

SUPREME COURT OF THE STATE OF NEW YORK;
KINGS COUNTY: PART 40

-X

THE PEOPLE OF THE STATE OF NEW YORK

-against-

XJ KWYME WADDELL, a.k.a. "K,"
X DAVID SIMONISE, a.k.a. "Preme,"
X JAQUAN FRASER, a.k.a. "Bashie,"
XB RAHIM VINCENT, a.k.a. "Spence Kashif,"
a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy,"
2015KN083655
X CHRISTIAN WILLIAMS, a.k.a. "Zone,"
X DENS MARCELLUS, a.k.a. "Denz,"
X JEROME MYRIE, a.k.a. "Rome,"
X JARMEL BLAKE, a.k.a. "Sha Murda,"
X JAVANNI MOISE, a.k.a. "Billz,"
XJ DELEON HUTCHINSON, a.k.a. "Delly,"
2014KN047696
XJ KENNY DORCEAN, a.k.a. "Stacks,"
2014KN041147
XJ TYREEK HAYES, a.k.a. "Ty General,"
2015KN030839
XJ SHAQUILLE HAYES,
a.k.a. "Shaq," a.k.a. "KayKay,"
2015KN030840
XC OSHANE FYFFE,
2015KN050906
X MARVIN JULIEN, a.k.a. "Scope,"
XJ COREY ROBERTS, a.k.a. "Fresh,"
2015KN045870
X JEAN FREMONT, a.k.a. "Juno,"
X PAOLO ALFARO BARBER, a.k.a. "Chico,"

DEFENDANTS.

-X

T12-2

IND. #6927-2015

THIS INDICTMENT
SUPERSEDES:

5227/2014

4452/2014

3828/2015

5609/2015

Resubmission of:
6014/2015

VIOLENT
CRIMINAL
ENTERPRISES
BUREAU

Assigned Judge:
Hon. Martin P. Murphy

CRIMINAL TERM ARR/MOT
SUPREME COURT KINGS
2016 JAN 25 PM 3:21

COUNTS

MURDER IN THE SECOND DEGREE P.L. § 125.25(1)

AFO: N SEX CRIME: N

MURDER IN THE SECOND DEGREE P.L. § 125.25(2)

AFO: N SEX CRIME: N

ATTEMPTED MURDER IN THE SECOND DEGREE P.L. § 110/125.25(1)

AFO: N SEX CRIME: N

ASSAULT IN THE FIRST DEGREE P.L. § 120.10(1)

AFO: Y SEX CRIME: N

ASSAULT IN THE FIRST DEGREE P.L. § 120.10(3)

AFO: N SEX CRIME: N

**CRIMINAL USE OF A FIREARM IN THE FIRST DEGREE, P.L.
§265.09(1)(a)**

AFO: Y SEX CRIME: N

CONSPIRACY IN THE SECOND DEGREE P.L. § 105.15

AFO: N SEX CRIME: N

ATTEMPTED ASSAULT IN THE FIRST DEGREE P.L. §110/120.10(1)

AFO: Y SEX CRIME: N

**CRIMINAL USE OF A FIREARM IN THE SECOND DEGREE, P.L.
§265.08(1)**

AFO: Y SEX CRIME: N

**CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE
P.L. §265.03(1)(b)**

AFO: Y SEX CRIME: N

**CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE
P.L. §265.03(3)**

AFO: Y SEX CRIME: N

ASSAULT IN THE SECOND DEGREE P.L. § 120.05(2)

AFO: Y SEX CRIME: N

RECKLESS ENDANGERMENT IN THE FIRST DEGREE P.L. §120.25

AFO: N SEX CRIME: N

CONSPIRACY IN THE FOURTH DEGREE P.L. § 105.10(1)

AFO: N SEX CRIME: N

**CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE
SECOND DEGREE P.L. §170.25**

AFO: N SEX CRIME: N

ENDANGERING THE WELFARE OF A CHILD P.L. § 260.10(1)

AFO: N SEX CRIME: N

**AGGRAVATED UNLICENSED OPERATION OF A MOTOR VEHICLE IN
THE FIRST DEGREE V.T.L. §511(3)(a)(ii)**

AFO: N SEX CRIME: N

**POSSESSION OF PISTOL OR REVOLVER AMMUNITION
N.Y.C. Admin. Code 10-131(I)(3)**

AFO: N SEX CRIME: N

COUNT ONE

THE GRAND JURY OF THE COUNTY OF KINGS, by this Indictment, accuses the defendants **KWYME WADDELL**, a.k.a. "K," **DAVID SIMONISE**, a.k.a. "Preme," **JAQUAN FRASER**, a.k.a. "Bashie," **RAHIM VINCENT**, a.k.a. "Spence Kashif", a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," **CHRISTIAN WILLIAMS**, a.k.a. "Zone," **DENS MARCELLUS**, a.k.a. "Denz," **JEROME MYRIE**, a.k.a. "Rome," **JARMEL BLAKE**, a.k.a. "Sha Murda," **JAVANNI MOISE**, a.k.a. "Billz," **DELEON HUTCHINSON**, a.k.a. "Delly," **KENNY DORCEAN**, a.k.a. "Stacks," **TYREEK HAYES**, a.k.a. "Ty General," **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," **OSHA NE FYFFE**, **MARVIN JULIEN**, a.k.a. "Scope," **COREY ROBERTS**, a.k.a. "Fresh," **JEAN FREMONT**, a.k.a. "Juno," and **PAOLO ALFARO BARBER**, a.k.a. "Chico," of the crime of **CONSPIRACY IN THE SECOND DEGREE**, in violation of P.L. § 105.15, committed as follows:

The defendants, in the County of the Kings, and elsewhere, from on or about September 27, 2013 to the date of this Indictment, with intent that conduct constituting the crime of Murder in the Second Degree be performed, and this crime being a Class A Felony, did knowingly and intentionally agree with each other and

others, to engage in and cause the performance of such conduct as would constitute the above-mentioned Class A Felony.

COUNT TWO

AND THE GRAND JURY further accuses the defendants, **KWYME WADDELL**, a.k.a. "K," **DAVID SIMONISE**, a.k.a. "Preme," **JAQUAN FRASER**, a.k.a. "Bashie," **RAHIM VINCENT**, a.k.a. "Spence Kashif", a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," **CHRISTIAN WILLIAMS**, a.k.a. "Zone," **DENS MARCELLUS**, a.k.a. "Denz," **JEROME MYRIE**, a.k.a. "Rome," **JARMEL BLAKE**, a.k.a. "Sha Murda," **JAVANNI MOISE**, a.k.a. "Billz," **DELEON HUTCHINSON**, a.k.a. "Delly," **KENNY DORCEAN**, a.k.a. "Stacks," **TYREEK HAYES**, a.k.a. "Ty General," **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," **OSHA NE FYFFE**, **MARVIN JULIEN**, a.k.a. "Scope," **COREY ROBERTS**, a.k.a. "Fresh," **JEAN FREMONT**, a.k.a. "Juno," and **PAOLO ALFARO BARBER**, a.k.a. "Chico," of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of P.L. § 105.10(1), committed as follows:

The defendants, in the County of the Kings and elsewhere, from on or about September 27, 2013 to the date of this Indictment, with intent that conduct constituting the crimes of Assault in the First Degree and Criminal Possession of a Weapon in the Second Degree be performed, and these crimes being a Class B Felony and a Class C Felony, respectively, did knowingly and intentionally agree

with each other and others, to engage in and cause the performance of such conduct as would constitute the above-mentioned Class B Felony and Class C Felony.

THE CONSPIRACIES

At all times relevant to the conspiracies, the defendants were members or associates of a criminal street organization named "FOLK – NO LOVE CITY" ("FOLK - NLC"), which is a subset of a larger criminal street organization known as the "FOLK NATION" or "GANGSTER DISCIPLES." FOLK - NLC primarily operated in and around the Flatbush section of Brooklyn, in the vicinity of Flatbush Avenue, Newkirk Avenue, and Ditmas Avenue. During the course of the conspiracy, members of FOLK – NLC participated in and agreed to embark upon a certain course of criminal conduct, including murder, assault, weapons possession, and other crimes, in order to maintain their dominance where they operated.

In addition to maintaining their dominance over Flatbush, since the murder of FOLK – NLC member Malik Bhola, a.k.a. "Reckless," on January 1, 2014, FOLK-NLC members directed their acts of violence toward rival street gang members living or operating in the Canarsie section of Brooklyn, including, but not limited to members of the gangs known as "100 Cloccs," "HQ Monopoly," "GS9," and the "1090s." The 100 Cloccs and GS9 are subsets of the Crips, a rival street organization.

It was part of the conspiracies for FOLK – NLC members to engage in armed attacks against rival gang members in Canarsie, running reconnaissance missions in vehicles, and shooting individuals they suspected of being 100 Cloccs or HQ Monopoly, or merely being rival gang members from Canarsie, which the FOLK – NLC members referred to as “the Flossy.” During the escalating violence over the course of the conspiracies, FOLK – NLC members frequently discussed their intentions and efforts to engage in additional attacks, took credit for committing past attacks, and made sure that their efforts in furtherance of the conspiracy were communicated to fellow gang members and rival gang members, by communicating with each other through the use of social media; most frequently via the website *Facebook.com*. The violent attacks by FOLK – NLC members on their Canarsie rivals escalated further in the wake of the murder of FOLK – NLC member Richard James, a.k.a. “Money Bags,” a.k.a. “Flocks,” a.k.a. “Spice,” on or about October 14, 2015.

It was part of the conspiracy for members of FOLK – NLC to possess, transport and keep readily available loaded firearms and ammunition which were made available to members of FOLK – NLC, for the purpose of engaging in the commission of murder, attempted murders, assaults, and attempted assaults.

It was also part of the conspiracy for the defendants to commit various crimes, including the sale of prison contraband and robberies, as a means of

making money and to use the proceeds of that criminal activity to further the criminal activities of the gang.

During the course of and in furtherance of the conspiracy, members of FOLK – NLC used a distinctive system of code words and phrases which allowed them to communicate with one another verbally in a way that hid the criminal nature of their communication from others, in order to avoid detection and apprehension by members of law enforcement. Among those code words and phrases were various references to firearms, including “grip,” “strap,” and “blick.” Also included among the code words and phrases utilized by the FOLK – NLC members and associates were the phrases “drill,” “stain,” and “promo,” which refer to shootings.

It was part of the conspiracy for the defendants to keep incarcerated members of FOLK – NLC informed of the activities and events related to the gang, including but not limited to, arrests of members and associates, acts of retributive violence, including beatings, and shootings against members and associates of rival gangs. It was also part of the conspiracy for the defendants to communicate with members of FOLK – NLC on behalf of incarcerated members and to convey messages, orders and other directives to members on the street. Communications with incarcerated FOLK – NLC members was effected in coded, guarded, and

cryptic language, in order to avoid detection and apprehension by members of law enforcement.

