SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

THE PEOPLE OF THE STATE OF NEW YORK

-against-

SAMMUEL CASTILLO, a/k/a "Sosa,"
[redacted]
DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay,"
[redacted]
ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli,"
[redacted]
CHRISTOPHER STEWARD, a/k/a "2Chris,"
KENDALL WATTS, a/k/a "Maybach Finesse,"

Defendants.

THE GRAND JURY OF THE COUNTY OF NEW YORK, by this indictment, accuses the defendants of the crime of **ENTERPRISE CORRUPTION**, in violation of Penal Law §460.20(1)(a), committed as follows:

Defendants, in the County of New York and elsewhere, during the period of on or about July 31 2023, to on or about the date of this indictment, having knowledge of the existence of a Criminal Enterprise, to wit: "Fast Life," and the nature of its activities, and being employed by and associated with that Criminal Enterprise, intentionally conducted and participated in the affairs of that Criminal Enterprise by participating in a pattern of criminal activity.

THE CRIMINAL ENTERPRISE

At all times relevant to this indictment:

Defendants and other persons, known and unknown to the Grand Jury, were members of, associated with, and comprised a criminal enterprise, as defined in Penal Law Section 460.10(3), in that they shared a common purpose of engaging in criminal conduct, and were associated in an ascertainable structure that was distinct from the pattern of criminal activity and that had a continuity of existence, structure and criminal purpose beyond the scope of individual criminal incidents.

Fast Life consisted, in part, of members of the Mac Ballers, a street gang originally formed in the New York City metropolitan region around 2003 as a subset of the Bloods gang. Fast Life was largely comprised of gang members who had residential, familial or social ties to certain New York City Housing Developments in East and West Harlem.

PURPOSE OF THE CRIMINAL ENTERPRISE

Each member and associate of the Fast Life Criminal Enterprise shared the common purpose to make money through various criminal activities, including armed robberies, the sale of synthetic cannabis, the sale of crack/cocaine, and financial fraud. The Enterprise also used violent acts to protect the Enterprise's assets and to promote its own reputation.

Members of the Enterprise were divided into two groups: (1) Act Bad and (2) Speed Demons. Act Bad members were tasked to earn money and Speed Demons committed acts of violence. The two groups worked symbiotically with one another in order to increase the money-making abilities of the Enterprise.

STRUCTURE OF THE CRIMINAL ENTERPRISE

The Fast Life Criminal Enterprise was founded and led by a man named "Rich Nick." [redacted] led the New York County branch of Fast Life and, while "Rich Nick" was incarcerated, ran the operations of the entire gang. [redacted] himself was incarcerated in 2022, but

continued to lead Fast Life from jail until his release from prison in 2024.

As the leader of the New York County branch of Fast Life, [redacted] established rules for the gang, appointed gang-members to high-ranking positions, and demanded that members either make money or commit acts of violence on behalf of the gang. The rules of the gang included a rule that members who made money must share their money with other members of the gang, especially those who were incarcerated. Members with money were also expected to provide money or guns to lower-level members to commit shootings and robberies. Fast Life members were also required to retaliate against rival gang members who harmed Fast Life members.

DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," and KENDALL WATTS, a/k/a "Maybach Finesse," were all high-ranking members of Fast Life under [redacted] Each in turn had multiple members of the gang who reported to them.

In June of 2024, [redacted] was expelled from Fast Life, and GILBERT became the leader of the New York County branch of the gang. Both in this capacity and in his earlier capacity under [redacted] GILBERT ordered low-level members of the gang to commit violent crimes and controlled Fast Life's K2 ("synthetic cannabis") trade in Manhattan.

Both [redacted] and GILBERT held large meetings with Fast Life members where they discussed the hierarchy of the gang, the rules and responsibilities of gang members, and ordered that members make more money or commit more violence.

During Fast Life's existence, the leadership changed as members were either incarcerated or expelled. But the existence of Fast Life and its goals remained constant.

PATTERN OF CRIMINAL ACTIVITY

During the period of this offense, with intent to participate in and advance the affairs of the Criminal Enterprise, defendants engaged in conduct constituting, or were criminally liable for, the following criminal acts included within a pattern of criminal activity:

PATTERN ACT ONE

Defendant [redacted] acting in concert with accomplices, committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on March 16, 2023, in the county of New York, when he possessed a loaded firearm, to wit, a .380 caliber semi-automatic pistol, said possession not being in defendant's or any accomplice's home or place of business.

PATTERN ACT TWO

Defendant [redacted] acting in concert with accomplices, committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on March 16, 2023, in the county of New York, when he possessed a second loaded firearm, to wit, a nine-millimeter caliber semi-automatic pistol, said possession not being in defendant's or any accomplice's home or place of business.

PATTERN ACT THREE

Defendant [redacted] acting in concert with accomplices, committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on March 16, 2023, in the county of New York, when he possessed a third loaded firearm, to wit, a .357 caliber revolver, said possession not being in defendant's or any accomplice's home or place of business.

PATTERN ACT FOUR

Defendant [redacted] acting in concert with accomplices, committed the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), from on or about September 5, 2023 to on or about September 18, 2023, in the county of New York and elsewhere, when he stole property from another person and the value of the property exceeded fifty-thousand dollars.

PATTERN ACT FIVE

Defendant [redacted] acting in concert with accomplices, committed the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), from on or about September 19, 2023 to on or about September 29, 2023, in the county of New York and elsewhere, when he stole property from another person and the value of the property exceeded fifty-thousand dollars.

PATTERN ACT SIX

Defendant [redacted] committed the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), in the county of New York and elsewhere, during the period from on or about July 31, 2023 to on or about September 29, 2023, when, with intent that conduct constituting the crimes of **GRAND LARCENY IN THE SECOND DEGREE** be performed, said crime being a class "C" felony, he agreed with others to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about July 31, 2023 to on or about September 29, 2023, the following overt acts, among others, were committed in New York County and elsewhere:

The overt acts enumerated in Count Two below are incorporated by reference and realleged as if fully set forth herein.

PATTERN ACT SEVEN

Defendants [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," [redacted] acting in concert with two other accomplices, committed the crime of **MURDER IN THE SECOND DEGREE**, in violation of Penal Law §125.25(1), on March 24, 2024, in the county of New York, when, with intent to cause the death of another person, they caused the death of Harry Mendoza.

PATTERN ACT EIGHT

One accomplice then committed the additional crime of **MURDER IN THE SECOND DEGREE**, in violation of Penal Law §125.25(1), on March 24, 2024, in the county of New York, when, with intent to participate in and advance the affairs of the Enterprise, and with intent to cause the death of Ashley Ballard, he caused the death of Ashley Ballard.

PATTERN ACT NINE

Defendants [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," [redacted] acting in concert with two other accomplices, committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on March 24, 2024, in the county of New York, when they possessed a loaded firearm, said possession not being in any defendant's or other accomplice's home or place of business.

