

SUPREME COURT OF THE STATE OF NEW YORK
SUFFOLK COUNTY: CRIMINAL TERM

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THE PEOPLE OF THE STATE OF NEW YORK,

**VIOLENT CRIMINAL
ENTERPRISES BUREAU**

INDICTMENT NUMBER

-against-

1. **LATIQUE JOHNSON**, also known as "La Brim,"
2. **JUSSIAH HERBERT**, also known as "Lokko,"
3. **OUMAR BARRY**, also known as "Dollo,"
4. **JAYVONTE NASH**, also known as "Barney,"
5. **OCTAVIOUS ROSE**, also known as "Skar,"
6. **JANELL JOHNSON**, also known as "Jah Jah,"
7. **DONOVAN CANNON**, also known as "Don Dollaz,"
8. **RAYMOND VILLEGAS**, also known as "Chase Mula,"
9. **KARIEM HARRELL**, also known as "Ghost,"
10. **JERMAINE JACKSON**, also known as "JJ,"
11. **ISAIAH BEAUFORD**, also known as "Benji,"
12. **KAMAR ADDISON**, also known as "Ky,"
13. **KHAMARI ELIE**, also known as "Mari,"
14. **JAIDAN BEAUBRUN**, also known as "Snipe,"
15. **KEYSEAN MEADE**, also known as "Key,"
16. **JOEL BADGER**, also known as "Suvy,"
17. **REYMON RODRIGUEZ**, also known as "Spazzo,"
18. **OMARIAN FRANCIS**, also known as "Mari,"
19. **AMIS BONNER**, also known as "Meechie,"

20. **JAVON HOLLIDAY**, also known as “Stakkz,”

21. **ERIC ROMAN**, also known as “E Dot,”

22. **ANDREW LITTLE**, also known as “A Dot,”

23. **MARWAN GHANEM**, also known as “M Dot,”

24. **ACOREY HOBBS**, also known as “Demon,”

25. **JAHEIM WOODSON**

26. **HORACE HIBBERT**

27. **SHANECKE TINCH**

28. **AARON BEATTY**

29. **MAHKI TAYLOR**

30. **TANAYA LOVE**

31. **GIAVANNA PERGOLA**

Defendants.

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CT 1. PL § 105.15	CONSPIRACY IN THE SECOND DEGREE [Class B Felony]
CT 2. PL § 105.10(1)	CONSPIRACY IN THE FOURTH DEGREE [Class E Felony]
CT 3. PL § 105.10(1)	CONSPIRACY IN THE FOURTH DEGREE [Class E Felony]
CT 4. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 5. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 6. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]
CT 7. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 8. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 9. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 10. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 11. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]
CT 12. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]
CT 13. PL § 120.05(2)	ASSAULT IN THE SECOND DEGREE [Class D Violent Felony]
CT 14. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 15. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 16. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 17. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]

CT 18. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]
CT 19. PL § 265.11(2)	CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE [Class D Violent Felony]
CT 20. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 21. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 22. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 23. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 24. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]
CT 25. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 26. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 27. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 28. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 29. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]
CT 30. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 31. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 32. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 33. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 34. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]

CT 35. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]
CT 36. PL § 265.01-b(1)	CRIMINAL POSSESSION OF A FIREARM [Class E Felony]
CT 37. PL § 265.01-b(1)	CRIMINAL POSSESSION OF A FIREARM [Class E Felony]
CT 38. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 39. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 40. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]
CT 41. PL § 110/125.25(1)	ATTEMPTED MURDER IN THE SECOND DEGREE [Class B Violent Felony]
CT 42. PL § 110/120.10(1)	ATTEMPTED ASSAULT IN THE FIRST DEGREE [Class C Violent Felony]
CT 43. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 44. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 45. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 46. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 47. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 48. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 49. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 50. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 51. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]
CT 52. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]

CT 53. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 54. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 55. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 56. PL § 220.09(1)	CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE [Class C Felony]
CT 57. PL § 220.03	CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE [Class A Misdemeanor]
CT 58. PL 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 59. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 60. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 61. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 62. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 63. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 64. PL § 120.25	RECKLESS ENDANGERMENT IN THE FIRST DEGREE [Class D Felony]
CT 65. PL § 120.10(1)	ASSAULT IN THE FIRST DEGREE [Class B Violent Felony]
CT 66. PL § 160.15(1)	ROBBERY IN THE FIRST DEGREE [Class B Violent Felony]
CT 67. PL § 160.15(2)	ROBBERY IN THE FIRST DEGREE [Class B Violent Felony]
CT 68. PL § 160.10(1)	ROBBERY IN THE SECOND DEGREE [Class C Violent Felony]
CT 69. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 70. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]

CT 71. PL § 265.01-b(1)	CRIMINAL POSSESSION OF A FIREARM [Class E Felony]
CT 72. PL § 205.60	HINDERING PROSECUTION IN THE SECOND DEGREE [Class E Felony]
CT 73. PL § 155.35(1)	GRAND LARCENY IN THE THIRD DEGREE [Class D Felony]
CT 74. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 75. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 76. PL § 110/120.10(1)	ATTEMPTED ASSAULT IN THE FIRST DEGREE [Class C Violent Felony]
CT 77. PL § 160.15(4)	ROBBERY IN THE FIRST DEGREE [Class B Violent Felony]
CT 78. PL § 160.15(2)	ROBBERY IN THE FIRST DEGREE [Class B Violent Felony]
CT 79. PL § 160.10(2)(a)	ROBBERY IN THE SECOND DEGREE [Class C Violent Felony]
CT 80. PL § 160.10(1)	ROBBERY IN THE SECOND DEGREE [Class C Violent Felony]
CT 81. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 82. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 83. PL § 265.01-b(1)	CRIMINAL POSSESSION OF A FIREARM [Class E Felony]
CT 84. PL § 160.15(4)	ROBBERY IN THE FIRST DEGREE [Class B Violent Felony]
CT 85. PL § 160.15(3)	ROBBERY IN THE FIRST DEGREE [Class B Violent Felony]
CT 86. PL § 160.10(1)	ROBBERY IN THE SECOND DEGREE [Class C Violent Felony]
CT 87. PL § 160.10(2)(a)	ROBBERY IN THE SECOND DEGREE [Class C Violent Felony]
CT 88. PL § 120.05(2)	ASSAULT IN THE SECOND DEGREE [Class D Violent Felony]
CT 89. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 90. PL 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]

CT 91. PL § 220.16(1)	CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [Class B Felony]
CT 92. PL § 220.06(5)	CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE [Class D Felony]
CT 93. PL § 155.35(1)	GRAND LARCENY IN THE THIRD DEGREE [Class D Felony]
CT 94. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 95. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 96. PL § 220.16(1)	CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [Class B Felony]
CT 97. PL § 220.16(12)	CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [Class B Felony]
CT 98. PL § 220.16(1)	CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [Class B Felony]
CT 99. PL § 220.09(1)	CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE [Class C Felony]
CT 100. PL § 220.16(1)	CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [Class B Felony]
CT 101. PL § 220.16(12)	CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE [Class B Felony]
CT 102. PL § 265.03(3)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]
CT 103. PL § 265.03(1)(b)	CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE [Class C Violent Felony]

THE CONSPIRACIES

At all times relevant to the conspiracies, the defendants and others, both known and unknown, were members or associates of a criminal street organization that referred to themselves as the “Afghan” set of the BLOODHOUND BRIMS (hereinafter “BHB”) also known as the “Jets.” BHB is a subset of the larger criminal street organization known as the “New York Blood Brim Army,” a faction of the nation-wide “Bloods” street gang. BHB operated throughout Suffolk and Nassau counties but primarily centered their criminal activities during this conspiracy period in the hamlets of Bay Shore, Coram, Mastic and the town of Riverhead in Suffolk County, New York.

On or about and between August 23, 2021 to the date of this indictment, BHB members, including their associates, sought to: (a) establish and enforce a set of rules, laws and hierarchy, within their own ranks; (b) make money for the organization through criminal acts, primarily armed robberies, narcotics sales and proceeds from stolen vehicles; (c) establish, maintain and expand geographic control and dominance over their territories, including correctional facilities, through acts of violence; (d) exact revenge against rival street gangs, specifically the HIT SQUAD BRIMS (hereinafter “HSB”), MAC BALLA BLOODS (hereinafter “MBB”), 9-TREY BLOODS (hereinafter “9-TREY”), and others, as well as specific individuals for violence or perceived disrespect against BHB members and their associates; (e) engage in violent acts to further enhance the status, prestige and reputation of BHB and their associates within their communities.

To achieve these goals, the defendants and other members of BHB, including their associates, participated in, and agreed to embark upon a certain course of criminal conduct, which included but was not limited to: armed assaults, armed robberies, larcenies and shootings against perceived rival gang members, specific individuals and innocent bystanders to further the prestige and violent reputation of BHB throughout the community.

Throughout the course of these conspiracies, BHB members and associates adhered to an oath, strict set of commands and established hierarchy. This was formalized in writing distributed to BHB members (hereinafter "BHB PAPERWORK") upon admission into the gang. The BHB PAPERWORK detailed the requirements of BHB membership, consequences of disobedience, and roles for specific ranks within the hierarchy. BHB members pledged loyalty and adherence to the gang, specifically pledging "death to all those who go against this set." In their "commandments," BHB members were ordered to not cooperate with law enforcement, contribute money to BHB and high-ranking BHB members, and commit violent acts, specifically shootings against any individual or gang that disrespects BHB. BHB members were additionally commanded to always communicate within the hierarchy and to use a distinctive system of coded words to communicate with one another verbally, to avoid detection by law enforcement and prove loyalty to the gang.

It was part of this conspiracy for the high-ranking members of BHB to order lower-ranking BHB members to commit acts of violence such as shootings and armed robberies for the lower-ranking members to prove their loyalty and worth to BHB. It was further part of these conspiracies for the lower-ranking BHB members to seek approval and inform high ranking members of the criminal activities they committed related to their membership within BHB. Following these acts of violence, high-ranking BHB members frequently "promoted" lower-ranking members within the gang, rewarding the lower-ranking members with status and more prestige for furthering BHB objectives.

It was part of these conspiracies for the defendants and other members of BHB, including their associates, to possess, secrete, transport, and keep readily available loaded firearms and ammunition which were made available to BHB members and their associates for the purpose of engaging in deadly acts of violence.

It was also part of these conspiracies for the defendants and other members of BHB, including their associates, to steal vehicles, and keep these stolen vehicles readily available for members and associates of BHB to commit deadly acts of violence directed at rival gang members. These stolen vehicles were also used to disguise the identity of BHB members and associates and transport firearms.

It was further part of these conspiracies for the defendants and other members of BHB, including their associates, to commit robberies, sell drugs and steal vehicles to acquire funds to pay into the “kitty” or funds for the gang. These funds were used to post bail for fellow BHB members, to fund the commissary accounts of incarcerated BHB members or to pay higher-ranking members such as LATIQUE JOHNSON a.k.a. “La Brim,” the founder of BHB to show continued loyalty to BHB. JOHNSON would punish those who did not pay into the “kitty” or pay him BHB dues by kicking those members out of BHB, a process known as “missing a flight.”

During the course of, and in furtherance of the conspiracies, the defendants and other BHB members, including their associates, communicated with one another on multiple platforms, including but not limited to text messaging applications and social media platforms such as Instagram, and Snapchat. BHB members and associates used these platforms to coordinate acts of violence, inform fellow BHB members and associates of violent acts that were committed, antagonize rivals, boast about previous acts of violence as well as demonstrate their loyalty to the BHB gang through hand signs, hashtags, and music lyrics.

During the course of and in furtherance of the conspiracies, the defendants and other BHB members, including their associates, used coded words and phrases to communicate with one another to hide the criminal nature of their communication from others outside of the gang and to avoid detection and apprehension by members of law enforcement. For example, BHB members

used words like “Stacey,” “Jackie,” “wifey” and “grip” to describe firearms. In describing robberies or larcenies, BHB members often used the word “stain.” To describe stolen vehicles, BHB members use as the terms “stoley,” and “V.” In discussing shootings, BHB members often referred to these incidents as “spinning the block” or “oot[ings].”

COUNT ONE

THE GRAND JURY OF THE COUNTY OF SUFFOLK, by this Indictment, accuses the defendants, **LATIQUE JOHNSON a.k.a. "La Brim," JUSSIAH HERBERT a.k.a. "Lokko," OUMAR BARRY a.k.a. "Dollo," JAYVONTE NASH a.k.a. "Barney," OCTAVIOUS ROSE a.k.a. "Skar," JANELL JOHNSON a.k.a. "Jah Jah," DONOVAN CANNON a.k.a. "Don Dollaz," RAYMOND VILLEGAS a.k.a. "Chase Mula," KARIEM HARRELL a.k.a. "Ghost," JERMAINE JACKSON a.k.a. "JJ," ISAIAH BEAUFORD a.k.a. "Benji," KAMAR ADDISON a.k.a. "Ky," KHAMARI ELIE a.k.a. "Mari," JAIDAN BEAUBRUN a.k.a. "Snipe," KEYSEAN MEADE a.k.a. "Key," JOEL BADGER a.k.a. "Suvy," REYMON RODRIGUEZ a.k.a. "Spazzo," OMARIAN FRANCIS a.k.a. "Mari," AMIS BONNER a.k.a. "Meechie," JAVON HOLLIDAY a.k.a. "Stakkz," ERIC ROMAN a.k.a. "E Dot," ANDREW LITTLE a.k.a. "A Dot," MARWAN GHANEM a.k.a. "M Dot," A COREY HOBBS a.k.a. "Demon," of the crime of CONSPIRACY IN THE SECOND DEGREE, in violation of P.L. § 105.15, committed as follows:**

The defendants, from on or about and between August 23, 2021 and February 7, 2024, in the County of Suffolk, State of New York, and elsewhere, with intent that conduct constituting the crime of Murder in the Second Degree be performed, 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.

OVERT ACTS

In furtherance of the conspiracy charged in COUNT ONE and to achieve the objects thereof, the following overt acts, among others, were committed in the County of Suffolk, State of New York, and elsewhere:

1. On or about August 23, 2021, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko" summoned BHB members from Nassau and Suffolk County to HERBERT's residence in Suffolk County to coordinate exacting revenge against a rival gang member who HERBERT believed was responsible for killing BHB member Allonte Shipp a.k.a. "Lotto" (hereinafter "Lotto").
2. On or about August 23, 2021, acting at the orders of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," JANELL JOHNSON a.k.a. "Jah Jah," and other BHB members travelled to the North Amityville residence of the suspected killer of "Lotto," a rival gang member.
3. On or about August 23, 2021, JUSSIAH HERBERT a.k.a. "Lokko," JANELL JOHNSON a.k.a. "Jah Jah," and other BHB members acted in concert to possess a loaded and operable .45 caliber pistol (hereinafter, "PISTOL 1") with the intent to use PISTOL 1 unlawfully.
4. On or about August 23, 2021, acting at the order of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," JANELL JOHNSON a.k.a. "Jah Jah," and other members of BHB acted in concert in firing PISTOL 1 multiple times at the North Amityville residence of the suspected killer of "Lotto."
5. On or about, September 15, 2021, JUSSIAH HERBERT a.k.a. "Lokko," JAYVONTE NASH a.k.a. "Barney," JANELL JOHNSON a.k.a. "Jah Jah" and several other members of BHB travelled to the Bay Shore residence of an HSB gang member to exact revenge for HSB members shooting at BHB members during a public memorial service for "Lotto."

