U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

November 19, 2026

BY ECF AND EMAIL

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The Honorable Valerie Figueredo
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The Honorable Gary Stein
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Matthew Newman*, et al., 26 Cr. 558 (LJL)

Dear Judges Liman, Stein, Figueredo, and Gorenstein:

Since at least 2023, members and associates of the Untouchable Gorilla Stone Nation set of the nationwide Bloods gang ("Gorilla Stone") have been engaged in prolific narcotics trafficking in Sara D. Roosevelt Park ("SDR Park"), located in the heart of Manhattan's Lower East Side. This drug trafficking organization (the "DTO") has wreaked havoc on the community, flooding our city's streets with crack cocaine, heroin, fentanyl, and K2. To further its drug business, the DTO has engaged in frequent acts of violence. Members of the DTO routinely commit slashings, stabbings, robberies, and gun violence against rival drug dealers and their own customers, typically drug-addicted individuals.

This morning, a three-count Indictment 26 Cr. 558 (LJL) (the "Indictment") was unsealed, charging fifteen members of the DTO with narcotics and firearms offenses. Count One of the Indictment charges each of the fifteen defendants with conspiring to distribute narcotics, in violation of 21 U.S.C. §§ 846, 841(b)(1)(A), and 841(b)(1)(C). Count Two of the Indictment charges two of the defendants, Matthew Newman and Sean Sims, with using and carrying a firearm, which was discharged, in furtherance of the narcotics conspiracy charged in Count One, and aiding and abetting the same, in violation of 18 U.S.C. §§ 924(c)(1)(A)(i), (ii), and (iii), and 2. Count Three charges ten other defendants with possessing, using, and carrying a firearm in furtherance of the narcotics conspiracy charged in Count One, and aiding and abetting the same,

in violation of 18 U.S.C. §§ 924(c)(1)(A)(i) and 2, under a liability theory established in *Rosemond v. United States*, 572 U.S. 65, 70-71 (2014).[1]

Last night and early this morning, fourteen members of the DTO were arrested or brought into federal custody.[2] Thirteen are expected to make their initial appearances in the Southern District of New York today.[3] The Government respectfully submits this letter to provide the Court and defense counsel with a summary of the offense conduct and in support of the Government's position that pretrial detention is warranted for each of the fifteen defendants.

The facts described below come from, among other sources, New York City Police Department ("NYPD") reports and records, surveillance videos, records and communications obtained from judicially authorized search warrants for electronic devices, and anticipated witness testimony. This letter proceeds in two parts. First, it provides an overview of the operations of the DTO, including the agreements and understandings that governed the conspiracy, as well as how the DTO relied on violence, including the use of firearms, to maintain control of their drug dealing territory. Second, the letter discusses each of the defendants who have been charged in the Indictment, describing each defendant's participation and involvement in the DTO.

I. The DTO

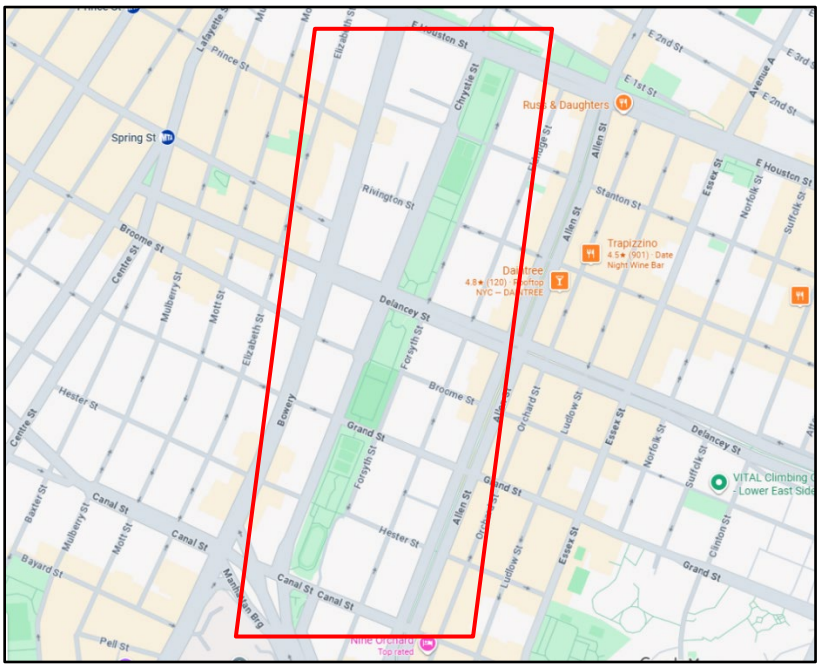
The DTO operates in SDR Park and the surrounding area, as depicted in the map below. SDR Park is home to a running track, handball courts, basketball courts, soccer fields, and several playgrounds. But in recent years, the Park has become overrun by the DTO, whose presence is felt in the proliferation of stabbings, slashings, robberies, and firearms in the area, as well as the used syringes and needles, discarded drug packaging, and other drug paraphernalia that have been strewn throughout the Park.

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[1] A defendant violates Section 924(c) if he uses or carries a firearm during and in relation to, or possesses a firearm in furtherance of, a "drug trafficking crime." 18 U.S.C. § 924(c)(1)(A). Aiding and abetting a Section 924(c) offense "requires both an affirmative act furthering the underlying offense and an intent to facilitate that offense's commission." *United States v. Robinson*, 799 F.3d 196, 200 (2d Cir. 2015) (citing *Rosemond v. United States*, 572 U.S. 65, 70-71 (2014)). "[T]he affirmative act requirement is met when the defendant facilitates any element of the underlying offense," even if that act "did not specifically facilitate the use of the firearm." *Id.* at 200 (citing *Rosemond*, 572 U.S. at 74-75). A defendant is therefore guilty under Section 924(c) where he has knowledge that one of his co-conspirators will carry a gun in connection with that conspiracy, has an opportunity to "alter that plan or, if unsuccessful, withdraw from" the conspiracy, and instead "go[es] ahead with his role in the venture." *Rosemond*, 572 U.S. at 79.

