

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

GRAND JURY N-14-1

UNITED STATES OF AMERICA

CRIMINAL NO. 3:15CR 174 (AWT)

v.

JEFFREY BENTON, a.k.a. "Tall Man"
and "Fresh";

KEITH YOUNG, a.k.a. "Capo," "Bapo"
and "Poncho";

ROBERT SHORT, a.k.a. "Santana";

TREVOR MURPHY, a.k.a. "Snookie";

ROBERT HARRIS, a.k.a. "Skully
Mack"; and

CHRISTOPHER GRAHAM, a.k.a.
"Ugg"

VIOLATIONS:

18 U.S.C. § 1962(c) (Engaging in a pattern of
racketeering activity)

18 U.S.C. § 1962(d) (Conspiracy to engage in a
pattern of racketeering activity)

18 U.S.C. § 1959(a)(1) (VCAR murder)

18 U.S.C. § 1959(a)(3) (VCAR assault with a
dangerous weapon)

18 U.S.C. § 1959(a)(4) (VCAR threat to commit
crime of violence)

18 U.S.C. § 1959(a)(5) (VCAR conspiracy to
commit murder)

18 U.S.C. § 1951(a) (Conspiracy to interfere with
commerce by robbery)

18 U.S.C. § 1956(a)(1)(A)(i) (Money laundering)

18 U.S.C. § 924(c) (Carrying and using a firearm
during and in relation to a crime of violence)

18 U.S.C. § 924(j)(1) (Causing the death of another
person through the use of a firearm in relation to a
crime of violence)

21 U.S.C. § 841(a)(1) (Distribution of cocaine base)

18 U.S.C. § 2 (Aiding and abetting)

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Engaging in a pattern of racketeering activity)

The Enterprise

1. At all times relevant to this Indictment, the defendants JEFFREY BENTON, a.k.a. "Tall Man" and "Fresh," KEITH YOUNG, a.k.a. "Capo," "Bapo" and "Poncho," ROBERT SHORT, a.k.a. "Santana," TREVOR MURPHY, a.k.a. "Snookie," ROBERT HARRIS, a.k.a. "Skully Mack," CHRISTOPHER GRAHAM, a.k.a. "Ugg," and others known and unknown, were members and associates of the Red Side Guerilla Brims, a criminal organization whose members and associates engaged in narcotics distribution, and acts of violence, including acts involving murder and robbery, and which operated principally in New Haven, Connecticut.

2. The Red Side Guerilla Brims, including its leadership, members and associates, constituted an "enterprise," as defined by Title 18, United States Code, Sections 1959(b)(2) and 1961(4) (hereinafter "the enterprise"), that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. The purposes of the enterprise included the following:

a. Enriching the members and associates of the enterprise through, among other things, murder, attempted murder, robbery, and the distribution of narcotics.

b. Preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, threats of violence, assaults, attempted murder and murder.

c. Promoting and enhancing the enterprise and its members' and associates' activities.

d. Keeping victims, witnesses and rival gang members in fear of the enterprise and in fear of its members and associates through threats of violence and violence.

Role of the Defendants

4. SHORT, MURPHY, HARRIS, and GRAHAM were members of the enterprise, and they acted under the direction of the leaders of the enterprise.

5. Under the direction of the leaders of the enterprise, SHORT, MURPHY, HARRIS, and GRAHAM participated in unlawful and other activities in furtherance of the conduct of the enterprise's affairs.

6. BENTON and YOUNG, who were both members of the enterprise and participated in unlawful and other activities in furtherance of the conduct of the enterprise's affairs, also held leadership roles within the enterprise at various times relevant to this Indictment.

Means and Methods of the Enterprise

7. Among the means and methods by which BENTON, YOUNG, SHORT, MURPHY, HARRIS, GRAHAM and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:

a. Members of the enterprise and their associates committed, attempted and threatened to commit acts of violence, including murder and robbery, to protect and expand the enterprise's criminal operations.

b. Members of the enterprise and their associates promoted a climate of fear through violence, threats of violence and retaliation.

c. Members of the enterprise and their associates trafficked in cocaine and cocaine base, Schedule II controlled substances.

d. Members of the enterprise engaged in money laundering to promote their narcotics trafficking operation.