6. On or about, September 15, 2021, JUSSIAH HERBERT a.k.a. "Lokko," JAYVONTE NASH a.k.a. "Barney," JANELL JOHNSON a.k.a. "Jah Jah," and several other members of BHB acted in concert to possess multiple loaded and operable firearms with the intent to use said firearms against rival HSB gang members.
7. On or about, September 15, 2021, JUSSIAH HERBERT a.k.a. "Lokko," JAYVONTE NASH a.k.a. "Barney," JANELL JOHNSON a.k.a. "Jah Jah" and several other members of BHB acted in concert in firing several loaded and operable firearms at rival HSB gang members, to exact revenge for HSB members shooting at BHB.
8. On or about September 20, 2021, JANELL JOHNSON a.k.a. "Jah Jah" sent RAYMOND VILLEGAS a.k.a. "Chase Mula," a photograph of a rival MBB gang member's Mastic residence, with the social media account of said rival MBB gang member.
9. On or about September 20, 2021, JANELL JOHNSON a.k.a. "Jah Jah" offered to sell fellow BHB member RAYMOND VILLEGAS a.k.a. "Chase Mula," a firearm.
10. On or about September 24, 2021, JUSSIAH HERBERT a.k.a. "Lokko," stored the addresses of rival HSB gang member's residences in HERBERT's phone.
11. On or about October 18, 2021, LATIQUE JOHNSON a.k.a. "La Brim" received a "kitty" payment, or BHB dues, from a lower-ranking BHB member.
12. From on or about and between December 30, 2021, through January 4, 2022, JUSSIAH HERBERT a.k.a. "Lokko" sent a series of addresses of rival gang members' residences to JANELL JOHNSON a.k.a. "Jah Jah."
13. On or about January 12, 2022, KARIEM HARRELL a.k.a. "Ghost" solicited "JM," a lower-ranking member of BHB, to join HARRELL in committing shootings at rival gang members.
14. On or about January 12, 2022, KARIEM HARRELL a.k.a. "Ghost," assured "JM," a lower-ranking member of BHB, that HARRELL's

intention was to shoot rival gang members, not just shoot at the residences of rival gang members.

15. On or about January 12, 2022, JUSSIAH HERBERT a.k.a. "Lokko," KARIEM HARRELL a.k.a. "Ghost," RAYMOND VILLEGAS a.k.a. "Chase Mulah," and JANELL JOHNSON a.k.a. "Jah Jah," acted in concert to possess multiple loaded and operable firearms, including a 9MM caliber pistol (hereinafter referred to as "PISTOL 2,") and another 9MM caliber pistol (hereinafter referred to as "PISTOL 3") with the intent to use said pistols unlawfully against rival HSB and MBB gang members.
16. On or about January 12, 2022, KARIEM HARRELL a.k.a. "Ghost," RAYMOND VILLEGAS a.k.a. "Chase Mulah," and JANELL JOHNSON a.k.a. "Jah Jah," acting at the order of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," travelled to Brentwood to commit a shooting at the residence of a rival HSB gang member.
17. On or about January 12, 2022, KARIEM HARRELL a.k.a. "Ghost," RAYMOND VILLEGAS a.k.a. "Chase Mulah," and JANELL JOHNSON a.k.a. "Jah Jah," at the order of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," acted in concert in firing at least two loaded and operable firearms, including PISTOL 2, and PISTOL 3 at the Brentwood residence of a rival HSB gang member.
18. On or about January 12, 2022, KARIEM HARRELL a.k.a. "Ghost," RAYMOND VILLEGAS a.k.a. "Chase Mulah," and JANELL JOHNSON a.k.a. "Jah Jah," acting at the order of JUSSIAH HERBERT a.k.a. "Lokko," travelled to Mastic to commit a shooting at the residence of a rival MBB gang member.
19. On or about January 12, 2022, KARIEM HARRELL a.k.a. "Ghost," RAYMOND VILLEGAS a.k.a. "Chase Mulah," and JANELL JOHNSON a.k.a. "Jah Jah," at the order of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," acted in concert in firing at least two loaded and operable firearms, including PISTOL 2, and PISTOL 3

at the residence of a rival MBB gang member, striking an individual whose identity is known to the Grand Jury (hereinafter referred to as "CIVILIAN WITNESS 1") in the leg.

20. On or about February 8, 2022, REYMON RODRIGUEZ a.k.a. "Spazzo," KARIEM HARRELL a.k.a. "Ghost," and DONOVAN CANNON a.k.a. "Don Dollaz," coordinated the shooting of a rival HSB member's Bay Shore residence at the behest of a higher-ranking BHB member.
21. On or about February 8, 2022, REYMON RODRIGUEZ a.k.a. "Spazzo," KARIEM HARRELL a.k.a. "Ghost," and DONOVAN CANNON a.k.a. "Don Dollaz," acted in concert to possess multiple loaded and operable firearms, including PISTOL 2, and a 9MM caliber pistol (hereinafter referred to as "PISTOL 4") with the intent to use said firearms against a rival HSB gang member.
22. On or about February 8, 2022, REYMON RODRIGUEZ a.k.a. "Spazzo," KARIEM HARRELL a.k.a. "Ghost," and DONOVAN CANNON a.k.a. "Don Dollaz," travelled to Bay Shore to shoot at the Bay Shore residence of a rival HSB gang member.
23. On or about February 8, 2022, REYMON RODRIGUEZ a.k.a. "Spazzo," KARIEM HARRELL a.k.a. "Ghost," and DONOVAN CANNON a.k.a. "Don Dollaz," acted in concert in firing several loaded and operable firearms, including PISTOL 2 and PISTOL 4, at the Bay Shore residence of a rival HSB gang member.
24. On or about February 11, 2022, LATIQUE JOHNSON a.k.a. "La Brim" received a "kitty" payment, or BHB dues, from a lower-ranking BHB member.
25. On or about February 12, 2022, KARIEM HARRELL a.k.a. "Ghost," boasted on social media about shooting a rival MBB gang member in the leg on January 12, 2022.
26. On or about and between February 23, 2022, through March 6, 2023, KARIEM HARRELL a.k.a. "Ghost," possessed PISTOL 2 with the intent to sell PISTOL 2 to DONOVAN CANNON a.k.a. "Don Dollaz."

27. On or about February 28, 2022, DONOVAN CANNON a.k.a. "Don Dollaz," requested high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko" send CANNON the addresses of rival MBB gang members so CANNON could shoot at rival MBB members and prove his worth within BHB.
28. On or about March 6, 2022, KARIEM HARRELL a.k.a. "Ghost," possessed PISTOL 2 with the intent to use PISTOL 2 unlawfully.
29. On or about March 13, 2022, LATIQUE JOHNSON a.k.a. "La Brim" received a "kitty" payment, or BHB dues, from a lower-ranking BHB member.
30. On or about March 20, 2022, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," ordered DONOVAN CANNON a.k.a. "Don Dollaz," to kill rival HSB members for disrespecting "Lotto," stating in sum and substance, that those rival gang members 'can't live on Long Island nomore (sic).'
31. On or about March 20, 2022, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," sent DONOVAN CANNON a.k.a. "Don Dollaz," the Central Islip address of "S.J.," a high-ranking rival HSB gang member so that CANNON could shoot at "S.J."
32. On or about March 20, 2022, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," contacted RAYMOND VILLEGAS a.k.a. "Chase Mula," about shooting at the Central Islip address of "S.J.," a high-ranking rival HSB gang member.
33. On or about March 20, 2022, DONOVAN CANNON a.k.a. "Don Dollaz," solicited RAYMOND VILLEGAS a.k.a. "Chase Mula," to shoot at the Central Islip and Bay Shore residences of rival HSB gang members.
34. On or about March 20, 2022, DONOVAN CANNON a.k.a. "Don Dollaz" and RAYMOND VILLEGAS a.k.a. "Chase Mula," acting at the direction of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," acted in concert in possessing two loaded and operable

firearms, including PISTOL 2, and a 9MM caliber pistol (hereinafter referred to as "PISTOL 5,") with the intent to use PISTOL 2 and PISTOL 5 unlawfully against rival HSB gang members.

35. On or about March 20, 2022, DONOVAN CANNON a.k.a. "Don Dollaz," and RAYMOND VILLEGAS a.k.a. "Chase Mula," at the direction of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," acted in concert in firing two loaded and operable firearms, including PISTOL 2 and PISTOL 5, at the Central Islip residence of a rival HSB gang member.
36. On or about March 21, 2022, DONOVAN CANNON a.k.a. "Don Dollaz," and RAYMOND VILLEGAS a.k.a. "Chase Mula," at the direction of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," acted in concert, in firing two loaded and operable firearms, including PISTOL 2 and PISTOL 5, at the Bay Shore residence of a rival HSB gang member.
37. On or about March 21, 2022, DONOVAN CANNON a.k.a. "Don Dollaz" requested additional addresses of HSB members' residences from JUSSIAH HERBERT a.k.a. "Lokko," so that CANNON could shoot at those HSB members.
38. On or about March 21, 2022, JUSSIAH HERBERT a.k.a. "Lokko" sent DONOVAN CANNON a.k.a. "Don Dollaz" addresses of multiple HSB members for CANNON and other BHB members to shoot.
39. On or about March 21, 2022, DONOVAN CANNON a.k.a. "Don Dollaz" requested that JUSSIAH HERBERT a.k.a. "Lokko," use HERBERT's high-ranking BHB status to let lower-ranking members of BHB know that CANNON was being promoted within BHB for committing shootings at rival gang members.
40. On or about March 21, 2022, high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and JAYVONTE NASH a.k.a. "Barney," coordinated which lower-ranking BHB members needed to commit shootings to prove their worth to BHB.

41. On or about March 21, 2022, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko" ordered DONOVAN CANNON a.k.a. "Don Dollaz" to bring specific lower-ranking BHB members, including OCTAVIOUS ROSE a.k.a. "Skar," and OMARIAN FRANCIS a.k.a. "Mari," with CANNON to shoot at rival HSB gang members to prove their worth and loyalty to BHB.
42. On or about March 21, 2022, high-ranking BHB member JAYVONTE NASH a.k.a. "Barney," ordered OCTAVIOUS ROSE a.k.a. "Skar," to contact DONOVAN CANNON a.k.a. "Don Dollaz," so that ROSE could join CANNON in committing shootings at rival HSB gang-members.
43. On or about March 21, 2022, high-ranking BHB member JAYVONTE NASH a.k.a. "Barney," ordered OMARIAN FRANCIS a.k.a. "Mari" to contact DONOVAN CANNON a.k.a. "Don Dollaz" so that FRANCIS could join CANNON in committing shootings ordered by HERBERT. FRANCIS confirmed that he was willing and able to shoot at rival gang members.
44. On or about March 21, 2022, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," ordered DONOVAN CANNON a.k.a. "Don Dollaz," to spread the message that any BHB members that are not committing shootings need to help acquire firearms or otherwise aid BHB. HERBERT further ordered that those that are not aiding BHB in these ways will be kicked out of the gang.
45. On or about March 21, 2022, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," ordered lower-ranking BHB members to shoot at rival gang members, not just rival gang members' residences, to show their loyalty and worth to BHB.
46. On or about March 22, 2022, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," ordered that any BHB members that did not join DONOVAN CANNON a.k.a. "Don Dollaz" in committing shootings at rival HSB members would be kicked out of BHB.

47. On or about March 22, 2022, OMARIAN FRANCIS a.k.a. "Mari," requested DONOVAN CANNON a.k.a. "Don Dollaz," bring FRANCIS so that FRANCIS could join CANNON and RAYMOND VILLEGAS a.k.a. "Chase Mula," in committing the shootings at rival HSB gang members ordered by high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko.
48. On or about March 22, 2022, DONOVAN CANNON a.k.a. "Don Dollaz" and RAYMOND VILLEGAS a.k.a. "Chase Mula," drove to pick up OMARIAN FRANCIS a.k.a. "Mari," and AMIS BONNER a.k.a. "Meechie," so that FRANCIS and BONNER could join CANNON and VILLEGAS in committing the shootings at rival HSB members ordered by high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko.
49. On or about March 22, 2022, DONOVAN CANNON a.k.a. "Don Dollaz," RAYMOND VILLEGAS a.k.a. "Chase Mula," OMARIAN FRANCIS a.k.a. "Mari," and AMIS BONNER a.k.a. "Meechie," acting at the direction of JUSSIAH HERBERT a.k.a. "Lokko," and JAYVONTE NASH a.k.a. "Barney" acted in concert to possess multiple loaded and operable firearms, including PISTOL 2 and PISTOL 5, with the intent to use PISTOL 2 and PISTOL 5 unlawfully against rival HSB gang members.
50. On or about March 22, 2022, DONOVAN CANNON a.k.a. "Don Dollaz," RAYMOND VILLEGAS a.k.a. "Chase Mula," OMARIAN FRANCIS a.k.a. "Mari," and AMIS BONNER a.k.a. "Meechie," at the direction of high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and JAYVONTE NASH a.k.a. "Barney" acted in concert in firing multiple loaded and operable firearms, including PISTOL 2 and PISTOL 5, at the Redington Street, Bay Shore residence of a rival HSB gang member.
51. On or about March 22, 2022, DONOVAN CANNON a.k.a. "Don Dollaz," and RAYMOND VILLEGAS a.k.a. "Chase Mula," at the direction of high-ranking BHB member JUSSIAH HERBERT a.k.a.

“Lokko,” acted in concert in firing multiple loaded and operable firearms, including PISTOL 2 and PISTOL 5 at the Chapman Place, Bay Shore residence of a rival HSB gang member.

52. On or about March 22, 2022, DONOVAN CANNON a.k.a. “Don Dollaz,” reported to high-ranking BHB member JUSSIAH HERBERT a.k.a. “Lokko,” that CANNON completed all of the shootings ordered by HERBERT, and that CANNON was joined by RAYMOND VILLEGAS a.k.a. “Chase Mula,” OMARIAN FRANCIS a.k.a. “Mari,” AMIS BONNER a.k.a. “Meechie,” and another BHB member, Gilbert Rodriguez a.k.a. “Avionne.”
53. On or about March 22, 2022, OMARIAN FRANCIS a.k.a. “Mari” reported back to high-ranking BHB member JAYVONTE NASH a.k.a. “Barney,” that FRANCIS committed the shooting ordered by high-ranking BHB members NASH and JUSSIAH HERBERT a.k.a. “Lokko.”
54. On or about March 22, 2022, high-ranking BHB members JUSSIAH HERBERT a.k.a. “Lokko,” and JAYVONTE NASH a.k.a. “Barney,” promoted lower-ranking BHB members, including DONOVAN CANNON a.k.a. “Don Dollaz,” OMARIAN FRANCIS a.k.a. “Mari,” and AMIS BONNER a.k.a. “Meechie” within the BHB ranks for committing the shootings ordered by HERBERT and NASH from March 20, 2022, through March 22, 2022.
55. On or about May 12, 2022, LATIQUE JOHNSON a.k.a. “La Brim” received a “kitty” payment, or BHB dues, from a lower-ranking BHB member.
56. On or about May 28, 2022, LATIQUE JOHNSON a.k.a. “La Brim” received a “kitty” payment, or BHB dues, from a lower-ranking BHB member.
57. On or about and between June 15, 2022, and June 18, 2022, JAYVONTE NASH a.k.a. “Barney,” possessed a loaded and operable .32 caliber

pistol (hereinafter referred to as "PISTOL 6") with the intent to use said firearm against a rival 9-TREY gang member.