OVERT ACTS

In furtherance of the conspiracies charged in COUNT ONE and COUNT TWO, and to achieve the objects thereof, the following overt acts, among others, were committed in the County of the Kings and elsewhere:

1. On or about September 27, 2013, the defendant **KWYME WADDELL**, a.k.a. "K," possessed a .40 caliber pistol in 466 East 25th Street, in the Flatbush section of Brooklyn.
2. On or about September 27, 2013, in an effort to avoid criminal prosecution, the defendant **KWYME WADDELL**, a.k.a. "K," while he was being arrested for possession of a .40 caliber pistol, in 466 East 25th Street, in the Flatbush section of Brooklyn, asked his girlfriend, Shantall Smith, to take responsibility for ownership of the firearm, stating, "Babe, will you take this one for me?"
3. On or about December 25, 2013, defendant **KWYME WADDELL**, a.k.a. "K," in a Facebook conversation with an unknown individual, declared himself to be the leader of the "No Love City" set of the

Folk Nation, which included Malik Bhola, a.k.a. "Reckless," as a member, when Waddell wrote, "wat you Jackin," received the response from the other individual, "74GD No7ovecity under Rexkless," and then wrote, "you talkin to the big homie . . . Reck my lil homie."

4. On or about December 30, 2013, defendant **DAVID SIMONISE**, a.k.a. "Preme," in a Facebook conversation with another individual, solicited .22 caliber and .32 caliber ammunition and stated his intent to buy a .40 caliber firearm the following day, writing, "yo bro ask sk kan he get me some 32 and 22 coins . . . ii5 bro let me know kause my shit done for both . . . lmao #regbevshiit lmaoim boutta buy a 40 2mmm new years shit litt : . . wen eva bro juss get them coins."
5. On or about December 31, 2013, defendant **DAVID SIMONISE**, a.k.a. "Preme," in a Facebook conversation with another individual, admitted to possessing a firearm, posting a photograph of himself with a pistol in his waistband and writing, "never laxkin bro . . . faxtz pocket rocket season."

6. On or about January 1, 2014, in the vicinity of Flatlands Avenue and East 83rd Street, in the Canarsie section of Brooklyn, the defendant **RAHIM VINCENT**, a.k.a. "Spence Kashif," a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," operated a motor vehicle occupied by defendant **JAQUAN FRASER**, a.k.a. "Bashie," and other individuals, in an effort to rush to the aid of their fellow gang member, Malik Bhola, a.k.a. "Reckless," who was shot and killed later that night in the Bushwick section of Brooklyn.
7. On or about January 1, 2014, in the vicinity of Flatlands Avenue and East 83rd Street, in the Canarsie section of Brooklyn, the defendant **JAQUAN FRASER**, a.k.a. "Bashie," unlawfully attempted to possess a loaded .22 pistol inside of a motor vehicle operated by defendant **RAHIM VINCENT**, a.k.a. Spence Kashif, a.k.a. Ahim, a.k.a. Rakim, a.k.a. Keemy.
8. On or about January 1, 2014, defendant **CHRISTIAN WILLIAMS**, a.k.a. "Zone," in a Facebook conversation with defendant **KWYME WADDELL**, a.k.a. "K," encouraged retaliation against rival gang members from Canarsie for the shooting of Malik Bhola, a.k.a.

"Reckless," writing, "Rexk still inda hospital he in brookdale; think its dem blood niggas from the flossy".

9. On or about January 3, 2014, defendant **KWYME WADDELL**, a.k.a. "K," in a Facebook conversation with an individual whose name is known to the Grand Jury, declared that he wanted his co-conspirators to "ride out" and retaliate for the death of Malik Bhola, suffered at the hands of rival gang members, writing "Nigga can't promote gro !! Like something gotta give boy my lil man gone. We need some more cars."
10. On or about January 3, 2014, defendant **DAVID SIMONISE**, a.k.a. "Preme," in a Facebook conversation with an unknown individual, declared that he was ready go out and shoot at rival gang members, writing, "im always ridin . . . idk why yall make it seem like I don't ride out out."
11. On or about January 3, 2014, defendant **DAVID SIMONISE**, a.k.a. "Preme," in a Facebook conversation with an unknown individual, declared his intent to exact revenge for the death of Malik Bhola

with the "No Love City" Folk gang members and their Bloods gang allies for the death of Malik Bhola, writing, "nobody told me nun bout the kirk yall movein side keepin shit to yall self," in response to the other individual writing, "U didn't cum to the Kirk to show love but bz to gz y'all was mobbin".

12. On or about January 3, 2014, defendant **DAVID SIMONISE**, a.k.a. "Preme," in a Facebook conversation with an unknown individual, further announced his plans to retaliate against the rival gang members he believed were responsible for Malik Bhola's death, writing "I found out that the homie passed wen yall told me then I started askin nikkas and all they sayin is that homie got into it with op . . . and im boutta find out were op live. . . . smfh op gotta go he kant see no more days of 2014."

13. On or about January 3, 2014, defendant **DAVID SIMONISE**, a.k.a. "Preme," in a Facebook conversation with an unknown individual, further announced his plans to kill rival gang members he believed were responsible for Malik Bhola's death, writing "roxkoff getting it . . . that's not my man he know not to let me find him me and rezzy boutta handle roxkoff . . . I got beef with him he know if I katxh him

imam grease him but we kould knock on his door and make him kome outside if he see someone he fuck wit.”

14. On or about January 3, 2014, defendant **DAVID SIMONISE**, a.k.a. “Preme,” in a Facebook conversation with an unknown individual, announced his intent to align with the Folk Nation “No Love City” gang in their goal of retaliating with violence against rival gang members from Canarsie, writing, “and never was I a flossy nikka.”

15. On or about January 16, 2014, defendant **JAQUAN FRASER**, a.k.a. “Bashie,” in a Facebook conversation with a fellow gang member stated his intent to acquire more weapons and vehicles to attack the rival gang members from Canarsie, writing, “Shit in my crib niggas need to get more vs and straps kus these flossy niggas talking hot . . . Especially op.”

16. On or about January 16, 2014, defendant **JAQUAN FRASER**, a.k.a. “Bashie,” in a Facebook conversation with a fellow gang member, denied possessing a firearm belonging to defendant **RAHIM VINCENT**, a.k.a. “Spence Kashif,” a.k.a. “Ahim,” a.k.a. “Rakim,” a.k.a. “Keemy,” while Fraser admitted to possessing a .38 caliber

revolver after losing another firearm in Canarsie, writing, "Nah I got some new shit38 special . . . I did have it [Vincent's gun] we stashed it in the floss n when I came out it wasn't there . . . That's the .38 n its in my cover flick guy go look . . . A 32 nose is not that big bro we both know this."

17. On or about January 24, 2014, defendant **RAHIM VINCENT**, a.k.a. "Spence Kashif," a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," and defendant **KWYME WADDELL**, a.k.a. "K," in a Facebook conversation with one another, agreed to meet up in the vicinity of Newkirk Avenue, in the Flatbush section of Brooklyn, and travel to Canarsie in order to attack rival gang members with gunfire, writing:

VINCENT: "wassup I wanna PROMO"

WADDELL: "2nite is a baby shower in Canarsie"

VINCENT: "im come on the kirk"

WADDELL: "We got no wheels"

VINCENT: "im geftmy man don't worry"

18. On or about January 27, 2014, in a Facebook conversation, defendant **JAQUAN FRASER**, a.k.a. "Bashie," offered for sale a .32 caliber handgun for \$250, writing "Knockie for sale 250 . . . 32."

19. On or about February 4, 2014, defendant **DAVID SIMONISE**, a.k.a. "Preme," in a Facebook conversation with another individual, called for a meeting of Folk Nation gang members and Bloods gang members to organize an attack on the rival gang members in Canarsie, writing, "bro we need to have a bz to gz meetin asap . . . duhh and that same day we mobbing on the flossy nikkas."
20. On or about February 9, 2014, in the vicinity of Flatlands Avenue and East 82nd Street, in the Canarsie section of Brooklyn, defendant **CHRISTIAN WILLIAMS**, a.k.a. "Zone," was in possession of a loaded firearm.
21. On or about February 9, 2014, in the vicinity of Flatlands Avenue and East 82nd Street, in the Canarsie section of Brooklyn, defendant **CHRISTIAN WILLIAMS**, a.k.a. "Zone," while acting in concert with others, jumped out of the passenger side of a vehicle and shot a rival gang member multiple times at close range, striking the rival gang member in the back and left arm.
22. On or about March 13, 2014, defendant **DENS MARCELLUS**, a.k.a. "Denz," in a Facebook conversation with one defendant

KWYME WADDELL, a.k.a. "K," admitted to working to get close to a rival gang member he believed to be responsible for the death of Malik Bhola, in order to kill that individual, writing:

WADDELL: "Yo y u talking to rock off"

MARCELLUS: "wassuo wit ya lil niggas"

MARCELLUS: "im rockin boy to sleep"

MARCELLUS: "juss kalm big boss"

WADDELL: "So were he at"

MARCELLUS: "i aint say much to boy . . . i aint even reply to son so i wouldn't kno gz"

MARCELLUS: "but u whylin bro im rokkin boy 2 sleep I want the #prize"

23. On or about March 22, 2014, defendant **RAHIM VINCENT**, a.k.a. "Spence Kashif," a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," in a telephone conversation with Montel James, admitted to chased after a rival gang member from Canarsie in or near the courthouse in Brooklyn, stating, "I pulled to your court last time, but I came late. Rockoff was there. My nigga, we chased him on the court. Nigga called mad flossy niggas. Me and Prince was wildin downtown. You feel me?"

24. On or about March 25, 2014, in the vicinity of 15 Paedergat 6th Street, in the Canarsie section of Brooklyn, defendant **JEROME MYRIE**, a.k.a. "Rome," possessed a 9mm pistol.
25. On or about March 25, 2014, defendant **KWYME WADDELL**, a.k.a. "K," in a Facebook conversation with defendant **DENS MARCELLUS**, a.k.a. "Denz," chastised MARCELLUS for failing to shoot rival gang members in retaliation for the death of Malik Bhola, and declared that only defendants **CHRISTIAN WILLIAMS**, a.k.a. "Zone," **JARMEL BLAKE**, a.k.a. "Sha Murda," **JAVANNI MOISE**, a.k.a. "Billz," and now-deceased gang member Richard James, a.k.a. "Rich Money Bags," a.k.a. "Rich Flocks," a.k.a. "Rich Spice," were working to execute a sufficient number of rival gang shootings in Canarsie, writing, "Biggs shit ain lit y'all niggas ain't popping out . . . zone . . . me . . . sha . . . billz, rich . . . only niggas that burn up some shit in the floss . . . Y'all nigga get a gun in y'all hand and hop str8 in fb before you put in work wat the fuck you doin".
26. On or about March 25, 2014, defendant **DENS MARCELLUS**, a.k.a. "Denz," in a Facebook conversation with defendant **KWYME**

WADDELL, a.k.a. "K," declared his allegiance to his fellow Folk No Love City members and his intent to exact retaliation on rival gang members for the death of Malik Bhola, writing, "AT THE END OF THE DAY IM 2MUCH OF A REAL NIGGA TO EVEN SMILE WITT THE OPPTS . . . II8 BRO SO SAY DAT 2MM IMMA LINK WE GONE CHOP IT UP... AINT NO OPPTS WITT DA F67KS I PROMISE U . . . IM WIT DA GANG SO MORELESS . . . IDK BOUT YALL BUT ITS 5 – 7 OPPTS IM ROCKIG 2 SLEEP."

