOULDBOURNE**, a/k/a “Young Hef,” **STEPHON JOHNSON**, a/k/a “Steph,” **ZAIRE PERRY**, and **CHARLES SIMMONS** 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 24, 2012, possessed a loaded firearm on school grounds, said possession not being in the defendants’ home or place of business.

FIFTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DENZEL BROWN**, a/k/a “Henny Denny,” **KEITH GOODMAN**, a/k/a “Inf,” **CHRISTOPHER PARKS**, a/k/a “Chris Black,” **EARNEST PLEASANT**, a/k/a “Monster,” and **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” 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 August 4, 2012, possessed a loaded firearm with the intent to use the same unlawfully against another person.

FIFTY-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DENZEL BROWN**, a/k/a “Henny Denny,” **KEITH GOODMAN**, a/k/a “Inf,” **CHRISTOPHER PARKS**, a/k/a “Chris Black,” **EARNEST PLEASANT**, a/k/a “Monster,” and **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” 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 August 4, 2012, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

FIFTY-SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DENZEL BROWN**, a/k/a “Henny Denny,” **KEITH GOODMAN**, a/k/a “Inf,” **CHRISTOPHER PARKS**, a/k/a “Chris Black,” and **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” and **MARKEESE SCOTT**, a/k/a “Doodie,” 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 August 4, 2012, with intent to cause the death of another person, attempted to cause the death of another person.

FIFTY-EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DENZEL BROWN**, a/k/a “Henny Denny,” **KEITH GOODMAN**, a/k/a “Inf,” **CHRISTOPHER PARKS**, a/k/a “Chris Black,” and **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” 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 4, 2012, with intent to cause serious physical injury to another person, caused serious physical injury to another person by means of a deadly weapon.

FIFTY-NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **TERRANCE ABDUR-RAHMAN**, a/k/a “T-Mula Mack,” **TY-KWAN ALLEN**, a/k/a “Ty,” **CHRISTOPHER BERKLEY**, a/k/a “Shark,” **NAQUAN BROCKINGTON**, a/k/a “Tubz,” **DENZEL BROWN**, a/k/a “Henny Denny,” **WILLIAM BUNCE**, a/k/a “Billz,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **KEITH GOODMAN**, a/k/a “Inf,” **DAVON GOULDBOURNE**, a/k/a “Young Hef,” **JOHNNY GREEN**, a/k/a “Jojo,” **LONZELL GREEN**, a/k/a “Zell Pacino” **ANTHONY GREGORY**, a/k/a “Ant,” **BRIAN HARRIS**, a/k/a “Snubbs,” **STEPHON JOHNSON**, a/k/a “Steph,” **MARQUISE JONES**, a/k/a “EZ,” **LONNIE LESTER**, a/k/a “L’s Slimes,” **KHALID MILLER**, **CHRISTOPHER PARKS**, a/k/a “Chris Black,” **ZAIRE PERRY**, **TAHEEM PRATT**, a/k/a “Tata,” **DONDRE RIDDICK**, a/k/a “Dre,” **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” **MARKEESE SCOTT**, a/k/a “Doodie,” **DAQUON WILLIAMS**, a/k/a “Quon Goonie,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” of the crime of **GANG ASSAULT IN THE FIRST DEGREE**, in violation of Penal Law § 120.07, committed as follows:

The defendants, in the County of New York, on or about August 4, 2012, 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.

SIXTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DONDRE RIDDICK**, a/k/a “Dre,” and **DANDRE TOOLE**, a/k/a “Dre,” 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 December 30, 2012, possessed a loaded firearm with the intent to use the same unlawfully against another person.

SIXTY-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DONDRE RIDDICK**, a/k/a “Dre,” and **DANDRE TOOLE**, a/k/a “Dre,” 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 December 30, 2012, possessed a loaded firearm, said not being in the defendants’ home or place of business.

SIXTY-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **ANDRE GUZMAN**, a/k/a “Drizzy,” 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 February 25, 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.

SIXTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **CHRISTOPHER BERKLEY**, a/k/a “Shark,” **NAQUAN BROCKINGTON**, a/k/a “Tubz,” **WILLIAM BUNCE**, a/k/a “Billz,” **LONZELL GREEN**, a/k/a “Zell Pacino,” **TYRELL HEDGES**, a/k/a “Rell,” **JORDAN LASTER**, a/k/a “Wop,” **KHALID MILLER**, **ZAIRE PERRY**, a/k/a “Za,” **DEVANTE TAYLOR**, a/k/a “Buck,” **DAQUON WILLIAMS**, a/k/a “Quon Goonie,” **DASHAWN WILLIAMS**, a/k/a “D Live,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 March 31, 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.

SIXTY-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **WILLIAM BUNCE**, a/k/a “Billz,” 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 defendant, in the County of New York, on or about March 31, 2013, with intent to cause the death of another person, attempted to cause the death of another person.

SIXTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **TYRELL HEDGES**, 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 4, 2013, possessed a loaded firearm on school grounds with the intent to use the same unlawfully against another person.

SIXTY-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **TYRELL HEDGES**, 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 4, 2013, possessed a loaded firearm on school grounds, said possession not being in the defendant's home or place of business.

SIXTY-SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **LARRY BUNCE**, a/k/a "Knockout," **JORDAN PINALES**, a/k/a "J.P.," and **ALEJANDRO RIVERA**, a/k/a "Whiteboy," 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 30, 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.

SIXTY-EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **LARRY BUNCE**, a/k/a “Knockout,” **JORDAN PINALES**, a/k/a “J.P.,” and **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” 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 30, 2013, with intent to cause serious physical injury to another person, attempted to cause serious physical injury to another person by means of a dangerous instrument.

SIXTY-NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **WILLIE BELLINGER**, a/k/a “Ill Will,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” **DEVANTE TAYLOR**, a/k/a “Buck,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 August 6, 2013, with intent to cause the death of another person, attempted to cause the death of another person.

SEVENTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **WILLIE BELLINGER**, a/k/a “Ill Will,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” **DEVANTE TAYLOR**, a/k/a “Buck,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 6, 2013, with intent to cause serious physical injury to another person, caused serious physical injury to another person by means of a deadly weapon.

SEVENTY-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **WILLIE BELLINGER**, a/k/a “Ill Will,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” **DEVANTE TAYLOR**, a/k/a “Buck,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 6, 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.

SEVENTY-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **WILLIE BELLINGER**, a/k/a “Ill Will,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” **DEVANTE TAYLOR**, a/k/a “Buck,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 August 6, 2013, possessed a loaded firearm with the intent to use the same unlawfully against another person.

SEVENTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **WILLIE BELLINGER**, a/k/a “Ill Will,” **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **ALEJANDRO RIVERA**, a/k/a “Whiteboy,” **DEVANTE TAYLOR**, a/k/a “Buck,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 August 6, 2013, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

SEVENTY-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **ANTHONY GREGORY**, a/k/a “Ant,” and **DEVANTE TAYLOR**, a/k/a “Buck,” 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 August 6, 2013, possessed a loaded firearm on school grounds with the intent to use the same unlawfully against another person.

SEVENTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **ANTHONY GREGORY**, a/k/a “Ant,” and **DEVANTE TAYLOR**, a/k/a “Buck,” 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 August 6, 2013, possessed a loaded firearm on school grounds, said possession not being in the defendants’ home or place of business.

SEVENTY-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JOSHUA CADLE**, a/k/a “Squidword,” 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 defendant, in the County of New York, on or about August 28, 2013, with intent to cause the death of another person, attempted to cause the death of another person.

SEVENTY-SEVENTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JOSHUA CADLE**, a/k/a “Squidword,” 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 defendant, in the County of New York, on or about August 28, 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.

SEVENTY-EIGHTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JOSHUA CADLE**, a/k/a “Squidword,” 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 August 28, 2013, possessed a loaded firearm with the intent to use the same unlawfully against another person.

SEVENTY-NINTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **JOSHUA CADLE**, a/k/a “Squidword,” 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 August 28, 2013, attempted to possess a loaded firearm, said possession not being in the defendant’s home or place of business.

EIGHTIETH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **DASHAWN WILLIAMS**, a/k/a “D Live,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 September 6, 2013, with intent to cause the death of another person, attempted to cause the death of another person.