58. On or about and between June 15, 2022, and June 18, 2022, JAYVONTE NASH a.k.a. "Barney," fired multiple shots from PISTOL 6 at the residence of a rival 9-TREY gang member on Wilson Avenue, Riverhead.
59. On or about July 8, 2022, AMIS BONNER a.k.a. Meechie possessed a loaded and operable 9MM pistol (hereinafter referred to as "PISTOL 7.")
60. On or about August 12, 2022, JANELL JOHNSON a.k.a. "Jah Jah," while incarcerated at the Yaphank Correctional Facility got into a physical altercation with a rival gang member.
61. On or about August 19, 2022, JAYVONTE NASH a.k.a. "Barney" collected the "kitty" payment, or BHB dues, from OCTAVIOUS ROSE a.k.a. "Skar" to pay tribute to the highest-ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim."
62. On or about September 29, 2022, the highest ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim," discussed current BHB hierarchy structure, and standing with lower-ranking member JAIDAN BEAUBRUN a.k.a. "Snipe."
63. On or about October 5, 2022, JAYVONTE NASH a.k.a. "Barney" collected the "kitty" payment, or BHB dues, payment from OCTAVIOUS ROSE a.k.a. "Skar" to pay tribute to the highest-ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim."
64. On or about October 16, 2022, LATIQUE JOHNSON a.k.a. "La Brim" received a "kitty" payment, or BHB dues, from a lower-ranking BHB member.
65. On or about October 29, 2022, JAYVONTE NASH a.k.a. "Barney," possessed a loaded and operable 10MM firearm (hereinafter referred to as "PISTOL 8") with the intent to use PISTOL 8 unlawfully.
66. On or about October 29, 2022, JAYVONTE NASH a.k.a. "Barney," fired PISTOL 8 at an individual whose identity is known to the Grand Jury

(hereinafter "CIVILIAN WITNESS 2"), attempting to kill CIVILIAN WITNESS 2.

67. On or about November 12, 2022, JAYVONTE NASH a.k.a. "Barney" collected the "kitty" payment, or BHB dues, payment from OCTAVIOUS ROSE a.k.a. "Skar" to pay tribute to the highest-ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim."
68. On or about November 15, 2022, LATIQUE JOHNSON a.k.a. "La Brim" received a "kitty" payment, or BHB dues, from a lower-ranking BHB member.
69. On or about and between January 5, 2023, through March 3, 2023, OUMAR BARRY a.k.a. "Dollo," offered to provide REYMON RODRIGUEZ a.k.a. "Spazzo," with a firearm.
70. On or about January 20, 2023, the highest-ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim," honored a deceased member of the "Afghan" set of BHB on JOHNSON's social media.
71. On or about January 27, 2023, OUMAR BARRY a.k.a. "Dollo" sent BHB dues to LATIQUE JOHNSON a.k.a. "La Brim" through an electronic payment application on behalf of the "Afghan" set of BHB.
72. On or about February 8, 2023, the highest-ranking BHB member, LATIQUE JOHNSON a.k.a. "La Brim," discussed gang hierarchy, structure, and current standing with high-ranking Long Island BHB members, OUMAR BARRY aka "Dollo" and JUSSIAH HERBERT aka "Lokko."
73. On or about February 11, 2023, higher-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," ordered lower-ranking BHB members to pay into the "kitty" or BHB dues for LATIQUE JOHNSON a.k.a. "La Brim."
74. On or about February 16, 2023, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," posted an image on social media of multiple lower-ranking BHB members, including JOEL BADGER a.k.a. "Suvy," and REYMON RODRIGUEZ a.k.a. "Spazzo," ERIC ROMAN a.k.a. "E

- Dot,” JAIDAN BEABRUN a.k.a. “Snipe” boasting that HERBERT can order violence or shootings on Long Island with a phone call.
75. On or about February 16, 2023, JERMAINE JACKSON a.k.a. “JJ,” ISAIAH BEAUFORD a.k.a. “Benji,” KAMAR ADDISON a.k.a. “Ky,” and KHAMARI ELIE a.k.a. “Mari,” coordinated a shooting at the residence of a rival gang member’s residence.
76. On or about February 16, 2023, JERMAINE JACKSON a.k.a. “JJ,” ISAIAH BEAUFORD a.k.a. “Benji,” KAMAR ADDISON a.k.a. “Ky,” and KHAMARI ELIE a.k.a. “Mari,” acted in concert to possess at least three loaded and operable firearms, a 9MM pistol (hereinafter referred to as “PISTOL 9,”) a 9MM pistol (hereinafter referred to as “PISTOL 10,”) and a .45 caliber pistol (hereinafter referred to as “PISTOL 11,”) with the intent to use said firearms unlawfully against a rival gang member.
77. On or about February 16, 2023, JERMAINE JACKSON a.k.a. “JJ,” ISAIAH BEAUFORD a.k.a. “Benji,” KAMAR ADDISON a.k.a. “Ky,” and KHAMARI ELIE a.k.a. “Mari,” traveled to the Bay Shore residence of a rival gang member.
78. On or about February 16, 2023, JERMAINE JACKSON a.k.a. “JJ,” ISAIAH BEAUFORD a.k.a. “Benji,” KAMAR ADDISON a.k.a. “Ky,” and KHAMARI ELIE a.k.a. “Mari,” acted in concert in firing multiple loaded and operable firearms, including PISTOL 9, PISTOL 10 and PISTOL 11 at the Bay Shore residence of a rival gang member.
79. On or about February 17, 2023, higher-ranking BHB member OCTAVIOUS ROSE a.k.a. “Skar” received “kitty” payments or BHB dues payment from a lower-ranking BHB member.
80. On or about February 24, 2023, LATIQUE JOHNSON a.k.a. “La Brim” promoted a lower-ranking “Afghan” BHB member within the BHB ranks.
81. On or about and between March 1, 2023, and March 31, 2023, ERIC ROMAN a.k.a. “E dot,” JAIDAN BEABRUN a.k.a. “Snipe,” REYMON

- RODRIGUEZ a.k.a. "Spazzo," and others acted in concert to possess a firearm with the intent to use it unlawfully.
82. On or about and between March 1, 2023, and March 31, 2023, ERIC ROMAN a.k.a. "E Dot," sold the proceeds from an armed robbery and provided money to higher-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko."
 83. On or about March 3, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo" and JAIDAN BEAUBRUN a.k.a. "Snipe" travelled to Nassau County to purchase a firearm from high-ranking Nassau County BHB member OUMAR BARRY a.k.a. "Dollo."
 84. On or about March 3, 2023, OCTAVIOUS ROSE a.k.a. "Skar" received "kitty" payments or BHB dues from a lower-ranking BHB member.
 85. On or about March 12, 2023, a lower-ranking BHB member sent a dues or "kitty" payment for LATIQUE JOHNSON a.k.a. "La Brim," to higher-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko."
 86. On or about March 15, 2023, JAIDAN BEABRUN a.k.a. "Snipe," and REYMON RODRIGUEZ a.k.a. "Spazzo," boasted on social media about possessing multiple firearms, including a .40 caliber pistol (hereinafter referred to as "PISTOL 12,") in a video posted on social media.
 87. On or about March 15, 2023, JAIDAN BEABRUN a.k.a. "Snipe," possessed PISTOL 12 with the intent to use PISTOL 12 unlawfully.
 88. On or about March 15, 2023, JUSSIAH HERBERT a.k.a. "Lokko," instructed lower-ranking member JOEL BADGER a.k.a. "Suvy" to shoot at any individual that pretends to be a member of BHB. BADGER agreed to follow said order.
 89. On or about March 16, 2023, the highest-ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim" posted OCTAVIOUS ROSE a.k.a. "Skar" on social media.
 90. On or about March 29, 2023, JERMAINE JACKSON a.k.a. "JJ," possessed a loaded firearm, namely PISTOL 9, in a vehicle used by

ISAAH BEAUFORD a.k.a. "Benji," and KAMAR ADDISON a.k.a. "Ky."

91. On or about March 30, 2023, OCTAVIOUS ROSE a.k.a. "Skar," sent a photograph, via an electronic messaging application, of himself lying in bed with a firearm to other members of BHB.
92. On or about March 31, 2023, high-ranking Nassau County BHB member OUMAR BARRY a.k.a. "Dollo," solicited assistance from high-ranking Suffolk County BHB member JUSSIAH HERBERT a.k.a. "Lokko," to have HERBERT to send lower-ranking BHB members from Suffolk County to commit a shooting for BARRY, as retaliation for rival gang members previously shooting at BARRY.
93. On or about March 31, 2023, JUSSIAH HERBERT a.k.a. "Lokko" reported back to OUMAR BARRY a.k.a. "Dollo," that lower-ranking BHB members from Suffolk County would steal a car and meet BARRY to commit the shooting at rival gang members ordered by BARRY.
94. On or about March 31, 2023, OCTAVIOUS ROSE a.k.a. "Skar" ordered lower-ranking BHB member JOEL BADGER a.k.a. "Suvy" to get a car to use in the shooting ordered by high ranking BHB members OUMAR BARRY a.k.a. "Dollo" and JUSSIAH HERBERT a.k.a. "Lokko."
95. On or about March 31, 2023, high-ranking BHB member OUMAR BARRY a.k.a. "Dollo," coordinated the theft of a Black Honda Accord, in Nassau County, for lower-ranking BHB members from Suffolk County to use in a shooting that BARRY ordered.
96. On or about March 31, 2023, JOEL BADGER a.k.a. "Suvy" and KEYSEAN MEADE a.k.a. "Key" coordinated acquiring a firearm to use in the shooting ordered by high ranking BHB members OUMAR BARRY a.k.a. "Dollo" and JUSSIAH HERBERT a.k.a. "Lokko."
97. On or about March 31, 2023, KEYSEAN MEADE a.k.a. "Key" offered to steal a vehicle to use in the shooting ordered by high ranking BHB members OUMAR BARRY a.k.a. "Dollo" and JUSSIAH HERBERT a.k.a. "Lokko."

98. On or about March 31, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo" and JOEL BADGER a.k.a. "Suvy," coordinated meeting up to commit the shooting ordered by high ranking BHB members OUMAR BARRY a.k.a. "Dollo" and JUSSIAH HERBERT a.k.a. "Lokko."
99. On or about March 31, 2023, high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and OUMAR BARRY a.k.a. "Dollo," planned to use the shooting ordered by HERBERT and BARRY to have lower-ranking BHB members also kill an unsuspecting fellow-BHB member who BARRY and HERBERT believed to be cooperating with law enforcement.
100. On or about March 31, 2023, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," ordered OCTAVIOUS ROSE a.k.a. "Skar," and JAYVONTE NASH a.k.a. "Barney," to kill a lower-ranking BHB member who HERBERT and OUMAR BARRY a.k.a. "Dollo" believed to be cooperating with law enforcement and take said lower-ranking BHB member's firearm after killing him.
101. On or about March 31, 2023, OCTAVIOUS ROSE a.k.a. "Skar" offered to kill the lower-ranking BHB member who high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and OUMAR BARRY a.k.a. "Dollo" believed to be cooperating with law enforcement.
102. On or about April 1, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key" travelled from Suffolk County to Nassau County to meet OUMAR BARRY a.k.a. "Dollo."
103. On or about April 1, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key," travelled within Nassau County in a stolen car to carry out a shooting at rival gang members, ordered by high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and OUMAR BARRY a.k.a. "Dollo."
104. On or about April 1, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key"

acted in concert to possess a loaded and operable 9mm caliber pistol (hereinafter referred to as "PISTOL 13"), in a stolen vehicle, with the intent to use said firearm unlawfully against a rival gang member at the direction of high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and OUMAR BARRY a.k.a. "Dollo."

105. On or about April 1, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key," while travelling in a stolen vehicle at Polk Avenue, Hempstead, Nassau County, fired multiple shots from PISTOL 13, killing an unintended victim, Kimberly Midgette and injuring another unintended victim.

106. On or about April 1, 2023, JAVON HOLLIDAY a.k.a. "Stakkz," reported to high-ranking BHB member JAYVONTE NASH a.k.a. "Barney," that JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key," were with OUMAR BARRY a.k.a. "Dollo," to carry out the shooting ordered by high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and OUMAR BARRY a.k.a. "Dollo."

107. On or about April 1, 2023, JOEL BADGER a.k.a. "Suvy," urged JUSSIAH HERBERT a.k.a. "Lokko," to promote BADGER within the BHB ranks for committing the shooting ordered by HERBERT and OUMAR BARRY a.k.a. "Dollo" on April 1, 2023.

108. On or about April 1, 2023, high-ranking Nassau County BHB member OUMAR BARRY a.k.a. "Dollo," reported back to high-ranking Suffolk County BHB member JUSSIAH HERBERT a.k.a. "Lokko," that lower-ranking Suffolk County BHB members JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key," performed well in committing the shooting ordered by BARRY and HERBERT.

109. On or about April 1, 2023, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," promoted JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key," within the BHB ranks for performing well in the shooting ordered by OUMAR BARRY a.k.a. "Dollo," and HERBERT on April 1, 2023.

110. On or about April 1, 2023, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," encouraged lower-ranking BHB members JAYVONTE NASH a.k.a. "Barney," and OCTAVIOUS ROSE a.k.a. "Skar," to get more actively involved in committing violence if they want to be promoted within the BHB ranks.
111. On or about April 1, 2023, OCTAVIOUS ROSE a.k.a. "Skar" received "kitty" payments or BHB dues from a lower-ranking BHB member.
112. On or about April 2, 2023, JUSSIAH HERBERT a.k.a. "Lokko" ordered lower-ranking Suffolk County BHB members to refrain from assisting Nassau County BHB members until Nassau County BHB members shot Suffolk County BHB rivals in return for Suffolk County BHB members committing the April 1, 2023, murder of Kimberly Midgette.
113. On or about April 2, 2023, JUSSIAH HERBERT a.k.a. "Lokko" ordered lower-ranking BHB members to refrain from any interaction with a BHB member that JUSSIAH HERBERT a.k.a. "Lokko" believed was cooperating with law enforcement.
114. On or about April 3, 2023, LATIQUE JOHNSON a.k.a. "La Brim," discussed gang hierarchy and structure, with JUSSIAH HERBERT a.k.a. "Lokko."
115. On or about April 4, 2023, higher-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko" communicated a message from LATIQUE JOHNSON a.k.a. "La Brim," to lower-ranking BHB members.
116. On or about April 4, 2023, higher-ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim," discussed gang hierarchy and structure, with lower-ranking member JUSSIAH HERBERT a.k.a. "Lokko."
117. On or about April 6, 2023, JAYVON HOLLIDAY a.k.a. "Stakkz" sent a video, via an electronic messaging application, of himself with multiple firearms, to other members of BHB.
118. On or about April 8, 2023, LATIQUE JOHNSON a.k.a. "La Brim" received "kitty" payments, or BHB dues from the "Afghan" set.