27. On or about April 5, 2014, defendant **DENS MARCELLUS**, a.k.a. "Denz," in a Facebook conversation with defendant **KWYME WADDELL**, a.k.a. "K," announced his intention to shoot rival gang members and asked for weapons and ammunition, writing, "Im sayin I need 4 promo . . . hoti need a blik . . . U GOT SHELLS . . . 22 Or 32."
28. On or about April 8, 2014, defendant **DENS MARCELLUS**, a.k.a. "Denz," in a Facebook conversation with defendant **KWYME WADDELL**, a.k.a. "K," announced his intention to shoot rival gang members and asked for ammunition, writing, "IM TRYNA FLEX OVA THEIR TODAY FOUBD DEM CHELS FI MEH."

29. On or about April 16, 2014, defendant **DENS MARCELLUS**, a.k.a. "Denz," and defendant **JAQUAN FRASER**, a.k.a. "Bashie," drew gunfire from rival gang members when MARCELLUS flashed a Folk hand signal.
30. On or about April 17, 2014, defendant **DENS MARCELLUS**, a.k.a. "Denz," in a Facebook conversation with another individual, admitted to possessing a loaded firearm, writing, "I'm Gucci bro I'm strapped right now full klip".
31. On or about April 17, 2014, defendant **JAQUAN FRASER**, a.k.a. "Bashie," in a Facebook conversation with another individual, declared his intent to obtain a vehicle in order to go and shoot at rival gang members, writing, "Son I'm tryna get another V so I could run a drill on niggas."
32. On or about May 24, 2014, at approximately 10:45 a.m., in the vicinity of East 105th Street and Flatlands 2nd Street, defendant **JEROME MYRIE**, a.k.a. "Rome," possessed a loaded and operable firearm.

33. On or about May 24, 2014, at approximately 10:45 a.m., in the vicinity of East 105th Street and Flatlands 2nd Street, defendant **JEROME MYRIE**, a.k.a. "Rome," repeatedly discharged a firearm at a 2010 Nissan Maxima, striking the vehicle and a dwelling with bullets.
34. On or about May 26, 2014, defendant **JEROME MYRIE**, a.k.a. "Rome," in a Facebook conversation with a group of unknown individuals, articulated his intention to fire multiple shots into a crowd of people at a party held that night in rival gang territory, writing, "Like 1030" and posting a screen shot of an invitation to the party for "Monday May 26" at "96 Btwn N&M."
35. On or about May 26, 2014, defendant **JEROME MYRIE**, a.k.a. "Rome," in a Facebook conversation with a group of unknown individuals, articulated his intention to use a firearm to cause serious physical injury to unknown individuals at a party in rival gang territory in Canarsie, by firing multiple shots into a crowd of people at the party, writing, "We gotta make sure somebody get touched

tonight . . . No leg shots dada . . . Facts it's gonna be mad shells . . .
This is a big stain tonight . . . No missing dada."

36. On or about May 26, 2014, defendant **JEROME MYRIE**, a.k.a. "Rome," in a Facebook conversation with a group of unknown individuals, articulated his plan to use unknown female co-conspirators to identify shooting targets at a party in rival gang territory in Canarsie, writing, "We need some low key bitches who know who they is . . . So they could tell exactly when they see them."
37. On or about May 26, 2014, at approximately 10:15 p.m., defendant **JEROME MYRIE**, a.k.a. "Rome," possessed a loaded and operable firearm.
38. On or about May 26, 2014, at approximately 10:15 p.m., defendant **JEROME MYRIE**, a.k.a. "Rome," repeatedly discharged a firearm into a crowd of people, in the vicinity of Avenue M and East 96th Street, striking Justin Johnson, a.k.a. "Cudda," Tabitha Patrick, and Kianna Richards, with bullets.

39. On May 29, 2014, defendant **JEROME MYRIE**, a.k.a. "Rome," in a Facebook conversation with a group of unknown individuals, admitted he shot into a crowd of partygoers in rival gang territory, writing "Shut down bbqs at 1030 and all dat."
40. On May 29, 2014, defendant **JEROME MYRIE**, a.k.a. "Rome," in a Facebook conversation with a group of unknown individuals, announced his intention to arm his co-conspirator with a .380 caliber pistol, then shoot at with intent to kill rival gang members, specifically "100 Cloccs," on behalf of the Folk Nation gang, writing, "One phone call away ops drop . . . Give my son that 380 . . . And let him out in da clocks . . . No cuss I'm #□SP #□STAIN GANG #□7□4□KICK DOOR."
41. On June 8, 2014, defendant **JEROME MYRIE**, a.k.a. "Rome," in a Facebook conversation with a rival gang member, admitted to hunting and shooting other rival gang members in Canarsie, including Justin Johnson, a.k.a. "Cudda," who was shot on May 26, 2014, writing, "I been circling ya block . . . Ask ya man who almost got left with his Shawty in da v rite by ya crib . . . They was in da jeep . . . I done seen niggas duffed you and sent you home you ass . .

. I mad the floss hot . . . *Made . . . I caught cooda tho."

42. On June 8, 2014, defendant **JEROME MYRIE**, a.k.a. "Rome," in a Facebook conversation with another rival gang member, further admitted to hunting and shooting other rival gang members in Canarsie, including Justin Johnson, a.k.a. "Cudda," who was shot on May 26, 2014, writing, "Why you wasn't at the bbq? . . . I was looking for you mang . . . Where u was at I ain't see you . . . Y'all mad coda get shot and y'all ain't in da fields . . . Made* . . . And I'm Staining y'all every time I see y'all . . . So what happened to cooda back? . . . I came back for da bbq . . . But I ended it at 1030."
43. On June 8, 2014, defendant **JEROME MYRIE**, a.k.a. "Rome," in a Facebook conversation with another rival gang member, further admitted to shooting at an individual in a White Nissan Maxima on May 24, 2014, in Canarsie, writing, "So what happened to ya man x white max? . . . He ain't tell you how he shelled down on flat 2 . . . Got*."
44. On or about May 29, 2014, defendant **MARCELLUS DENS**, a.k.a. "Denz," in a Facebook conversation with another individual,

admitted to menacing two individuals in Brooklyn with a firearm a day earlier, writing, "I gotchu doe bro yesterday I had 2 bakk dwn juggy n junes on my blokk."

45. On or about May 30, 2014, defendant **KENNY DORCEAN**, a.k.a. "Stacks," possessed a loaded and operable firearm in the vicinity of Ditmas Avenue and Flatbush Avenue, in the Flatbush section of Brooklyn.
46. On or about May 30, 2014, at approximately 8:30 pm, in the vicinity of Flatbush Avenue and Ditmas Avenue, defendant **KENNY DORCEAN**, a.k.a. "Stacks," discharged a firearm multiple times with intent to kill a third party, but instead struck an innocent bystander in the spine, causing her to suffer permanent full paralysis from the waist down.
47. On June 8, 2014, defendant **JEROME MYRIE**, a.k.a. "Rome," in a Facebook conversation with a rival gang member, issued a threat to the 100 Cloccs gang, by posting a photograph of three semiautomatic handguns, each with extended ammunition magazines, and writing, "Ready for da Cloccs."

48. On or about June 15, 2014, in a telephone conversation, defendant **TYREEK HAYES**, a.k.a. "Ty General," told defendant **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," that he needed to be careful and that they needed guns and vehicles, stating "I don't care how old you get, watch yourself . . . you know we needed them straps and shit, and Vees"
49. On or about June 17, 2014, in the vicinity of 1010 East 105th Street, in the Canarsie section of Brooklyn, defendant **JEROME MYRIE**, a.k.a. "Rome," and defendant **DELEON HUTCHINSON**, a.k.a. "Delly," possessed loaded and operable firearms.
50. On or about June 17, 2014, in the vicinity of 1010 East 105th Street, in the Canarsie section of Brooklyn, defendant **JEROME MYRIE**, a.k.a. "Rome," and defendant **DELEON HUTCHINSON**, a.k.a. "Delly," shot a rival gang member multiple times at close range, with the intent to kill their target; shooting first from within a vehicle, then getting out on foot in an attempt to finish off their prey.
51. On or about July 2, 2014, in a telephone conversation, defendant **MARVIN JULIEN**, a.k.a. "Scope," reported to defendant **KENNY**

DORCEAN, a.k.a. "Stacks," that **MARVIN JULIEN**, a.k.a. "Scope," and defendant **OSHANE FYFFE** were shot on East 25th Street, in the Flatbush section of Brooklyn by rival gang members, stating "some niggas that tried to pull up on the block. They shot up the block and Oshane got clapped, too . . Me too [on] my leg."

52. On or about July 2, 2014, in a telephone conversation, defendant **KENNY DORCEAN**, a.k.a. "Stacks," while being held in on bail for shooting an innocent bystander, requested that defendant **MARVIN JULIEN**, a.k.a. "Scope," ask their fellow gang members to help raise **DORCEAN**'s bail money, stating "Ask niggas to put up \$300 each man . . . I was gonna tell you to ask the one . . . where we did for your shit, where we took out, where they took out of a stack."

53. On or about July 2, 2014, in a telephone conversation, defendant **MARVIN JULIEN**, a.k.a. "Scope," reported to defendant **KENNY DORCEAN**, a.k.a. "Stacks," that defendant **KWYME WADDELL**, a.k.a. "K," was calling for the Folk No Love City gang members and their associates to retaliate for the recent shootings in Flatbush by shooting the rival gang members, stating after

DORCEAN asked what the gang was intending, "K and them want to go promote. They been promoting."

54. On or about July 5, 2014, in a telephone conversation, defendant **JAVANNI MOISE**, a.k.a. "Billz," identified to defendant **KENNY DORCEAN**, a.k.a. "Stacks," the people that had shot Dorcean's brother, defendant **MARVIN JULIEN**, a.k.a. "Scope," stating, "you don't know them. They from the 90s . . . like the GSC 90s . . . the 90s and Church."

