

IN THE DISTRICT COURT OF THE UNITED STATES

for the Western District of New York

MAY 2014 GRAND JURY
(Impaneled 5/9/2014)

THE UNITED STATES OF AMERICA

INDICTMENT

-vs-

14-CR-2145

JEFFERY GRAHAM a/k/a Twenty
(Counts 1, 13, 29, 36, 40)

REUBEN FEARS a/k/a Jay
(Counts 1, 7, 19, 38),

DERRICK PATTERSON a/k/a Dinky a/k/a
Post

(Counts 1, 8, 33, 37),
CRAIG ELDRIDGE

(Counts 1, 23, 26),
CHARLES ROSE a/k/a Chuck

(Counts 1, 3, 18),
LARON THOMPSON

(Counts 1, 9, 11, 35),
SHARON THOMPSON a/k/a Kintae

(Counts 1-2),
WALDEMAR PABON

(Counts 1, 4, 6, 34),
REGINALD ROYAL, JR.

(Counts 1, 15, 16, 17),
SHAVON ROYAL a/k/a Sir

(Counts 1, 5, 27),
JAMES SULLIVAN

(Counts 1, 12, 31, 32),
THEODORE HINES a/k/a Teddy

(Counts 10, 14, 21, 24, 25),
TARRELL HENDRIX

(Counts 1, 28, 30),
THOMAS HAKEEM

(Count 1),

Violations:

Title 21, United States Code,
Sections 841(a)(1), 846, and 860(a)
(40 Counts and Forfeiture Allegation)

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UNITED STATES DISTRICT COURT CLERK
WESTERN DISTRICT OF NEW YORK

DEC 5 2014

BY: 

TERRY WILLIAMS

(Count 1),

EDWARD GREEN

(Counts 1, 20, 22),

LAFERALD HINES

(Counts 1, 39), and

CHARISMA ROYSTER

(Count 31)

COUNT 1

(Conspiracy)

The Grand Jury Charges That:

Between at least as early as in or about early 2014, the exact date being unknown, and on or about the date of the return of this Indictment, in the Western District of New York, and elsewhere, the defendants, JEFFERY GRAHAM a/k/a Twenty, REUBEN FEARS a/k/a Jay, DERRICK PATTERSON a/k/a Dinky a/k/a Post, CRAIG ELDRIDGE, CHARLES ROSE a/k/a Chuck, LARON THOMPSON, SHARON THOMPSON a/k/a Kintae, WALDEMAR PABON, REGINALD ROYAL, JR., SHAVON ROYAL a/k/a Sir, JAMES SULLIVAN, TARRELL HENDRIX, THOMAS HAKEEM, TERRY WILLIAMS, EDWARD GREEN, and LAFERALD HINES did knowingly, willfully and unlawfully combine, conspire and agree together and with others, known and unknown, to commit the following offenses, that is:

(a) to possess with intent to distribute, and to distribute, 280 grams or more of a mixture and substance containing cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); and

(b) on and within 1,000 feet of the real property comprising housing facilities owned by a public housing authority, that is, the Lackawanna Municipal Housing Authority, to possess with intent to distribute, and to distribute, 280 grams or more of a mixture and substance containing cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about May 7, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **SHARON THOMPSON a/k/a Kintae**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 3

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about May 22, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, CHARLES ROSE a/k/a Chuck, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 4

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about May 27, 2014, in the Western District of New York, the defendant, WALDEMAR PABON, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about May 30, 2014, in the Western District of New York, the defendant, **SHAVON ROYAL a/k/a Sir**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about May 30, 2014, in the Western District of New York, the defendant, **WALDEMAR PABON**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 7

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about June 3, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, REUBEN FEARS a/k/a Jay, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 8

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about June 9, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, DERRICK PATTERSON a/k/a Dinky a/k/a Post, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 9

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about June 10, 2014, in the Western District of New York, the defendant, **LARON THOMPSON**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 10

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about June 13, 2014, in the Western District of New York, the defendant, **THEODORE HINES a/k/a Teddy**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 11

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about June 18, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, LARON THOMPSON, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 12

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about June 25, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, JAMES SULLIVAN, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 13

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about July 1, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **JEFFERY GRAHAM a/k/a Twenty**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 14

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about July 3, 2014, in the Western District of New York, the defendant, **THEODORE HINES a/k/a Teddy**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 15

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about July 9, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **REGINALD ROYAL, JR.**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 16

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about July 17, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Baker Homes Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **REGINALD ROYAL, JR.**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 17

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about July 18, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Baker Homes Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, REGINALD ROYAL, JR., did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 18

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about August 14, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, CHARLES ROSE a/k/a Chuck, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 19

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about August 15, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, REUBEN FEARS a/k/a Jay, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 20

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about August 18, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Baker Homes Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, EDWARD GREEN, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 21

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about August 19, 2014, in the Western District of New York, the defendant, **THEODORE HINES a/k/a Teddy**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 22

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about August 19, 2014, in the Western District of New York, the defendant, **EDWARD GREEN**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 23