PATTERN ACT TEN

Defendants [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," [redacted] acting in concert with an accomplice, committed the crime of **CONSPIRACY IN THE FIRST DEGREE**, in violation of Penal Law §105.17, from on or about March 23, 2024 to on or about May 2, 2024, in the county of New York and elsewhere, when, with intent that conduct constituting the crimes of **MURDER IN THE SECOND DEGREE,** said crime being a class "A" felony, be performed, the defendants, being over eighteen years of age, agreed with each other and with others, with one or more persons being under sixteen years of age, to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about March 23, 2024 to on or about March 24, 2024, in the county of New York and elsewhere, the following overt acts, among others, were committed in New York County and elsewhere:

The overt acts enumerated in Count Three below are incorporated by reference and realleged as if fully set forth herein.

PATTERN ACT ELEVEN

Defendant ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, on April 6, 2024, in the county of New York, when he, with intent to use the same unlawfully against another, possessed a loaded firearm, to wit, a nine-millimeter caliber semi-automatic pistol.

PATTERN ACT TWELVE

Defendant ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," committed the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Penal Law §220.18(1), on April 6, 2024, in the county of New York, when he knowingly and unlawfully possessed one or more preparations, compounds, mixtures and substances containing a narcotic drug, to wit cocaine, and said preparations, compounds, mixtures and substances were of an aggregate weight of four ounces or more.

PATTERN ACT THIRTEEN

Defendants SAMMUEL CASTILLO, a/k/a "Sosa," [redacted] acting in concert with accomplices, committed the crime of **ROBBERY IN THE FIRST DEGREE**, in violation of Penal Law §160.15(4), on May 7, 2024, in the county of New York, when they forcibly stole property and, in the course of the commission of the crime and in immediate flight therefrom, a participant in the crime displayed what appeared to be a pistol.

PATTERN ACT FOURTEEN

Defendants SAMMUEL CASTILLO, a/k/a "Sosa," and [redacted] acting in concert with accomplices, committed the crime of GRAND LARCENY IN THE FOURTH DEGREE, in violation of Penal Law §155.30(8), on May 7, 2024, when they stole property and the value of the property exceeded one hundred dollars and the property consisted of a motor vehicle.

PATTERN ACT FIFTEEN

Defendants SAMMUEL CASTILLO, a/k/a "Sosa," [redacted] and KENDALL WATTS, a/k/a "Maybach Finesse," committed the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), in the county of New York and elsewhere, during the period from on or about March 22, 2024 to on or about October 28, 2024, when, with intent that conduct constituting the crimes of **ROBBERY IN THE FIRST DEGREE**, said crime being a class "B" felony, be performed, agreed with each other with others to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about March 22, 2024, to on or about October 28, 2024, the following overt acts, among others, were committed in New York County and elsewhere:

The overt acts enumerated in Count Four below are incorporated by reference and realleged as if fully set forth herein.

PATTERN ACT SIXTEEN

Defendant [redacted] acting in concert with an accomplice, committed the crime of **GRAND LARCENY IN THE THIRD DEGREE**, in violation of Penal Law §155.35(1), from on or about May 8, 2024 to on or about May 21, 2024, in the county of New York and elsewhere, when he stole property and the value of the property exceeded three-thousand dollars.

PATTERN ACT SEVENTEEN

DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] KENDALL WATTS, a/k/a "Maybach Finesse," acting in concert with an accomplice, committed the crime of **AN ATTEMPT TO COMMIT THE CRIME OF MURDER IN THE SECOND DEGREE**, in violation of Penal Law §§110/125.25(1), on May 28, 2024, in the county of New York, when with intent to cause the death of another person, they attempted to cause the death of such person.

PATTERN ACT EIGHTEEN

DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] acting in concert with an accomplice committed the crime of **KIDNAPPING IN THE SECOND DEGREE**, in violation of Penal Law §135.20, on May 28, 2024, in the county of New York, when they abducted another person.

PATTERN ACT NINETEEN

DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] KENDALL WATTS, a/k/a "Maybach Finesse," acting in concert with an accomplice committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on May 28, 2024, in the county of New York, when they possessed a loaded firearm, said possession not being in any defendant's or any accomplice's home or place of business.

PATTERN ACT TWENTY

DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] KENDALL WATTS, a/k/a "Maybach Finesse," acting in concert with an accomplice committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on May 28, 2024, in the county of New York, when they possessed a second loaded firearm, said possession not being in any defendant's or any accomplice's home or place of business.

PATTERN ACT TWENTY-ONE

Defendant [redacted] and ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," committed the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), in the county of New York and elsewhere, during the period from on or about April 6, 2024 to on or about October 31, 2024, when, with intent that conduct constituting the crimes of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE,** said crime being a class "B" felony, be performed, they agreed with each other and with others to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about April 6, 2024, to on or about October 31, 2024, the following overt acts, among others, were committed in New York County and elsewhere:

The overt acts enumerated in Count Five below are incorporated by reference and realleged as if fully set forth herein.

PATTERN ACT TWENTY-TWO

Defendant [redacted] acting in concert with an accomplice committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on January 7, 2025, in the county of New York, when he possessed a loaded firearm, said possession not being in any defendant's or any accomplice's home or place of business.

PATTERN ACT TWENTY-THREE

Defendant SAMMUEL CASTILLO, a/k/a "Sosa," committed the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE,** in violation of Penal Law §220.39(1), in the county of New York, on or about January 16, 2025, when he sold a narcotic drug.

PATTERN ACT TWENTY-FOUR

Defendant Christopher Steward, a/k/a "2Chris," and accomplices, committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on January 29, 2025, in the county of New York, when he possessed a loaded firearm, to wit, a .380 caliber semi-automatic pistol, said possession not being in defendant's or any accomplice's home or place of business.

PATTERN ACT TWENTY-FIVE

Defendant Christopher Steward, a/k/a "2Chris," acting in concert with accomplices, committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on January 29, 2025, in the county of New York, when he possessed a second loaded firearm, to wit, a .40 caliber semi-automatic pistol, said possession not being in defendant's or any accomplice's home or place of business.

PATTERN ACT TWENTY-SIX

Defendant Christopher Steward, a/k/a "2Chris," acting in concert with accomplices, committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on January 29, 2025, in the county of New York, when he possessed a third loaded firearm, to wit, a .22 caliber semi-automatic pistol, said possession not being in defendant's or any accomplice's home or place of business.

PATTERN ACT TWENTY-SEVEN

Defendant Christopher Steward, a/k/a "2Chris," acting in concert with accomplices, committed the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, on January 29, 2025, in the county of New York, when he possessed a loaded firearm, to wit, a fourth nine-millimeter caliber semi-automatic pistol, said possession not being in defendant's or any accomplice's home or place of business.

SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1) committed as follows:

The defendant, in the county of New York and elsewhere, during the period from on or about July 31, 2023, to on or about September 29, 2023, with intent that conduct constituting the crime of **GRAND LARCENY IN THE SECOND DEGREE** be performed, said crime being a class "C" felony, agreed with others to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about July 31, 2023 to on or about September 29, 2023, the following overt acts, among others, were committed in New York County and elsewhere:

1) On July 31, 2023, at approximately 10:42 a.m., [redacted] sent a text message to co-conspirator [redacted], stating, "IMMA SEND YOU THE LIST." [redacted] then sent a second message to [redacted], stating, "REMEMBER TAKE 1K FOR YOURSELF," to which [redacted] responded, "I KNOW I FORGOT ABOUT ALL THAT [*three laughing emojis*]."
2) On July 31, 2023, at approximately 10:52 a.m., [redacted] sent a text message to [redacted], stating, "CHASE, TRUIST, SUNTRUST, BB&T, REGIONS, M&T, TD,PNC." [redacted] then sent a second message to [redacted], stating, "NO CREDIT UNIONS," to which [redacted] responded, "OKAY GOT U."
3) On August 1, 2023, at approximately 6:19 p.m., [redacted] sent a series of text messages to [redacted] stating, "OKAY LET ME GO BACK INTO THE FOLDER," "THE BILLING IS WHAT I NEED," "THAT'S THE FOLDER I NEED TO GET INTO," and "SO

I HAVE TO WAIT UNTIL THAT GIVES ME A GREEN CHECK."