[2] Tyre Banks, Michael Durham, Matthew Newman, Ravell Rosser, Sean Sims, and Ibrahim Toure are in state custody. We anticipate that each of them will arrive on a federal writ this morning. Jahfari Johnson, Ashante Inniss, Basil Simms, Jaden Wayne, Joseph Crispin, Marvin Ward, and Antonio Torrecilla were arrested last night or this morning. Cameron Barnhill remains at large.

[3] Antonio Torrecilla was arrested in Ohio this morning and will be presented in the Southern District of Ohio.



Members of the DTO include the following individuals: Matthew Newman, a/k/a "Money"; Sean Sims, a/k/a "Vito"; Jahfari Johnson, a/k/a "G Dot"; Michael Durham, a/k/a "Kano"; Ravell Rosser, a/k/a "Velle"; Ashante Inniss, a/k/a "Fire"; Cameron Barnhill, a/k/a "Baby Ape"; Tyre Banks, a/k/a "Mighty"; Basil Simms, a/k/a "Sheff"; Ibrahim Toure, a/k/a "Fah"; Jaden Wayne, a/k/a "Six," a/k/a "Six Shot"; Joseph Crispin, a/k/a "Chance"; Marvin Ward, a/k/a "Marv"; Trayvon Johnson, a/k/a "Trigga"; and Antonio Torrecilla, a/k/a "Tone." With the exception of Torrecilla, who supplies several members of the DTO with crack cocaine, heroin, and fentanyl for resale, all of these individuals are members of Gorilla Stone or allied gangs, such as the Bloodhound Brims, who dominate the narcotics trafficking in SDR Park through coordinated drug dealing and acts of violence.

Coordinated Drug Dealing. The DTO has established agreements, understandings, and practices that govern how the organization operates and how its different members coexist within the same drug-dealing territory. For example, members of the DTO have divided up SDR Park, with certain dealers controlling different parts of the Park. While these dealers permit one another to sell in close physical proximity, they do not allow outsiders or newcomers to sell in their territory. In particular, the members of the DTO work together, often using violence and intimidation, as further discussed below, to keep out rival or unfamiliar drug dealers. Victim statements, police reports, surveillance footage, text messages from cellphones obtained during the course of the investigation, and information provided by confidential sources and witnesses establish the DTO's practice of protecting its drug dealing territory and using violence as a means of doing so.

Members of the DTO have also exercised control over the Park by working in shifts. By agreement and with proactive coordination, certain dealers, along with individuals working for them, sell in the morning, while others sell in the afternoon and others still sell at night. For instance, the Government has identified text messages among co-conspirators in which they discuss which shifts each co-conspirator will work. Specifically, in one group chat, co-

conspirators discussed how one of them would "control the morning shift," Matthew Newman would "control after noon," and Tyre Banks would "control the night." In other text messages, Banks informed a co-conspirator that he was "outside all night" and that Banks "got it all day" because "Y'all held it down the other day."

In addition to protecting their territory and working in shifts, members of the DTO furthered their collective drug dealing by warning one another about law enforcement's presence in the area, sharing suppliers (and several DTO members themselves supplied drugs to other DTO members), steering customers to each other, providing each other with product when someone runs out, and jointly responding to threats that might impact any dealer in the DTO. These collaborative activities have one important feature: they advance the common goal of lucrative drug dealing.

Acts of Violence. As noted, members of the DTO also further their drug-dealing business by protecting their operations with violence, including slashings, stabbings, robberies, assaults, and the possession and use of firearms. Members of the DTO are known to resort to violence where customers fail to pay them, where rival dealers encroach upon their territory, or to prove their loyalty to the DTO. For instance:

- In December 2024, in the vicinity of SDR Park, Ibrahim Toure sold K2 to a customer who Toure believed paid him with counterfeit cash. Toure slashed the victim twice, once to the top of his head and once to his face, as depicted below, with the Park in the background.[4]



- In February 2026, in the vicinity of SDR Park, Matthew Newman participated in the stabbing of a victim whose close friend, a drug user, had a narcotics-related debt to Newman. Specifically, Newman gave a blade to an uncharged co-conspirator, who stabbed the victim seven times in the back, resulting in a collapsed lung and bleeding

[4] Toure was arrested for this incident, but the case was sealed. Toure is currently in custody on attempted murder charges for his participation in an unrelated incident, a retaliatory stabbing in the vicinity of SDR Park.

of the kidney. A photo of Newman (on the right) passing the blade to the co-conspirator is depicted below.



- In April 2026, in the vicinity of SDR Park, Newman, Sean Sims, Basil Simms, and one unidentified perpetrator assaulted and stabbed a competitor drug dealer who was selling K2 at the Park at under-market prices. Photos of the victim's leg and head are depicted below.[5]





- From approximately 2024 to 2025, Sims, who was then a member of the Mac Baller subset of the Bloods, engaged in a series of back-and-forth acts of violence with Newman and others regarding, among other things, their respective drug-dealing

[5] Newman and Simms were both arrested for this incident, but not Sims. Newman's case is sealed. Simms was charged with assault in the second degree, and this case is currently pending. The victim informed law enforcement that the perpetrators wanted the victim to sell narcotics on their behalf.

territory in SDR Park. In March 2025, for example, Newman, along with Trayvon Johnson, slashed Sims in the face, and Sims slashed Newman in the head, as shown below.





Following that incident, Sims determined that he wanted to become Gorilla Stone to avoid further confrontations with Newman and his allies. To become Gorilla Stone, in April 2026, Sims and an uncharged co-conspirator shot a sixteen-year-old victim, with whom Newman had "beef," in proximity to the victim's femoral artery, as depicted below. This incident is the basis of Count Two of the Indictment, which charges Newman and Sims with aiding and abetting the discharge of a firearm in furtherance of the DTO.[6]



- In July 2026, in the vicinity of SDR Park, Cameron Barnhill and Ashante Inniss assaulted a rival drug dealer to protect the DTO's drug dealing territory. Barnhill and Inniss attacked the rival dealer with a traffic cone, stomped on his face and neck,

[6] Neither Sims nor Newman have been arrested in connection with this incident.

dragged him by his ankles, and robbed him, as depicted in the below image taken from surveillance video.[7]



In addition to these incidents—which represent only a handful of the violent acts in which members of the DTO have engaged—beginning at least in or around 2025, Newman possessed firearms that he provided to or made available to other members of the DTO, including at least Jahfari Johnson, Ravell Rosser, and Jaden Wayne, to protect themselves and their drug-dealing operation in SDR Park.