119. On or about April 8, 2023, high-ranking BHB members OUMAR BARRY a.k.a. "Dollo" and JUSSIAH HERBERT a.k.a. "Lokko" coordinated sending "kitty" payments or BHB dues to LATIQUE JOHNSON a.k.a. "La Brim," to stay in good standing within BHB.
120. On or about April 8, 2023, JUSSIAH HERBERT a.k.a. "Lokko" sent \$250.00 United States Currency with the notation "AFGHAN FEES" on the mobile payment service "Cash App" to LATIQUE JOHNSON a.k.a. "La Brim."
121. On or about April 9, 2023, higher-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," communicated an order from LATIQUE JOHNSON a.k.a. "La Brim," to lower-ranking BHB members giving notice that a member from BHB was removed from BHB.
122. On or about April 14, 2023, OCTAVIOUS ROSE a.k.a. "Skar," asked lower-ranking BHB member, JOEL BADGER a.k.a. "Suvy," if BADGER could acquire a firearm so that BADGER could join ROSE in a shooting to retaliate for a rival gang member shooting at JAVON HOLLIDAY a.k.a. "Stakkz."
123. On or about April 14, 2023, OCTAVIOUS ROSE a.k.a. "Skar," and JUSSIAH HERBERT a.k.a. "Lokko" coordinated with lower-ranking BHB members, JAVON HOLLIDAY a.k.a. "Stakkz," JOEL BADGER a.k.a. "Suvy," and ACOREY HOBBS a.k.a. "Demon" to commit a shooting to retaliate for a rival gang member shooting at HOLLIDAY.
124. On or about April 14, 2023, JUSSIAH HERBERT a.k.a. "Lokko" informed lower-ranking BHB members that when he catches a BHB member he believed to be cooperating with law enforcement, he is going to kill said perceived cooperator by blowing his head off.
125. On or about April 15, 2023, OCTAVIOUS ROSE a.k.a. "Skar," JOEL BADGER a.k.a. "Suvy," JAVON HOLLIDAY a.k.a. "Stakkz," and ACOREY HOBBS a.k.a. "Demon," travelled to Brentwood to commit a shooting at a residence on Hancock Street.

126. On or about April 15, 2023, OCTAVIOUS ROSE a.k.a. "Skar," JOEL BADGER a.k.a. "Suvy," JAVON HOLLIDAY a.k.a. "Stakkz," and ACOREY HOBBS a.k.a. "Demon," acted in concert to possess at least three loaded and operable firearms, including a loaded PISTOL 13, a loaded and operable .40 caliber pistol (hereinafter referred to as "PISTOL 14,") and a 9MM caliber pistol (hereinafter referred to as "PISTOL 15,") with the intent to use said pistols unlawfully against rival gang members.
127. On or about April 15, 2023, OCTAVIOUS ROSE a.k.a. "Skar," JOEL BADGER a.k.a. "Suvy," JAVON HOLLIDAY a.k.a. "Stakkz," ACOREY HOBBS a.k.a. "Demon," acted in concert with each other and fired rounds from at least three loaded and operable firearms including PISTOL 13, PISTOL 14, and PISTOL 15, at multiple residences on Hancock Street in Brentwood to retaliate for a rival gang member shooting at HOLLIDAY.
128. On or about April 15, 2023, OCTAVIOUS ROSE a.k.a. "Skar" offered to sell a .40 caliber firearm for \$900 United States Currency to participants in a group electronic message.
129. On or about April 17, 2023, KARIEM HARRELL a.k.a. "Ghost" informed high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko" that another member of BHB was cooperating with law enforcement and KARIEM HARRELL a.k.a. "Ghost" made said individual vacate said individual's jail cell while KARIEM HARRELL a.k.a. "Ghost" was housed in the Suffolk County Correctional Facility.
130. On or about April 19, 2023, OCTAVIOUS ROSE a.k.a. "Skar" ordered lower-ranking BHB members to destroy evidence of the gang's activity upon learning that high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko" was arrested by federal law enforcement.
131. On or about April 24, 2023, DONOVAN CANNON a.k.a. "Don Dollaz," while incarcerated at the Yaphank Correctional Facility, got into a physical altercation with multiple rival gang members.

132. On or about May 11, 2023, LATIQUE JOHNSON received a dues or “kitty” payment for from a lower-ranking BHB member on behalf of the “Afghan” set of BHB.
133. On or about May 12, 2023, JAYVONTE NASH a.k.a. “Barney” received “kitty” payments or BHB dues payment from OCTAVIOUS ROSE a.k.a. “Skar.”
134. On or about May 25, 2023, KAMAR ADDISON a.k.a. “Ky,” and ISAIAH BEAUFORD a.k.a. “Benji,” acted in concert with another individual to possess a loaded and operable .45 caliber pistol (hereinafter, “PISTOL 16”) with the intent to use PISTOL 16 unlawfully.
135. On or about May 25, 2023, KAMAR ADDISON a.k.a. “Ky,” ISAIAH and BEAUFORD a.k.a. “Benji,” acted in concert with another individual, to shoot PISTOL 16 at an individual whose identity is known to the Grand Jury (hereinafter, “CIVILIAN WITNESS 3”) during the course and commission of an armed robbery, seriously injuring CIVILIAN WITNESS 3.
136. On or about June 20, 2023, JOEL BADGER a.k.a. “Suvy,” and ACorey HOBBS a.k.a. “Demon,” stole a Lexus vehicle.
137. On or about July 1, 2023, OCTAVIOUS ROSE a.k.a. “Skar,” possessed a loaded PISTOL 14 with the intent to use unlawfully.
138. On or about July 1, 2023, OCTAVIOUS ROSE a.k.a. “Skar,” fired multiple rounds from PISTOL 14 outside The Bays Bar & Grill in Hampton Bays.
139. On or about July 5, 2023, OCTAVIOUS ROSE a.k.a. “Skar,” instructed lower-ranking BHB members to pay fees that would go to LATIQUE JOHNSON a.k.a. “La Brim” to prove their loyalty and worth to BHB.
140. On or about July 5, 2023, OCTAVIOUS ROSE a.k.a. “Skar,” advised lower-ranking BHB members to sell narcotics to help raise money to send to LATIQUE JOHNSON a.k.a. “La Brim.”
141. On or about July 7, 2023, ANDREW LITTLE a.k.a. “A Dot,” MARWAN GHANEM a.k.a. “M Dot,” and ERIC ROMAN a.k.a. “E

Dot,” and others acted in concert to possess a loaded and operable 9MM pistol (hereinafter “PISTOL 17”) with the intent to use PISTOL 17 unlawfully.

142. On or about July 7, 2023, ANDREW LITTLE a.k.a. “A Dot,” MARWAN GHANEM a.k.a. “M Dot,” ERIC ROMAN a.k.a. “E Dot,” and others acted in concert to shoot PISTOL 17 at an individual whose identity is known to the Grand Jury (hereinafter, “CIVILIAN WITNESS 4”) during the course and commission of an armed robbery, injuring CIVILIAN WITNESS 4.

143. On or about July 28, 2023, OCTAVIOUS ROSE a.k.a. “Skar,” sent his “Cash App” username to lower-ranking BHB members so that ROSE could collect fees for the BHB.

144. On or about July 29, 2023, OCTAVIOUS ROSE a.k.a. “Skar,” sent the details of a BHB meeting to discuss BHB activities and membership to lower-ranking BHB members.

145. On or about July 31, 2023, OCTAVIOUS ROSE a.k.a. “Skar,” ordered lower-ranking BHB member to send fees, as this month’s fees would go to LATIQUE JOHNSON a.k.a. “La Brim,” and the next month’s fees would stay with the “Afghan” BHB set.

146. On or about July 31, 2023, LATIQUE JOHNSON a.k.a. “La Brim” shared his approval and validated the criminal activities of the “Afghan” set of BHB in a message to a lower-ranking BHB member.

147. On or about August 13, 2023, OCTAVIOUS ROSE a.k.a. “Skar,” ordered lower-ranking BHB members to “shoot to kill,” in response to a lower-ranking BHB getting shot.

148. On or about August 19, 2023, LATIQUE JOHNSON a.k.a. “La Brim,” received a communication advising that the “Afghan” set sent in their required BHB dues payments to stay in good standing within BHB.

149. On or about August 24, 2023, OUMAR BARRY a.k.a. “Dollo,” punished OCTAVIOUS ROSE a.k.a. “Skar,” with a fine to be paid to the

BHB for not following instructions given by OUMAR BARRY a.k.a. "Dollo."

150. On or about August 25, 2023, OUMAR BARRY a.k.a. "Dollo," demanded fees from lower-ranking BHB member, OCTAVIOUS ROSE a.k.a. "Skar," and the BHB members under ROSE.
151. On or about August 25, 2023, OUMAR BARRY a.k.a. "Dollo," asked OCTAVIOUS ROSE a.k.a. "Skar" to return a firearm to BARRY.
152. On or about August 29, 2023, OCTAVIOUS ROSE a.k.a. "Skar," posted publicly on social media the highest-ranking BHB member, LATIQUE JOHNSON a.k.a. "La Brim" has ordered that every member of MBB should be shot and killed.
153. On or about September 5, 2023, OUMAR BARRY a.k.a. "Dollo," communicated an order from highest-ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim" and instructed lower-ranking BHB member, OCTAVIOUS ROSE a.k.a. "Skar," that ROSE and another member were in charge of the Suffolk BHB members and everything else was "shut down," because LATIQUE JOHNSON a.k.a. "La Brim" was upset with infighting within BHB.
154. On or about September 5, 2023, OCTAVIOUS ROSE a.k.a. "Skar," communicated the message from highest-ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim" instructing lower-ranking BHB members that ROSE, and another member were in charge of the Suffolk BHB set, due to infighting within BHB.
155. On or about September 23, 2023, KAMAR ADDISON a.k.a. "Ky," while incarcerated at the Yaphank Correctional Facility got into a physical altercation with a rival gang member.
156. On or about September 27, 2023, JOEL BADGER a.k.a. "Suvy," displayed what appeared to be a firearm during a robbery of two individuals.

157. On or about October 4, 2023, OCTAVIOUS ROSE a.k.a. "Skar," sent a message to lower-ranking BHB members that LATIQUE JOHNSON a.k.a. "La Brim" demanded fees paid by BHB members.
158. On or about October 4, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," acting in concert with another, possessed a loaded and operable 9MM caliber pistol (hereinafter "PISTOL 18") with the intent to use PISTOL 18 unlawfully.
159. On or about October 14, 2023, OCTAVIOUS ROSE a.k.a. "Skar" told lower-ranking BHB members that lower-ranking BHB members should tell law enforcement that the lower-ranking members of BHB committed the April 1, 2023, homicide of Kimberly Midgette to help get OUMAR BARRY a.k.a. "Dollo" out of jail.
160. On or about October 18, 2023, OCTAVIOUS ROSE a.k.a. "Skar," sold a quantity of crack cocaine to raise money for BHB.
161. On or about October 23, 2023, LATIQUE JOHNSON a.k.a. "La Brim," authorized the continued existence of numerous BHB sets and ordered the cancellation of another BHB set.
162. On or about October 26, 2023, LATIQUE JOHNSON a.k.a. "La Brim" received an email advising him that the "kitty" and/or "dues" payments for BHB were paid.
163. On or about and between November 1, 2023, and November 2, 2023, JOEL BADGER a.k.a. "Suvy," stole a Mercedes vehicle.
164. On or about November 3, 2023, JAVON HOLLIDAY a.k.a. "Stakkz" acting in concert with another, possessed a loaded and operable .45 caliber pistol (hereinafter, "PISTOL 19") with the intent to use PISTOL 19 unlawfully.
165. On or about November 11, 2023, LATIQUE JOHNSON a.k.a. "La Brim" discussed, the ongoing "kitty" payments and dues obligations to JOHNSON from the "Afghan" set of BHB.

166. On or about December 26, 2023, OUMAR BARRY a.k.a. "Dollo," while incarcerated at the Riverhead Correctional Facility, got into a physical altercation with a rival gang member.

167. On or about January 20, 2024, JAYVONTE NASH a.k.a. "Barney," while incarcerated at the Riverhead Correctional Facility, got into a physical altercation with another.

168. On or about January 19, 2024, JAVON HOLLIDAY a.k.a. "Stakkz," acting in concert with another, possessed a loaded and operable polymer 9mm pistol (hereinafter, "PISTOL 20") with the intent to use PISTOL 20 unlawfully.

COUNT TWO

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **LATIQUE JOHNSON a.k.a. "La Brim," JUSSIAH HERBERT a.k.a. "Lokko," OUMAR BARRY a.k.a. "Dollo," JAYVONTE NASH a.k.a. "Barney," OCTAVIOUS ROSE a.k.a. "Skar," JANELL JOHNSON a.k.a. "Jah Jah," DONOVAN CANNON a.k.a. "Don Dollaz," RAYMOND VILLEGAS a.k.a. "Chase Mula," KARIEM HARRELL a.k.a. "Ghost," JERMAINE JACKSON a.k.a. "JJ," ISAIAH BEAUFORD a.k.a. "Benji," KAMAR ADDISON a.k.a. "Ky," KHAMARI ELIE a.k.a. "Mari," JAIDAN BEAUBRUN a.k.a. "Snipe," KEYSEAN MEADE a.k.a. "Key," JOEL BADGER a.k.a. "Suvy," REYMON RODRIGUEZ a.k.a. "Spazzo," OMARIAN FRANCIS a.k.a. "Mari," AMIS BONNER a.k.a. "Meechie," JAVON HOLLIDAY a.k.a. "Stakkz," ERIC ROMAN a.k.a. "E Dot," ANDREW LITTLE a.k.a. "A Dot," MARWAN GHANEM a.k.a. "M Dot," A COREY HOBBS a.k.a. "Demon," JAHEIM WOODSON, HORACE HIBBERT, AARON BEATTY, and GIAVANNA PERGOLA of the crime of CONSPIRACY IN THE FOURTH DEGREE, in violation of P.L. § 105.10(1), committed as follows:**

The defendants, from on or about August 23, 2021 to February 7, 2024, in the County of the Suffolk, State of New York, and elsewhere, with intent that conduct constituting the crime of Criminal Possession of a Weapon in the Second Degree be performed, a Class C 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 C Felony.

OVERT ACTS

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

1. On or about August 23, 2021, JANELL JOHNSON a.k.a. "Jah Jah," and other BHB members acted in concert to possess PISTOL 1 with the intent to use PISTOL 1 unlawfully.
2. On or about August 23, 2021, acting at the order of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," JANELL JOHNSON a.k.a. "Jah Jah," and other members of BHB acted in concert in firing PISTOL 1 at the North Amityville residence of the suspected killer of "Lotto."
3. On or about, September 15, 2021, JUSSIAH HERBERT a.k.a. "Lokko," JAYVONTE NASH a.k.a. "Barney," JANELL JOHNSON a.k.a. "Jah Jah," and several other members of BHB acted in concert to possess multiple loaded and operable firearms with the intent to use said firearms against rival HSB gang members.
4. On or about, September 15, 2021, JUSSIAH HERBERT a.k.a. "Lokko," JAYVONTE NASH a.k.a. "Barney," JANELL JOHNSON a.k.a. "Jah Jah" and several other members of BHB acted in concert in firing several loaded and operable firearms at rival HSB gang members, to exact revenge for HSB members shooting at BHB.
5. On or about September 20, 2021, JANELL JOHNSON a.k.a. "Jah Jah" offered to sell member RAYMOND VILLEGAS a.k.a. "Chase Mula," a firearm.
6. On or about January 12, 2022, JUSSIAH HERBERT a.k.a. "Lokko," KARIEM HARRELL a.k.a. "Ghost," RAYMOND VILLEGAS a.k.a. "Chase Mulah," and JANELL JOHNSON a.k.a. "Jah Jah," acted in concert to possess multiple loaded and operable firearms, including a

PISTOL 2 and PISTOL 3 with the intent to use said pistols unlawfully against rival HSB and MBB gang members.