4) On August 3, 2023, at approximately 8:35 p.m., [redacted] sent a series of text messages to [redacted] stating, "I STILL WORKING WITH THIS BITCH," and "WHEN SHE LOG OFF," to which [redacted] responded, "HIT ME WHEN YOU DONE."

5) On August 3, 2023, at approximately 8:35 p.m., [redacted] sent forty images, which were subsequently deleted, to [redacted] to which [redacted] responded, "THANK YOU."

6) On August 4, 2023, at approximately 11:01 a.m., [redacted] sent a text message over the Telegram Messenger service to an account named "SSN EMPIRE," stating, "I'M TRYNA LOAD UP," to which "SSN EMPIRE" responded with a menu of the services provided, including a price list and a list of rules. One of the prices provided by "SSN Empire" was "SSN+DOB – 8$," which means that it costs eight dollars to get a person's social security number and date of birth.

7) On August 12, 2023, at approximately 11:15 a.m., [redacted] sent a text message to [redacted], stating, "I NEED SOME MORE WORK." [redacted] then sent a second message to [redacted], stating, "TRUIST, SUNTRUST, BB&T, M&T AND REGIONS," to which [redacted] responded, "GOT U."

8) Between August 18, 2023 and October 20, 2023, [redacted] made twenty-four transactions, totaling more than $11,000, over the Cash App application to various payees, writing, "TWAN" in the subject line of each transaction.

9) On August 23, 2023, [redacted] sent a text message to [redacted], stating, "HOW MUCH I HAVE ALL TOGETHER?" [redacted] responded by sending a digital image showing a chart of incoming and outgoing money, with the title "T-FUNDS."

10) On September 5, 2023, at approximately 7:30 p.m., [redacted] sent a text message to [redacted] that contained a digital image of a written and signed personal check, issued by VICTIM 1.

11) On September 6, 2023, at approximately 3:09 p.m., [redacted] sent a text message over the Telegram Messenger service to an account named "SSN EMPIRE," including the name and address of VICTIM 1. [redacted] then sent a second message, stating, "SSN DL," to which "SSN EMPIRE" responded, "HELLO ACCEPTED," and then sent to [redacted] VICTIM 1'S name, address, date of birth, driver's license number, and social security number.

12) On September 11, 2023, at approximately 11:54 a.m., [redacted] sent a text message over the Telegram Messenger service to an account named "BIGGEST BAG," containing VICTIM 1's name, address, date of birth, and driver's license information, as well as a passport-style photo of an unknown woman.

13) On September 11, 2023, at approximately 11:54 a.m., [redacted] sent a text message over the Telegram Messenger service to an account named "BIGGEST BAG," containing a digital image of VICTIM 1'S signature, cropped from VICTIM 1'S personal check sent to [redacted] by [redacted]

14) On September 11, 2023, at approximately 9:37 a.m., [redacted] paid via Cash App financial services $270 to a Cash App account owned by the same owner as the "BIGGEST BAG" Telegram Messenger account, with the transaction memo line, "FOR TWAN."

15) On September 13, 2023, at approximately 2:53 p.m., a second co-conspirator ("CONSPIRATOR 2") sent a text message to [redacted] stating, "SHE DON'T KNO THE EMAIL," referring to the female who would be impersonating VICTIM 1 inside the bank ("CONSPIRATOR 3"). [redacted] responded, "TELL HER JUST TO CALM DOWN." [redacted] then sent to CONSPIRATOR 2 an email address that contained the name of VICTIM 1.

16) On September 13, 2023, at approximately 2:54 p.m., [redacted] sent a series of text messages to [redacted] explaining that CONSPIRATOR 3 was unable to remember VICTIM'S 1 personal information while inside the bank and [redacted] was concerned that their plan might be ruined.

17) On September 13, 2023, at approximately 2:58 p.m., [redacted] sent a text message to [redacted] stating a bank employee was asking CONSPIRATOR 3 for the phone number on VICTIM 1'S ACCOUNT. [redacted] then sent to [redacted] a phone number.

18) On September 13, 2023, [redacted] and CONSPIRATOR 3, posing as VICTIM 1, opened a joint bank account at Truist.

19) From on or about September 13, 2023, to on or about September 18, 2023, [redacted] caused $59,920 to be transferred from the bank accounts of VICTIM 1 into the bank account of [redacted]

20) On September 19, 2023, at approximately 9:43 a.m., [redacted] sent a text message to [redacted] stating, "CAN YOU GET SOME BB&T SUBTRUST AND TRUST?" [redacted] responded, "YEA I GOT U."

21) On September 19, 2023, at approximately 1:14 p.m., [redacted] sent a text message over the Telegram Messenger service to the "SSN EMPIRE" account containing the name and address of VICTIM 2. A few minutes later, "SSN EMPIRE" responded to [redacted] with a message containing VICTIM 2'S date of birth, driver's license number, and social security number.

22) On September 19, 2023, at approximately 3:49 p.m., [redacted] sent a text message over the Telegram Messenger service to an account named "BIGGEST BAG," containing VICTIM 2'S name, address, date of birth, and driver's license information, followed later, at approximately 8:15 p.m., by a passport-style photo of an unknown woman.

23) On September 19, 2023, at approximately 4:55 p.m., [redacted] sent a text message to [redacted], asking "CAN YOU SEND $570 TO $SUPERBERNIE?" which is the Cash App financial services account belonging to the same person who owns the "BIGGEST BAG" Telegram Messenger service account.

24) On September 19, 2023, at approximately 4:58 p.m., [redacted] sent $570 to the "$SUPERBERNIE" Cash App account.

25) On September 20, 2023, at approximately 9:00 a.m., a fourth co-conspirator ("CONSPIRATOR 4") sent a text message to [redacted] stating, "410 CHINCHILLA DRIVE BAYBORO NORTH CAROLINA 28515," to which [redacted] responded, "I'M ABOUT TO NEXT DAY MAIL TO THAT ADDRESS YOU SENT ME."

26) On September 20, 2023, at approximately 12:58 p.m., the user of the Telegram Messenger service account "BIGGEST BAG" sent three digital images to [redacted], including (1) a Georgia driver's license with VICTIM 2'S personal information, (2) the digital photo described in Overt Act number 9, and (3) a photograph of a receipt from the United Postal Service stating that a package was sent from New York City on September 20, 2023 to the North Carolina address mentioned in Overt Act number 12.

27) On September 21, 2023, at approximately 7:20 p.m., [redacted] sent to [redacted] over text message eighteen digital photos containing images of written and signed personal checks.