II. The Members of the DTO

As set forth above, pretrial detention is warranted for each of the fifteen defendants charged in this conspiracy. Each defendant is discussed in greater detail below:

1. Matthew Newman, a/k/a "Money"

Matthew Newman, a/k/a "Money," is a member of Gorilla Stone and has been a leader of the narcotics trafficking in the SDR Park area for years. In addition to selling drugs to customers himself, Newman also supplied other members of the DTO, including Barnhill, Durham, Jahfari Johnson, and Rosser. Newman further engaged in significant violence in and around SDR Park, including as described above, to protect the DTO's territory and to address disputes with competitor drug dealers and customers.

[7] Barnhill and Innis were both arrested for this incident and their cases are currently pending. A bench warrant was issued on October 16, 2026, for Barnhill's arrest following his failure to appear at his last court proceeding.

Newman has been arrested approximately 11 times since July 2024 following observed hand-to-hand narcotics transactions in and around SDR Park. Through those arrests, officers recovered from Newman fentanyl, crack cocaine, cocaine, and K2. In one December 2025 arrest, for example, Newman was in possession of fentanyl, crack cocaine, K2, a large quantity of cash, and a knife, as shown below:



In connection with a separate arrest in Brooklyn in June 2025—which resulted in the recovery of crack cocaine, cocaine, and fentanyl—Newman pled guilty in Kings County Supreme Court in July 2026 to criminal possession of a controlled substance in the seventh degree, a misdemeanor in violation of New York Penal Law ("NYPL") § 220.03, and, on September 10, 2026, was sentenced to a term of 364 days' incarceration. Newman is currently in custody on that sentence.

Newman's criminal history extends beyond New York. In October 2017, for example, Newman pled guilty in Delaware to possession of a firearm while also possessing a controlled substance, a felony in violation of Del. Code § 1448(a)(9). In February 2020, Newman pled guilty in Pennsylvania to possession of a firearm without a license, a felony in violation of 18 Pa.C.S. § 6106.1(a)(1), and was sentenced to a term of 15 to 30 months' imprisonment. In December 2022, Newman pled guilty in New Jersey to possession of a firearm without a license, a felony in violation of N.J. Rev. Stat. § 2C:39-5(b)(1), and was sentenced to a five-year term of imprisonment.

In addition, between June 2026 and August 2026, law enforcement conducted multiple undercover buys of crack cocaine into Newman in SDR Park. In those buys, Newman was selling narcotics in concert with Barnhill and Inniss. Law enforcement also has observed Newman conducting hand-to-hand narcotics transactions on other occasions; in one instance, for example, Newman was observed serving drugs to approximately nine customers in less than fifteen minutes.

Further, notwithstanding that Newman has sustained felony convictions, Newman has continued to possess firearms himself (as shown, for example, in the below photograph, depicting a handgun next to cash and narcotics, obtained from Newman's phone), to provide firearms to other members of the DTO, including Jahfari Johnson, Rosser, Sims, Wayne, and other co-conspirators, and to engage in violence involving the use of firearms.



For example, in 2024, Newman, with two other Gorilla Stone members, assaulted a man at a liquor store in the vicinity of SDR Park. According to the surveillance video of the incident, Newman confronted the man and stated, "You know you're food, right?," and "You've been food," i.e., Bloods slang used to refer to an out-of-favor gang member. Newman physically assaulted the man, and a co-conspirator brandished a firearm, as shown in the below photograph, and struck the victim with the gun on the head.



Additional evidence of Newman's participation in the DTO has been identified on cellphones that have been seized from Newman and searched pursuant to judicially authorized search warrants. That evidence is described in greater detail in sections on several other co-conspirators below.

2. Sean Sims, a/k/a "Vito"

Sean Sims, a/k/a "Vito," a former member of Gorilla Stone (and before that, a former Mac Baller) and current member of Sex Money Murder, is a prominent dealer who for years sold crack, heroin, fentanyl, and K2 in SDR Park. Sims has been arrested in the SDR Park Area on several occasions. In December 2023, Sims was arrested after he was observed engaging in a suspected hand-to-hand narcotics transaction and was found in possession of crack and K2. Sims was arrested again in February 2024 after selling crack to an undercover police officer on approximately four occasions. In May 2026, Sims was arrested after moving between train cars; he attempted to flee, resisted arrest, and attempted to hide a kitchen knife and drugs on the tracks. Officers recovered crack and K2 from Sims. Sims is currently detained on related state charges.

Sims was personally responsible for numerous acts of violence in SDR Park. For example, in 2022, before the start of the charged conspiracy but while Sims was selling drugs in SDR Park, Sims stabbed another dealer in SDR Park in what the Government understands, based on witness information, to be a dispute over narcotics territory. In February 2024, Sims maced and stabbed another person in SDR Park, for which he was convicted of assault in the second degree. As described above, between approximately 2024 to 2025, Sims engaged in back-and-forth violence with Newman about drug-dealing territory, among other things. During that time period, Sims was arrested in possession of a firearm on at least two occasions—in August 2025, when he was arrested near SDR Park with a loaded firearm (below left), and in April 2026, after Sims's probation officer found a firearm in Sims's home during a probation search (below right). Also in April 2026, in the vicinity of SDR Park, Newman, Sean Sims, Basil Simms, and one unidentified perpetrator assaulted and stabbed a competitor drug dealer who was selling K2 at under-market prices. In 2026, to join Gorilla Stone and avoid further violence, Sims and an associate shot a sixteen-year-old at Newman's direction.