7. On or about January 12, 2022, KARIEM HARRELL a.k.a. "Ghost," RAYMOND VILLEGAS a.k.a. "Chase Mulah," and JANELL JOHNSON a.k.a. "Jah Jah," at the order of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," acted in concert in firing at least two loaded and operable firearms, including PISTOL 2, and PISTOL 3 at the Brentwood residence of a rival HSB gang member.
8. On or about January 12, 2022, KARIEM HARRELL a.k.a. "Ghost," RAYMOND VILLEGAS a.k.a. "Chase Mulah," and JANELL JOHNSON a.k.a. "Jah Jah," at the order of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," acted in concert in firing at least two loaded and operable firearms, including PISTOL 2, and PISTOL 3 at the residence of a rival MBB gang member, striking CIVILIAN WITNESS 1.
9. On or about February 8, 2022, REYMON RODRIGUEZ a.k.a. "Spazzo," KARIEM HARRELL a.k.a. "Ghost," and DONOVAN CANNON a.k.a. "Don Dollaz," acted in concert to possess multiple loaded and operable firearms, including PISTOL 2, and PISTOL 4 with the intent to use said firearms against a rival HSB gang member.
10. On or about February 8, 2022, REYMON RODRIGUEZ a.k.a. "Spazzo," KARIEM HARRELL a.k.a. "Ghost," and DONOVAN CANNON a.k.a. "Don Dollaz," acted in concert in firing several loaded and operable firearms, including PISTOL 2 and PISTOL 4, at the Bay Shore residence of a rival HSB gang member.
11. On or about and between February 23, 2022, through March 6, 2023, KARIEM HARRELL a.k.a. "Ghost," possessed PISTOL 2 with the intent to sell PISTOL 2 to fellow BHB member DONOVAN CANNON a.k.a. "Don Dollaz."
12. On or about March 6, 2022, KARIEM HARRELL a.k.a. "Ghost," possessed PISTOL 2 with the intent to use PISTOL 2 unlawfully.

13. On or about March 20, 2022, DONOVAN CANNON a.k.a. "Don Dollaz," solicited RAYMOND VILLEGAS a.k.a. "Chase Mula," to shoot at the Central Islip and Bay Shore residences of rival HSB gang members.
14. On or about March 20, 2022, DONOVAN CANNON a.k.a. "Don Dollaz" and RAYMOND VILLEGAS a.k.a. "Chase Mula," acting at the direction of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," acted in concert in possessing two loaded and operable firearms, including PISTOL 2 and PISTOL 5 with the intent to use PISTOL 2 and PISTOL 5 unlawfully against rival HSB gang members.
15. On or about March 20, 2022, DONOVAN CANNON a.k.a. "Don Dollaz," and RAYMOND VILLEGAS a.k.a. "Chase Mula," at the direction of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," acted in concert in firing two loaded and operable firearms, including PISTOL 2 and PISTOL 5, at the Central Islip residence of a rival HSB gang member.
16. On or about March 21, 2022, DONOVAN CANNON a.k.a. "Don Dollaz," and RAYMOND VILLEGAS a.k.a. "Chase Mula," at the direction of high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," acted in concert, in firing two loaded and operable firearms, including PISTOL 2 and PISTOL 5, at the Bay Shore residence of a rival HSB gang member.
17. On or about March 21, 2022, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," ordered DONOVAN CANNON a.k.a. "Don Dollaz," to spread the message that any BHB members that are not committing shootings need to help acquire firearms or otherwise aid BHB. HERBERT further ordered that those that are not aiding BHB in these ways will be kicked out of the gang.
18. On or about March 22, 2022, DONOVAN CANNON a.k.a. "Don Dollaz" and RAYMOND VILLEGAS a.k.a. "Chase Mula," drove to pick up OMARIAN FRANCIS a.k.a. "Mari," and AMIS BONNER a.k.a.

- “Meechie,” so that FRANCIS and BONNER could join CANNON and VILLEGAS in committing the shootings at rival HSB members ordered by high-ranking BHB member JUSSIAH HERBERT a.k.a. “Lokko.
19. On or about March 22, 2022, DONOVAN CANNON a.k.a. “Don Dollaz,” RAYMOND VILLEGAS a.k.a. “Chase Mula,” OMARIAN FRANCIS a.k.a. “Mari,” and AMIS BONNER a.k.a. “Meechie,” acting at the direction of JUSSIAH HERBERT a.k.a. “Lokko,” and JAYVONTE NASH a.k.a. “Barney” acted in concert to possess multiple loaded and operable firearms, including PISTOL 2 and PISTOL 5, with the intent to use PISTOL 2 and PISTOL 5 unlawfully against rival HSB gang members.
 20. On or about March 22, 2022, DONOVAN CANNON a.k.a. “Don Dollaz,” RAYMOND VILLEGAS a.k.a. “Chase Mula,” OMARIAN FRANCIS a.k.a. “Mari,” and AMIS BONNER a.k.a. “Meechie,” at the direction of high-ranking BHB members JUSSIAH HERBERT a.k.a. “Lokko,” and JAYVONTE NASH a.k.a. “Barney” acted in concert in firing multiple loaded and operable firearms, including PISTOL 2 and PISTOL 5, at the Redington Street, Bay Shore residence of a rival HSB gang member.
 21. On or about March 22, 2022, DONOVAN CANNON a.k.a. “Don Dollaz,” and RAYMOND VILLEGAS a.k.a. “Chase Mula,” at the direction of high-ranking BHB member JUSSIAH HERBERT a.k.a. “Lokko,” acted in concert in firing multiple loaded and operable firearms, including PISTOL 2 and PISTOL 5 at the Chapman Place, Bay Shore residence of a rival HSB gang member.
 22. On or about and between June 15, 2022, and June 18, 2022, JAYVONTE NASH a.k.a. “Barney,” possessed PISTOL 6 with the intent to use said firearm against a rival 9-TREY gang member.
 23. On or about and between June 15, 2022, and June 18, 2022, JAYVONTE NASH a.k.a. “Barney,” fired multiple shots from PISTOL 6 at the

residence of a rival 9-TREY gang member on Wilson Avenue, Riverhead.

24. On or about July 8, 2022, AMIS BONNER a.k.a. Meechie possessed PISTOL 7.
25. On or about October 29, 2022, JAYVONTE NASH a.k.a. "Barney" and JAHEIM WOODSON possessed PISTOL 8 with the intent to use PISTOL 8 unlawfully.
26. On or about October 29, 2022, JAYVONTE NASH a.k.a. "Barney," acting in concert with JAHEIM WOODSON, fired PISTOL 8 at CIVILIAN WITNESS 2, attempting to kill CIVILIAN WITNESS 2.
27. On or about and between January 5, 2023, through March 3, 2023, OUMAR BARRY a.k.a. "Dollo," offered to provide REYMON RODRIGUEZ a.k.a. "Spazzo," with a firearm.
28. On or about February 16, 2023, JERMAINE JACKSON a.k.a. "JJ," ISAIAH BEAUFORD a.k.a. "Benji," KAMAR ADDISON a.k.a. "Ky," and KHAMARI ELIE a.k.a. "Mari," coordinated a shooting at the residence of a rival gang member's residence.
29. On or about February 16, 2023, JERMAINE JACKSON a.k.a. "JJ," ISAIAH BEAUFORD a.k.a. "Benji," KAMAR ADDISON a.k.a. "Ky," and KHAMARI ELIE a.k.a. "Mari," acted in concert to possess at least three loaded and operable firearms, PISTOL 9, PISTOL 10, and PISTOL 11, with the intent to use said firearms unlawfully against a rival gang member.
30. On or about February 16, 2023, JERMAINE JACKSON a.k.a. "JJ," ISAIAH BEAUFORD a.k.a. "Benji," KAMAR ADDISON a.k.a. "Ky," and KHAMARI ELIE a.k.a. "Mari," acted in concert in firing multiple loaded and operable firearms, including PISTOL 9, PISTOL 10, and PISTOL 11 at the Bay Shore residence of a rival gang member.
31. On or about and between March 1, 2023, and March 31, 2023, ERIC ROMAN a.k.a. "E dot," JAIDAN BEABRUN a.k.a. "Snipe," REYMON

- RODRIGUEZ a.k.a. "Spazzo," and others acted in concert to possess a firearm with the intent to use it unlawfully.
32. On or about March 3, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo" travelled to Nassau County to purchase a firearm from high-ranking Nassau County BHB member OUMAR BARRY a.k.a. "Dollo."
 33. On or about March 15, 2023, JAIDAN BEABRUN a.k.a. "Snipe," and REYMON RODRIGUEZ a.k.a. "Spazzo," boasted on social media about possessing multiple firearms, including PISTOL 12 in a video posted on social media.
 34. On or about March 15, 2023, JAIDAN BEABRUN a.k.a. "Snipe," possessed PISTOL 12 with the intent to use PISTOL 12 unlawfully.
 35. On or about March 29, 2023, JERMAINE JACKSON a.k.a. "JJ," possessed a loaded PISTOL 9, in a vehicle used by ISAAH BEAUFORD a.k.a. "Benji," and KAMAR ADDISON a.k.a. "Ky."
 36. On or about March 31, 2023, high-ranking Nassau County BHB member OUMAR BARRY a.k.a. "Dollo," solicited assistance from high-ranking Suffolk County BHB member JUSSIAH HERBERT a.k.a. "Lokko," to have HERBERT to send lower-ranking BHB members from Suffolk County to commit a shooting for BARRY, as retaliation for rival gang members previously shooting at BARRY.
 37. On or about March 31, 2023, JUSSIAH HERBERT a.k.a. "Lokko" reported back to OUMAR BARRY a.k.a. "Dollo," that lower-ranking BHB members from Suffolk County would steal a car and meet BARRY to commit the shooting at rival gang members ordered by BARRY.
 38. On or about March 31, 2023, OCTAVIOUS ROSE a.k.a. "Skar" ordered lower-ranking BHB member JOEL BADGER a.k.a. "Suvy" to get a car to use in the shooting ordered by high ranking BHB members OUMAR BARRY a.k.a. "Dollo" and JUSSIAH HERBERT a.k.a. "Lokko."
 39. On or about March 31, 2023, high-ranking BHB member OUMAR BARRY a.k.a. "Dollo," coordinated the theft of a Black Honda Accord,

in Nassau County, for lower-ranking BHB members from Suffolk County to use in a shooting that BARRY ordered.

40. On or about March 31, 2023, JOEL BADGER a.k.a. "Suvy" and KEYSEAN MEADE a.k.a. "Key" coordinated acquiring a firearm to use in the shooting ordered by high ranking BHB members OUMAR BARRY a.k.a. "Dollo" and JUSSIAH HERBERT a.k.a. "Lokko."
41. On or about March 31, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo" and JOEL BADGER a.k.a. "Suvy," coordinated meeting up to commit the shooting ordered by high ranking BHB members OUMAR BARRY a.k.a. "Dollo" and JUSSIAH HERBERT a.k.a. "Lokko."
42. On or about March 31, 2023, high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and OUMAR BARRY a.k.a. "Dollo," planned to use the shooting ordered by HERBERT and BARRY to have lower-ranking BHB members also kill an unsuspecting fellow-BHB member who BARRY and HERBERT believed to be cooperating with law enforcement.
43. On or about March 31, 2023, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," ordered OCTAVIOUS ROSE a.k.a. "Skar," and JAYVONTE NASH a.k.a. "Barney," to kill a lower-ranking BHB member who HERBERT and OUMAR BARRY a.k.a. "Dollo" believed to be cooperating with law enforcement and take said lower-ranking BHB member's firearm after killing him.
44. On or about March 31, 2023, OCTAVIOUS ROSE a.k.a. "Skar" offered to kill the lower-ranking BHB member who high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and OUMAR BARRY a.k.a. "Dollo" believed to be cooperating with law enforcement.
45. On or about April 1, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key" travelled from Suffolk County to Nassau County to meet OUMAR BARRY a.k.a. "Dollo."

46. On or about April 1, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key," travelled within Nassau County in a stolen car to carry out a shooting at rival gang members, ordered by high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and OUMAR BARRY a.k.a. "Dollo."
47. On or about April 1, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key" acted in concert to possess PISTOL 13, in a stolen vehicle with the intent to use said firearm unlawfully against a rival gang member at the direction of high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and OUMAR BARRY a.k.a. "Dollo."
48. On or about April 1, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key," while travelling in a stolen vehicle at Polk Avenue, Hempstead, Nassau County, fired multiple shots from PISTOL 13, killing an unintended victim, Kimberly Midgette and injuring another unintended victim.
49. On or about April 1, 2023, JAVON HOLLIDAY a.k.a. "Stakkz," reported to high-ranking BHB member JAYVONTE NASH a.k.a. "Barney," that JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key," were with OUMAR BARRY a.k.a. "Dollo," to carry out the shooting ordered by high-ranking BHB members JUSSIAH HERBERT a.k.a. "Lokko," and OUMAR BARRY a.k.a. "Dollo."
50. On or about April 1, 2023, high-ranking Nassau County BHB member OUMAR BARRY a.k.a. "Dollo," reported back to high-ranking Suffolk County BHB member JUSSIAH HERBERT a.k.a. "Lokko," that lower-ranking Suffolk County BHB members JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key," performed well in committing the shooting ordered by BARRY and HERBERT.
51. On or about April 1, 2023, JOEL BADGER a.k.a. "Suvy," urged JUSSIAH HERBERT a.k.a. "Lokko," to promote BADGER within the

BHB ranks for committing the shooting ordered by HERBERT and OUMAR BARRY a.k.a. "Dollo" on April 1, 2023.

52. On or about April 1, 2023, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," promoted JOEL BADGER a.k.a. "Suvy," and KEYSEAN MEADE a.k.a. "Key," within the BHB ranks for performing well in the shooting ordered by OUMAR BARRY a.k.a. "Dollo," and HERBERT on April 1, 2023.
53. On or about April 1, 2023, high-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko," encouraged lower-ranking BHB members JAYVONTE NASH a.k.a. "Barney," and OCTAVIOUS ROSE a.k.a. "Skar," to get more actively involved in committing violence if they want to be promoted within the BHB ranks.
54. On or about April 14, 2023, OCTAVIOUS ROSE a.k.a. "Skar," asked lower-ranking BHB member, JOEL BADGER a.k.a. "Suvy," if BADGER could acquire a firearm so that BADGER could join ROSE in a shooting to retaliate for a rival gang member shooting at JAVON HOLLIDAY a.k.a. "Stakkz."
55. On or about April 14, 2023, OCTAVIOUS ROSE a.k.a. "Skar," and JUSSIAH HERBERT a.k.a. "Lokko" coordinated with lower-ranking BHB members, JAVON HOLLIDAY a.k.a. "Stakkz," JOEL BADGER a.k.a. "Suvy," and ACOREY HOBBS a.k.a. "Demon" to commit a shooting to retaliate for a rival gang member shooting at HOLLIDAY.
56. On or about April 15, 2023, OCTAVIOUS ROSE a.k.a. "Skar," JOEL BADGER a.k.a. "Suvy," JAVON HOLLIDAY a.k.a. "Stakkz," and ACOREY HOBBS a.k.a. "Demon," travelled to Brentwood to commit a shooting at a residence on Hancock Street.
57. On or about April 15, 2023, OCTAVIOUS ROSE a.k.a. "Skar," JOEL BADGER a.k.a. "Suvy," JAVON HOLLIDAY a.k.a. "Stakkz," and ACOREY HOBBS a.k.a. "Demon," acted in concert to possess at least three loaded and operable firearms, including a loaded PISTOL 13, a

loaded PISTOL 14, and a loaded PISTOL 15, with the intent to use said pistols unlawfully against rival gang members.