28) On September 25, 2023, at approximately 12:55 p.m., [redacted] placed a Facetime call to [redacted] which lasted approximately nine minutes.

29) On September 25, 2023, at approximately 12:55 p.m., while on a Facetime call with [redacted] [redacted] logged into the bank account belonging to VICTIM 2, took screenshots of her computer screen, and, at 1:05 p.m., sent the screenshots to [redacted]

30) On September 25, 2023, at approximately 1:05 p.m., [redacted] sent a text message to CONSPIRATOR 4, stating, "HUSBAND IS ON HER ACCOUNT TOO." [redacted] then sent a message stating the name of VICTIM 2'S husband.

31) On September 25, 2023, at approximately 1:07 p.m., CONSPIRATOR 4 sent a series of text messages to [redacted] referring to a woman who would impersonate VICTIM 2 ("CONSPIRATOR 5") and stated, "YOU SHOULDA BEEN SENT ME ALL THIS MAC," "I WOULDA BEEN PRACTICING IT WITH HER," and "IMMA GO OVER IT FOR A WHILE BEFORE WE GO."

32) On September 25, 2023, at approximately 1:14 p.m., [redacted] sent a text message to CONSPIRATOR 4, stating, "IN THE MEAN WHILE HAVE HER STUDYING THE SS," referring to CONSPIRATOR 5.

33) On September 25, 2023, a sixth co-conspirator ("CONSPIRATOR 6") opened up a Truist bank account.

34) On September 26, 2023, at approximately 4:22 p.m., [redacted] logged into VICTIM 2'S bank account and sent a text message to [redacted] stating, "STILL NOT CONNECTED TO THE OTHER ACCOUNT."

35) On September 27, 2023, CONSPIRATOR 5, pretending to be VICTIM 2, and CONSPIRATOR 6, added VICTIM 2 as a joint holder of the recently-opened Truist bank account.

36) On September 27, 2023 at approximately 3:16 p.m., [redacted] logged into VICTIM 2'S online banking account and sent a text message to [redacted] confirming that VICTIM 2'S bank account and the newly-created joint account were both accessible on the online account.

37) On September 27, 2023, the co-conspirators caused $120,000 to be transferred, via an online transfer, from VICTIM 2'S bank account to the newly-created joint account.

38) On September 27, 2023, the co-conspirators caused $120,000 to be transferred, via an online transfer and a phone transfer, from the newly-created joint account to a bank account owned by CONSPIRATOR 5.

THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," and [redacted] of the crime of **CONSPIRACY IN THE FIRST DEGREE**, in violation of Penal Law §105.17, committed as follows:

The defendants, in the county of New York and elsewhere, from on or about March 23, 2024 to on or about May 2, 2024, with intent that conduct constituting the crimes of **MURDER IN THE SECOND DEGREE** be performed, said crime being a class "A" felony, being over eighteen years of age, agreed with each other and with others, with one or more persons being under sixteen years of age, to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about March 23, 2024 to on or about May 2, 2024, the following overt acts, among others, were committed in New York County and elsewhere:

1) On March 23, 2024, in response to the shooting of Lucas Rodriguez earlier that day, co-conspirator Elton Chandler, who was under the age of 16-years-old, contacted a rival gang member over Instagram, asking for his phone number and threatening him in messages and Facetime calls that followed.
2) On March 24, 2024, at approximately 12:23 p.m., Elton Chandler sent a text message to the same rival gang member, stating, "YU GONNA BE OUTSIDE 2DAY?"

3) On March 24, 2024, Elton Chandler called the same rival gang member over FaceTime five times.

4) On March 24, 2024, at approximately 12:59 p.m., Elton Chandler sent a message over Instagram to another person, stating in part and in substance that he was "spinning" with [A7] because one his associates had been shot.

5) On March 24, 2024, at approximately 3:26 p.m., inside of the Moon Rock Smoke Shop located at 2081 Lexington Avenue, Elton Chandler engaged in an argument with a higher-ranking member of the gang, who said, in part and in substance,, "FUCK YOU MEAN WHY WE TALKING ABOUT MIKEY B. THAT'S THE QUESTION. Y'ALL [N-WORD]S DON'T DO NOTHING OVER HERE OR PERIOD FOR [N-WORD]S. Y'ALL [N-WORD]S IS GETTING [N-WORD]S SHOT AT. [N-WORD] IN CRITICAL CONDITION BECAUSE Y'ALL [N-WORD] DON'T GIVE A FUCK ABOUT NOBODY."

6) On March 24, 2024, at approximately 3:28 p.m., inside of the Moon Rock Smoke Shop located at 2081 Lexington Avenue, Elton Chandler engaged in an argument with a higher-ranking member of the gang, who said, in part and in substance, referring to Lucas Rodriguez, "THAT'S YOUR MANS, RIGHT? YOU WENT TO THE HOSPITAL TO SEE HIM? WE WENT? WHY IS NOBODY RESPECTING THAT [N-WORD]?"

7) On March 24, 2024, at approximately 3:28 p.m., inside of the Moon Rock Smoke Shop located at 2081 Lexington Avenue, Elton Chandler engaged in an argument with a higher-ranking member of the gang, who said, in part and in substance, "I'M TALKING TO YOU DIRECTLY. YOUR CROWD, YES! Y'ALL [N-WORD]S IS DAYROOM. YOU ALLOW MAD SHIT TO HAPPEN…THEM [N-WORD]S IS COMING AFTER YOU AND WHEN [N-WORD]S BEEN COMING AT YOU, YOU DON'T CRY LIKE A FUCKING BOZO. YOU BANG THAT [N-WORD]'S LIFE."

8) On March 24, 2024, at approximately 3:28 p.m., inside of the Moon Rock Smoke Shop located at 2081 Lexington Avenue, Elton Chandler engaged in an argument with a higher-ranking member of the gang, who said, in part and in substance, "STOP TALKING TO ME. GO GET YOUR BIG HOMIE. STOP TALKING TO ME."

9) On March 24, 2024, Uriel Thompson, a/k/a "A7," and Elton Chandler traveled from the Moon Rock Smoke Shop located at 2081 Lexington Avenue to the apartment of ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," located at 322 Pleasant Avenue.

10) On March 24, 2024, [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," [redacted] Uriel Thompson, a/k/a "A7," and Elton Chandler met inside of 322 Pleasant Avenue.

11) On March 24, 2024, at approximately 6:45 p.m., at the deli at 315 Pleasant Avenue, Elton Chandler bought a mask.

12) On March 24, 2024, [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," and two others left 322 Pleasant Avenue and traveled by car to the west side of Lexington Avenue between East 128th Street and East 129th Street, at approximately 7:16 p.m.

13) On March 24, 2024, [redacted] URIEL THOMPSON, a/k/a "A7," and Elton Chandler, wearing masks and armed with a loaded pistol, left 322 Pleasant Avenue and traveled on foot to the southwest corner of Lexington Avenue and East 128th Street, arriving at approximately 7:25 p.m.

14) On March 24, 2024, at approximately 7:25 p.m., just after Harry Mendoza and Ashley Ballard walked past the parked car containing [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," on Lexington Avenue, [redacted] Uriel Thompson, a/k/a "A7," and Elton Chandler approached Harry Mendoza and Ashley Ballard at the northwest corner of Lexington Avenue and East 128th Street.