The Racketeering Violation

8. From approximately 2011 through in or about 2015, in the District of Connecticut and elsewhere, defendants JEFFREY BENTON and KEITH YOUNG, together with others known and unknown, being persons employed by and associated with the Red Side Guerilla Brims, which was an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully, and knowingly conducted and participated, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, that is, through the commission of Racketeering Acts One through Seven, as set forth in paragraphs Ten through Sixteen below.

The Pattern of Racketeering Activity

9. The pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisted of the following acts:

Racketeering Act One – Conspiracy to Distribute Cocaine Base and Money Laundering

10. The defendants JEFFREY BENTON and KEITH YOUNG, and others known and unknown, committed the following acts, either of which alone constitutes the commission of Racketeering Act One:

a. Conspiracy to Distribute Cocaine Base

From in or about 2011 through in or about 2012, in the District of Connecticut and the District of Maine and elsewhere, the defendants JEFFREY BENTON and KEITH YOUNG, and

others known and unknown, unlawfully, intentionally and knowingly combined, conspired, confederated and agreed together and with each other to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base (“crack cocaine”), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 846.

b. Conspiracy to Commit Money Laundering

From in or about August 2011 through in or about November 2011, in the District of Connecticut, the District of Maine and elsewhere, the defendants JEFFREY BENTON and KEITH YOUNG knowingly combined, conspired, confederated and agreed together and with each other to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, i.e., sending Western Union money transfers in amounts ranging from \$500 to \$2,500 from Bangor, Maine to New Haven, Connecticut, which transactions involved the proceeds of a specified unlawful activity, that is, a conspiracy to distribute and to possess with intent to distribute cocaine base (“crack cocaine”), in violation of Title 21, United States Code, Section 846, with the intent to promote the carrying on of the specified unlawful activity, and that while conspiring to conduct and attempt to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(h).

All in violation of Title 18, United States Code, Section 1962(c).

Racketeering Act Two – Conspiracy to Murder Carl Williams

11. On or about February 23, 2011, in the District of Connecticut, the defendant JEFFREY BENTON, along with Luis Padilla, who is charged in a separate Information,

unlawfully, willfully, intentionally and knowingly conspired to murder Carl Williams, in violation of Conn. Gen. Stat. §§ 53a-48(a) and 53a-54a.

Racketeering Act Three – Felony Murder of Kevin Lee

12. On or about April 20, 2011, in the District of Connecticut, the defendant JEFFREY BENTON, and others, including Rodrigo Ramirez, Luis Padilla and Miles Price, all of whom are charged in separate Informations and/or Indictments, unlawfully, intentionally and knowingly attempted to commit a robbery of Kevin Lee, a marijuana distributor, and, during the course of attempting to commit the robbery, which was intended to provide monies to the Red Side Guerilla Brims, caused the death of Kevin Lee, in violation of Conn. Gen. Stat. §§ 53a-8(a) and 53a-54c (Felony murder).

Racketeering Act Four – Murder of Donnell Allick

13. On or about June 24, 2011, in the District of Connecticut, the defendants JEFFREY BENTON and KEITH YOUNG, along with Luis Padilla and Kavon Rogers, who are charged in separate Informations and/or Indictments, with the intent to cause the death of another individual, caused the death of Donnell Allick, in violation of Conn. Gen. Stat. §§ 53a-8(a) and 53a-54a.

Racketeering Act Five – Conspiracy to Murder Darrick Cooper

14. On or about September 19, 2011, in the District of Connecticut, the defendants JEFFREY BENTON and KEITH YOUNG, along with Robert Short, who is not charged in this Count, unlawfully, willfully, intentionally and knowingly conspired to murder Darrick Cooper, in violation of Conn. Gen. Stat. §§ 53a-48(a) and 53a-54a.