Firearm seized in August 2025

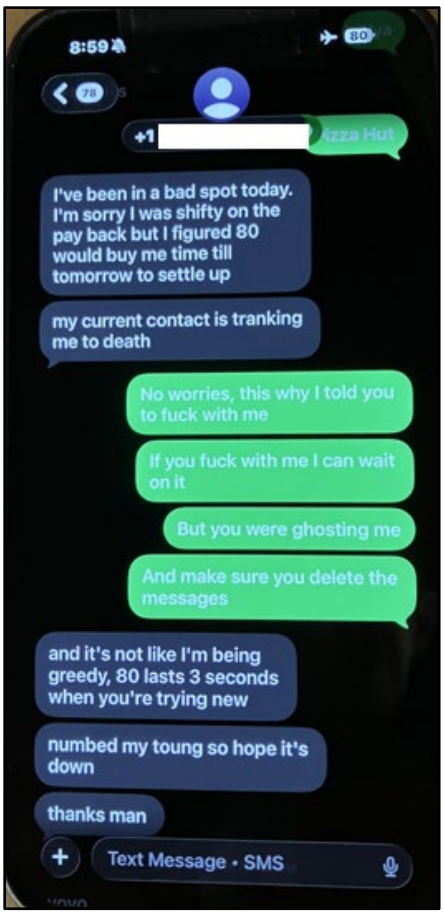


Firearm seized in April 2026

3. Jahfari Johnson, a/k/a "G Dot"

Jahfari Johnson, a/k/a "G Dot," is a member of Gorilla Stone who has been selling crack cocaine, heroin, fentanyl, and K2 in SDR Park, beginning in at least 2024. Johnson is one of the highest-ranking members of Gorilla Stone selling drugs in SDR Park. Along with Newman, Johnson supplies other Gorilla Stone dealers with crack, heroin, and fentanyl. From a cellphone seized from Johnson on November 12, 2026, incident to his arrest in connection with a traffic violation, and searched pursuant to a judicially authorized warrant, Johnson exchanged text messages with a customer regarding his sales of "down" (i.e., heroin and fentanyl) as recently as October 16, 2026.





Johnson has been arrested after being observed engaging in hand-to-hand transactions in the SDR Park area on two occasions—once in August 2025 and once in August 2026. In August 2025, Johnson was found in possession of 25 gel capsules of crack cocaine. In August 2026, Johnson was found in possession of 159 vials of crack cocaine, 1 bag of cocaine powder, and 19 glassine envelopes of fentanyl.

Evidence of Johnson's participation in the DTO has been identified on Newman's phone, which was searched pursuant to a judicially authorized warrant. Johnson was part of a group text titled "Get it in BLOOD" with Newman, Jaden Wayne, and other co-conspirators, in which they discussed other drug dealers in the SDR Park area, police activity in the SDR Park area, and Johnson's intention to "violat[e]" another individual. Johnson has approximately five Cash App transactions with Newman.

The investigation has established that Johnson has participated in acts of violence, including fighting a rival dealer who was trying to undercut Newman and gain more control of the area. During that fight, both Newman and Johnson brandished a gun at the rival dealer. Johnson also has participated in the robbery of a different rival dealer who was selling drugs in a part of SDR Park in which Johnson and other members of the DTO sold drugs.

4. Michael Durham, a/k/a "Kano"

Michael Durham, a/k/a "Kano," is a former member of Gorilla Stone and a current member of the Bloodhound Brims (also referred to as the Jets), another subset of the national Bloods gang. This investigation has revealed that Durham is a leader of the Jets that sell drugs in SDR Park. Durham dealt drugs in the SDR Park area from in or around 2024 until in or around February 2026, when Durham was detained on state narcotics offenses. On October 28, 2026, Durham pleaded guilty to attempted criminal sale of a controlled substance in the third degree to resolve three pending narcotics cases from drug sales in the SDR Park area. He is still awaiting sentencing. Prior to being detained in February 2026, Durham was a prolific drug dealer in the SDR Park area, selling crack cocaine, heroin, and fentanyl. When Durham first started selling drugs in the area, he used the same supplier as Matthew Newman, and the two would occasionally re-supply each other. After a few months, Durham found a new supplier, who was also the supplier to Marvin Ward. Durham and Ward are known to sell together in the SDR Park area.

Between April 2025 and January 2026, Durham was arrested for narcotics offenses five times in the SDR Park area. Some of these arrests have involved significant quantities of crack cocaine.[8] For instance, on July 17, 2025, Durham was in possession of a crack rock weighing approximately 138.69 grams, 184 vials of crack, and 47 bags of cocaine. Less than two weeks later, Durham was arrested again in the SDR Park area, this time selling K2 in the Park. In addition, between July 2025 and January 2026, the NYPD has done six undercover buys of crack cocaine into Durham. In the most recent undercover buy, in January 2026 (one month before his detention), Durham sold the undercover officer a crack rock weighing 27.629 grams.

[8] The final of these arrests was for Durham's sixth sale to an undercover officer.



Drugs Purchased in January 2026 Undercover Buy from Michael Durham, including 27.629 grams of cocaine

Even though Durham is now a Jet, he is allied with the Gorilla Stone members dealing drugs in SDR Park and sells in the same area as them. The alliance between Durham and Gorilla Stones, and Durham's membership in the DTO, is evident from his co-conspirators' prior willingness to permit Durham's ex-girlfriend to sell in the SDR Park area, but only when the two were in a relationship. The investigation has established that when Durham and his ex-girlfriend broke up in 2026, and his ex-girlfriend started dating another dealer, Gorilla Stone members, including Matthew Newman, Jahfari Johnson, and Joseph Crispin robbed the workers of Durham's ex-girlfriend and her then boyfriend, leading to back-and-forth violence that culminated in Newman stashing guns around the Park.

Additional evidence of Durham's participation in the DTO has been identified on Newman's phone. In January 2025, for example, Newman texted Durham that the "politics on th[e] block" (i.e., in the SDR Park area) have nothing to do with Newman and Durham, and to let other dealers "go thru" because they have "more important shit to handle." On another occasion, in October 2025, Durham and Newman again texted about the dynamics on the block. Newman informed Durham that "[n-word] is commin to an understanding now" and Durham responded, "Sturdy what ever we can do to keep it together lmk ape fuck the rest of these [n-word]."

According to a confidential source, Durham has been involved in acts of violence in the SDR Park area, in particular, pulling a gun on a rival drug dealer in or around 2025.