58. On or about April 15, 2023, OCTAVIOUS ROSE a.k.a. "Skar," JOEL BADGER a.k.a. "Suvy," JAVON HOLLIDAY a.k.a. "Stakkz," ACOREY HOBBS a.k.a. "Demon," acted in concert with each other and fired rounds from at least three loaded and operable firearms including PISTOL 13, PISTOL 14, and PISTOL 15, at multiple residences on Hancock Street in Brentwood to retaliate for a rival gang members shooting at HOLLIDAY.
59. On or about May 25, 2023, KAMAR ADDISON a.k.a. "Ky," ISIAIAH BEAUFORD a.k.a. "Benji," and HORACE HIBBERT acted in concert to possess PISTOL 16 with the intent to use PISTOL 16 unlawfully.
60. On or about May 25, 2023, KAMAR ADDISON a.k.a. "Ky," ISIAIAH and BEAUFORD a.k.a. "Benji," and HORACE HIBBERT, acted in concert to shoot PISTOL 16 at CIVILIAN WITNESS 3 during the course and commission of an armed robbery, seriously injuring CIVILIAN WITNESS 3.
61. On or about July 1, 2023, OCTAVIOUS ROSE a.k.a. "Skar," possessed a loaded PISTOL 14 with the intent to use unlawfully.
62. On or about July 1, 2023, OCTAVIOUS ROSE a.k.a. "Skar," fired multiple rounds from PISTOL 14 outside The Bays Bar & Grill in Hampton Bays.
63. On or about July 7, 2023, ANDREW LITTLE a.k.a. "A Dot," MARWAN GHANEM a.k.a. "M Dot," and ERIC ROMAN a.k.a. "E Dot," and others acted in concert to possess PISTOL 17 with the intent to use PISTOL 17 unlawfully.
64. On or about July 7, 2023, ANDREW LITTLE a.k.a. "A Dot," MARWAN GHANEM a.k.a. "M Dot," ERIC ROMAN a.k.a. "E Dot," and others acted in concert to shoot PISTOL 17 at CIVILIAN WITNESS 4 during the course and commission of an armed robbery, injuring CIVILIAN WITNESS 4.

65. On or about August 13, 2023, OCTAVIOUS ROSE a.k.a. "Skar," ordered lower-ranking BHB members to "shoot to kill," in response to a lower-ranking BHB getting shot.
66. On or about August 25, 2023, OUMAR BARRY a.k.a. "Dollo," asked for OCTAVIOUS ROSE a.k.a. "Skar" to return a firearm to BARRY.
67. On or about August 29, 2023, OCTAVIOUS ROSE a.k.a. "Skar," posted publicly on social media the highest-ranking BHB member, LATIQUE JOHNSON a.k.a. "La Brim" has ordered that every member of MBB should be shot and killed.
68. On or about September 27, 2023, JOEL BADGER a.k.a. "Suvy," acting in concert with others, displayed what appeared to be a firearm during a robbery of two individuals.
69. On or about October 4, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," acting in concert with AARON BEATTY, possessed PISTOL 18 with intent to use PISTOL 18 unlawfully.
70. On or about November 3, 2023, JAVON HOLLIDAY a.k.a. "Stakkz," and GIAVANNA PERGOLA acted in concert to possess PISTOL 19 with the intent to use PISTOL 19 unlawfully.
71. On or about January 19, 2024, JAVON HOLLIDAY a.k.a. "Stakkz," and GIAVANNA PERGOLA acted in concert to possess PISTOL 20 with the intent to use PISTOL 20 unlawfully.

COUNT THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **LATIQUE JOHNSON** a.k.a. “La Brim,” **JUSSIAH HERBERT** a.k.a. “Lokko,” **OUMAR BARRY** a.k.a. “Dollo,” **JAYVONTE NASH** a.k.a. “Barney,” **ISAIAH BEAUFORD** a.k.a. “Benji,” **KAMAR ADDISON** a.k.a. “Ky,” **JAIDAN BEAUBRUN** a.k.a. “Snipe,” **JOEL BADGER** a.k.a. “Suvy,” **REYMON RODRIGUEZ** a.k.a. “Spazzo,” **ERIC ROMAN** a.k.a. “E Dot,” **ANDREW LITTLE** a.k.a. “A Dot,” **MARWAN GHANEM** a.k.a. “M Dot,” **HORACE HIBBERT**, **MAHKI TAYLOR**, and **TANAYA LOVE** of the crime of CONSPIRACY IN THE FOURTH DEGREE, in violation of P.L. § 105.10(1), committed as follows:

The defendants, from on or about August 23, 2021 to February 7, 2024, in the County of Suffolk, State of New York, and elsewhere, with intent that conduct constituting the crime of Robbery in the First Degree be performed, a Class B 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 B Felony.

OVERT ACTS

In furtherance of the conspiracies charged in COUNT THREE, and to achieve the objects thereof, the following overt acts, among others, were committed in the County of Suffolk, State of New York, and elsewhere:

1. On or about and between March 1, 2023, and March 31, 2023, **MARWAN GHANEM** a.k.a. “M Dot,” **ERIC ROMAN** a.k.a. “E Dot,” **JAIDAN BEAUBRUN** a.k.a. “Snipe,” and others attempted to commit a robbery of another in East Setauket, New York.
2. On or about and between March 1, 2023, and March 31, 2023, **MARWAN GHANEM** a.k.a. “M. Dot,” **ERIC ROMAN** a.k.a. “E dot,”

JAIDAN BEABRUN a.k.a. "Snipe," and others committed a robbery of another on Tenpoint Lane, East Setauket, New York.

3. On or about and between March 1, 2023, and March 31, 2023, MARWAN GHANEM a.k.a. "M. Dot," ERIC ROMAN a.k.a. "E dot," JAIDAN BEABRUN a.k.a. "Snipe," REYMON RODRIGUEZ a.k.a. "Spazzo," and others acted in concert to coordinate the armed robbery of another individual in Port Jefferson, New York.
4. On or about and between March 1, 2023, and March 31, 2023, ERIC ROMAN a.k.a. "E dot," JAIDAN BEABRUN a.k.a. "Snipe," REYMON RODRIGUEZ a.k.a. "Spazzo," and others acted in concert to possess a firearm with the intent to use it unlawfully.
5. On or about and between March 1, 2023, and March 31, 2023, REYMON RODRIGUEZ a.k.a. "Spazzo," and others displayed what appeared to be a firearm during a robbery of another individual.
6. On or about and between March 1, 2023, and March 31, 2023, ERIC ROMAN a.k.a. "E Dot," sold the proceeds from an armed robbery and provided money to higher-ranking BHB member JUSSIAH HERBERT a.k.a. "Lokko."
7. On or about April 8, 2023, high-ranking BHB members OUMAR BARRY a.k.a. "Dollo" and JUSSIAH HERBERT a.k.a. "Lokko" coordinated sending BHB fees to the highest-ranking BHB member, LATIQUE JOHNSON a.k.a. "La Brim," to stay in good standing within BHB.
8. On or about April 8, 2023, JUSSIAH HERBERT a.k.a. "Lokko" sent \$250.00 United States Currency with the notation "AFGHAN FEES" on the mobile payment service "Cash App" to the highest-ranking BHB member, LATIQUE JOHNSON a.k.a. "La Brim."
9. On or about and between May 1, 2023, and May 31, 2023, JAYVONTE NASH a.k.a. "Barney," lured an individual to a location in Suffolk County under the guise that lower-ranking BHB members wanted to purchase marihuana from said individual.

10. On or about and between May 1, 2023, and May 31, 2023, JAYVONTE NASH a.k.a. "Barney," ordered lower-ranking members of BHB to rob an individual that NASH lured to a specific location within Suffolk County under the guise that said individual was going to sell marihuana to lower-ranking BHB members.
11. On or about May 25, 2023, ISAIAH BEAUFORD a.k.a. "Benji" lured CIVILIAN WITNESS 3 to a location where KAMAR ADDISON a.k.a. "Ky," BEAUFORD, and HORACE HIBBERT could rob CIVILIAN WITNESS 3 under the guise that BEAUFORD wanted to purchase marihuana from CIVILIAN WITNESS 3.
12. On or about May 25, 2023, KAMAR ADDISON a.k.a. "Ky," ISAIAH BEAUFORD a.k.a. "Benji," and HORACE HIBBERT acted in concert to possess PISTOL 16 with the intent to use PISTOL 16 unlawfully.
13. On or about May 25, 2023, KAMAR ADDISON a.k.a. "Ky," ISAIAH BEAUFORD a.k.a. "Benji," and HORACE HIBBERT acted in concert to shoot PISTOL 16 at CIVILIAN WITNESS 3 during the course and commission of an armed robbery, seriously injuring CIVILIAN WITNESS 3.
14. On or about May 25, 2023, KAMAR ADDISON a.k.a. "Ky," ISAIAH BEAUFORD a.k.a. "Benji," and HORACE HIBBERT acted in concert to forcibly steal property from CIVILIAN WITNESS 3.
15. On or about July 5, 2023, OCTAVIOUS ROSE a.k.a. "Skar," instructed lower-ranking BHB members to pay fees that would go to LATIQUE JOHNSON a.k.a. "La Brim" to prove their loyalty and worth to BHB.
16. On or about July 5, 2023, OCTAVIOUS ROSE a.k.a. "Skar," advised lower-ranking BHB members to sell narcotics to help raise money to send to LATIQUE JOHNSON a.k.a. "La Brim."
17. On or about July 7, 2023, MARWAN GHANEM a.k.a. "M Dot" lured CIVILIAN WITNESS 4 to a location where GHANEM, ANDREW LITTLE A.K.A. "A Dot," and ERIC ROMAN a.k.a. "E Dot" could rob

CIVILIAN WITNESS 4 under the guise that GHANEM wanted to purchase marihuana from CIVILIAN WITNESS 4.

18. On or about July 7, 2023, ANDREW LITTLE a.k.a. "A Dot," ERIC ROMAN a.k.a. "E Dot," and MARWAN GHANEM a.k.a. "M Dot" acted in concert to possess a PISTOL 17 with the intent to use PISTOL 17 unlawfully.
19. On or about July 7, 2023, MARWAN GHANEM a.k.a. "M Dot," ANDREW LITTLE A.K.A. "A Dot," and ERIC ROMAN a.k.a. "E Dot," travelled to the location where CIVILIAN WITNESS 4 agreed to meet GHANEM.
20. On or about July 7, 2023, ANDREW LITTLE a.k.a. "A Dot," ERIC ROMAN a.k.a. "E Dot," and MARWAN GHANEM a.k.a. "M Dot," acted in concert to forcibly steal property from CIVILIAN WITNESS 4.
21. On or about July 7, 2023, ANDREW LITTLE a.k.a. "A Dot," ERIC ROMAN a.k.a. "E Dot," and MARWAN GHANEM a.k.a. "M Dot" acted in concert to shoot PISTOL 17 at CIVILIAN WITNESS 4 during the course and commission of an armed robbery, injuring CIVILIAN WITNESS 4.
22. On or about July 28, 2023, OCTAVIOUS ROSE a.k.a. "Skar," sent his "Cash App" username to lower-ranking BHB members so that ROSE could collect fees for the BHB.
23. On or about July 29, 2023, OCTAVIOUS ROSE a.k.a. "Skar," sent the details of a BHB meeting to discuss BHB activities and membership to lower-ranking BHB members.
24. On or about July 31, 2023, OCTAVIOUS ROSE a.k.a. "Skar," ordered lower-ranking BHB member to send fees, as this month's fees would go to LATIQUE JOHNSON a.k.a. "La Brim," and the next month's fees would stay with the "Afghan" BHB set.
25. On or about August 24, 2023, OUMAR BARRY a.k.a. "Dollo," punished OCTAVIOUS ROSE a.k.a. "Skar," with a fine to be paid to the BHB for not following instructions given by OUMAR BARRY a.k.a. "Dollo."

26. On or about August 25, 2023, OUMAR BARRY a.k.a. "Dollo," demanded fees from lower-ranking BHB member, OCTAVIOUS ROSE a.k.a. "Skar," and the BHB members under ROSE.
27. On or about September 5, 2023, OUMAR BARRY a.k.a. "Dollo," communicated an order from highest-ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim" and instructed lower-ranking BHB member, OCTAVIOUS ROSE a.k.a. "Skar," that ROSE and another member were in charge of the Suffolk BHB members and everything else was "shut down," because LATIQUE JOHNSON a.k.a. "La Brim" was mad at members for infighting within BHB.
28. On or about September 5, 2023, OCTAVIOUS ROSE a.k.a. "Skar," communicated the message from highest-ranking BHB member LATIQUE JOHNSON a.k.a. "La Brim" instructing lower-ranking BHB members that ROSE, and another BHB member were in charge of the Suffolk BHB set, due to infighting within BHB.
29. On or about September 27, 2023, TANAYA LOVE lured two individuals to a location where JOEL BADGER a.k.a. "Suvy" and MAHKI TAYLOR could rob these individuals under the guise that LOVE wanted to purchase marihuana from these individuals.
30. On or about September 27, 2023, JOEL BADGER a.k.a. "Suvy," TANAYA LOVE and MAHKI TAYLOR acted in concert to display what appeared to be a firearm during a robbery of two individuals.
31. On or about September 27, 2023, JOEL BADGER a.k.a. "Suvy," TANAYA LOVE and MAHKI TAYLOR acted in concert to display a knife and used said knife during the course and commission of a robbery of two individuals, injuring one of those individuals.
32. On or about September 27, 2023, JOEL BADGER a.k.a. "Suvy," TANAYA LOVE and MAHKI TAYLOR forcibly stole property from two individuals.

33. On or about October 4, 2023, OCTAVIOUS ROSE a.k.a. “Skar,” sent a message to lower-ranking BHB members that LATIQUE JOHNSON a.k.a. “La Brim” demanded fees paid by BHB members.

COUNT FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. “Lokko,” and **JANELL JOHNSON** a.k.a. “Jah Jah” of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other and others, on or about August 23, 2021, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 1, such possession not being in the defendant’s home or place of business.

COUNT FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. “Lokko,” and **JANELL JOHNSON** a.k.a. “Jah Jah” of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other and others, on or about August 23, 2021, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 1, with the intent to use the same unlawfully against another.

COUNT SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," and **JANELL JOHNSON** a.k.a. "Jah Jah" of the crime of RECKLESS ENDANGERMENT IN THE FIRST DEGREE, in violation of P.L. § 120.25, committed as follows:

The defendants, acting in concert with each other and others, on or about August 23, 2021, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

COUNT SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **JANELL JOHNSON** a.k.a. "Jah Jah," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **KARIEM HARRELL** a.k.a. "Ghost," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about January 12, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 2, such possession not being in the defendant's home or place of business.

COUNT EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **JANELL JOHNSON** a.k.a. "Jah Jah," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **KARIEM HARRELL** a.k.a. "Ghost," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about January 12, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 3, such possession not being in the defendant's home or place of business.

COUNT NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **JANELL JOHNSON** a.k.a. "Jah Jah," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **KARIEM HARRELL** a.k.a. "Ghost," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about January 12, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 2, with the intent to use the same unlawfully against another.