EIGHTY-FIRST COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **DASHAWN WILLIAMS**, a/k/a “D Live,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 September 6, 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.

EIGHTY-SECOND COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **DASHAWN WILLIAMS**, a/k/a “D Live,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 September 6, 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.

EIGHTY-THIRD COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **DASHAWN WILLIAMS**, a/k/a “D Live,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 6, 2013, possessed a loaded firearm with the intent to use the same unlawfully against another person.

EIGHTY-FOURTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendants **DAMIAN GARCIA**, a/k/a “Day Day,” **RAYMOND GARCIA**, a/k/a “Ray Ray,” **ANTHONY GREGORY**, a/k/a “Ant,” **DASHAWN WILLIAMS**, a/k/a “D Live,” and **DEMETRIOUS WILLIAMS**, a/k/a “Meetry,” 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 6, 2013, possessed a loaded firearm, said possession not being in the defendants’ home or place of business.

EIGHTY-FIFTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **LONZELL GREEN**, a/k/a “Zell Pacino,” 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 Bronx County, on or about November 8, 2013, possessed a loaded firearm on school grounds with the intent to use the same unlawfully against another person.

EIGHTY-SIXTH COUNT

AND THE GRAND JURY AFORESAID, by this indictment, further accuses defendant **LONZELL GREEN**, a/k/a “Zell Pacino,” 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 Bronx County, on or about November 8, 2013, possessed a loaded firearm on school grounds, said possession not being in the defendants’ home or place of business.

FULLY SUPERSEDES INDICTMENTS 2896/2013 & 4886/2013

No.

THE PEOPLE OF THE STATE OF NEW YORK

-against-

TERRANCE ABDUR-RAHMAN, a/k/a “T Mula Mack,”
TY-KWAN ALLEN, a/k/a “Ty,”
PATRICK BAPTISTE, a/k/a “Pat Banga,”
WILLIE BELLINGER, a/k/a “Ill Will,”
CHRISTOPHER BERKLEY, a/k/a “Shark,”
CARASHANE BRADFORD, a/k/a “Shane,”
LONDELL BREVARD,
NAQUAN BROCKINGTON, a/k/a “Tubz,”
DENZEL BROWN, a/k/a “Henny Denny,”
COREY BUMPASS, a/k/a “Cor,” a/k/a “Bump,”
LARRY BUNCE, a/k/a “Knockout,”
WILLIAM BUNCE, a/k/a “Billz,”
JOSHUA CADLE, a/k/a “Squidward,”
TIJAE CHAPPLE, a/k/a “Mula Ty,”
JUWAN ELLIS, a/k/a “Cha Cha,”
DEONDRE ELLIS-VAZQUEZ, a/k/a “Dre,”
MICHAEL ENGLISH, a/k/a “White Mike,”
DAMIAN GARCIA, a/k/a “Day Day,”
RAYMOND GARCIA, a/k/a “Ray Ray,”
JAVANN GARNES, a/k/a “J Hat”
KEITH GOODMAN, a/k/a “Inf,”
DAVON GOULDBOURNE, a/k/a “Young Hef,”
STEVEN GRANDY, a/k/a STEVEN JOSEPH,
JOHNNY GREEN, a/k/a “Jojo”
LONZELL GREEN, a/k/a “Zell Pacino,” as a juvenile offender,
ANTHONY GREGORY, a/k/a “Ant,”
ANDRE GUZMAN, a/k/a “Drizzy,”
JALEN HARRIS, a/k/a “Fatboy,” a/k/a “J Bundles,”