5. Ravell Rosser, a/k/a "Velle"

Ravell Rosser, a/k/a "Velle," is a member of Gorilla Stone who has sold crack, heroin, fentanyl, K2, and various other narcotics or pills in SDR Park from at least 2024 to July 2026, when he was arrested in Jersey City for assaulting his child's mother (resulting in visible injuries to her face) and brandishing a firearm at her, her sister, and her mother. In August 2026, Rosser

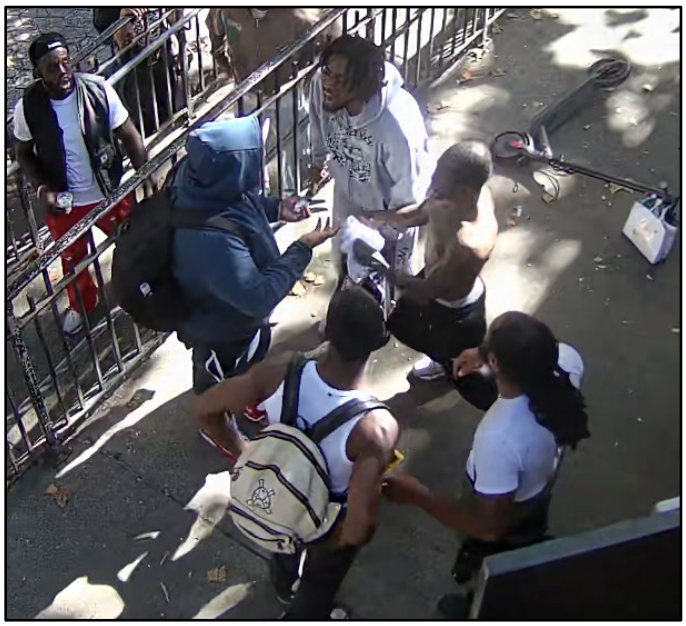
pled guilty to possession of a firearm and is awaiting sentencing in this case. According to a confidential source, the firearm, depicted below, to which Rosser pled guilty was a firearm he received from Newman and was carrying in furtherance of the DTO.



In an approximately one-and-a-half-year period between April 2024 and October 2025, Rosser has been arrested approximately seven times either in SDR Park, or in the vicinity of SDR Park, after being observed engaging in hand-to-hand transactions. In his most recent arrest, in October 2025, he was in possession of 11 vials of crack, 70 oxy pills, and 16 MDMA pills. On another occasion, in May 2025, he was in possession of 24 glassine envelopes of fentanyl and 44 twists of K2. On yet another occasion, in November 2024, he was in possession of 42 vials of crack. And in his first arrest, in April 2024, he was in possession of five crack rocks weighing 45 grams, 27 twists of K2, and 28 grams of Adderall pills.

Evidence from Newman's phone indicates Rosser's participation in the DTO. We have obtained messages between Newman and Rosser discussing: upcoming Gorilla Stone meetings, meeting up in SDR Park for the purpose of selling narcotics, how many customers are at the park, and police presence within SDR Park.

Rosser has also engaged in acts of violence inside of SDR Park, including with other members of the DTO. On one such occasion, on or about October 6, 2025, Rosser, Newman, and two uncharged co-conspirators brutally assaulted an individual inside of SDR Park at the entrance to a public bathroom. According to surveillance video obtained of the incident, and as depicted below, Barnhill (wearing the white tank top and beige backpack), Newman (in the white t-shirt on the bottom right), and two others engaged in a heated argument with the victim (wearing the blue hoodie) and began to assault the victim.



As further shown below, the victim was pressed up against a metal fence trying to protect himself as Rosser (left) assaulted him and the individual in the grey sweatshirt stabbed the victim in the torso.[9]



The assailants, including Rosser, quickly fled as the victim laid down on the floor bleeding until NYPD officers and EMS arrived and rendered assistance. Approximately ten days later, on October 16, 2025, Rosser was arrested in connection with this stabbing. According to his criminal history records, Rosser pled guilty to assault in the second degree, a felony in violation of NYPL § 120.05, on September 21, 2026, and is awaiting sentencing.

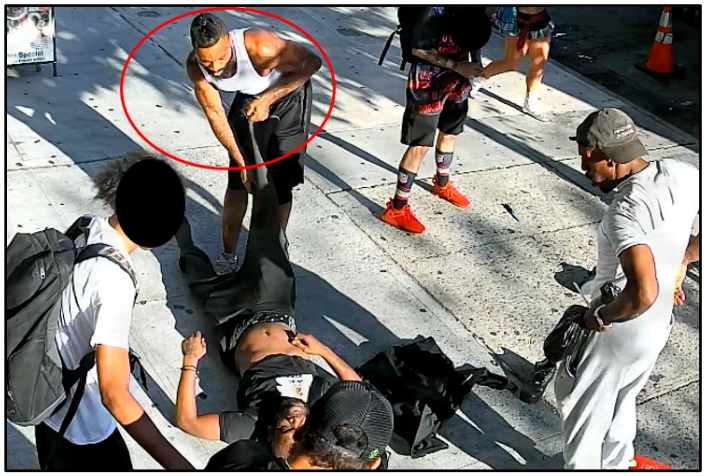
[9] The knife used to stab the victim is in the right hand of the individual in the grey sweatshirt and circled in red.

6. Ashante Inniss, a/k/a "Fire"

Ashante Inniss, a/k/a "Fire," is a member of Gorilla Stone who has sold fentanyl, heroin, crack cocaine, and K2 in the SDR Park area since at least 2024. In recent months, and in particular since Newman has been in custody beginning in September 2026, Inniss has been a leading seller in the Park.

While Inniss has not been arrested for narcotics related offenses in the SDR Park area, in September 2026, surveillance captured Inniss engaging in hand-to-hand drug sales in the SDR Park area on two different occasions. In addition, in August 2026, Inniss was present with Matthew Newman and Cameron Barnhill in an encampment area in SDR Park when an undercover officer purchased crack cocaine from a co-conspirator.

Inniss has engaged in significant violence in furtherance of the DTO, including in July 2026, as described above, when Inniss (shown circled in red below), with Barnhill, assaulted and robbed a competitor drug dealer near SDR Park.