Racketeering Act Six – Conspiracy to Murder Marquis Moore

15. On or about October 21, 2011, in the District of Connecticut, the defendant

JEFFREY BENTON, along with Harry Anderson, a.k.a. "Ace," who is charged in a separate Indictment, unlawfully, willfully, intentionally and knowingly conspired to murder Marquis Moore, in violation of Conn. Gen. Stat. §§ 53a-48(a) and 53a-54a.

Racketeering Act Seven – Murder of Donald Bolden

16. On or about March 20, 2012, in the District of Connecticut, the defendant JEFFREY BENTON, along with Marquise Harris, who was then a member of the Red Side Guerilla Brims, but who has since been murdered, with the intent to cause the death of another individual, caused the death of Donald Bolden, in violation of Conn. Gen. Stat. §§ 53a-8(a) and 53a-54a.

All in violation of Title 18, United States Code, Section 1962(c).

COUNT TWO
(RICO Conspiracy)

17. The allegations in paragraphs 1-7 are incorporated by reference in this Count.

18. From in or about 2011 through 2015, in the District of Connecticut and elsewhere, the defendants JEFFREY BENTON and KEITH YOUNG, being persons employed by and associated with the above-described enterprise, that is, the Red Side Guerilla Brims, which was engaged in, and the activities of which affected interstate and foreign commerce, unlawfully and willfully did combine, conspire, confederate, and agree with each other, and with persons known and unknown to the grand jury, to commit an offense against the United States, to wit: to violate Title 18, United States Code, section 1962(c), that is, to conduct and participate directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5). The pattern of racketeering activity through which the defendants agreed to conduct the affairs of the enterprise consisted of the Racketeering Acts One through Seven set forth in paragraphs Ten

through Sixteen of this Indictment, incorporated by reference as if fully set forth herein. It was part of the conspiracy that each defendant agreed that a conspirator would commit two acts of racketeering.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT THREE
(VCAR Conspiracy to Murder Carl Williams)

19. The allegations in paragraphs 1-7 are incorporated by reference in this Count.

20. The Red Side Guerilla Brims, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely acts involving murder and robbery, in violation of Connecticut state law, acts indictable under Title 18, United States Code, Section 1956 (money laundering), and acts involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

21. On or about February 23, 2011, in the District of Connecticut, the defendant JEFFREY BENTON, a.k.a. "Tall Man" and "Fresh," for the purpose of maintaining and increasing position in the Red Side Guerilla Brims, an enterprise engaged in racketeering activity, as described above, together with Luis Padilla, who is charged in a separate Information, unlawfully, willfully, intentionally and knowingly conspired to murder Carl Williams, in violation of Conn. Gen. Stat. §§ 53a-48(a) and 53a-54a.

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT FOUR
(VCAR Felony Murder of Kevin Lee)

22. The allegations in paragraphs 1-7 and 20 are incorporated by reference in this Count.

23. On April 20, 2011, in the District of Connecticut, the defendant JEFFREY BENTON, a.k.a. "Tall Man" and "Fresh," for the purpose of maintaining and increasing position in the Red Side Guerilla Brims, an enterprise engaged in racketeering activity, as described above, together with others, including Rodrigo Ramirez, Luis Padilla and Miles Price, all of whom are charged in separate Informations and/or Indictments, murdered Kevin Lee; to wit BENTON, Ramirez, Padilla and Price unlawfully, intentionally and knowingly attempted to commit a robbery of Kevin Lee, a marijuana distributor, and, during the course of attempting to commit the robbery, which was intended to provide monies to the Red Side Guerilla Brims, caused the death of Kevin Lee, in violation of Conn. Gen. Stat. §§ 53a-8(a) and 53a-54c (Felony murder).

All in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

COUNT FIVE
(VCAR Murder of Donnell Allick)

24. The allegations in paragraphs 1-7 and 20 are incorporated by reference in this Count.

25. On or about June 24, 2011, in the District of Connecticut, the defendants JEFFREY BENTON, a.k.a. "Tall Man" and "Fresh," and KEITH YOUNG, a.k.a. "Capo," "Bapo" and "Poncho," for the purpose of maintaining and increasing position in the Red Side Guerilla Brims, an enterprise engaged in racketeering activity, as described above, together with others, including Luis Padilla and Kavon Rogers, both of whom are charged in separate Informations and/or Indictments, unlawfully, willfully, intentionally and knowingly murdered Donnell Allick, in violation of Conn. Gen. Stat. §§ 53a-8(a) and 53a-54a.