55. On or about July 23, 2014, in a telephone conversation, defendant **KWYME WADDELL**, a.k.a. "K," ordered Latisha Sterling to pass on directions to Folk – NLC members to try to prevent unidentified individuals from testifying in the Grand Jury, stating "tell Rahkim to run down on . . . Khalid and Bread . . . tell them – tell the nigga . . . for the shit don't come to Grand Jury . . . Tell him when he sees them niggas, beat them niggas up . . . Tell them they got the Big Homie locked."

56. On or about July 24, 2014, in a telephone conversation, defendant **KWYME WADDELL**, a.k.a. "K," reprimanded **JEAN FREMONT**, a.k.a. "Juno," for not being violent enough and

demanded that **FREMONT** and other gang members slash an individual named "Jose" in the face, stating "Beat these niggas up! Give this nigga Jose a 'buck fifty' on his fat ass face! Are you serious?! Y'all niggas not evil!"

57. On or about July 27, 2014, in a telephone conversation, defendant **KWYME WADDELL**, a.k.a. "K," discussed with defendant **JEAN FREMONT**, a.k.a. "Juno," potential candidates to hold onto Waddell's firearm, asking "what ya'll doing with my flock?" to which **FREMONT** replied "I gotta find somebody to hold it."

58. On or about July 27, 2014, in a telephone conversation, defendant **KWYME WADDELL**, a.k.a. "K," ordered defendant **JEAN FREMONT**, a.k.a. "Juno," to retrieve Waddell's firearm, from fellow gang member defendant **PAOLO ALFAROBARBER**, a.k.a. "Chico," stating "Make sure you get my shit from Paolo . . . Make sure you get everything, the clip, everything."

59. On or about July 27, 2014, in a telephone conversation, defendant **JAVANNI MOISE**, a.k.a. "Billz," admitted to defendant **KWYME WADDELL**, a.k.a. "K," that **MOISE** successfully secreted a firearm on his person when arrested and processed through

arraignments, stating "if you know me you know what's up with me" to which Waddell asked "Cannon?" and Moise responded "Yeah, you know how I move . . . everything through the whole shit . . . judge to judge, mad crazy shit."

60. On or about August 9, 2014, in a telephone conversation, defendant **KWYME WADDELL**, a.k.a. "K," admitted to **JEAN FREMONT**, a.k.a. "Juno," that Waddell sold a firearm with an extended magazine to defendant **JEROME MYRIE**, a.k.a. "Rome," stating "That's for the extend and that, um, box we sold him . . ."
61. On or about September 14, 2014, in a Facebook conversation, defendant **JAQUAN FRASER**, a.k.a. "Bashie," admitted to possessing a .32 caliber revolver, and offering the weapon for sale to another individual, posting a photograph of the revolver and writing, "Yo .32 350 bro . . . Yo guy you want the grip or not . . . its not small guy."
62. On or about October 5, 2014, in a telephone conversation, defendant **KENNY DORCEAN**, a.k.a. "Stacks," warned defendant **MARVIN JULIEN**, a.k.a. "Scope," about being ambushed when going out on the block, but Julien confirms he is always armed, stating "I already

know, I go to the yard every day with the grip."

63. On or about November 10, 2014, in a Facebook conversation, defendant **TYREEK HAYES**, a.k.a. "Ty General," received several screen shots of a Facebook conversation between an unknown female and a rival gang member, in which the female arranged to meet up in person with the rival gang member.

64. On or about November 10, 2014, in a Facebook conversation, defendant **TYREEK HAYES**, a.k.a. "Ty General," and defendant **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," planned the baiting and shooting of a random rival gang member, now known to the Grand Jury, writing to one another:

TYREEK: yo help me out give me a ake address out there so I
kould send the opp nigga

SHAQUILLE: We dont got shells yet for u to do that . . . I only
got one

TYREEK: head tap

SHAQUILLE: Im tryna figure out wat address

TYREEK: east 92nd btw k & L

65. On or about November 12, 2014, on East 92nd Street, in the vicinity of K Avenue and L Avenue, defendant **TYREEK HAYES**, a.k.a. "Ty General," and defendant **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," shot a rival gang member one time in the face at point blank range, causing the rival gang member to suffer a broken jaw.
66. On or about February 6, 2015, in a telephone conversation, defendant **PAOLO ALFAROBARBER**, a.k.a. "Chico," reported to fellow FOLK – NLC gang member, Rakeem Ifill, a.k.a. "Ra", that AlfaroBarber had to assist fellow gang member Richard James – now deceased – in evading apprehension by law enforcement officers, stating "So he called me, he pulling up, and soon as he pulled up by the garage, Ds tried to lock him . . . Nigga just backed up mad quick . . . drove on the sidewalk. Grazed them [the police], fucked up the whip and calls me. I had to go pick him up with Billz shit."
67. On or about April 17, 2015, defendant **OSHA NE FYFFE** shot an individual know to the Grand Jury in front of 2574 Bedford Avenue, in the Flatbush section of Brooklyn.

68. On or about April 17, 2015, defendant **OSHANE FYFFE**, in an attempt to avoid detection and apprehension by law enforcement, stashed the firearm he had just used to shoot an individual known to the Grand Jury in front of 2574 Bedford Avenue, in the Flatbush section of Brooklyn.
69. On or about April 17, 2015, defendant **OSHANE FYFFE**, changed his clothing in order to avoid identification and apprehension by law enforcement for the shooting Fyffe had just committed in the vicinity of 2574 Bedford Avenue, in the Flatbush section of Brooklyn.
70. On or about April 25, 2015, in a telephone conversation, defendant **KWYME WADDELL**, a.k.a. "K", disclosed to defendant **PAOLO ALFAROBARBER**, a.k.a. "Chico," that Waddell has a maintenance worker at Rikers Island that helps Waddell smuggle marijuana, tobacco, and synthetic marijuana into the correctional facility, stating "I got the worker that work downstairs. I just throw whatever I want in the garbage, in a chip bag and tell him what chip bag it is and he bring it up for me; Mad weed, mad backo, mad K-2."

71. On or about May 14, 2015, defendant **TYREEK HAYES**, a.k.a. "Ty General" and **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," acted in concert to possess a firearm.
72. On or about May 22, 2015, in a telephone conversation, defendant **TYREEK HAYES**, a.k.a. "Ty General" admitted to a female caller that he used firearms, stating "you know how I ride . . . I was shooting at niggas."
73. On or about May 22, 2015, in a telephone conversation, defendant **TYREEK HAYES**, a.k.a. "Ty General" admitted to a female caller that he possessed and sold firearms, stating "they wanted that Uzi, but I got rid of it . . . I sold them, I sold that shit."
74. On or about May 22, 2015, in a telephone conversation, defendant **TYREEK HAYES**, a.k.a. "Ty General" admitted to his mother that he possessed firearms and that in the past he had other people take responsibility for firearms he possessed, stating "I said he should take it. All the guns were mine. Other niggas took charges for me before. So what?"
75. On or about June 5, 2015, in a telephone conversation, defendant

KWYME WADDELL, a.k.a. "K," asked defendant **JEAN FREMONT**, a.k.a. "Juno," to check to make sure the surgical steel blades, that Fremont was going to have someone else smuggle in to Waddell in a correctional facility, were made of material that would not trigger detection by magnetometer, stating "You gotta Google and tell me what's the difference. I don't want this bitch coming, and shit starts ringing off all crazy."

76. On or about June 5, 2015, in a telephone conversation, defendant **KWYME WADDELL**, a.k.a. "K," informed defendant **JEAN FREMONT**, a.k.a. "Juno," that Waddell had saved \$3,000 cash selling smuggled contraband in a correctional facility, stating "I got three bands cash . . . and I got work comin this week, bro! . . . the nigga that I usually make get shit for me not feeling good . . . I need you to be more consistent . . . you need to be baggin shit up."

77. On or about June 23, 2015, in a telephone conversation, defendant **KWYME WADDELL**, a.k.a. "K," demanded that defendant **PAOLO ALFAROBARBER**, a.k.a. "Chico," pay Waddell a percentage of proceeds from a robbery as tribute for Waddell being the Big Homie (i.e., the Boss), stating to defendant **JEAN**

FREMONT, a.k.a. "Juno," "call Paolo and tell him he gonna have to send me up some cheese on that. What he think life about? Gotta send the Big Homie some bread, son . . . I want 10% . . . I certified his name in the streets."

78. On or about the evening of July 13, 2015, defendant **COREY ROBERTS**, a.k.a. "Fresh," walked into a courtyard in a residential building in Brooklyn and fired multiple shots at numerous people at close range, striking and severely wounding two individuals and missing two other individuals as a crowd of people, including young child fled for their safety.
79. On or about the evening of July 13, 2015, defendant **COREY ROBERTS**, a.k.a. "Fresh," possessed a loaded and operable firearm.
80. On or about July 14, 2015, in a telephone conversation, defendant **JEAN FREMONT**, a.k.a. "Juno," reported to defendant **KWYME WADDELL**, a.k.a. "K," who asked the question of who was "putting in work", that few gang members were committing the required acts of violence, stating "none of these niggas . . . just Oshane . . . Fresh (u/i) went over there talking about how he hit two

people. You know niggas be talking . . . ain't nobody get hit . . . its like we holding down they fort!"

81. On or about July 14, 2015, in a telephone conversation, defendant **JEAN FREMONT**, a.k.a. "Juno," reported to defendant **KWYME WADDELL**, a.k.a. "K," that defendant **PAOLO ALFAROBARBER**, a.k.a. "Chico," was in possession of a Berretta firearm, stating "Paolo got it on him."

82. On or about July 14, 2015, in a telephone conversation, defendant **KWYME WADDELL**, a.k.a. "K," ordered defendant **JEAN FREMONT**, a.k.a. "Juno," to take care of Waddell's firearm and extended magazine, stating "tell Paolo hold my ladder for my glizzy, I need my ladder, bro . . . my extendo, tell him don't let nothing happen to my clip. I am going to get another one soon."

83. On or about July 14, 2015, in a telephone conversation, defendant **JEAN FREMONT**, a.k.a. "Juno," told defendant **KENNY DORCEAN**, a.k.a. "Stacks," that a fellow gang member had been killed by Rugby Road Bloods gang members, responding to Dorcean's statement "They don't even know who did it, right?" by stating "Rugby, bro!"