BRIAN HARRIS, a/k/a “Snubbs,”
TYRELL HEDGES, a/k/a “Rell,” as a juvenile offender,
CHRISTOPHER HENDRICKSON, a/k/a “Noodles,”
NICHOLAS HOLDEN, a/k/a “Nick Bannon,”
DAVON JENKINS,
CHRISTOPHER JIMINEZ,
STEPHON JOHNSON, a/k/a “Steph,
MARQUIS JONES, a/k/a “Little Knockout,” as a juvenile offender,
JORDAN LASTER, a/k/a “Wop,”
SHAWN LASTER, a/k/a “S Dot,”
LONNIE LESTER, a/k/a “L’s”
MICHAEL LOPEZ, a/k/a “Nino,”
JOSE MARTINEZ, a/k/a “Cuevo,”
KHALID MILLER, a/k/a “Little Monster,”
CHRISTOPHER PARKS, a/k/a “Chris Black,”
ZAIRE PERRY, a/k/a “Za,”
JORDAN PINALES, a/k/a “J.P.,”
DAVON PINKSTON, a/k/a “Pac,”
EARNEST PLEASANT, a/k/a “Monster,”
SHAVON PRATT, a/k/a “B-Mack,”
TAHEEM PRATT, a/k/a “Tata,
DARRELL RHETT, a/k/a “D Slimes,”
DONDRE RIDDICK, a/k/a “Dre,”
ALEJANDRO RIVERA, a/k/a “Whiteboy,”
CARLOS RODRIGUEZ, a/k/a “Loso,”
ALEXIS ROLANDEDWIGE, a/k/a “B.B.,”
MARKEESE SCOTT, a/k/a “Doodie,”
CHARLES SIMMONS,
ERVIN SWAIN, a/k/a “G Baby,”
DEVANTE TAYLOR, a/k/a “Buck,”
KENNETH THOMAS,
DEONDRE TOOLE, a/k/a “Dre,”
DEVANTE WASHINGTON, a/k/a “Sleeps,”
DOMONIQUE WASHINGTON, a/k/a “Domo,”
ISAAC WATERMAN, a/k/a “Poe,”
DASHAWN WILLIAMS, a/k/a “D Live,”
DEMETRIUS WILLIAMS, a/k/a “Meetry,”
DAQUON WILLIAMS, a/k/a “Quon Goonie,”
SAMUEL WILLIAMS, a/k/a “Sambo,” a/k/a “Sammy Pastrana,”

Defendants.

CONSPIRACY IN THE FIRST DEGREE, P.L. §105.17 – defs. ALLEN, BELLINGER, BRADFORD, BROWN, BUMPASS, CADLE, ELLIS, ELLIS-VAZQUEZ, ENGLISH, GARNES, GOODMAN, LASTER, PARKS, PINKSTON, PLEASANT, S. PRATT, RIDDICK, RIVERA, RODRIGUEZ, ROLANDEDWIGE, SCOTT, SWAIN, THOMAS, TOOLE, and DOMONIQUE WASHINGTON

CONSPIRACY IN THE SECOND DEGREE, P.L. §105.15 – defs. ABDUR-RAHMAN, D. GARCIA, R. GARCIA, GOULDBOURNE, GREGORY, JOHNSON, S. LASTER, LOPEZ, PERRY, RHETT, SIMMONS, TAYLOR, DASHAWN WILLIAMS, and DEMETRIOUS WILLIAMS

CONSPIRACY IN THE THIRD DEGREE, P.L. §105.13 – defs. ALLEN (2 counts), BAPTISTE (2 counts), BELLINGER (2 counts), BERKLEY, BRADFORD (2 counts), BREVARD (2 counts), BROWN (2 counts), BUMPASS (2 counts), L. BUNCE, CADLE (2 counts), ELLIS (2 counts), ELLIS-VAZQUEZ (2 counts), ENGLISH (2 counts), GARNES (2 counts), GOODMAN (2 counts), GRANDY (2 counts), J. GREEN (2 counts), GUZMAN (2 counts), B. HARRIS (2 counts), J. HARRIS (2 counts), HENDRICKSON, HOLDEN (2 counts), JENKINS (2 counts), J. LASTER (2 counts), MARTINEZ (2 counts), PARKS (2 counts), PINALES, PINKSTON (2 counts), PLEASANT (2 counts), S. PRATT (2 counts), T. PRATT (2 counts), RIDDICK (2 counts), RIVERA (2 counts), RODRIGUEZ (2 counts), ROLANDEDWIGE (2 counts), SCOTT (2 counts), SWAIN (2 counts), THOMAS (2 counts), TOOLE (2 counts), DEVANTE WASHINGTON (2 counts), DOMONIQUE WASHINGTON (2 counts) and ISAAC WATERMAN (2 counts)