15) On March 24, 2024, at approximately 7:25 p.m., on the northwest corner of Lexington Avenue and East 128th Street, Elton Chandler fired two shots from a firearm, striking Mendoza once in the head and Ballard once in the back, killing them both.

16) On March 24, 2024, at approximately 7:26 p.m., immediately after the murders of Ballard and Mendoza, [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye,"

a/k/a "Eli," and two others left their parking spot located half a block north of the southwest corner of Lexington Avenue and East 128th Street.

17) On March 24, 2024, at approximately 7:30 p.m., five minutes after the murders of Ballard and Mendoza, Elton Chandler ducked between two cars, removed his sweatshirt, and continued to flee down the street.

18) On March 24, 2024, seven minutes after the murders of Ballard and Mendoza, Elton Chandler called Harry Mendoza's brother, who was also a rival gang member, over FaceTime and had a 24 second phone call.

19) On March 24, 2024, Elton Chandler traveled to his apartment in the same car that [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," were in at the time of Ballard and Mendoza's murders.

20) On May 2, 2024, Elton Chandler texted ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," that he got a new SIM card. REIS directed Elton Chandler not to call any of the "BROS" using that number because he was "HOT."

FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants SAMMUEL CASTILLO, a/k/a "Sosa," [redacted] and KENDALL WATTS, a/k/a "Maybach Finesse," of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), committed as follows:

The defendants, in the county of New York and elsewhere, from on or about March 22, 2024, to on or about October 28, 2024, with intent that conduct constituting the crimes of **ROBBERY IN THE FIRST DEGREE** be performed, said crime being a class "B" felony, agreed with each other and with others to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about March 22, 2024 to on or about October 28, 2024, the following overt acts, among others, were committed in New York County and elsewhere:

1) On March 22, 2024, at approximately 4:17 a.m., [redacted] sent a text message to a group chat, which included several co-conspirators, and taunted [redacted] and Uriel Thompson, a/k/a "A7," for failing to rob several suitable victims, stating, "MIKE B (*SALCEDO*) & A7 (*Thompson*) rookies OF THE CENTURY." PEREZ then sent a second message, stating, "[N-WORDS] BEEN OUTSIDE 6 HOURS CAN'T HIT A SKI TO SAVE THEY LIFE I JUST WITNESSED IT W MY OWN EYES."

2) On March 22, 2024, at approximately 4:19 a.m., [redacted] sent a text message to a group chat, which involved several co-conspirators, continuing to taunt [redacted] and Uriel Thompson, a/k/a "A7," and stating, "THEY JUST LET AT LEAST 6/7 [N-WORDS] SLIDE EASILY THEY DIDN'T HARM A FLY." [redacted] then sent a second message, stating, "THEY JUST HAD A [N-WORD] WITH A BIG ASS CUBAN AND MIKE B ACT LIKE HE DIDN'T SEE HIM AND NEVER HOPPED OUT."

3) On March 22, 2024, at approximately 4:20 a.m., co-conspirator Elton Chandler sent a message to the same group chat, stating, "I WOULD HAVE WAITED OUTSIDE CLUBS…IF I WAS EM."

4) On March 22, 2024, at approximately 4:21 a.m., [redacted] sent a text message to the same group chat, stating, "I WOULD'VE GOT THE JOB DONE," to which Elton Chandler responded, stating, "IMA GET SOME [SKI EMOJI]'S 4 US THO," referring to robberies.

5) On March 22, 2024, at approximately 4:25 a.m., [redacted] sent a text message to the same group chat, stating, "BRO IDK I WILL NEVER SHIT SKI W THEM AFTER THE FUCKERY I JUST WITNESSED." [redacted] then texted, "A7 MR. PANIC HIM SELF," meaning that he will never do a robbery again with [redacted] and Uriel

Thompson, a/k/a "A7," and that Thompson was too scared to do them.

6) On March 22, 2024, at approximately 4:31 a.m., Elton Chandler sent a message to the same group chat, stating, "COULD'VE GOT ODEE WATCHES CHAINS AND AT LEAST SOLD 1 AND GET SOME MORE BREAD," meaning that if [redacted] and Uriel Thompson, a/k/a "A7," hadn't failed to commit the robberies, they could have made some money.

7) On March 22, 2024, at approximately 4:36 a.m., [redacted] sent a text message to the same group chat, stating, "MIKE B TOP CLOWN CAKE OF CENTURY." [redacted] then texted, "GOT THE JACKIE TO DO JACK SHIT WITH IT," meaning that [redacted] had a gun on him but never used it.

8) On March 22, 2024, at approximately 11:52 a.m., ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," sent a series of text messages to the same group chat, stating, "NAH NFS AFTER YESTERDAY SHOWED YA [N-WORDS] NOT REALLY ON THAT," meaning that [redacted] and Uriel Thompson, a/k/a "A7," were not cut out for doing robberies. REIS then stated, "EB (*Elton Chandler*) I NEED YOU OUTSIDE MH," and "U MIGHT BE THE ONLY YOUNG SPEEDY TRYIN TO BLITZ SOMETHING," meaning that Chandler was the only young person in the gang willing to commit crimes. REIS then texted, "YA OTHER [N-WORDS] SIT BACK," meaning that [redacted] and Thompson should let Chandler commit the crimes from now on.

9) On April 28, 2024, at approximately 12:10 a.m., KENDALL WATTS, a/k/a "Maybach Finesse," placed a FaceTime call to co-conspirator Sebastian Alvarado. The call lasted for over two minutes.

10) On April 28, 2024, at approximately 12:17 a.m., KENDALL WATTS, a/k/a "Maybach Finesse," sent a text message to Sebastian Alvarado and another co-conspirator ("CONSPIRATOR 1,") stating, "BRING UR JACKIE BK," asking him to bring his gun. CONSPIRATOR 1 wrote back, "SHIT GOT NO FOOD IN IT THO," meaning that he had no ammunition for his gun. WATTS then texted, "YOU STURDY BRING THAT," and Alvarado texted, "MINE DO."

11) On April 28, 2024, at approximately 12:23 a.m., KENDALL WATTS, a/k/a "Maybach Finesse," sent a text message to Alvarado and CONSPIRATOR 1, stating, "77 ESSEX STREET."

12) On April 28, 2024, at approximately 1:44 a.m., KENDALL WATTS, a/k/a "Maybach Finesse," sent a digital photo over text message to Alvarado and CONSPIRATOR 1. The digital photo was a picture taken of a man from across the bar.

13) On April 28, 2024, at approximately 1:58 a.m., Alvarado sent a text message to KENDALL WATTS, a/k/a "Maybach Finesse," and CONSPIRATOR 1, stating, "WE GON TRY TO BLITZ HIM RIGHT INFRONT." Alvarado then sent a second message, stating, "SO LET US KNOW AS SOON AS HE GETTING UP AND LOOKING LIKE HE GON LEAVE."

14) On April 28, 2024, at approximately 2:51 a.m., KENDALL WATTS, a/k/a "Maybach Finesse," sent a text message to Sebastian Alvarado and CONSPIRATOR 1, stating, "HE LEAVING NOW."