Inniss was arrested on July 14, 2026 in connection with the foregoing assault and robbery; the case remains pending. In addition, just three months beforehand, in April 2026, Inniss was arrested after assaulting a 79-year-old man, who was hospitalized, on the subway. Inniss pled guilty in New York Criminal Court to assault in the third degree and sentenced in May 2026 to a 90-day term.

Inniss also sustained prior convictions prior to his arrival at SDR Park. In February 2019, for example, Inniss pled guilty in Ulster County, New York, to criminal contempt in the second degree, and sentenced to a 180-day term with an order of protection. In January 2020, Inniss pled guilty again to criminal contempt in the second degree, for which he received another order of protection. And in June 2022, Inniss pled guilty to criminally negligent homicide, in violation of NYPL § 125.10, and to criminal contempt in the first degree, in violation of NYPL § 215.51(c), and sentenced to a total term of three years. He was released from custody in December 2022, after which he arrived in the Washington Square Park area, and thereafter the SDR Park area, to traffic drugs.

7. Cameron Barnhill, a/k/a "Baby Ape"

Cameron Barnhill, a/k/a "Baby Ape," is an influential member of Gorilla Stone who has been selling crack cocaine and K2 in SDR Park, since at least early 2026. According to a confidential source, who has personally obtained a supply of crack from Barnhill on several occasions, Barnhill supplies other members of the DTO with crack. When Barnhill first began selling in and around SDR Park, he worked for other members of the DTO, specifically Matthew Newman and Joseph Crispin, selling drugs on their behalf.

Barnhill has been arrested approximately 31 times, including 23 times for felonies.[10] In the five-week period from July 9, 2026 to August 14, 2026, in the vicinity of SDR Park, Barnhill was arrested for narcotics offenses on five separate occasions, averaging an arrest of once a week. Each time, he was arrested being observed engaging in hand-to-hand transactions and found in possession of large quantities of crack or K2, and sometimes both. For example, on July 25, 2026, NYPD officers recovered 2 crack rocks from Barnhill incident to his arrest. This arrest did not deter Barnhill. To the contrary, just three days later, on July 28, 2026, NYPD officers recovered 41 vials of crack and two large bags of K2 incident to his arrest.

In addition to these arrests in the summer of 2026, Barnhill also sold drugs to undercover officers on three occasions during the same time period, each in an encampment area in the vicinity of SDR Park. On August 4, 2026, Barnhill sold an undercover officer $120 worth of crack. Two days later, on August 6, 2026, Barnhill, along with other members of the DTO, including Newman and Ashante Inniss, were present when a co-conspirator made another sale of crack to an undercover officer. And about ten days after that, on August 17, 2026, Barnhill again participated in the sale of crack to an undercover officer. These narcotics transactions were audio and video recorded and Barnhill is captured on video as depicted below:



As noted in detail above, in the same five-week time period in which Barnhill was responsible for eight narcotics transactions (based on arrests and undercover buys) between mid-July and mid-August 2026, Barnhill also committed the extremely violent assault and robbery with Inniss, described above. As depicted below, Barnhill used a traffic cone to beat the victim. Inniss, meanwhile, stomped on the victim's head.

[10] More than half of these arrests have been voided, dismissed, or otherwise sealed.



8. Tyre Banks, a/k/a "Mighty"

Tyre Banks, a/k/a "Mighty," is a Gorilla Stone member who sold narcotics and engaged in acts of violence in SDR Park in or around 2024. Banks was physically present in the SDR Park area for only a period of months: He was released from custody on August 31, 2023, after serving a nine-year prison sentence for attempted murder, and was only at liberty until December 20, 2024, when he was arrested for committing a stabbing in Harlem, for which he was eventually convicted of attempted murder and sentenced to 14 years' imprisonment.

While he was trafficking narcotics in SDR Park, Banks sold crack cocaine, which was supplied by Matthew Newman, and K2. Evidence from cellphones obtained in the course of this investigation establish Banks's membership in the DTO. For instance, these cellphones contain messages in which co-conspirators, including Banks and Newman, among others, discuss (i) meeting up in prime drug-selling locations in and around SDR Park, (ii) getting and selling "packs" (i.e., packs of drugs) and deuce (i.e., K2), (iii) pricing of drugs, how much supply they have left, and running out of product, (iv) selling drugs all night and doing it "for da team" followed by ape emojis, (v) how Banks, Newman, and another co-conspirator would "control" different shifts at different times of day; and (vi) using other younger Gorilla Stones, including Ibrahim Toure to sell drugs on their behalf.

Banks's cellphone also contains messages with Banks's younger brother, Basil Simms, who is also a member of Gorilla Stone. In these messages, Banks and Simms discuss meeting up in the SDR Park area, packaging drugs, and the best practices of drug dealing, specifically getting drug supply and making money before spending money. Records from Cash App indicate that Banks's Cash App had more than 20 transactions with Simms in 2024.





Photos identified on Banks's cellphone

9. Basil Simms, a/k/a "Sheff"

Basil Simms, a/k/a "Sheff," is a member of Gorilla Stone who has been selling crack cocaine and K2 in SDR Park since at least July 2025. According to a confidential source, Simms obtained his narcotics supply from Newman and another uncharged co-conspirator. When Simms first began selling in and around SDR Park, he worked for other members of the DTO, specifically Newman and Simms' brother, Tyre Banks.

Simms has been arrested approximately seven times, including five felonies and two misdemeanors. Between May 2025 and July 2026, Simms has been arrested for narcotics offenses on six separate occasions in or around SDR Park. For example, Simms was arrested on May 14, 2025, after officers observed him engaging in multiple hand-to-hand transactions inside of SDR Park, resulting in the seizure of 20 vials of crack. Two months later, on July 15, 2025, Simms was again arrested after officers observed him conducting hand-to-hand transactions inside of SDR Park, leading to the seizure of 59 twists of K2. Simms was again arrested inside of SDR Park on September 16, 2025, and during a search incident to his arrest, 245 twists of K2 were seized.

Evidence from Newman's phone further expands on Simms' participation in the DTO. We have obtained messages between Newman and Simms discussing: meeting up in SDR Park for the purposes of selling narcotics and police presence within SDR Park. Additionally, Simms and Newman routinely used Gorilla Stone terminology in their communications, further indicating Simms' involvement in the DTO.