CONSPIRACY IN THE FOURTH DEGREE, P.L. §105.10(1) – defs. ABDUR-RAHMAN (2 counts), BROCKINGTON (2 counts), W. BUNCE (2 counts), CHAPPLE (2 counts), D. GARCIA (2 counts), R. GARCIA (2 counts), GOULDBOURNE (2 counts), GREGORY (2 counts), JOHNSON (2 counts), S. LASTER (2 counts), LOPEZ (2 counts), MILLER (2 counts), PERRY (2 counts), RHETT (2 counts), SIMMONS (2 counts), TAYLOR (2 counts), DASHAWN WILLIAMS (2 counts), DAQUON WILLIAMS, DEMETRIOUS WILLIAMS (2 counts), SAMUEL WILLIAMS

AN ATTEMPT TO COMMIT THE CRIME OF MURDER IN THE SECOND DEGREE, P.L. §§110/125.25(1) – defs. ALLEN (3 counts), BELLINGER (1 count), BRADFORD (1 count), BROWN (1 count), W. BUNCE as a juvenile offender (1 count), CADLE (1 count), D.GARCIA (2 counts), ELLIS-VAZQUEZ (1 count), R. GARCIA (2 counts), R. GARCIA as a juvenile offender (1 count), GOODMAN (2 counts), GREGORY as a juvenile offender (1 count), GREGORY (1 count), JOHNSON as a juvenile offender (1 count), J. LASTER (1 count), LOPEZ (1 count), PARKS (1 count), PINKSTON (5 counts), RIVERA (2 counts), ROLANDEDWIGE (1 count), SCOTT (2 counts), TAYLOR as a juvenile offender (1 count), DASHAWN WILLIAMS (1 count), & DEMETRIOUS WILLIAMS (2 counts).

ASSAULT IN THE FIRST DEGREE, P.L. §120.10(1) – defs. ALLEN (1 count), BELLINGER (1 count), BROWN (1 count), D. GARCIA (1 count), R. GARCIA (1 count), GOODMAN (2 counts), GREGORY as a juvenile offender (1 count), JOHNSON as a juvenile offender (1 count), PARKS (1 count), PINKSTON (1 count) RIVERA (2 counts), SCOTT (1 count), TAYLOR as a juvenile offender (1 count) & DEMETRIOUS WILLIAMS (1 count).

GANG ASSAULT IN THE FIRST DEGREE, P.L. §120.07 – defs. ABDUR-RAHMAN as a juvenile offender (1 count), ALLEN (2 counts), BELLINGER (1 count), BERKLEY (1 count), BROCKINGTON (1 count), BROWN (1 count), W. BUNCE as a juvenile offender (1 count), D. GARCIA (1 count), R. GARCIA (1 count), R. GARCIA as a juvenile offender (1 count), GOODMAN (2 counts), GOULBOURNE as a juvenile offender (1 count), GREGORY as a juvenile offender (2 counts), J. GREEN (1 count), L. GREEN as a juvenile offender (1 count), B. HARRIS (1 count), JOHNSON as a juvenile offender (2 counts), LESTER (1 count), MILLER as a juvenile offender (1 count), PARKS(1 count), PERRY as a juvenile offender (1 count), T. PRATT (1 count), RIDDICK (1 count), RIVERA (2 counts), SCOTT (2 counts), TAYLOR as a juvenile offender (1 count), DAQUON WILLIAMS (1 count), DEMETRIOUS WILLIAMS as a juvenile offender (1 count) & DEMETRIOUS WILLIAMS (1 count)

AN ATTEMPT TO COMMIT THE CRIME OF GANG ASSAULT IN THE FIRST DEGREE, P.L. §§110/120.07(1) – defs. ALLEN (2 counts), BERKLEY (1 count), BRADFORD (1 count), BROCKINGTON (2 counts), L.BUNCE (1 count), W. BUNCE (1 count), ELLIS-VAZQUEZ (1 count), D. GARCIA (1 count), R. GARCIA (1 count), L. GREEN (1 count), GREGORY (1 count), GUZMAN (1 count), HEDGES (1 count), J. LASTER (1 count), MILLER (1 count), PERRY (1 count), PINALES (1 count), PINKSTON (3 counts), RIVERA (1 count), ROLANDEDWIGE (1 count), SCOTT (1 count), TAYLOR (1 count), DAQUON WILLIAMS (1 count), DASHAWN WILLIAMS (2 counts) & DEMETRIOUS WILLIAMS (2 counts).

AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE FIRST DEGREE, P.L. §§110/120.10 – defs. ALLEN (2 counts), BRADFORD (1 count), BROCKINGTON (1 count), L. BUNCE (1 count), CADLE (1 count), ELLIS-VAZQUEZ (1 count), D.GARCIA(1 count), R. GARCIA (2 counts), GREGORY (1 count), J. LASTER (1 count), LOPEZ (1 count), PINALES (1 count), PINKSTON (4 counts), RIVERA (1 count),

ROLANDEDWIGE (1 count), SCOTT (1 count), DASHAWN WILLIAMS (1 count) & DEMETRIOUS WILLIAMS (1 count).

CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, P.L. §265.03(1)(b), an armed felony – defs. ABDUR-RAHMAN as a juvenile offender(1 count), ALLEN (3 counts), BELLINGER (1 count), BRADFORD (1 count), BROWN (1 count), CADLE (1 count), ELLIS-VAZQUEZ (1 count), D. GARCIA (2 counts), R. GARCIA as a juvenile offender (1 count), R. GARCIA (2 counts), GOODMAN (3 counts), GOULBOURNE as a juvenile offender (1 count), L. GREEN as a juvenile offender (1 count), GREGORY as a juvenile offender (1 count), GREGORY (1 count), HEDGES as a juvenile offender (1 count), JOHNSON as a juvenile offender (2 counts), J. LASTER (1 count), PARKS (1 count), PERRY as a juvenile offender (1 count), PINKSTON (5 counts), PLEASANT (1 count), RIDDICK (1 count), RIVERA (2 counts), ROLANDEDWIGE (1 count), SCOTT (3 counts), SIMMONS as a juvenile offender (1 count), TAYLOR as a juvenile offender (1 count), TOOLE (1 count), DASHAWN WILLIAMS (1 count) & DEMETRIOUS WILLIAMS (2 counts).

CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, P.L. §265.03(3), an armed felony – defs. ABDUR-RAHMAN as a juvenile offender(1 count), ALLEN (3 counts), BELLINGER (1 count), BRADFORD (1 count), BROWN (1 count), CADLE (1 count), ELLIS-VAZQUEZ (1 count), D. GARCIA (2 counts), R. GARCIA as a juvenile offender (1 count), R. GARCIA (2 counts), GOODMAN (3 counts), GOULBOURNE as a juvenile offender (1 count), L. GREEN as a juvenile offender (1 count), GREGORY as a juvenile offender (1 count), GREGORY (1 count), HEDGES as a juvenile offender (1 count), JOHNSON as a juvenile offender (2 counts), J. LASTER (1 count), PARKS (1 count), PERRY as a juvenile offender (1 count), PINKSTON (5 counts), PLEASANT (1 count), RIDDICK (1 count), RIVERA (2 counts), ROLANDEDWIGE (1 count), SCOTT (3 counts), SIMMONS as a juvenile offender (1 count), TAYLOR as a juvenile offender (1 count), TOOLE (1 count), DASHAWN WILLIAMS (1 count) & DEMETRIOUS WILLIAMS (2 counts).

AN ATTEMPT TO COMMIT THE CRIME OF CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, P.L. §§110/265.03(1)(b) – defs. GARNES (1 count), B. HARRIS (1 count), JEKINS (1 count), MARTINEZ (1 count) & SWAIN (2 counts)

AN ATTEMPT TO COMMIT THE CRIME OF CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, P.L. §§110/265.03(3) – defs. GARNES (1 count), B. HARRIS (1 count), JEKINS (1 count), MARTINEZ (1 count) & SWAIN (2 counts)

CYRUS R. VANCE, JR, District Attorney

A True Bill

Foreman

ADA ANDREW WARSHAWER
VIOLENT CRIMINAL ENTERPRISES UNIT