All in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

COUNT SIX
(VCAR Murder of Darrick Cooper)

26. The allegations in paragraphs 1-7 and 20 are incorporated by reference in this Count.

27. On or about September 19, 2011, in the District of Connecticut, the defendants KEITH YOUNG, a.k.a. "Capo," "Bapo," and "Poncho" and ROBERT SHORT, a.k.a. "Santana," for the purpose of maintaining and increasing position in the Red Side Guerilla Brims, an enterprise engaged in racketeering activity, as described above, unlawfully, willfully, intentionally and knowingly murdered Darrick Cooper, in violation of Conn. Gen. Stat. §§ 53a-8(a) and 53a-54a.

All in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

COUNT SEVEN
(VCAR Conspiracy to Murder Marquis Moore)

28. The allegations in paragraphs 1-7 and 20 are incorporated by reference in this Count.

29. On or about October 21, 2011, in the District of Connecticut, the defendant JEFFREY BENTON, a.k.a. "Tall Man" and "Fresh," for the purpose of maintaining and increasing position in the Red Side Guerilla Brims, an enterprise engaged in racketeering activity, as described above, along with Harry Anderson, a.k.a. "Ace," who is charged in a separate Indictment, unlawfully, willfully, intentionally and knowingly conspired to murder Marquis Moore, in violation of Conn. Gen. Stat. §§ 53a-48(a) and 53a-54a.

All in violation of Title 18, United States Code, Section 1959(a)(5).

COUNT EIGHT
(VCAR Murder/Felony Murder of Joseph Zargo)

30. The allegations in paragraphs 1-7 and 20 are incorporated by reference in this Count.

31. On or about December 23, 2011, in the District of Connecticut, the defendant TREVOR MURPHY, a.k.a. "Snookie," for the purpose of maintaining and increasing position in the Red Side Guerilla Brims, an enterprise engaged in racketeering activity, as described above, both (1) unlawfully, willfully, intentionally and knowingly murdered Joseph Zargo, in violation of Conn. Gen. Stat. § 53a-54a (Murder), and (2) unlawfully, intentionally and knowingly attempted to commit a robbery of Joseph Zargo, a distributor of controlled substances, and, during the course of attempting to commit the robbery, caused the death of Joseph Zargo, in violation of Conn. Gen. Stat. § 53a-54c (Felony murder).

All in violation of Title 18, United States Code, Section 1959(a)(1).

COUNT NINE
(Conspiracy to Interfere with Commerce by Robbery)

32. On or about December 23, 2011, in the District of Connecticut, the defendant TREVOR MURPHY, a.k.a. "Snookie," together with others known and unknown to the Grand Jury, did knowingly and willfully conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TEN
(VCAR Murder of Donald Bolden)

33. The allegations in paragraphs 1-7 and 20 are incorporated by reference in this Count.

34. On or about March 20, 2012, in the District of Connecticut, the defendant

JEFFREY BENTON, a.k.a. "Tall Man" and "Fresh," for the purpose of maintaining and increasing position in the Red Side Guerilla Brims, an enterprise engaged in racketeering activity, as described above, along with Marquise Harris, who was then a member of the Red Side Guerilla Brims, but who has since been murdered, unlawfully, willfully, intentionally and knowingly murdered Donald Bolden, in violation of Conn. Gen. Stat. §§ 53a-8(a) and 53a-54a.

All in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

COUNT ELEVEN

(VCAR Assault with a Dangerous Weapon of Kevin Terry)

35. The allegations in paragraphs 1-7 and 20 are incorporated by reference in this Count.

36. On or about December 23, 2014, in the District of Connecticut, the defendants ROBERT HARRIS, a.k.a. "Skully Mack," and CHRISTOPHER GRAHAM, a.k.a. "Ugg," for the purpose of maintaining and increasing position in the Red Side Guerilla Brims, an enterprise engaged in racketeering activity, as described above, unlawfully, willfully, intentionally and knowingly assaulted Kevin Terry with a dangerous weapon, in violation of Conn. Gen. Stat. §§ 53a-8(a) and 53a-60(a)(2).