15) On April 28, 2024, at approximately 2:55 a.m., Sebastian Alvarado sent a series of text messages to KENDALL WATTS, a/k/a "Maybach Finesse," and CONSPIRATOR 1, stating, "WE GOT CARTI," meaning they had robbed a Cartier watch from the victim. Alvarado then texted , "COME TO MY POT WE DROPPING OFF JACKS," meaning that WATTS should come to Alvarado's apartment where he and CONSPIRATOR 1 have to drop off their guns. KENDALL WATTS, a/k/a "Maybach Finesse," responded, "KOPY."

16) On April 30, 2024, at approximately 7:29 p.m., KENDALL WATTS, a/k/a "Maybach Finesse," sent a text message to Sebastian Alvarado, SAMMUEL CASTILLO, a/k/a "Sosa," and [redacted] stating, "500 GR CUBAN IN THAT'S OD RN," meaning that WATTS had seen a person wearing an expensive chain at that moment in a store called, "That's OD."

17) On April 30, 2024, SAMMUEL CASTILLO, a/k/a "Sosa," responded with a series of text messages, stating, among other things, "LEMME SEE WASSUP," "YU KNO THAT'S MAD FAR," and "TRY SEE WHO GOT V,", meaning that the location was far from where CASTILLO was, and he would need a car to get there.

18) On April 30, 2024, at approximately 7:49 p.m., [redacted] responded to the text chain, stating, "[*N-WORDS*] GOT GET THIS V," and then, "SHIT BE TOO EASY."

19) On May 6, 2024, at approximately 11:49 p.m., Sebastian Alvarado sent a text message to [redacted] stating, "WTW WHERE YA [*N-WORDS*] AT."

20) On May 6, 2024, at approximately 11:51 p.m., Sebastian Alvarado sent a text message to SAMMUEL CASTILLO, a/k/a "Sosa," stating, "YOU TRYNA GO WORK?," asking CASTILLO if he was planning on doing robberies.

21) On May 6, 2024, at approximately 11:52 p.m., SAMMUEL CASTILLO, a/k/a "Sosa," sent a text message to Sebastian Alvarado, stating, "WYD" and then "YU BOUTA WOrk?" to which Alvarado responded, "NTH I JUST TEXTED JOEY SO [*N-WORDS*] COULD WORK," and then, "YEAH."

22) On May 6, 2024, at approximately 11:52 p.m., Sebastian Alvarado sent a text message to SAMMUEL CASTILLO, a/k/a "Sosa," stating, "YOU COMING OUTSIDE?" to which CASTILLO responded, "HELL YEAH."

23) On May 7, 2024, at approximately 1:32 a.m., Sebastian Alvarado sent a text message to [redacted] stating, "[*N-WORDS*] GOT THAT CAR FOR A FEW MORE DAY WE GOTTA WORK," to which [redacted] responded, "I KNOW," and then, "I BE ON EVERYTHING."

24) On May 7, 2024, at approximately 1:35 a.m., SAMMUEL CASTILLO, a/k/a "Sosa," sent a text message to [redacted] stating, "156 W 38TH ST NEW YORK, NY 10018 UNITED STATES," referring to an address where there was a possible robbery location.

25) On May 7, 2024, from approximately 1:38 a.m. to 1:39 a.m., [redacted] called Sebastian Alvarado over FaceTime three times.

26) On May 7, 2024, at approximately 2:03 a.m., SAMMUEL CASTILLO, a/k/a "Sosa," sent a text message to [redacted] stating, "BRO THEY SLEEP IN THE V," meaning that the targets of the robbery were asleep in their car.

27) On May 7, 2024, at approximately 2:04 a.m., SAMMUEL CASTILLO, a/k/a "Sosa," [redacted] and Sebastian Alvarado had a group FaceTime call that lasted approximately six minutes.

28) On May 7, 2024, at approximately 2:21 a.m., [redacted] sent a text message to SAMMUEL CASTILLO, a/k/a "Sosa," stating, "I'M BE THERE IN 20."

29) On May 7, 2024, at approximately 3:12 a.m., in the area of 156 W. 38th Street, SAMMUEL CASTILLO, a/k/a "Sosa," exited a white vehicle, approached a black vehicle, looked into the driver's window of the black vehicle, and then returned to the white vehicle.

30) On May 7, 2024, at approximately 3:14 a.m., [redacted] in the area of 156 W. 38th Street, parked a third vehicle next to the black vehicle mentioned above.

31) On May 7, 2024, at approximately 3:14 a.m, in the area of 156 W. 38th Street, [redacted] Sebastian Alvarado, and another co-conspirator ("CONSPIRATOR 2") exited the third vehicle armed with a firearm, and, together, pulled the driver out of the black vehicle.

32) On May 7, 2024, at approximately 3:14 a.m, in the area of 156 W. 38th Street, [redacted] pointed the firearm at two people who were in the black vehicle.

33) On May 7, 2024, at approximately 3:14 a.m, in the area of 156 W. 38th Street, [redacted] Sebastian Alvarado, and CONSPIRATOR 2 removed a watch and other items from the two individuals inside the black vehicle.

34) On May 7, 2024, at approximately 3:15 a.m., in the area of 156 W. 38th Street, two co-conspirators dragged the driver of the black vehicle out of the car, and one of the conspirators drove the car away from the area.

35) On October 28, 2024, at approximately 5:56 a.m., SAMMUEL CASTILLO, a/k/a "Sosa," and [redacted] rode in a car while [redacted] was holding a gun and CASTILLO was wearing a black mask. An unknown accomplice in the car shouted, "NOW YOU KNOW WHY WE MOVE HOW WE MOVE!"

36) On October 28, 2024, at approximately 5:58 a.m, [redacted] and DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," sat in a car, while SAMMUEL CASTILLO, a/k/a "Sosa," stood outside the car leaning in the window. [redacted] and SOSA both held a large amount of cash in their hands.

FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," and [redacted] of the crime of **CONSPIRACY IN THE FOURTH DEGREE**, in violation of Penal Law §105.10(1), committed as follows:

The defendants, in the county of New York and elsewhere, from on or about April 6, 2024 to on or about October 31, 2024, with intent that conduct constituting the crimes of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE** be performed**,** said crime being a class "B" felony, agreed with each other and with others to engage in and cause the performance of such conduct.

OVERT ACTS

In furtherance of said conspiracy and to effect the objects thereof, from on or about April 6, 2024 to on or about October 31, 2024, the following overt acts, among others, were committed in New York County and elsewhere:

1) On April 6, 2023, ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," inside 322 Pleasant Avenue, possessed over five ounces of cocaine hidden in a cereal box in his kitchen, with the intent to sell it.

2) On June 15, 2024, at approximately 5:43 p.m., ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," sent a text message to [redacted] "SHE THERE," to which [redacted] responded, "GOING DOWN," and then, "GOT IT." REIS then sent a series of messages, stating, "II IT'S 150?" "II TAKE 30," and "TUCK THE REST FOR ME."

3) On June 15, 2024, ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," sent a text message to [redacted] stating, "MAKE A OUNCE OF HARD AND HALF OF SOFT," referencing different types of cocaine. The two then discussed how much of each should be made.

4) On June 15, 2024, at approximately 7:08 p.m., [redacted] sent a text message to ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," stating, "GOT IT PUT TOGETHER," and REIS responded, "LI BET," "HE OUT THERE," and "BLUE CAR."