84. On or about July 14, 2015, in a telephone conversation, defendant **KENNY DORCEAN**, a.k.a. "Stacks," stated to defendant **JEAN FREMONT**, a.k.a. "Juno," that anybody from Rugby Road should be shot and that Oshane Fyffe would have to take care of that, stating "Yeah, but they just know anybody from over there a dub, right? . . . I mean, that's Oshane! Oshane have to take care of that.
85. On or about July 15, 2015, in the vicinity of East 17th Street and Newkirk Avenue, approximately three blocks from Rugby Road, defendant **OSHA NE FYFFE**, shot Adetundi Ajakaye multiple times at close range in the torso, causing the death of Adetundi Ajakaye.
86. On or about July 15, 2015, in the vicinity of East 17th Street and Newkirk Avenue, defendant **OSHA NE FYFFE**, was in possession of a loaded, operable firearm.
87. On or about October 18, 2015, **JEAN FREMONT**, a.k.a. "Juno," **JAVANNI MOISE**, a.k.a. "Billz," and **JARMEL BLAKE**, a.k.a. "Sha Murda," acted in concert to fire multiple shots from inside a vehicle while hunting rival gang members on the streets of the DUMBO section of Brooklyn.

88. On or about October 18, 2015, **JEAN FREMONT**, a.k.a. "Juno," **JAVANNI MOISE**, a.k.a. "Billz," and **JARMEL BLAKE**, a.k.a. "Sha Murda," acted in concert to flee the scene of their attack and discard two loaded and operable firearms while attempting to avoid detection and apprehension by law enforcement.
89. On or about October 18, 2015, **JEAN FREMONT**, a.k.a. "Juno," and **JAVANNI MOISE**, a.k.a. "Billz," abandoned their bullet-riddled vehicle, a 2013 Cadillac, in the vicinity of Prospect Park, Brooklyn, leaving behind ballistics evidence, DNA evidence and fingerprint evidence.
90. On or about October 18, 2015, **JEAN FREMONT**, a.k.a. "Juno," and **JAVANNI MOISE**, a.k.a. "Billz," sought medical attention for Moise's and Malik Downer's gunshot wounds at Kings County Hospital.
91. On or about October 18, 2015, in a telephone conversation, **JARMEL BLAKE**, a.k.a. "Sha Murda," reported to **KWYME WADDELL**, a.k.a. "K," that **BLAKE** had acted as a decoy to the police, in order to help his fellow FOLK – NLC members avoid detection and apprehension by law enforcement, as they fled from the DUMBO shooting, stating "he acting like he want me to hop out the V, like

there were two other knocks and stop for the D's . . . when I see that the D's was watching me . . . I turnt back around and put goods back in the Veek, closed the door, and let- told them drive off, and they drove off and then I ran to the D's . . . so now they all jumpin on me, stopping me, questioning me, 'Oh, what's up, you drunk? What's up with your friend? You drunk? You driving?' . . . 'cause they don't know we promo. They just seen us flying by. So they started chasin niggas. . . . I'm like "yeah man, that nigga drunk man. I'm taking a cab home, fuck it . . . so by the time then, Bill's already gone bro."

92. On or about December 30, 2015, defendant **RAHIM VINCENT**, a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," was in possession of a loaded and operable firearm with a magazine capable of holding thirty rounds of ammunition.

93. On or about December 30, 2015, defendant **RAHIM VINCENT**, a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," fled from the police during a routine traffic stop, in order to avoid apprehension, leading them on a high speed chase during which the defendant drove recklessly, that ended with the defendant striking three separate

vehicles and fleeing the scene of the accident on foot.

COUNT THREE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **CHRISTIAN WILLIAMS**, a.k.a. "Zone," of the crime of **ATTEMPTED MURDER IN THE SECOND DEGREE**, in violation of P.L. §110/125.25(1), committed as follows:

The defendant, while aided by, and acting in concert with unindicted individuals, in the County of Kings, City of New York, on or about February 9, 2014, with intent to cause the death of an individual whose identity is known to the Grand Jury (Victim #1), attempted to cause the death of such person or a third person.

COUNT FOUR

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **CHRISTIAN WILLIAMS**, a.k.a. "Zone," of the crime of **ATTEMPTED ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §110/120.10(1), an armed felony, committed as follows:

The defendant, while aided by, and acting in concert with unindicted individuals, in the County of Kings, City of New York, on or about February 9, 2014, with intent to cause serious physical injury to an individual whose identity is known to the Grand Jury (Victim #1), attempted to cause such injury to such

person or to a third person by means of a deadly weapon, specifically a loaded firearm.

COUNT FIVE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **CHRISTIAN WILLIAMS**, a.k.a. "Zone," of the crime of **ASSAULT IN THE SECOND DEGREE**, in violation of P.L. §120.05(2), an armed felony, committed as follows:

The defendant, while aided by, and acting in concert with unindicted individuals, in the County of Kings, City of New York, on or about February 9, 2014, with intent to cause physical injury to an individual whose identity is known to the Grand Jury (Victim #1), caused such injury to such person or to a third person by means of a deadly weapon, specifically a loaded firearm.

COUNT SIX

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **CHRISTIAN WILLIAMS**, a.k.a. "Zone," of the crime of **CRIMINAL USE OF A FIREARM IN THE FIRST DEGREE**, in violation of P.L. §265.09(1)(a), an armed felony, committed as follows:

The defendant, The defendant, while aided by, and acting in concert with

unindicted individuals, in the County of Kings, City of New York, on or about February 9, 2014, while committing the class B violent felony offense, as defined under Penal Law §70.02, of Attempted Murder in the Second Degree, possessed a deadly weapon consisting of a loaded weapon from which a shot readily capable of producing death or other serious injury may be discharged.

COUNT SEVEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **CHRISTIAN WILLIAMS**, a.k.a. "Zone," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(1)(b), an armed felony, committed as follows:

The defendant, while aided by, and acting in concert with unindicted individuals, in the County of Kings, City of New York, on or about February 9, 2014, possessed a loaded firearm, with intent to use the same unlawfully against another.

COUNT EIGHT

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **CHRISTIAN WILLIAMS**, a.k.a. "Zone," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(3), an armed felony, committed as follows:

The defendant, while aided by, and acting in concert with unindicted individuals, in the County of Kings, City of New York, on or about February 9, 2014, possessed a loaded firearm, such possession taking place outside the defendant's home and place of business.

COUNT NINE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **JEROME MYRIE**, a.k.a. "Rome," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 24, 2014, possessed a loaded firearm, with intent to use the same unlawfully against another.

COUNT TEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **JEROME MYRIE**, a.k.a. "Rome," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(3), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 24, 2014, possessed a loaded firearm, such possession taking place outside the defendant's home and place of business.

COUNT ELEVEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **JEROME MYRIE**, a.k.a. "Rome," of the crime of **RECKLESS ENDANGERMENT IN THE FIRST DEGREE**, in violation of P.L. §120.25, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 24, 2014, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct that created a grave risk of death to another person.

COUNT TWELVE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **JEROME MYRIE**, a.k.a. "Rome," of the crime of **ATTEMPTED ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §110/120.10(1), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 26, 2014, with intent to cause serious physical injury to another person, whose

identity is known to the Grand Jury (Victim #2), attempted to cause such injury to such person or to a third person by means of a deadly weapon, specifically a loaded firearm.

COUNT THIRTEEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **JEROME MYRIE**, a.k.a. "Rome," of the crime of **ATTEMPTED ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §110/120.10(1), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 26, 2014, with intent to cause serious physical injury to another person, whose identity is known to the Grand Jury (Victim #3), attempted to cause such injury to such person or to a third person by means of a deadly weapon, specifically a loaded firearm.

COUNT FOURTEEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **JEROME MYRIE**, a.k.a. "Rome," of the crime of **ATTEMPTED ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §110/120.10(1), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 26, 2014, with intent to cause serious physical injury to another person, whose identity is known to the Grand Jury (Victim #4), attempted to cause such injury to such person or to a third person by means of a deadly weapon, specifically a loaded firearm.

COUNT FIFTEEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **JEROME MYRIE**, a.k.a. "Rome," of the crime of **ASSAULT IN THE SECOND DEGREE**, in violation of P.L. §120.05(2), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 26, 2014, with intent to cause physical injury to another person, whose identity is known to the Grand Jury (Victim #2), caused such injury to such person or to a third person by means of a deadly weapon, specifically a loaded firearm.

COUNT SIXTEEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **JEROME MYRIE**, a.k.a. "Rome," of the crime of **ASSAULT IN THE SECOND DEGREE**, in violation of P.L. §120.05(2), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 26, 2014, with intent to cause physical injury to another person, whose identity is known to the Grand Jury (Victim #3), caused such injury to such person by means of a deadly weapon, specifically a loaded firearm.

COUNT SEVENTEEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **JEROME MYRIE**, a.k.a. "Rome," of the crime of **ASSAULT IN THE SECOND DEGREE**, in violation of P.L. §120.05(2), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 26, 2014, with intent to cause physical injury to another person, whose identity is known to the Grand Jury (Victim #4), caused such injury to such person by means of a deadly weapon, specifically a loaded firearm.

COUNT EIGHTEEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **JEROME MYRIE**, a.k.a. "Rome," of the crime of **RECKLESS ENDANGERMENT IN THE FIRST DEGREE**, in violation of P.L. §120.25, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 26, 2014, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct that created a grave risk of death to another person.

COUNT NINETEEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **JEROME MYRIE**, a.k.a. "Rome," of the crime of **CRIMINAL USE OF A FIREARM IN THE SECOND DEGREE**, in violation of P.L. §265.08(1), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 26, 2014, while committing the class C violent felony offenses, as defined under Penal Law §70.02, of Attempted Assault in the First Degree, possessed a deadly weapon consisting of a loaded weapon from which a shot readily capable of producing death or other serious injury may be discharged.

COUNT TWENTY

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **JEROME MYRIE**, a.k.a. "Rome," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 26, 2014, possessed a loaded firearm, with intent to use the same unlawfully against another.

COUNT TWENTY-ONE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **JEROME MYRIE**, a.k.a. "Rome," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(3); an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 26, 2014, possessed a loaded firearm, such possession taking place outside the defendant's home and place of business.

COUNT TWENTY-TWO

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **KENNY DORCEAN**, a.k.a. "Stacks," of the crime of **ATTEMPTED MURDER IN THE SECOND DEGREE**, in violation of P.L. §110/125.25(1), committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 30, 2014, with intent to cause the death of another person, attempted to cause the death of such person or a third person.

COUNT TWENTY-THREE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **KENNY DORCEAN**, a.k.a. "Stacks" of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §120.10(1), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 30, 2014, with intent to cause serious physical injury to another person, caused such injury to a third person (Victim #5), by means of a deadly weapon, specifically a loaded firearm.

COUNT TWENTY-FOUR

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **KENNY DORCEAN**, a.k.a. "Stacks," of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §120.10(3), committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 30, 2014, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused serious physical injury to another person (Victim #5).

COUNT TWENTY-FIVE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **KENNY DORCEAN**, a.k.a. "Stacks," of the crime of **CRIMINAL USE OF A FIREARM IN THE FIRST DEGREE**, in violation of P.L. §265.09(1)(a), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 30, 2014, while committing the class B violent felony offenses, as defined under Penal Law §70.02, of Attempted Murder in the Second Degree and Assault in the First Degree, possessed a deadly weapon consisting of a loaded weapon from which a shot readily capable of producing death or other serious injury may be discharged.