All in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNT TWELVE

(VCAR Threatening to Commit Crime of Violence as to Kevin Terry)

37. The allegations in paragraphs 1-7 and 20 are incorporated by reference in this Count.

38. On or about December 23, 2014, in the District of Connecticut, the defendants ROBERT HARRIS, a.k.a. "Skully Mack," and CHRISTOPHER GRAHAM, a.k.a. "Ugg," for the purpose of maintaining and increasing position in the Red Side Guerilla Brims, an enterprise

engaged in racketeering activity, as described above, unlawfully, willfully, intentionally and knowingly threatened to commit a crime of violence as to Kevin Terry, in violation of Conn. Gen. Stat. §§ 53a-8(a) and 53a-61aa(a)(3).

All in violation of Title 18, United States Code, Sections 2 and 1959(a)(4).

COUNTS THIRTEEN THROUGH TWENTY-TWO
(Money Laundering)

39. On or about the dates set forth below, in the District of Connecticut, the District of Maine and elsewhere, the defendants JEFFREY BENTON, a.k.a. "Tall Man" and "Fresh," and KEITH YOUNG, a.k.a. "Capo," "Bapo" and "Poncho," and Rodrigo Ramirez, who is charged in a separate Information, did knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, a conspiracy to distribute and to possess with intent to distribute cocaine base ("crack cocaine"), with the intent to promote the carrying on of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

<u>COUNT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
13	August 8, 2011	Transfer of \$2,500 via Western Union from Rodrigo Ramirez in Bangor, Maine to JEFFREY BENTON in New Haven, Connecticut.
14	August 11, 2011	Transfer of \$1,500 via Western Union from Rodrigo Ramirez in Bangor, Maine to JEFFREY BENTON in New Haven, Connecticut.
15	September 16, 2011	Transfer of \$2,500 via Western Union from Rodrigo Ramirez, in Bangor, Maine to JEFFREY BENTON in New Haven, Connecticut.
16	September 23, 2011	Transfer of \$500 via Western Union from Rodrigo Ramirez in

- Bangor, Maine to JEFFREY BENTON in New Haven, Connecticut.
- 17 September 23, 2011 Transfer of \$500 via Western Union from Rodrigo Ramirez in Bangor, Maine to JEFFREY BENTON in New Haven, Connecticut.
 - 18 November 7, 2011 Transfer of \$1,150 via Western Union from KEITH YOUNG in Bangor, Maine to JEFFREY BENTON in New Haven, Connecticut.
 - 19 November 14, 2011 Transfer of \$500 via Western Union from Rodrigo Ramirez in Bangor, Maine to JEFFREY BENTON in New Haven, Connecticut.
 - 20 November 14, 2011 Transfer of \$500 via Western Union from Rodrigo Ramirez in Bangor, Maine to JEFFREY BENTON in New Haven, Connecticut.
 - 21 November 14, 2011 Transfer of \$500 via Western Union from Rodrigo Ramirez in Bangor, Maine to JEFFREY BENTON in New Haven, Connecticut.
 - 22 November 15, 2011 Transfer of \$500 via Western Union from Rodrigo Ramirez in Bangor, Maine to JEFFREY BENTON in New Haven, Connecticut.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2.

COUNT TWENTY-THREE

(Using a firearm during and in relation to a crime of violence)

40. On or about June 24, 2011, in the District of Connecticut, the defendant JEFFREY BENTON, a.k.a. "Tall Man" and "Fresh," during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: the crime charged in Count Five (VCAR murder in violation of 18 U.S.C. § 1959(a)(1)) of this Indictment, did knowingly and intentionally cause the death of Donnell Allick through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111(a).

In violation of Title 18, United States Code, Sections 924(c) and 924(j)(1).