As noted above in the section on Banks, we have also obtained messages between Banks and Simms from Banks' phone. On Banks' phone were several messages with Simms discussing: meeting up in SDR Park for the purposes of selling narcotics, the amount of customers at the Park, police presence and movement within SDR Park, and placing narcotics proceeds into a "pot."

Simms has also engaged in acts of violence inside of SDR Park, including with other members of the DTO, to protect the DTO's turf within the Park. As mentioned above, in April 2026, Newman, Sims, Simms, and one unidentified perpetrator violently assaulted and stabbed a rival drug dealer who had been selling K2 in the vicinity of their turf at below-market prices.

Simms was arrested for this incident and has been charged with assault in the second degree. The case is still pending.

In addition to his involvement in violence inside SDR Park, Simms also has criminal convictions for violent conduct outside SDR Park. In particular, on April 1, 2026, Simms was arrested in Manhattan for strangulation in the second degree, in violation of New York Penal Law § 121.12. On October 28, 2026, Simms pled guilty to criminal obstruction of breathing, an A-Misdemeanor. Sentencing is currently scheduled for January 13, 2027. Simms also has two other criminal convictions—one for criminal possession of a controlled substance in the seventh degree and another for an unknown conviction—for which he is currently awaiting sentencing.

10. Ibrahim Toure, a/k/a "Fah"

Ibrahim Toure, a/k/a "Fah," is a member of Gorilla Stone who has sold crack cocaine in the SDR Park area from at least in or about 2024 to April 2026, when he was arrested for attempted murder in connection with a retaliatory stabbing he committed in the vicinity of SDR Park.[11]

Toure has been arrested in the SDR Park area on four occasions—once for the retaliatory stabbing referenced above, once for slashing a customer in the face after Toure perceived the customer to give him fake currency in exchange for K2, as discussed above (in December 2024), and twice for engaging in narcotics transactions (in March 2025 and September 2024). In connection with the March 2025 narcotics arrest, Toure was observed conducting hand-to-hand transactions and was found in possession of a dagger and K2. In connection with the September 2024 narcotics arrest, Toure was also observed conducting hand-to-hand transactions and found in possession of 16 vials of crack cocaine. As for the retaliatory stabbing, Toure committed this act of violence with two unapprehended perpetrators in March 2026 against a friend of Sean Sims because Sims had previously stabbed Toure. During the attack, which left the victim hospitalized and in critical condition, Toure and the other perpetrators declared to the victim that they were "Ape," which is a term used to identify oneself as a member of Gorilla Stone.

Matthew Newman's cellphone contains evidence that demonstrates Toure's participation in the DTO. Toure is referenced in messages between Newman and Tyre Banks, in which Banks indicated that he gave Toure and another worker "packs" of drugs to sell, but complained that they "never came back with no money." Newman responded, "[o]fcourse they gonna do weird shit they young ape." Newman's cellphone also contains text messages between Newman and Toure, in which the two discuss undercover police in the SDR Park area, "bagging up the deuce," and being "in da ape cave" before "coming back outside."

11. Jaden Wayne, a/k/a "Six," a/k/a "Six Shot"

Jaden Wayne, a/k/a "Six," a/k/a "Six Shot," is a member of or closely associated with Gorilla Stone, and has sold crack, heroin, fentanyl, and K2 in SDR Park since at least 2025. In 2026, Wayne was arrested twice in or around SDR Park. He was arrested in January 2026 after being observed in narcotics transactions; while he was not found with any drugs, he was found in

[11] Since being in custody, Toure has sustained a conviction for introducing contraband into a prison in the second degree, for which he was sentenced to 30 days' imprisonment.

possession of nearly 200 capsules used for crack. In October 2026, Wayne was arrested after selling crack to an undercover police officer. Evidence from cellphones obtained in the course of this investigation establish Wayne's active and long-term participation in the DTO. Wayne is a member of the "Get it in BLOOD" group chat discussed above, in which the defendants detail their persistent and pervasive drug sales in SDR Park. Wayne personally provided active updates on his own drug sales, including about how "Chance," i.e., his co-defendant Joseph Crispin, needed drugs; how he was going to "broadway n Lafayette," i.e., the area near SDR Park; and about how other dealers were selling in the area. Wayne also warned others about police in SDR Park and encouraged round-the-clock sales in the Park.

In addition to his drug dealing, Wayne has engaged in significant violence as a member of the DTO. Wayne possessed firearms in connection with his drug trafficking and was involved in stabbing a rival drug dealer in SDR Park.

12. Joseph Crispin, a/k/a "Chance"

Joseph Crispin, a/k/a "Chance," is a member of Gorilla Stone who has been selling drugs—crack cocaine, heroin, fentanyl and K2—in SDR Park since in or around late 2025 or early 2026. Crispin has received narcotics supply from both Matthew Newman and Jahfari Johnson.

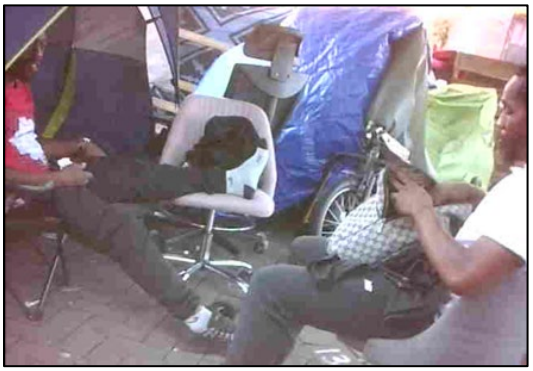
Crispin has been selling drugs in lower Manhattan for years. Prior to selling drugs in SDR Park, Crispin was a drug dealer in the vicinity of Washington Square Park, several blocks west and north of SDR Park, and attempted to sell drugs to an undercover officer in the Sixth Precinct (where Washington Square Park is located) in December 2024.[12] After approximately twenty drug dealers were arrested on federal narcotics charges in October 2025, *see United States v. Lugg et al.*, 25 Cr. 484 (DLC), Crispin began selling in SDR Park. On account of Crispin's membership in the DTO, the DTO permitted other non-Gorilla Stone dealers who were affiliated with Crispin to sell in the SDR Park area.