COUNT TWENTY-SIX

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **KENNY DORCEAN**, a.k.a. "Stacks," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 30, 2014, possessed a loaded firearm, with intent to use the same unlawfully against another.

COUNT TWENTY-SEVEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **KENNY DORCEAN**, a.k.a. "Stacks," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(3), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 30, 2014, possessed a loaded firearm, and such possession did not occur in the defendant's home or place of business.

COUNT TWENTY-EIGHT

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **KENNY DORCEAN**, a.k.a. "Stacks," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of P.L. §265.02(1), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about May 30, 2014, possessed a loaded firearm, such possession being in violation of P.L. §265.01(1), and the defendant has previously been convicted of a crime.

COUNT TWENTY-NINE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants **JEROME MYRIE**, a.k.a. "Rome" and **DELEON HUTCHINSON**, a.k.a. "Delly," of the crime of **ATTEMPTED MURDER IN THE SECOND DEGREE**, in violation of P.L. §110/125.25(1), committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about June 17, 2014, with intent to cause the death of another person, attempted to cause the death of such person or a third person.

COUNT THIRTY

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants **JEROME MYRIE**, a.k.a. "Rome" and **DELEON HUTCHINSON**, a.k.a. "Delly," of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §120.10(1), an armed felony, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about June 17, 2014, with intent to cause serious physical injury to another person, caused such injury to such person (Victim #6) by means of a deadly weapon, specifically a loaded firearm.

COUNT THIRTY-ONE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants **JEROME MYRIE**, a.k.a. "Rome" and **DELEON HUTCHINSON**, a.k.a. "Delly," of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §120.10(3), committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about June 17, 2014, under circumstances evincing a depraved indifference to human life, they recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused serious physical injury to another person (Victim #6).

COUNT THIRTY-TWO

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants **JEROME MYRIE**, a.k.a. "Rome" and **DELEON HUTCHINSON**, a.k.a. "Delly," of the crime of **CRIMINAL USE OF A FIREARM IN THE FIRST DEGREE**, in violation of P.L. §265.09(1)(a), an armed felony, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about June 17, 2014, while committing the class B violent felony offenses, as defined under Penal Law §70.02, of Attempted

Murder in the Second Degree and Assault in the First Degree, possessed a deadly weapon consisting of a loaded weapon from which a shot readily capable of producing death or other serious injury may be discharged.

COUNT THIRTY-THREE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants **JEROME MYRIE**, a.k.a. "Rome" and **DELEON HUTCHINSON**, a.k.a. "Delly," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(1)(b), an armed felony, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about June 17, 2014, possessed a loaded firearm, with intent to use the same unlawfully against another.

COUNT THIRTY-FOUR

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants **JEROME MYRIE**, a.k.a. "Rome" and **DELEON HUTCHINSON**, a.k.a. "Delly," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(3), an armed felony, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about June 17, 2014, possessed a loaded firearm, and such possession taking place outside the defendants' homes and places of business.

COUNT THIRTY-FIVE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **TYREEK HAYES**, a.k.a. "Ty General," and **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," of the crime of **ATTEMPTED MURDER IN THE SECOND DEGREE**, in violation of P.L. §110/125.25(1), committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about and between November 10, 2014, and November 12, 2014, with intent to cause the death of another person, attempted to cause the death of such person (Victim #7).

COUNT THIRTY-SIX

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **TYREEK HAYES**, a.k.a. "Ty General," and **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," of the crime of **ASSAULT**

IN THE FIRST DEGREE, in violation of P.L. §120.10(1), an armed felony, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about and between November 10, 2014, and November 12, 2014, with intent to cause serious physical injury to another person, caused such injury to such person, whose identity is known to the Grand Jury (Victim #7) by means of a deadly weapon, specifically a loaded firearm.

COUNT THIRTY-SEVEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **TYREEK HAYES**, a.k.a. "Ty General," and **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §120.10(3), committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about and between November 10, 2014, and November 12, 2014, under circumstances evincing a depraved indifference to human life, they recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused serious physical injury to another person, whose identity is known to the Grand Jury (Victim #7).

COUNT THIRTY-EIGHT

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **TYREEK HAYES**, a.k.a. "Ty General," and **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," of the crime of **CRIMINAL USE OF A FIREARM IN THE FIRST DEGREE**, in violation of P.L. §265.09(1)(a), an armed felony, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about and between November 10, 2014, and November 12, 2014, while committing the class B violent felony offenses, as defined under Penal Law §70.02, of Attempted Murder in the Second Degree and Assault in the First Degree, possessed a deadly weapon consisting of a loaded weapon from which a shot readily capable of producing death or other serious injury may be discharged.

COUNT THIRTY-NINE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **TYREEK HAYES**, a.k.a. "Ty General," and **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of

P.L. §265.03(1)(b), an armed felony, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about and between November 10, 2014, and November 12, 2014, possessed a loaded firearm, with intent to use the same unlawfully against another.

COUNT FORTY

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **OSHA NE FYFFE** of the crime of **ASSAULT IN THE SECOND DEGREE**, in violation of P.L. §120.05(2), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about April 17, 2015, with intent to cause physical injury to another person, caused such injury to such person, whose identity is known to the Grand Jury (Victim #8) by means of a deadly weapon, specifically a loaded firearm.

COUNT FORTY-ONE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **OSHA NE FYFFE**, of the crime of **RECKLESS**

ENDANGERMENT IN THE FIRST DEGREE, in violation of P.L. §120.25, committed as follows:

The defendant, in the County of Kings, City of New York, on or about April 17, 2015, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct that created a grave risk of death to another person.

COUNT FORTY-TWO

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **OSHANE FYFFE**, of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about April 17, 2015, possessed a loaded firearm, with intent to use the same unlawfully against another.

COUNT FORTY-THREE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **OSHANE FYFFE** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(3), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about April 17, 2015, possessed a loaded firearm, such possession taking place outside the defendant's home or place of business.

COUNT FORTY-FOUR

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **TYREEK HAYES**, a.k.a. "Ty General" and **SHAQUILLE HAYES**, a.k.a. "Shaq," a.k.a. "KayKay," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of P.L. §265.02(1), an armed felony, committed as follows:

The defendants, while aiding one another and acting in concert with each other, in the County of Kings, City of New York, on or about May 14, 2015, possessed a loaded firearm, such possession being in violation of P.L. §265.01(1), and each defendant has previously been convicted of a crime.

COUNT FORTY-FIVE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **TYREEK HAYES**, a.k.a. "Ty General" and **SHAQUILLE HAYES**, a.k.a. "Shaq" a.k.a. "KayKay", of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of P.L. §265.01-b, an armed felony,

committed as follows:

The defendants, while aiding one another and acting in concert with each other, in the County of Kings, City of New York, on or about May 14, 2015, possessed a firearm.

COUNT FORTY-SIX

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **TYREEK HAYES**, a.k.a. "Ty General" and **SHAQUILLE HAYES**, a.k.a. "Shaq" a.k.a. "KayKay", of the offense of **POSSESSION OF PISTOL OR REVOLVER AMMUNITION**, in violation of New York City Administrative Code section 10-131(I)(3) committed as follows:

The defendants, while aiding one another and acting in concert with each other, in the County of Kings, City of New York, on or about May 14, 2015, possessed a quantity of pistol or revolver ammunition within the City of New York, without authorization.

COUNT FORTY-SEVEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **ATTEMPTED MURDER IN THE SECOND DEGREE**, in violation of P.L. §110/125.25(1),

committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, with intent to cause the death of another person, attempted to cause the death of such person or a third person (Victim #9).

COUNT FORTY-EIGHT

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **ATTEMPTED MURDER IN THE SECOND DEGREE**, in violation of P.L. §110/125.25(1), committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, with intent to cause the death of another person, attempted to cause the death of such person or a third person (Victim #10).

COUNT FORTY-NINE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **ATTEMPTED MURDER IN THE SECOND DEGREE**, in violation of P.L. §110/125.25(1), committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13,

2015, with intent to cause the death of another person, attempted to cause the death of such person or a third person (Victim #11).

COUNT FIFTY

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **ATTEMPTED MURDER IN THE SECOND DEGREE**, in violation of P.L. §110/125.25(1), committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, with intent to cause the death of another person, attempted to cause the death of such person or a third person (Victim #12).

COUNT FIFTY-ONE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §120.10(1), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, with intent to cause serious physical injury to another person, caused such injury to that person, whose identity is known to the Grand Jury and is the

same individual mentioned in COUNT FORTY-SEVEN, by means of a deadly weapon, specifically a loaded firearm.

COUNT FIFTY-TWO

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §120.10(3), committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused serious physical injury to another person, whose identity is known to the Grand Jury, and is the same individual mentioned in COUNT FORTY-SEVEN.

COUNT FIFTY-THREE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §120.10(1), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, with intent to cause serious physical injury to another person, caused such injury to that person, whose identity is known to the Grand Jury and is the same individual mentioned in COUNT FORTY-EIGHT, by means of a deadly weapon, specifically a loaded firearm.

COUNT FIFTY-FOUR

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §120.10(3), committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct which created a grave risk of death to another person, and thereby caused serious physical injury to another person, whose identity is known to the Grand Jury, and is the same individual mentioned in COUNT FORTY-EIGHT.

COUNT FIFTY-FIVE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh" of the crime of **ATTEMPTED ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §§ 110/120.10(1), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, with intent to cause serious physical injury to another person, caused such injury to that person, whose identity is known to the Grand Jury and is the same individual mentioned in COUNT FORTY-NINE, by means of a deadly weapon, specifically a loaded firearm.

COUNT FIFTY-SIX

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **ATTEMPTED ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §§ 110/120.10(1), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, with intent to cause serious physical injury to another person, caused such injury to that person, whose identity is known to the Grand Jury and is the

same individual mentioned in COUNT FIFTY, by means of a deadly weapon, specifically a loaded firearm.

COUNT FIFTY-SEVEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **CRIMINAL USE OF A FIREARM IN THE FIRST DEGREE**, in violation of P.L. §265.09(1)(a), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, while committing the class B violent felony offenses, as defined under Penal Law §70.02, of Attempted Murder in the Second Degree and Assault in the First Degree, possessed a deadly weapon consisting of a loaded weapon from which a shot readily capable of producing death or other serious injury may be discharged.

COUNT FIFTY-EIGHT

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, possessed a loaded firearm, with intent to use the same unlawfully against another.

COUNT FIFTY-NINE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(3), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, possessed a loaded firearm, such possession taking place outside the defendant's home and place of business.

COUNT SIXTY

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **RECKLESS ENDANGERMENT IN THE FIRST DEGREE**, in violation of P.L. §120.25, committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct which created a grave risk of death to another person.