COUNT TWENTY-FOUR

(Using a firearm during and in relation to a crime of violence)

41. On or about September 19, 2011, in the District of Connecticut, the defendant ROBERT SHORT, a.k.a. "Santana," during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: the crime charged in Count Six (VCAR murder in violation of 18 U.S.C. § 1959(a)(1)) of this Indictment, did knowingly and intentionally cause the death of Darrick Cooper through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111(a).

In violation of Title 18, United States Code, Sections 924(c) and 924(j)(1).

COUNT TWENTY-FIVE

(Using a firearm during and in relation to a crime of violence)

42. On or about December 23, 2011, in the District of Connecticut, the defendant TREVOR MURPHY, a.k.a. "Snookie," during and in relation to crimes of violence for which he may be prosecuted in a court of the United States, to wit: the crimes charged in Counts Eight (VCAR murder in violation of 18 U.S.C. § 1959(a)(1)) and Nine (Hobbs Act robbery in violation of 18 U.S.C. § 1951) of this Indictment, did knowingly and intentionally cause the death of Joseph Zargo through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111(a).

In violation of Title 18, United States Code, Sections 924(c) and 924(j)(1).

COUNT TWENTY-SIX

(Brandishing a firearm during and in relation to a crime of violence)

43. On or about December 23, 2014, in the District of Connecticut, the defendants ROBERT HARRIS, a.k.a. "Skully Mack," and CHRISTOPHER GRAHAM, a.k.a. "Ugg," did knowingly brandish, carry and use a firearm during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, that is, violations of Title 18,

United States Code, Sections 1959(a)(3) and 1959(a)(4), as set forth in Counts Eleven and Twelve of this Indictment.

In violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A).

COUNT TWENTY-SEVEN
(Distribution of cocaine base)

44. On or about June 3, 2014, in the District of Connecticut, the defendant ROBERT HARRIS, a.k.a. "Skully Mack," along with Delton Pyles, who is charged in a separate Information, did knowingly and intentionally possess with the intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT
(Distribution of cocaine base)

45. On or about June 4, 2014, in the District of Connecticut, the defendant ROBERT HARRIS, a.k.a. "Skully Mack," did knowingly and intentionally possess with the intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

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

COUNT TWENTY-NINE
(Possession with intent to distribute cocaine base)

46. On or about October 10, 2014, in the District of Connecticut, the defendant CHRISTOPHER GRAHAM, a.k.a. "Ugg," did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

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

COUNT THIRTY
(Distribution of cocaine base)

47. On or about December 5, 2014, in the District of Connecticut, the defendant CHRISTOPHER GRAHAM, a.k.a. "Ugg," did knowingly and intentionally possess with the intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

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

COUNT THIRTY-ONE
(Distribution of cocaine base)

48. On or about December 9, 2014, in the District of Connecticut, the defendant CHRISTOPHER GRAHAM, a.k.a. "Ugg," did knowingly and intentionally possess with the intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

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

COUNT THIRTY-TWO
(Distribution of cocaine base)

49. On or about December 19, 2014, in the District of Connecticut, the defendant CHRISTOPHER GRAHAM, a.k.a. "Ugg," did knowingly and intentionally possess with the intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

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

COUNT THIRTY-THREE
(Possession with intent to distribute cocaine base)

50. On or about December 23, 2014, in the District of Connecticut, the defendant

COUNT THIRTY-THREE

(Possession with intent to distribute cocaine base)

50. On or about December 23, 2014, in the District of Connecticut, the defendant CHRISTOPHER GRAHAM, a.k.a. "Ugg," did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

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

COUNT THIRTY-FOUR

(Possession with intent to distribute cocaine base)

51. On or about December 30, 2014, in the District of Connecticut, the defendant CHRISTOPHER GRAHAM, a.k.a. "Ugg," did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance.

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

A TRUE BILL

/s/

FOREPERSON

UNITED STATES OF AMERICA



DEIRDRE M. DALY
UNITED STATES ATTORNEY



ROBERT M. SPECTOR
ASSISTANT UNITED STATES ATTORNEY



PETER D. MARKLE
ASSISTANT UNITED STATES ATTORNEY