5) On June 16, 2024, at approximately 2:43 p.m., ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," sent a text message to [redacted] stating, "LMK HM I HAVE LEFT WHEN YOU GET A CHANCE," to which [redacted] responded, "I WEIGHED IT LAST NIGHT," "90 GRAMS," "OR 93 I THINK I'M CHECK RIGHT WHEN I GET BACK." A few minutes later, [redacted] sent a message to REIS which included a digital photo depicting a large bag of white powder on a scale. The scale read "80.4."

6) On June 16, 2024, at approximately 2:50 p.m., [redacted] sent a text message to ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," stating, "THE OTHER 50 G WE SOLD."

7) On June 25, 2024, at approximately 4:38 p.m., [redacted] sent a text message to an unknown person, stating, "SO 20 G HARD, THEN ANOTHER 5 G HARD SEPARATE THEN 3 G SOFT."

8) On June 25, 2024, at approximately 4:48 p.m., the same unknown person sent a text message to [redacted] stating, "HOW MUCH UP IS LEFT?" [redacted] responded by sending a digital photo depicting a bag of white powder on a scale. The scale read "39.93."

9) On October 31, 2024, at approximately 11:32 a.m., [redacted] sent a series of text messages to ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," stating, "YEA [*N-WORD*] GOT SWITCH GAME PLAN UP," "CAN'T HAVE NOTHING IN CRIB," "NO MORE," "WE GOTTA GET ANOTHER SPOT," and "TO TRAP OUT."

10) On October 31, 2024, at approximately 11:35 a.m., ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," responded over text message to [redacted] stating, "WE GOTTA JUST CHILL FOR NOW," and "NO SALES."

SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the county of New York, on or about March 16, 2023, possessed a loaded firearm, to wit, a .380 caliber semi-automatic pistol, with intent to use the same unlawfully against another person.

SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the county of New York, on or about March 16, 2023, possessed a loaded firearm, to wit, a .380 caliber semi-automatic pistol, said possession not being in defendant's home or place of business.

EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the county of New York, on or about March 16, 2023, possessed a loaded firearm, to wit, a nine-millimeter caliber semi-automatic pistol, with intent to use the same unlawfully against another person.

NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the county of New York, on or about March 16, 2023, possessed a loaded firearm, to wit, a nine-millimeter caliber semi-automatic pistol, said possession not being in defendant's home or place of business.

TENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the county of New York, on or about March 16, 2023, possessed a loaded firearm, to wit, a .357 caliber revolver, with intent to use the same unlawfully against another person.

ELEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the county of New York, on or about March 16, 2023, possessed a loaded firearm, to wit, a .357 caliber revolver, said possession not being in defendant's home or place of business.

TWELFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendant, in the county of New York and elsewhere, from on or about September 5, 2023 to on or about September 18, 2023, stole property from another person and the value of the property exceeded fifty-thousand dollars.

THIRTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **IDENTITY THEFT IN THE FIRST DEGREE**, in violation of Penal Law §190.80(1), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about September 5, 2023 to on or about September 18, 2023, knowingly and with intent to defraud, acted in concert with another person who assumed the identity of a third other person by presenting herself as that third other person, and by acting as that third other person, and by using personal identifying information of that third other person and thereby obtained money in an aggregate amount that exceeded two thousand dollars.

FOURTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **IDENTITY THEFT IN THE FIRST DEGREE**, in violation of Penal Law §190.80(3), committed as follows:

The defendant, in the County of New York, during the period from on or about September 5, 2023 to on or about September 18, 2023, knowingly and with intent to defraud acted in concert with another person who assumed the identity of a third other person by presenting herself as that third other person, and by acting as that third other person, and by using personal identifying information of that third other person and thereby committed and attempted to commit a class D felony or higher level crime, and acted as an accessory in the commission of a class D or higher level felony.

FIFTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **GRAND LARCENY IN THE SECOND DEGREE**, in violation of Penal Law §155.40(1), committed as follows:

The defendant, in the county of New York and elsewhere, from on or about September 19, 2023 to on or about September 29, 2023, stole property from another person and the value of the property exceeded fifty-thousand dollars.

SIXTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **IDENTITY THEFT IN THE FIRST DEGREE**, in violation of Penal Law §190.80(1), committed as follows:

The defendant, in the County of New York and elsewhere, during the period from on or about September 19, 2023 to on or about September 29, 2023, knowingly and with intent to defraud acted in concert with another person who assumed the identity of a third other person by presenting herself as that third other person, and by acting as that third other person, and by using personal identifying information of that third other person and thereby obtained money in an aggregate amount that exceeded two thousand dollars.

SEVENTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **IDENTITY THEFT IN THE FIRST DEGREE**, in violation of Penal Law §190.80(3), committed as follows:

The defendant, in the County of New York, during the period from on or about September 19, 2023 to on or about September 29, 2023, knowingly and with intent to defraud acted in concert with another person who assumed the identity of a third other person by presenting herself as that third other person, and by acting as that third other person, and by using personal identifying information of that third other person and thereby committed and attempted to commit a class D felony or higher level crime, and acted as an accessory in the commission of a class D or higher level felony.

EIGHTEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," and [redacted] of the crime of **MURDER IN THE SECOND DEGREE**, in violation of Penal Law §125.25(1), committed as follows:

The defendants, in the county of New York, on or about March 24, 2024, with intent to cause the death of another person, caused the death of Harry Mendoza.

NINETEENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," and [redacted] of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendants, in the county of New York, on or about March 24, 2024, possessed a loaded firearm, with intent to use the same unlawfully against another person.

TWENTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants [redacted] ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," and [redacted] of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendants, in the county of New York, on or about March 24, 2024, possessed a loaded firearm, said possession not being in any defendant's home or place of business.

TWENTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, an armed felony, in violation of Penal Law §265.03(1)(b), committed as follows:

The defendant, in the county of New York, on or about April 6, 2024, possessed a loaded firearm, to wit, a nine-millimeter caliber semi-automatic pistol, with intent to use the same unlawfully against another.

TWENTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE SECOND DEGREE**, in violation of Penal Law §220.18(1), committed as follows:

The defendant, in the county of New York, on or about April 6, 2024, knowingly and unlawfully possessed one or more preparations, compounds, mixtures and substances containing a narcotic drug, to wit cocaine, and said preparations, compounds, mixtures and substances were of an aggregate weight of four ounces or more.

TWENTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant ELIJAH REIS, a/k/a "Gleechy," a/k/a "Third Eye," a/k/a "Eli," of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE**, in violation of Penal Law §220.16(1), committed as follows:

The defendant, in the county of New York, on or about April 6, 2024, knowingly and unlawfully possessed a narcotic drug, to wit cocaine, with intent to sell it.

TWENTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants SAMMUEL CASTILLO, a/k/a "Sosa," and [redacted] of the crime of **ROBBERY IN THE FIRST DEGREE**, in violation of Penal Law §160.15(4), committed as follows:

The defendants, in the county of New York, on or about May 7, 2024, forcibly stole property and, in the course of the commission of the crime and in immediate flight therefrom, a participant in the crime displayed what appeared to be a pistol.

TWENTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants SAMMUEL CASTILLO, a/k/a "Sosa," [redacted] of the crime of **ROBBERY IN THE SECOND DEGREE**, in violation of Penal Law §160.10(1), committed as follows:

The defendants, in the county of New York, on or about May 7, 2024, forcibly stole property and were each aided by another person actually present.

TWENTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants SAMMUEL CASTILLO, a/k/a "Sosa," [redacted] of the crime of **ROBBERY IN THE SECOND DEGREE**, in violation of Penal Law §160.10(2)(a), committed as follows:

The defendants, in the county of New York, on or about May 7, 2024, forcibly stole property and in the course of the commission of the crime and of immediate flight therefrom, caused physical injury to a person who was not a participant in the crime.

TWENTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants SAMMUEL CASTILLO, a/k/a "Sosa," [redacted] of the crime of **ROBBERY IN THE SECOND DEGREE**, in violation of Penal Law §160.10(3), committed as follows:

The defendants, in the county of New York, on or about May 7, 2024, forcibly stole property and the property consisted of a motor vehicle.

TWENTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **GRAND LARCENY IN THE THIRD DEGREE**, in violation of Penal Law §155.35(1), committed as follows:

The defendant, in the county of New York, from on or about May 8, 2024 to on or about May 21, 2024, stole property and the value of the property exceeded three-thousand dollars.

TWENTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] and KENDALL WATTS, a/k/a "Maybach Finesse," of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF MURDER IN THE SECOND DEGREE**, in violation of Penal Law §§110/125.25(1), committed as follows:

The defendants, in the county of New York, on or about May 28, 2024, with intent to cause the death of another person, attempted to cause the death of such person.

THIRTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] and KENDALL WATTS, a/k/a "Maybach Finesse," of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE FIRST DEGREE**, in violation of Penal Law §§110/120.10(1), an armed felony, committed as follows:

The defendants, in the county of New York, on or about May 28, 2024, with intent to cause serious physical injury to another person, attempted to cause such injury to such person by means of a deadly weapon, to wit, a loaded firearm.

THIRTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] and KENDALL WATTS, a/k/a "Maybach Finesse," of the crime of **AN ATTEMPT TO COMMIT THE CRIME OF ASSAULT IN THE FIRST DEGREE**, in violation of Penal Law §§110/120.10(1), an armed felony, committed as follows:

The defendants, in the county of New York, on or about May 28, 2024, with intent to cause serious physical injury to another person, attempted to cause such injury to such person by means of a deadly weapon, to wit, a second loaded firearm.

THIRTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] of the crime of **KIDNAPPING IN THE SECOND DEGREE**, in violation of Penal Law §135.20, committed as follows:

The defendants, in the county of New York, on or about May 28, 2024, abducted another person.

THIRTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] and KENDALL WATTS, a/k/a "Maybach Finesse," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the county of New York, on or about May 28, 2024, possessed a loaded firearm, with intent to use the same unlawfully against another.

THIRTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] and KENDALL WATTS, a/k/a "Maybach Finesse," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the county of New York, on or about May 28, 2024, possessed a loaded firearm, said possession not being in any defendant's or any accomplice's home or place of business.

THIRTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] and KENDALL WATTS, a/k/a "Maybach Finesse," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the county of New York, on or about May 28, 2024, possessed a second loaded firearm, with intent to use the same unlawfully against another.

THIRTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendants DAJO DAJON GILBERT, a/k/a "African Boy," a/k/a "AB," a/k/a "DayDay," [redacted] and KENDALL WATTS, a/k/a "Maybach Finesse," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the county of New York, on or about May 28, 2024, possessed a second loaded firearm, said possession not being in any defendant's or any accomplice's home or place of business.

THIRTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the county of New York, on or about January 7, 2025, possessed a loaded firearm, to wit, a nine-millimeter caliber semi-automatic pistol, with intent to use the same unlawfully against another person.

THIRTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant [redacted] of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the county of New York, on or about January 7, 2025, possessed a loaded firearm, to wit, a nine-millimeter caliber semi-automatic pistol, said possession not being in defendant's home or place of business.

THIRTY-NINTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant SAMMUEL CASTILLO, a/k/a "Sosa," of the crime of **CRIMINAL SALE OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE,** in violation of Penal Law §220.39(1), committed as follows:

The defendant, in the county of New York, on or about January 16, 2025, sold a narcotic drug, to wit, cocaine.

FORTIETH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant SAMMUEL CASTILLO, a/k/a "Sosa," of the crime of **CRIMINAL POSSESSION OF A CONTROLLED SUBSTANCE IN THE THIRD DEGREE,** in violation of Penal Law §220.16(1), committed as follows:

The defendant, in the county of New York, on or about January 16, 2025, possessed a narcotic drug, to wit, cocaine, with intent to sell it.

FORTY-FIRST COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHRISTOPHER STEWARD, a/k/a "2Chris," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the county of New York, on or about January 29, 2025, possessed a loaded firearm, to wit, a .380 caliber semi-automatic pistol, with intent to use the same unlawfully against another person.

FORTY-SECOND COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHRISTOPHER STEWARD, a/k/a "2Chris," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the county of New York, on or about January 29, 2025, possessed a loaded firearm, to wit, a .380 caliber semi-automatic pistol, said possession not being in defendant's home or place of business.

FORTY-THIRD COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHRISTOPHER STEWARD, a/k/a "2Chris," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the county of New York, on or about January 29, 2025, possessed a loaded firearm, to wit, a .40 caliber semi-automatic pistol, with intent to use the same unlawfully against another person.

FORTY-FOURTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHRISTOPHER STEWARD, a/k/a "2Chris," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the county of New York, on or about January 29, 2025, possessed a loaded firearm, to wit, a .40 caliber semi-automatic pistol, said possession not being in defendant's home or place of business.

FORTY-FIFTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHRISTOPHER STEWARD, a/k/a "2Chris," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the county of New York, on or about January 29, 2025, possessed a loaded firearm, to wit, a .22 caliber semi-automatic pistol, with intent to use the same unlawfully against another person.

FORTY-SIXTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHRISTOPHER STEWARD, a/k/a "2Chris," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the county of New York, on or about January 29, 2025, possessed a loaded firearm, to wit, a .22 caliber semi-automatic pistol, said possession not being in defendant's home or place of business.

FORTY-SEVENTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHRISTOPHER STEWARD, a/k/a "2Chris," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(1)(b), an armed felony, committed as follows:

The defendant, in the county of New York, on or about January 29, 2025, possessed a loaded firearm, to wit, a nine-millimeter caliber semi-automatic pistol, with intent to use the same unlawfully against another person.

FORTY-EIGHTH COUNT:

AND THE GRAND JURY AFORESAID, by this indictment, further accuses the defendant CHRISTOPHER STEWARD, a/k/a "2Chris," of the crime of **CRIMINAL POSSESSION OF A WEAPON IN THE SECOND DEGREE**, in violation of Penal Law §265.03(3), an armed felony, committed as follows:

The defendant, in the county of New York, on or about January 29, 2025, possessed a loaded firearm, to wit, a nine-millimeter caliber semi-automatic pistol, said possession not being in defendant's home or place of business.

ALVIN L. BRAGG, JR.
District Attorney