COUNT SIXTY-ONE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **COREY ROBERTS**, a.k.a. "Fresh," of the crime of **ENDANGERING THE WELFARE OF A CHILD**, in violation of P.L. §260.10(1), committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 13, 2015, knowingly acted in a manner likely to be injurious to the physical, mental or moral welfare of a child less than seventeen years old.

COUNT SIXTY-TWO

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **OSHA NE FYFFE** of the crime of **MURDER IN THE SECOND DEGREE**, in violation of P.L. 125.25(1), committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 15, 2015, with intent to cause the death of another person, caused the death of such person or a third person.

COUNT SIXTY-THREE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **OSHA NE FYFFE** of the crime of **MURDER IN THE SECOND DEGREE**, in violation of P.L. 125.25(2), committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 15, 2015, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct that created a grave risk of death to another person and thereby caused the death another person.

COUNT SIXTY-FOUR

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **OSHA NE FYFFE** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 15, 2015, possessed a loaded firearm, with intent to use the same unlawfully against another.

COUNT SIXTY-FIVE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant **OSHANE FYFFE** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(3), an armed felony, committed as follows:

The defendant, in the County of Kings, City of New York, on or about July 15, 2015, possessed a loaded firearm, such possession taking place outside of the defendant's home and place of business.

COUNT SIXTY-SIX

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **JEAN FREMONT**, a.k.a. "Juno," **JAVANNI MOISE**, a.k.a. "Billz," and **JARMEL BLAKE**, a.k.a. "Sha Murda," of the crime of **ATTEMPTED MURDER IN THE SECOND DEGREE**, in violation of P.L. §110/125.25(1), committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about October 18, 2015, with intent to cause the death of another person, attempted to cause the death of such person or a third person.

COUNT SIXTY-SEVEN

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **JEAN FREMONT**, a.k.a. "Juno," **JAVANNI MOISE**, a.k.a. "Billz," and **JARMEL BLAKE**, a.k.a. "Sha Murda," of the crime of **ATTEMPTED ASSAULT IN THE FIRST DEGREE**, in violation of P.L. §110/120.10(1), an armed felony, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about October 18, 2015, with intent to cause serious physical injury to another or to a third person, attempted to cause such injury to such person or to a third person by means of a deadly weapon, specifically a loaded firearm.

COUNT SIXTY-EIGHT

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **JEAN FREMONT**, a.k.a. "Juno," **JAVANNI MOISE**, a.k.a. "Billz," and **JARMEL BLAKE**, a.k.a. "Sha Murda," of the crime of **CRIMINAL USE OF A FIREARM IN THE FIRST DEGREE**, in violation of P.L. §265.09(1)(a), an armed felony, committed as follows:

The defendant, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about October 18, 2015,

while committing the class B violent felony offense, as defined under Penal Law §70.02, of Attempted Murder in the Second Degree, possessed a deadly weapon consisting of a loaded weapon from which a shot readily capable of producing death or other serious injury may be discharged.

COUNT SIXTY-NINE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **JEAN FREMONT**, a.k.a. "Juno," **JAVANNI MOISE**, a.k.a. "Billz," and **JARMEL BLAKE**, a.k.a. "Sha Murda," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(1)(b), an armed felony, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about October 18, 2015, possessed a loaded firearm, with intent to use the same unlawfully against another.

COUNT SEVENTY

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **JEAN FREMONT**, a.k.a. "Juno," **JAVANNI MOISE**, a.k.a. "Billz," and **JARMEL BLAKE**, a.k.a. "Sha Murda," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of

P.L. §265.03(3), an armed felony, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about October 18, 2015, possessed a loaded firearm, such possession taking place outside the defendants' homes and places of business.

COUNT SEVENTY-ONE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendants, **JEAN FREMONT**, a.k.a. "Juno," **JAVANNI MOISE**, a.k.a. "Billz," and **JARMEL BLAKE**, a.k.a. "Sha Murda," of the crime of **RECKLESS ENDANGERMENT IN THE FIRST DEGREE**, in violation of P.L. §120.25, committed as follows:

The defendants, while aided by, and acting in concert with one another, in the County of Kings, City of New York, on or about October 18, 2015, under circumstances evincing a depraved indifference to human life, recklessly engaged in conduct which created a grave risk of death to another person.

COUNT SEVENTY-TWO

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **RAHIM VINCENT**, a.k.a. "Spence Kashif," "Ahim," a.k.a.

"Rakim," a.k.a. "Keemy," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of P.L. §265.03(3), an armed felony, committed as follows:

The defendant, while acting in concert with an unapprehended individual, in the County of Kings, City of New York, on or about December 30, 2015, possessed a loaded firearm, such possession taking place outside of the defendant's home and place of business.

COUNT SEVENTY-THREE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **RAHIM VINCENT**, a.k.a. "Spence Kashif," a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE THIRD DEGREE**, in violation of P.L. §265.02(1), an armed felony, committed as follows:

The defendant, while acting in concert with an unapprehended individual, in the County of Kings, City of New York, on or about December 30, 2015, possessed a loaded firearm, such possession being in violation of P.L. §265.01(1), whereas the defendant has previously been convicted of a crime.

COUNT SEVENTY-FOUR

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **RAHIM VINCENT**, a.k.a. "Spence Kashif," a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," of the crime of **CRIMINAL POSSESSION OF A FIREARM**, in violation of P.L. §265.01-b, an armed felony, committed as follows:

The defendant, while acting in concert with an unapprehended individual, in the County of Kings, City of New York, on or about December 30, 2015 possessed a firearm.

COUNT SEVENTY-FIVE

AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **RAHIM VINCENT**, a.k.a. "Spence Kashif", a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," of the crime of **CRIMINAL POSSESSION OF A FORGED INSTRUMENT IN THE SECOND DEGREE**, in violation of P.L. §170.25, committed as follows:

The defendant, in the County of Kings, City of New York, on or about December 30, 2015, with knowledge that they were forged and with intent to defraud, deceive or injure another, defendant was in possession of a forged instruments of a kind specified in P.L. §170.10, specifically five credit cards.

COUNT SEVENTY-SIX

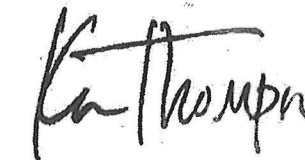
AND THE GRAND JURY AFORESAID, by this Indictment, further accuses the defendant, **RAHIM VINCENT**, a.k.a. "Spence Kashif," a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy," of the crime of **AGGRAVATED UNLICENSED OPERATION OF A MOTOR VEHICLE IN THE FIRST DEGREE**, in violation of **VEHICLE AND TRAFFIC LAW §511(3)(a)(ii)**, committed as follows:

The defendant, in the County of Kings, City of New York, on or about December 30, 2015, operated a motor vehicle on a public highway while knowing or having reason to know that his license or privilege of operating such motor vehicle in this state or privilege of obtaining a license to operate such motor vehicle issued by the commissioner is suspended, revoked or otherwise withdrawn by the commissioner, and the defendant had in effect ten or more suspensions, imposed on at least ten separate dates for failure to answer, appear or pay a fine, pursuant to §§226 or 510(4)(a) of the Vehicle and Traffic Law.

Dated: January 25, 2016
Brooklyn, New York

A TRUE BILL


FOREPERSON



KENNETH P. THOMPSON
DISTRICT ATTORNEY

CRIMINAL TERM ARR/MOT
SUPREME COURT KINGS
2016 JAN 25 PM 3:22

**SUPREME COURT OF THE STATE OF NEW YORK;
KINGS COUNTY: PART 40**

-----X

THE PEOPLE OF THE STATE OF NEW YORK

-against-

XJ **KWYME WADDELL, a.k.a. "K",**
X **DAVID SIMONISE, a.k.a. "Preme",**
X **JAQUAN FRASER, a.k.a. "Bashie",**
XJ **RAHIM VINCENT, a.k.a. Spence Kashif,**
a.k.a. "Ahim", a.k.a. "Rakim", a.k.a. Keemy",
2015KN083655
X **CHRISTIAN WILLIAMS, a.k.a. "Zone",**
X **DENS MARCELLUS, a.k.a. "Denz",**
X **JEROME MYRIE, a.k.a. "Rome",**
X **JARMEL BLAKE, a.k.a. "Sha Murda",**
X **JAVANNI MOISE, a.k.a. "Billz",**
XJ **DELEON HUTCHINSON, a.k.a. "Delly",**
2014KN047696
XJ **KENNY DORCEAN, a.k.a. "Stacks",**
2014KN041147
XJ **TYREEK HAYES, a.k.a. "Ty General",**
2015KN030839
XJ **SHAQUILLE HAYES, a.k.a. "Shaq", a.k.a. "KayKay",**
2015KN030840
XJ **OSHANE FYFFE,**
2015KN050906
X **MARVIN JULIEN, a.k.a. "Scope",**
XJ **COREY ROBERTS, a.k.a. "Fresh",**
2015KN045870
X **JEAN FREMONT, a.k.a. "Juno",**
X **PAOLO ALFARO BARBER, a.k.a. "Chico,"**

DEFENDANTS.

-----X

IND. #6927-2015

VIOLENT
CRIMINAL
ENTERPRISES

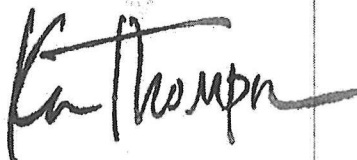
Information Pursuant
to Criminal Procedure
Law §200.60(2)

BE IT REMEMBERED:

That **THE DISTRICT ATTORNEY OF THE COUNTY OF KINGS**, by this information, hereby accuses the defendant **KENNY DORCEAN**, a.k.a. "Stacks," of having previously been convicted of another crime, prior to the commission of the crime of Criminal Possession of a Weapon in the Third Degree, of which he now stands under Indictment #6927/2015, filed in this court on January 25, 2016, which said previous conviction of a crime is as follows:

Defendant **KENNY DORCEAN**, a.k.a. "Stacks," on May 13, 2014, was duly convicted of the crime of Criminal Possession of a Controlled Substance in the Third Degree, in the Supreme Court of the State of New York, held in and for Kings County, before the Honorable M. Sciarrino.

Dated: January 25, 2016
Brooklyn, New York

A handwritten signature in dark ink, appearing to read "Ken Thompson", with a stylized, sweeping flourish extending from the end of the name.