COUNT TEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **JANELL JOHNSON** a.k.a. "Jah Jah," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **KARIEM HARRELL** a.k.a. "Ghost," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about January 12, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 3, with the intent to use the same unlawfully against another.

COUNT ELEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **JANELL JOHNSON** a.k.a. "Jah Jah," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **KARIEM HARRELL** a.k.a. "Ghost," of the crime of RECKLESS ENDANGERMENT IN THE FIRST DEGREE, in violation of P.L. § 120.25, committed as follows:

The defendants, acting in concert with each other and others, on or about January 12, 2022, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

COUNT TWELVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **JANELL JOHNSON** a.k.a. "Jah Jah," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **KARIEM HARRELL** a.k.a. "Ghost," of the crime of RECKLESS ENDANGERMENT IN THE FIRST DEGREE, in violation of P.L. § 120.25, committed as follows:

The defendants, acting in concert with each other and others, on or about January 12, 2022, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

THE SUBJECT MATTER OF THIS COUNT BEING DIFFERENT THAN THAT OF COUNT ELEVEN ABOVE.

COUNT THIRTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **JANELL JOHNSON** a.k.a. "Jah Jah," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **KARIEM HARRELL** a.k.a. "Ghost," of the crime of ASSAULT IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 120.05 (2), committed as follows:

The defendants, acting in concert with each other, on or about January 12, 2022, in the County of Suffolk, State of New York, with intent to cause physical injury to CIVILIAN WITNESS 1, did cause such injury to such person or a third person, by means of a deadly weapon, namely a firearm.

COUNT FOURTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **KARIEM HARRELL** a.k.a. "Ghost," **REYMON RODRIGUEZ** a.k.a. "Spazzo," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about February 8, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 2, such possession not being in the defendant's home or place of business.

COUNT FIFTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **KARIEM HARRELL** a.k.a. "Ghost," **REYMON RODRIGUEZ** a.k.a. "Spazzo," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about February 8, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 4, such possession not being in the defendant's home or place of business.

COUNT SIXTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **KARIEM HARRELL** a.k.a. "Ghost," **REYMON RODRIGUEZ** a.k.a. "Spazzo," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about February 8, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 2, with the intent to use the same unlawfully against another.

COUNT SEVENTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **KARIEM HARRELL** a.k.a. "Ghost," **REYMON RODRIGUEZ** a.k.a. "Spazzo," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about February 8, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 4, with the intent to use the same unlawfully against another.

COUNT EIGHTEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **KARIEM HARRELL** a.k.a. "Ghost," **REYMON RODRIGUEZ** a.k.a. "Spazzo," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of RECKLESS ENDANGERMENT IN THE FIRST DEGREE, in violation of P.L. § 120.25, committed as follows:

The defendants, acting in concert with each other and others, on or about February 8, 2022, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

COUNT NINETEEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant **KARIEM HARRELL** a.k.a. "Ghost" of the crime of CRIMINAL SALE OF A FIREARM IN THE THIRD DEGREE, an armed violent felony, in violation of P.L. § 265.11(2), committed as follows:

The defendant, on or about and between February 23, 2022, through March 6, 2022, did possess a firearm, namely PISTOL 2, with the intent to sell it.

COUNT TWENTY

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," **and DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about March 20, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 2, such possession not being in the defendant's home or place of business.

COUNT TWENTY-ONE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," **and DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about March 20, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 5, such possession not being in the defendant's home or place of business.

COUNT TWENTY-TWO

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about March 20, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 2, with the intent to use the same unlawfully against another.

COUNT TWENTY-THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about March 20, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 5, with the intent to use the same unlawfully against another.

COUNT TWENTY-FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of RECKLESS ENDANGERMENT IN THE FIRST DEGREE, in violation of P.L. § 120.25, committed as follows:

The defendants, acting in concert with each other, on or about March 20, 2022, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

COUNT TWENTY-FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about March 21, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 2, such possession not being in the defendant's home or place of business.

COUNT TWENTY-SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about March 21, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 5, such possession not being in the defendant's home or place of business.

COUNT TWENTY-SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about March 21, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 2, with the intent to use the same unlawfully against another.

COUNT TWENTY-EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about March 21, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 5, with the intent to use the same unlawfully against another.

COUNT TWENTY-NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of **RECKLESS ENDANGERMENT IN THE FIRST DEGREE**, in violation of P.L. § 120.25, committed as follows:

The defendants, acting in concert with each other, on or about March 21, 2022, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

COUNT THIRTY

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," **DONOVAN CANNON** a.k.a. "Don Dollaz," **JAYVONTE NASH** a.k.a. "Barney," **OMARIAN FRANCIS** a.k.a. "Mari," and **AMIS BONNER** a.k.a. "Meechie," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about March 22, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 2, such possession not being in the defendant's home or place of business.

COUNT THIRTY-ONE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," **DONOVAN CANNON** a.k.a. "Don Dollaz," **JAYVONTE NASH** a.k.a. "Barney," **OMARIAN FRANCIS** a.k.a. "Mari," and **AMIS BONNER** a.k.a. "Meechie," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about March 22, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 5, such possession not being in the defendant's home or place of business.

COUNT THIRTY-TWO

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," **DONOVAN CANNON** a.k.a. "Don Dollaz," **JAYVONTE NASH** a.k.a. "Barney," **OMARIAN FRANCIS** a.k.a. "Mari," and **AMIS BONNER** a.k.a. "Meechie," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about March 22, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 2, with the intent to use the same unlawfully against another.

COUNT THIRTY-THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," **DONOVAN CANNON** a.k.a. "Don Dollaz," **JAYVONTE NASH** a.k.a. "Barney," **OMARIAN FRANCIS** a.k.a. "Mari," and **AMIS BONNER** a.k.a. "Meechie," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about March 22, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 5, with the intent to use the same unlawfully against another.

COUNT THIRTY-FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," **DONOVAN CANNON** a.k.a. "Don Dollaz," **JAYVONTE NASH** a.k.a. "Barney," **OMARIAN FRANCIS** a.k.a. "Mari," and **AMIS BONNER** a.k.a. "Meechie," of the crime of RECKLESS ENDANGERMENT IN THE FIRST DEGREE, in violation of P.L. § 120.25, committed as follows:

The defendants, acting in concert with each other, on or about March 22, 2022, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

COUNT THIRTY-FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JUSSIAH HERBERT** a.k.a. "Lokko," **RAYMOND VILLEGAS** a.k.a. "Chase Mula," **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of RECKLESS ENDANGERMENT IN THE FIRST DEGREE, in violation of P.L. § 120.25, committed as follows:

The defendants, acting in concert with each other, on or about March 22, 2022, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

THE SUBJECT MATTER OF THIS COUNT BEING DIFFERENT THAN THAT OF
COUNT THIRTY-FOUR ABOVE.

COUNT THIRTY-SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A FIREARM, an armed felony, in violation of P.L. § 265.01-b(1) committed as follows:

The defendants, acting in concert with each other, on or about March 22, 2022, in the County of Suffolk, State of New York, did knowingly possess a firearm, namely PISTOL 2.

COUNT THIRTY-SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **RAYMOND VILLEGAS** a.k.a. "Chase Mula," and **DONOVAN CANNON** a.k.a. "Don Dollaz," of the crime of CRIMINAL POSSESSION OF A FIREARM, an armed felony, in violation of P.L. § 265.01-b(1) committed as follows:

The defendants, acting in concert with each other, on or about March 22, 2022, in the County of Suffolk, State of New York, did knowingly possess a firearm, namely PISTOL 5.

COUNT THIRTY-EIGHT

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

The defendant, on or about and between June 15, 2022, and June 18, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 6, such possession not being in the defendant's home or place of business.

COUNT THIRTY-NINE

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

The defendants, acting in concert with each other, on or about and between June 15, 2022, and June 18, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 6, with the intent to use the same unlawfully against another.

COUNT FORTY

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

The defendant, on or about and between June 15, 2022, and June 18, 2022, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

COUNT FORTY-ONE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JAYVONTE NASH** a.k.a. "Barney," and **JAHEIM WOODSON** of the crime of ATTEMPTED MURDER IN THE SECOND DEGREE, a violent felony, in violation of P.L. § 110/125.25(1), committed as follows:

The defendants, acting in concert with each other, on or about October 29, 2022, in the County of Suffolk, State of New York, with intent to cause the death of CIVILIAN WITNESS 2, attempted to cause the death of such person or a third person.

COUNT FORTY-TWO

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JAYVONTE NASH** a.k.a. "Barney," and **JAHEIM WOODSON** of the crime of **ATTEMPTED ASSAULT IN THE FIRST DEGREE**, an armed violent felony, in violation of P.L. § 110/120.10(1), committed as follows:

The defendants, acting in concert with each other, on or about October 29, 2022, in the County of Suffolk, State of New York, with intent to cause the serious physical injury to **CIVILIAN WITNESS 2**, attempted to cause such injury to such person by means of a deadly weapon, namely **PISTOL 8**.

COUNT FORTY-THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JAYVONTE NASH** a.k.a. "Barney," and **JAHEIM WOODSON** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about October 29, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, **PISTOL 8**, such possession not being in the defendant's home or place of business.

COUNT FORTY-FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JAYVONTE NASH** a.k.a. “Barney,” and **JAHEIM WOODSON** of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about October 29, 2022, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, **PISTOL 8**, with the intent to use the same unlawfully against another.

COUNT FORTY-FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JERMAINE JACKSON** a.k.a. “JJ,” **ISAIAH BEAUFORD** a.k.a. “Benji,” **KAMAR ADDISON** a.k.a. “Ky,” and **KHAMARIE ELIE** a.k.a. “Mari,” of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about February 16, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely **PISTOL 9**, such possession not being in the defendant’s home or place of business.

COUNT FORTY-SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JERMAINE JACKSON** a.k.a. "JJ," **ISAIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **KHAMARIE ELIE** a.k.a. "Mari," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about February 16, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely **PISTOL 10**, such possession not being in the defendant's home or place of business.

COUNT FORTY-SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JERMAINE JACKSON** a.k.a. "JJ," **ISAIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **KHAMARIE ELIE** a.k.a. "Mari," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about February 16, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely **PISTOL 11**, such possession not being in the defendant's home or place of business.

COUNT FORTY-EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JERMAINE JACKSON** a.k.a. "JJ," **ISAIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **KHAMARIE ELIE** a.k.a. "Mari," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about February 16, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 9, with the intent to use the same unlawfully against another.

COUNT FORTY-NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JERMAINE JACKSON** a.k.a. "JJ," **ISAIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **KHAMARIE ELIE** a.k.a. "Mari," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about February 16, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 10, with the intent to use the same unlawfully against another.

COUNT FIFTY

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JERMAINE JACKSON** a.k.a. "JJ," **ISAIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **KHAMARIE ELIE** a.k.a. "Mari," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about February 16, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 11, with the intent to use the same unlawfully against another.

COUNT FIFTY-ONE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JERMAINE JACKSON** a.k.a. "JJ," **ISAIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **KHAMARIE ELIE** a.k.a. "Mari," of the crime of **RECKLESS ENDANGERMENT IN THE FIRST DEGREE**, in violation of P.L. § 120.25, committed as follows:

The defendants, acting in concert with each other, on or about February 16, 2023, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

COUNT FIFTY-TWO

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

The defendant, on or about March 15, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 12, such possession not being in the defendant's home or place of business.

COUNT FIFTY-THREE

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

The defendant, on or about March 15, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 12, with the intent to use the same unlawfully against another.

COUNT FIFTY-FOUR

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

The defendant, on or about March 29, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 9, such possession not being in the defendant's home or place of business.

COUNT FIFTY-FIVE

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

The defendant, on or about March 29, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 9, with the intent to use the same unlawfully against another.

COUNT FIFTY-SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, **JERMAINE JACKSON** a.k.a. "JJ," of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of P.L. § 220.09(1), committed as follows:

The defendant on or about March 29, 2023, in the County of Suffolk, State of New York, did knowingly and unlawfully possess one or more preparations, compounds, mixtures or substances containing a narcotic drug, namely cocaine, and said preparations, compounds, mixtures or substances are of an aggregate weight of one-eighth ounce or more.

COUNT FIFTY-SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, **JERMAINE JACKSON** a.k.a. "JJ," of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SEVENTH DEGREE, in violation of P.L. § 220.03, committed as follows:

The defendant on or about March 29, 2023, in the County of Suffolk, State of New York, did knowingly and unlawfully possess a controlled substance, namely fentanyl.

COUNT FIFTY-EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **OCTAVIOUS ROSE** a.k.a. "Skar," **JOEL BADGER** a.k.a. "Suvy," **JAVON HOLLIDAY** a.k.a. "Stakkz," and **ACOREY HOBBS** a.k.a. "Demon," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about April 15, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 13, such possession not being in the defendant's home or place of business.

COUNT FIFTY-NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **OCTAVIOUS ROSE** a.k.a. "Skar," **JOEL BADGER** a.k.a. "Suvy," **JAVON HOLLIDAY** a.k.a. "Stakkz," and **ACOREY HOBBS** a.k.a. "Demon," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about April 15, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 14, such possession not being in the defendant's home or place of business.

COUNT SIXTY

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **OCTAVIOUS ROSE** a.k.a. "Skar," **JOEL BADGER** a.k.a. "Suvy," **JAVON HOLLIDAY** a.k.a. "Stakkz," and **ACOREY HOBBS** a.k.a. "Demon," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about April 15, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 15, such possession not being in the defendant's home or place of business.

COUNT SIXTY-ONE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **OCTAVIOUS ROSE** a.k.a. "Skar," **JOEL BADGER** a.k.a. "Suvy," **JAVON HOLLIDAY** a.k.a. "Stakkz," and **ACOREY HOBBS** a.k.a. "Demon," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about April 15, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 13, with the intent to use the same unlawfully against another.

COUNT SIXTY-TWO

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **OCTAVIOUS ROSE** a.k.a. "Skar," **JOEL BADGER** a.k.a. "Suvy," **JAVON HOLLIDAY** a.k.a. "Stakkz," and **ACOREY HOBBS** a.k.a. "Demon," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about April 15, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 14, with the intent to use the same unlawfully against another.

COUNT SIXTY-THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **OCTAVIOUS ROSE** a.k.a. "Skar," **JOEL BADGER** a.k.a. "Suvy," **JAVON HOLLIDAY** a.k.a. "Stakkz," and **ACOREY HOBBS** a.k.a. "Demon," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about April 15, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, namely PISTOL 15, with the intent to use the same unlawfully against another.

COUNT SIXTY-FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **OCTAVIOUS ROSE** a.k.a. "Skar," **JOEL BADGER** a.k.a. "Suvy," **JAVON HOLLIDAY** a.k.a. "Stakkz," and **ACOREY HOBBS** a.k.a. "Demon," of the crime of RECKLESS ENDANGERMENT IN THE FIRST DEGREE, in violation of P.L. § 120.25, committed as follows:

The defendants, acting in concert with each other, on or about April 15, 2023, in the County of Suffolk, State of New York, under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a grave risk of death for another person.

COUNT SIXTY-FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ISIAAH BAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **HORACE HIBBERT** of the crime of ASSAULT IN THE FIRST DEGREE, an armed violent felony, in violation of P.L. §120.10(1), committed as follows:

The defendants, acting in concert with each other, on or about May 25, 2023, in the County of Suffolk, State of New York, with intent to cause serious physical injury to another person, did cause such injury to CIVILIAN WITNESS 3 by means of a deadly weapon, namely PISTOL 16.