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about August 20, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **CRAIG ELDRIDGE**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 24

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about August 22, 2014, at approximately 11:30 a.m., in the Western District of New York, the defendant, **THEODORE HINES a/k/a Teddy**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 25

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about August 22, 2014, at approximately 12:40 p.m., in the Western District of New York, the defendant, **THEODORE HINES a/k/a Teddy**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 26

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about August 25, 2014, in the Western District of New York, the defendant, **CRAIG ELDRIDGE**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 27

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about August 25, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **SHAVON ROYAL a/k/a Sir**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 28

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about August 26, 2014, in the Western District of New York, the defendant, **TARRELL HENDRIX**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 29

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about August 27, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **JEFFERY GRAHAM a/k/a Twenty**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 30

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about August 29, 2014, in the Western District of New York, the defendant, **TARRELL HENDRIX**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 31

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about September 15, 2014, in the Western District of New York, the defendants, JAMES SULLIVAN and CHARISMA ROYSTER, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 32

(Possession with Intent to Distribute and Distribution of Cocaine Base)

The Grand Jury Further Charges That:

On or about September 16, 2014, in the Western District of New York, the defendant, JAMES SULLIVAN, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 33

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about September 24, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **DERRICK PATTERSON a/k/a Dinky a/k/a Post**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 34

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about September 26, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, **WALDEMAR PABON**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II

controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 35

**(Possession with Intent to Distribute Cocaine Base
Within 1,000 Feet of Public Housing Property)**

The Grand Jury Further Charges That:

On or about October 10, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, LARON THOMPSON, did knowingly, intentionally and unlawfully possess with intent to distribute cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 36

**(Possession with Intent to Distribute and Distribution of
Cocaine Base Within 1,000 Feet of Public Housing Property)**

The Grand Jury Further Charges That:

On or about October 14, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant, JEFFERY GRAHAM a/k/a Twenty, did knowingly, intentionally and

unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 37

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about October 24, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the defendant **DERRICK PATTERSON a/k/a Dinky a/k/a Post**, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 38

(Possession with Intent to Distribute and Distribution of Cocaine Base Within 1,000 Feet of Public Housing Property)

The Grand Jury Further Charges That:

On or about October 25, 2014, in the Western District of New York, on and within 1,000 feet of the real property comprising the Gates Housing Projects, a housing facility owned by the Lackawanna Municipal Housing Authority, a public housing authority, the

defendant, REUBEN FEARS a/k/a Jay, did knowingly, intentionally and unlawfully possess with intent to distribute, and distribute, cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 860(a).

COUNT 39

(Possession of Cocaine Base with Intent to Distribute)

The Grand Jury Further Charges That:

On or about November 26, 2014, in the Western District of New York, the defendant, LAFERALD HINES, did knowingly, intentionally and unlawfully possess with intent to distribute cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 40

(Possession of 28 Grams or More of Cocaine Base with Intent to Distribute)

The Grand Jury Further Charges That:

On or about November 28, 2014, in the Western District of New York, the defendant, JEFFERY GRAHAM a/k/a Twenty, did knowingly, intentionally and unlawfully possess with intent to distribute 28 grams or more of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of Count 1 of the Indictment and/or upon conviction for any other offense for which they are respectively charged in Counts 2 through 40 of this Indictment, the defendants, JEFFERY GRAHAM a/k/a Twenty, REUBEN FEARS a/k/a Jay, DERRICK PATTERSON a/k/a Dinky a/k/a Post, CRAIG ELDRIDGE, CHARLES ROSE a/k/a Chuck, LARON THOMPSON, SHARON THOMPSON a/k/a Kintae, WALDEMAR PABON, REGINALD ROYAL, JR., SHAVON ROYAL a/k/a Sir, JAMES SULLIVAN, THEODORE HINES a/k/a Teddy, TARRELL HENDRIX, THOMAS HAKEEM, TERRY WILLIAMS, EDWARD GREEN, and LAFERALD HINES, severally and jointly, shall forfeit to the United States any and all property constituting and derived from any proceeds obtained, directly and indirectly, as a result of such violations and any and all property used, and intended to be used, in any manner and part, to commit and to facilitate the commission of such violations, including, but not limited to:

MONETARY JUDGMENT:

The sum of TWO-HUNDRED AND FIFTY THOUSAND DOLLARS (\$250,000.00) in United States Currency, to be evidenced by a monetary judgment issued by this Court in aforesaid amount. Said judgment amount to be held joint and severally will accrue at the prevailing rate per annum and serve as a judgment and lien against defendant's property, wherever situated until fully satisfied.

It is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All pursuant to Sections 853(a)(1) and 853(p) of Title 21 of the United States Code.

DATED: Buffalo, New York, December 5, 2014.

WILLIAM J. HOCHUL, JR.
United States Attorney

BY: S/EDWARD H. WHITE
Assistant United States Attorney
United States Attorney's Office
Western District of New York
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Buffalo, New York 14202
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A TRUE BILL:

S/FOREPERSON