Hon. Kenneth P. Thompson
District Attorney
Kings County

SUPREME COURT OF THE STATE OF NEW YORK;
KINGS COUNTY: PART 40

-----X

THE PEOPLE OF THE STATE OF NEW YORK

-against-

XJ KWYME WADDELL, a.k.a. "K",
X DAVID SIMONISE, a.k.a. "Preme",
X JAQUAN FRASER, a.k.a. "Bashie",
XJ RAHIM VINCENT, a.k.a. Spence Kashif,
a.k.a. "Ahim", a.k.a. "Rakim", a.k.a. Keemy",
2015KN083655
X CHRISTIAN WILLIAMS, a.k.a. "Zone",
X DENS MARCELLUS, a.k.a. "Denz",
X JEROME MYRIE, a.k.a. "Rome",
X JARMEL BLAKE, a.k.a. "Sha Murda",
X JAVANNI MOISE, a.k.a. "Billz",
XJ DELEON HUTCHINSON, a.k.a. "Delly",
2014KN047696
XJ KENNY DORCEAN, a.k.a. "Stacks",
2014KN041147
XJ TYREEK HAYES, a.k.a. "Ty General",
2015KN030839
XJ SHAQUILLE HAYES, a.k.a. "Shaq", a.k.a. "KayKay",
2015KN030840
XJ OSHANE FYFFE,
2015KN050906
X MARVIN JULIEN, a.k.a. "Scope",
XJ COREY ROBERTS, a.k.a. "Fresh",
2015KN045870
X JEAN FREMONT, a.k.a. "Juno",
X PAOLO ALFARO BARBER, a.k.a. "Chico,"

DEFENDANTS.

-----X

IND. #6927-2015

**VIOLENT
CRIMINAL
ENTERPRISES**

Information Pursuant to
Criminal Procedure
Law §200.60(2)

BE IT REMEMBERED:

That **THE DISTRICT ATTORNEY OF THE COUNTY OF KINGS**, by this information, hereby accuses the defendant **TYREEK HAYES**, a.k.a. "Ty General," of having previously been convicted of another crime, prior to the commission of the crime of Criminal Possession of a Weapon in the Third Degree, of which he now stands under Indictment #6927/2015, filed in this court on January 25, 2016, which said previous conviction of a crime is as follows:

Defendant **TYREEK HAYES**, a.k.a. "Ty General," on January 7, 2014, was duly convicted of the crime of Criminal Possession of a Weapon in the Fourth Degree, in the Criminal Court of the City of New York, held in and for Kings County, before the Honorable D. Douglas.

Dated: January 25, 2016
Brooklyn, New York

A handwritten signature in black ink, appearing to read "Ken Thompson", written over a horizontal line.

Hon. Kenneth P. Thompson
District Attorney
Kings County

**SUPREME COURT OF THE STATE OF NEW YORK;
KINGS COUNTY: PART 40**

-----X

THE PEOPLE OF THE STATE OF NEW YORK

-against-

XJ KWYME WADDELL, a.k.a. "K",
X DAVID SIMONISE, a.k.a. "Preme",
X JAQUAN FRASER, a.k.a. "Bashie",
XJ RAHIM VINCENT, a.k.a. Spence Kashif,
a.k.a. "Ahim", a.k.a. "Rakim", a.k.a. Keemy",
2015KN083655
X CHRISTIAN WILLIAMS, a.k.a. "Zone",
X DENS MARCELLUS, a.k.a. "Denz",
X JEROME MYRIE, a.k.a. "Rome",
X JARMEL BLAKE, a.k.a. "Sha Murda",
X JAVANNI MOISE, a.k.a. "Billz",
XJ DELEON HUTCHINSON, a.k.a. "Delly",
2014KN047696
XJ KENNY DORCEAN, a.k.a. "Stacks",
2014KN041147
XJ TYREEK HAYES, a.k.a. "Ty General",
2015KN030839
XJ SHAQUILLE HAYES, a.k.a. "Shaq", a.k.a. "KayKay",
2015KN030840
XJ OSHANE FYFFE,
2015KN050906
X MARVIN JULIEN, a.k.a. "Scope",
XJ COREY ROBERTS, a.k.a. "Fresh",
2015KN045870
X JEAN FREMONT, a.k.a. "Juno",
X PAOLO ALFARO BARBER, a.k.a. "Chico,"

DEFENDANTS.

-----X

IND. #6927-2015

**VIOLENT
CRIMINAL
ENTERPRISES**

**Information Pursuant to
Criminal Procedure
Law §200.60(2)**

BE IT REMEMBERED:

That **THE DISTRICT ATTORNEY OF THE COUNTY OF KINGS**, by this information, hereby accuses the defendant **SHAQUILLE HAYES**, a.k.a. "Shaq", a.k.a. "KayKay", of having previously been convicted of another crime, prior to the commission of the crime of Criminal Possession of a Weapon in the Third Degree, of which he now stands under Indictment #6927/2015, filed in this court on January 25, 2016, which said previous conviction of a crime is as follows:

Defendant **SHAQUILLE HAYES**, a.k.a. "Shaq", a.k.a. "KayKay", on April 6, 2015, was duly convicted of the crime of Attempted Criminal Possession of a Weapon in the Second Degree, in the Supreme Court of the State of New York, held in and for Kings County, before the Honorable W. Miller.

Dated: January 25, 2016
Brooklyn, New York

A handwritten signature in black ink, appearing to read "Ken Thompson", with a long horizontal flourish extending to the right.

Hon. Kenneth P. Thompson
District Attorney
Kings County

**SUPREME COURT OF THE STATE OF NEW YORK;
KINGS COUNTY: PART 40**

-----X

THE PEOPLE OF THE STATE OF NEW YORK

-against-

XJ KWYME WADDELL, a.k.a. "K",
X DAVID SIMONISE, a.k.a. "Preme",
X JAQUAN FRASER, a.k.a. "Bashie",
XJ RAHIM VINCENT, a.k.a. Spence Kashif,
a.k.a. "Ahim", a.k.a. "Rakim", a.k.a. Keemy",
2015KN083655
X CHRISTIAN WILLIAMS, a.k.a. "Zone",
X DENS MARCELLUS, a.k.a. "Denz",
X JEROME MYRIE, a.k.a. "Rome",
X JARMEL BLAKE, a.k.a. "Sha Murda",
X JAVANNI MOISE, a.k.a. "Billz",
XJ DELEON HUTCHINSON, a.k.a. "Delly",
2014KN047696
XJ KENNY DORCEAN, a.k.a. "Stacks",
2014KN041147
XJ TYREEK HAYES, a.k.a. "Ty General",
2015KN030839
XJ SHAQUILLE HAYES, a.k.a. "Shaq", a.k.a. "KayKay",
2015KN030840
XJ OSHANE FYFFE,
2015KN050906
X MARVIN JULIEN, a.k.a. "Scope",
XJ COREY ROBERTS, a.k.a. "Fresh",
2015KN045870
X JEAN FREMONT, a.k.a. "Juno",
X PAOLO ALFAROBARBER, a.k.a. "Chico,"

DEFENDANTS.

-----X

IND. #6927-2015

**VIOLENT
CRIMINAL
ENTERPRISES**

Information Pursuant
to Criminal Procedure
Law §200.60(2)

BE IT REMEMBERED:

That THE DISTRICT ATTORNEY OF THE COUNTY OF KINGS, by this information, hereby accuses the defendant RAHIM VINCENT, a.k.a. "Spence Kashif", a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. Keemy," of having previously been convicted of another crime, prior to the commission of the crime of Criminal Possession of a Weapon in the Third Degree, of which he now stands under Indictment #6927/2015, filed in this court on January 25, 2016, which said previous conviction of a crime is as follows:

Defendant RAHIM VINCENT, a.k.a. "Spence Kashif", a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. Keemy," on January 8, 2015, was duly convicted of the crime of Aggravated Unlicensed Operation of a Motor Vehicle in the First Degree, in the Supreme Court of the State of New York, held in and for Kings County, before the Honorable E. Foley.

Dated: January 25, 2016
Brooklyn, New York

A handwritten signature in black ink, appearing to read "K. Thompson", written over a horizontal line.

Hon. Kenneth P. Thompson
District Attorney
Kings County

SUPREME COURT OF THE STATE OF NEW YORK;
KINGS COUNTY: PART 40

X

THE PEOPLE OF THE STATE OF NEW YORK

-against-

XJ KWYME WADDELL, a.k.a. "K,"
X DAVID SIMONISE, a.k.a. "Preme,"
X JAQUAN FRASER, a.k.a. "Bashie,"
XB RAHIM VINCENT, a.k.a. "Spence Kashif,"
a.k.a. "Ahim," a.k.a. "Rakim," a.k.a. "Keemy,"
2015KN083655
X CHRISTIAN WILLIAMS, a.k.a. "Zone,"
X DENS MARCELLUS, a.k.a. "Denz,"
X JEROME MYRIE, a.k.a. "Rome,"
X JARMEL BLAKE, a.k.a. "Sha Murda,"
X JAVANNI MOISE, a.k.a. "Billz,"
XJ DELEON HUTCHINSON, a.k.a. "Delly,"
2014KN047696
XJ KENNY DORCEAN, a.k.a. "Stacks,"
2014KN041147
XJ TYREEK HAYES, a.k.a. "Ty General,"
2015KN030839
XJ SHAQUILLE HAYES,
a.k.a. "Shaq," a.k.a. "KayKay,"
2015KN030840
XC OSHANE FYFFE,
2015KN050906
X MARVIN JULIEN, a.k.a. "Scope,"
XJ COREY ROBERTS, a.k.a. "Fresh,"
2015KN045870
X JEAN FREMONT, a.k.a. "Juno,"
X PAOLO ALFAROBARBER, a.k.a. "Chico,"

DEFENDANTS.

X

IND. #6927-2015

THIS INDICTMENT
SUPERSEDES:

5227/2014

4452/2014

3828/2015

5609/2015

Resubmission of:
6014/2015

VIOLENT
CRIMINAL
ENTERPRISES
BUREAU

Assigned Judge:
Hon. Martin P. Murphy

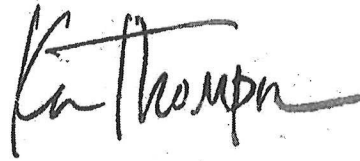
STATEMENT OF
READINESS
PURSUANT TO C.P.L.
§30.30

CRIMINAL TERM ARR/MOT
SUPREME COURT KINGS
2016 JAN 25 PM 3:22

PLEASE TAKE NOTICE that the People are ready for trial in the above-captioned matter.

PLEASE TAKE NOTICE that the undersigned will be the Assistant District Attorneys assigned to the trial of this case on behalf of the People. Accordingly, all correspondence, requests, demands, inquiries, papers, notices and motions should be addressed to one or both of them at the Office of the Kings County District Attorney, 350 Jay Street, Brooklyn, New York 11201.

Dated: January 25, 2016
Brooklyn, New York



Respectfully submitted,
KENNETH P. THOMPSON
KINGS COUNTY DISTRICT ATTORNEY

By: 

Jonathan R. Sennett
Assistant District Attorney
Violent Criminal Enterprises Bureau

CRIMINAL TERM ARR/MOT
SUPREME COURT KINGS
2016 JAN 25 PM 3:22