COUNT SIXTY-SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ISAIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **HORACE HIBBERT** of the crime of ROBBERY IN THE FIRST DEGREE, a violent felony, in violation of P.L. §160.15(1), committed as follows:

The defendants, acting in concert with each other, on or about May 25, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from CIVILIAN WITNESS 3 and in the course of the commission of the crime or of immediate flight therefrom caused serious physical injury to CIVILIAN WITNESS 3, who was not a participant in the crime.

COUNT SIXTY-SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ISAIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **HORACE HIBBERT** of the crime of ROBBERY IN THE FIRST DEGREE, an armed violent felony, in violation of P.L. §160.15(2), committed as follows:

The defendants, acting in concert with each other, on or about May 25, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from CIVILIAN WITNESS 3 and in the course of the commission of the crime or of immediate flight therefrom, the defendants were armed with a deadly weapon, namely PISTOL 16.

COUNT SIXTY-EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ISALIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **HORACE HIBBERT** of the crime of ROBBERY IN THE SECOND DEGREE, a violent felony, in violation of P.L. §160.10(1), committed as follows:

The defendants, acting in concert with each other and each aiding the other actually present, on or about May 25, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from CIVILIAN WITNESS 3.

COUNT SIXTY-NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ISALIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **HORACE HIBBERT**, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about May 25, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 16, with the intent to use the same unlawfully against another.

COUNT SEVENTY

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant **ISAIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **HORACE HIBBERT**, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about May 25, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 16, such possession not being in the defendant's home or place of business.

COUNT SEVENTY-ONE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **ISAIAH BEAUFORD** a.k.a. "Benji," **KAMAR ADDISON** a.k.a. "Ky," and **HORACE HIBBERT**, of the crime of CRIMINAL POSSESSION OF A FIREARM, an armed felony, in violation of P.L. § 265.01-b(1) committed as follows:

The defendants, acting in concert with each other, on or about May 25, 2023, in the County of Suffolk, State of New York, did knowingly possess a firearm, namely PISTOL 16.

COUNT SEVENTY-TWO

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, **SHANECKE TINCH**, of the crime of HINDERING PROSECUTION IN THE SECOND DEGREE, in violation of P.L. § 205.60 committed as follows:

The defendant, on or about May 25, 2023, in the County of Suffolk, State of New York, did render criminal assistance to a person, namely ISAIAH BEAUFORD a.k.a. "Benji," who had committed the class B felony of Robbery in the First Degree and Class C felony of Criminal Possession of a Weapon in the Second Degree.

COUNT SEVENTY-THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JOEL BADGER** a.k.a. "Suvy," and **ACOREY HOBBS** a.k.a. "Demon," of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of P.L. § 155.35(1) committed as follows:

The defendants, acting in concert with each other, on or about June 20, 2023, in the County of Suffolk, State of New York, stole property that had a value exceeding three thousand dollars.

COUNT SEVENTY-FOUR

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

The defendant, on or about July 1, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 14, such possession not being in the defendant's home or place of business.

COUNT SEVENTY-FIVE

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

The defendant, on or about July 1, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 14, with the intent to use the same unlawfully against another.

COUNT SEVENTY-SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ANDREW LITTLE** a.k.a. "A Dot," **MARWAN GHANEM** a.k.a. "M Dot," **and ERIC ROMAN** a.k.a. "E Dot," of the crime of ATTEMPTED ASSAULT IN THE FIRST DEGREE, an armed violent felony, in violation of P.L. § 110/120.10(1), committed as follows:

The defendants, acting in concert with each other, on or about July 7, 2023, in the County of Suffolk, State of New York, with intent to cause serious physical injury to another person, did attempt to cause such injury to such person, namely CIVILIAN WITNESS 4, by means of a deadly weapon namely PISTOL 17.

COUNT SEVENTY-SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ANDREW LITTLE** a.k.a. "A Dot," **MARWAN GHANEM** a.k.a. "M Dot," **and ERIC ROMAN** a.k.a. "E Dot," of the crime of ROBBERY IN THE FIRST DEGREE, an armed felony, in violation of P.L. § 160.15(4), committed as follows:

The defendants, acting in concert with each other, on or about July 7, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from CIVILIAN WITNESS 4 and in the course of the commission of the crime or of immediate flight therefrom displayed what appeared to be a firearm.

COUNT SEVENTY-EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ANDREW LITTLE** a.k.a. "A Dot," **MARWAN GHANEM** a.k.a. "M Dot," **and ERIC ROMAN** a.k.a. "E Dot," of the crime of ROBBERY IN THE FIRST DEGREE, an armed violent felony, in violation of P.L. § 160.15(2), committed as follows:

The defendants, acting in concert with each other, on or about July 7, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from CIVILIAN WITNESS 4 and in the course of the commission of the crime or of immediate flight therefrom, the defendants were armed with a deadly weapon, namely PISTOL 17.

COUNT SEVENTY-NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ANDREW LITTLE** a.k.a. "A Dot," **MARWAN GHANEM** a.k.a. "M Dot," **and ERIC ROMAN** a.k.a. "E Dot," of the crime of ROBBERY IN THE SECOND DEGREE, a violent felony, in violation of P.L. §160.10(2)(a), committed as follows:

The defendants, acting in concert with each other, on or about July 7, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from CIVILIAN WITNESS 4, and in the course of the commission of the crime or immediate flight therefrom, one of the defendants, caused physical injury to CIVILIAN WITNESS 4, who was not a participant in the crime.

COUNT EIGHTY

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ANDREW LITTLE** a.k.a. "A Dot," **MARWAN GHANEM** a.k.a. "M Dot," **and ERIC ROMAN** a.k.a. "E Dot," of the crime of ROBBERY IN THE SECOND DEGREE, a violent felony, in violation of P.L. § 160.10(1), committed as follows:

The defendants, acting in concert with each other and each aiding the other actually present, on or about July 7, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from CIVILIAN WITNESS 4.

COUNT EIGHTY-ONE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **ANDREW LITTLE** a.k.a. "A Dot," **MARWAN GHANEM** a.k.a. "M Dot," **and ERIC ROMAN** a.k.a. "E Dot," of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about July 7, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 17, with the intent to use the same unlawfully against another.

COUNT EIGHTY-TWO

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant **ANDREW LITTLE** a.k.a. "A Dot," **MARWAN GHANEM** a.k.a. "M Dot," **and ERIC ROMAN** a.k.a. "E Dot," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed violent felony, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about July 7, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 17, such possession not being in the defendant's home or place of business.

COUNT EIGHTY-THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **ANDREW LITTLE** a.k.a. "A Dot," **MARWAN GHANEM** a.k.a. "M Dot," **and ERIC ROMAN** a.k.a. "E Dot," of the crime of **CRIMINAL POSSESSION OF A FIREARM**, an armed felony, in violation of P.L. § 265.01-b(1) committed as follows:

The defendants, acting in concert with each other, on or about July 7, 2023, in the County of Suffolk, State of New York, did knowingly possess a firearm, namely PISTOL 17.

COUNT EIGHTY-FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JOEL BADGER** a.k.a. "Suvy," **MAHKI TAYLOR**, and **TANAYA LOVE** of the crime of ROBBERY IN THE FIRST DEGREE, an armed felony, in violation of P.L. §160.15(4), committed as follows:

The defendants, acting in concert with each other, on or about September 27, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from person whose identity is known to the Grand Jury, (CIVILIAN WITNESS 5) and in the course of the commission of the crime or of immediate flight therefrom displayed what appeared to be a firearm.

COUNT EIGHTY-FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JOEL BADGER** a.k.a. "Suvy," **MAHKI TAYLOR**, and **TANAYA LOVE** of the crime of ROBBERY IN THE FIRST DEGREE, a violent felony, in violation of P.L. § 160.15(3), committed as follows:

The defendants, acting in concert with each other, on or about September 27, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from CIVILIAN WITNESS 5 and in the course of the commission of the crime or of immediate flight therefrom, used or threatened the immediate use of a dangerous instrument, namely a knife.

COUNT EIGHTY-SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JOEL BADGER** a.k.a. "Suvy," **MAHKI TAYLOR**, and **TANAYA LOVE**, of the crime of ROBBERY IN THE SECOND DEGREE, a violent felony, in violation of P.L. §160.10(1), committed as follows:

The defendants, acting in concert with each other and each aiding the other actually present, on or about September 27, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from CIVILIAN WITNESS 5.

COUNT EIGHTY-SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JOEL BADGER** a.k.a. "Suvy," **MAHKI TAYLOR**, and **TANAYA LOVE**, of the crime of ROBBERY IN THE SECOND DEGREE, a violent felony, in violation of P.L. § 160.10(2)(a), committed as follows:

The defendants, acting in concert with each other, on or about September 27, 2023, in the County of Suffolk, State of New York, forcibly stole certain property from CIVILIAN WITNESS 5, and in the course of the commission of the crime or immediate flight therefrom, one of the defendants, caused physical injury to CIVILIAN WITNESS 5, who was not a participant in the crime.

COUNT EIGHTY-EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JOEL BADGER** a.k.a. "Suvy," **MAHKI TAYLOR**, and **TANAYA LOVE**, of the crime of ASSAULT IN THE SECOND DEGREE, a violent felony, in violation of P.L. § 120.05(2), committed as follows:

The defendants, acting in concert with each other, on or about September 27, 2023, in the County of Suffolk, State of New York, with the intent to cause physical injury to another person, did cause such injury to CIVILIAN WITNESS 5, by means of a deadly weapon or a dangerous instrument, namely a knife.

COUNT EIGHTY-NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **REYMON RODRIGUEZ** a.k.a. "Spazzo," and **AARON BEATTY**, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about October 4, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 18, such possession not being in the defendant's home or place of business.

COUNT NINETY

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **REYMON RODRIGUEZ** a.k.a. "Spazzo," and **AARON BEATTY**, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about October 4, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 18, with the intent to use the same unlawfully against another.

COUNT NINETY-ONE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, **OCTAVIOUS ROSE** a.k.a. "Skar," of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of P.L. § 220.16(1), committed as follows:

The defendant, on or about October 18, 2023, in the County of Suffolk, State of New York, knowingly and unlawfully possessed a narcotic drug, namely cocaine, with intent to sell the same.

COUNT NINETY-TWO

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant, **OCTAVIOUS ROSE** a.k.a. "Skar," of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FIFTH DEGREE, in violation of P.L. § 220.06(5), committed as follows:

The defendant, on or about October 18, 2023, in the County of Suffolk, State of New York, knowingly and unlawfully possessed cocaine, and said cocaine weighed five hundred milligrams or more.

COUNT NINETY-THREE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendant **JOEL BADGER** a.k.a. "Suvy," of the crime of GRAND LARCENY IN THE THIRD DEGREE, in violation of P.L. § 155.35(1) committed as follows:

The defendant, on or about and between November 1, 2023, and November 2, 2023, in the County of Suffolk, State of New York, stole property that had a value exceeding three thousand dollars.

COUNT NINETY-FOUR

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JAVON HOLLIDAY** a.k.a. “Stakkz,” and **GIAVANNA PERGOLA**, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about November 3, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 19, such possession not being in the defendant’s home or place of business.

COUNT NINETY-FIVE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JAVON HOLLIDAY** a.k.a. “Stakkz,” and **GIAVANNA PERGOLA**, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about November 3, 2023, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 19, with the intent to use the same unlawfully against another.

COUNT NINETY-SIX

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JAVON HOLLIDAY** a.k.a. "Stakkz," and **GIAVANNA PERGOLA**, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of P.L. § 220.16(1), committed as follows:

The defendants, acting in concert with each other, on or about November 3, 2023, in the County of Suffolk, State of New York, knowingly and unlawfully possessed a narcotic drug, namely fentanyl, with intent to sell the same.

COUNT NINETY-SEVEN

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JAVON HOLLIDAY** a.k.a. "Stakkz," and **GIAVANNA PERGOLA**, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of P.L. § 220.16(12), committed as follows:

The defendants, acting in concert with each other, on or about November 3, 2023, in the County of Suffolk, State of New York, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, namely fentanyl, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT NINETY-EIGHT

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JAVON HOLLIDAY** a.k.a. "Stakkz," and **GIAVANNA PERGOLA**, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of P.L. § 220.16(1), committed as follows:

The defendants, acting in concert with each other, on or about November 3, 2023, in the County of Suffolk, State of New York, knowingly and unlawfully possessed a narcotic drug, namely cocaine, with intent to sell the same.

COUNT NINETY-NINE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants **JAVON HOLLIDAY** a.k.a. "Stakkz," and **GIAVANNA PERGOLA**, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE FOURTH DEGREE, in violation of P.L. § 220.09(1), committed as follows:

The defendants, acting in concert with each other, on or about November 3, 2023, in the County of Suffolk, State of New York, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, namely cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-eighth ounce or more.

COUNT ONE HUNDRED

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JAVON HOLLIDAY** a.k.a. "Stakkz," and **GIAVANNA PERGOLA**, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of P.L. § 220.16(1), committed as follows:

The defendants, acting in concert with each other, on or about November 3, 2023, in the County of Suffolk, State of New York, knowingly and unlawfully possessed a narcotic drug, namely cocaine, with intent to sell the same.

THE SUBJECT MATTER OF THIS COUNT BEING DIFFERENT THAN THAT OF COUNT NINETY-EIGHT ABOVE.

COUNT ONE HUNDRED-ONE

AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JAVON HOLLIDAY** a.k.a. "Stakkz," and **GIAVANNA PERGOLA**, of the crime of CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE, in violation of P.L. § 220.16(12), committed as follows:

The defendants, acting in concert with each other, on or about November 3, 2023, in the County of Suffolk, State of New York, knowingly and unlawfully possessed one or more preparations, compounds, mixtures or substances containing a narcotic drug, namely cocaine, and said preparations, compounds, mixtures or substances were of an aggregate weight of one-half ounce or more.

COUNT ONE-HUNDRED-TWO

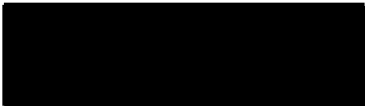
AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JAVON HOLLIDAY** a.k.a. "Stakkz," and **GIAVANNA PERGOLA**, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, in violation of P.L. § 265.03(3), committed as follows:

The defendants, acting in concert with each other, on or about January 19, 2024, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 20, such possession not being in the defendant's home or place of business.

COUNT ONE-HUNDRED-THREE

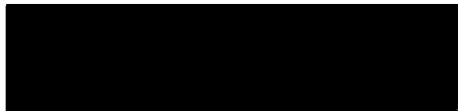
AND THE AFORESAID GRAND JURY, by this Indictment, further accuses the defendants, **JAVON HOLLIDAY** a.k.a. "Stakkz," and **GIAVANNA PERGOLA**, of the crime of CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE, an armed violent felony, an armed violent felony, in violation of P.L. § 265.03(1)(b), committed as follows:

The defendants, acting in concert with each other, on or about January 19, 2024, in the County of Suffolk, State of New York, did knowingly possess a loaded firearm, PISTOL 20, with the intent to use the same unlawfully against another.



FOREPERSON

ASSISTANT FOREPERSON
September 14, 2023 to March 14, 2024
GRAND JURY TERM 10-E



RAYMOND A. TIERNEY
DISTRICT ATTORNEY
SUFFOLK COUNTY