Crispin has been the subject of one undercover narcotics purchase in the SDR Park area. In August 2026, Crispin sold crack cocaine in concert with other members of the DTO, namely Newman and Cameron Barnhill. A photograph showing Crispin (in white) with Newman (in red) is below:

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[12] Crispin has additional arrests in the Sixth Precinct from 2025 and 2026, as well. In May 2026, Crispin was arrested on assault charges. According to the complaint in that case, Crispin struck the victim with his closed fist, displayed a knife, and threatened to slice the victim's throat, and then stole his bike. Crispin's robbery case is pending. In August 2025, Crispin was arrested for burglary / stolen property charges. According to the complaint, Crispin and another individual stole items from a FedEx truck. This arrest has been sealed.

Crispin also has prior robbery convictions. In September 2013, in connection with two separate robbery arrests, Crispin was convicted of robbery in the first degree (displaying what appears to be a firearm), in violation of NYPL § 160.15(4), and attempted robbery in the second degree, in violation of NYPL § 160.10, and sentenced to a five-year term. On the same date, in connection with yet another arrest, Crispin was convicted of attempted criminal possession in the second degree, in violation of NYPL § 265.03, and sentenced to a consecutive two-year term.



Crispin's participation in the DTO is further confirmed by evidence identified on cellphones obtained in the course of the investigation. As noted above, in the "Get it in BLOOD" group chat in which Newman, Jahfari Johnson, and Jaden Wayne were participants, Wayne texted the group about "Chance" (which is Crispin's nickname) needing drugs. In addition, the below photograph of Crispin, in SDR Park, was identified on Newman's phone in which Crispin, on the right and facing the camera, appears to be making a Gorilla Stone pose, next to a drug user who is high and folded over in a similar pose. Crispin appears to be mocking the user.



As discussed above, Crispin has also participated in acts of violence with other members of the DTO. In particular, Crispin, along with Matthew Newman and Jahfari Johnson, robbed the workers of a rival drug dealer, leading to back-and-forth violence that culminated in Newman stashing guns around the Park.

13. Marvin Ward, a/k/a "Marv"

Marvin Ward, a/k/a "Marv," is a current member of "Billy," another Bloods set. Ward has been selling heroin and fentanyl in SDR Park since at least 2025. According to a confidential source, Ward initially obtained his narcotics supply from Newman, but at some point Ward and Michael Durham split off from Newman and found their own supplier.

From November 2025 to April 2026, the NYPD conducted a long-term investigation into Ward's narcotics trafficking in SDR Park. Beginning on November 18, 2025, while inside of SDR Park, an NYPD undercover officer bought four glassines of heroin from Ward for $40. Lab results confirmed the glassines contained 0.187 grams of fentanyl. A few weeks later, on December 2, 2025, while inside of SDR Park, the undercover officer bought 11 glassines of heroin from Ward for $80. Similarly, lab results confirmed the narcotics to be 0.52 grams of fentanyl. This pattern repeated seven more times.[13] each time the undercover officer asked for larger quantities of heroin, and each time Ward sold the larger amounts of narcotics that, after lab testing, confirmed to be fentanyl. This occurred until Ward's final narcotics sale to the undercover officer on April 1, 2026, where Ward sold the undercover officer one vacuum sealed bag and three twists of purported heroin for $4,800, weighing approximately 114 grams. As with the previous eight narcotics sales, an NYPD lab confirmed the narcotics sold by Ward in this ninth transaction to be fentanyl. As a result, Ward was arrested for these narcotics sales on April 13, 2026. In total, the NYPD bought approximately 336 grams of fentanyl from Ward during the course of that investigation.

Undeterred by his April 2026 arrest, on October 13, 2026, Ward sold crack cocaine to another undercover officer in the vicinity of SDR Park, resulting in Ward's arrest for Criminal Possession of a Controlled Substance in the Third Degree, in violation of NYPL § 220.16(1). During a search incident to his arrest, officers recovered over 150 capsules and twists of crack cocaine on his person. On October 20, 2026, upon exiting the New York County Criminal Court, at 111 Centre Street, following an appearance in one of his pending criminal cases, Ward approached a 74-year-old woman selling pretzels outside of the courthouse and stole two pretzels. When the elderly woman attempted to take back the pretzels, Ward punched her in the face and threw her to the ground, resulting in her hospitalization. Ward was immediately arrested and charged with Assault in the Third Degree.

Newman's cellphone contains messages that indicate Ward's participation in the DTO. In these messages Newman and Ward referred to each other using Bloods' terms, *i.e.*, calling each other "bloody." Additionally, on one occasion, Ward and Newman discussed Ward owing him money, to which Ward sent Newman $65 by Cash App and texted Newman a screenshot of the completed transaction. The Cash App transaction has a description stating, "chance" which is believed to be in reference to Joseph Crispin's alias, "Chance."

14. Trayvon Johnson, a/k/a "Trigga"

Trayvon Johnson, a/k/a "Trigga," is a Gorilla Stone member who sold crack, heroin, fentanyl, and K2 in SDR Park beginning in or around 2022. In November 2023, Johnson was arrested after engaging in an apparent drug transaction approximately seven blocks from SDR Park. For this, Johnson was convicted of criminal possession of a controlled substance. Johnson was arrested again in March 2024 after being observed again engaging in apparent drug transactions. And he was arrested yet again June 2024 after selling crack to an undercover law enforcement officer. For this, Johnson was convicted of criminal possession of a controlled substance in the seventh degree and sentenced to six months' imprisonment.

[13] The first seven buys in this investigation occurred in or around SDR Park. The eighth and ninth buys occurred in Brooklyn, at Ward's request to meet in Brooklyn rather than in or near SDR Park.

Upon his release from incarceration, Johnson quickly returned to working with the DTO and participated in the March 2025 mutual slashing between Newman and Sims, described above. Johnson stabbed Sims, and attempted to hide his weapon in a standpipe on the street, where it was recovered by law enforcement. These recent arrests are the latest in a long history of criminal conduct. In 2015, Johnson was convicted of attempted assault in the first degree and, separately, conspiracy in the third degree. For the latter, he was sentenced to an indeterminate term of two to six years' imprisonment. He was released to parole in May 2019, only a few years before he started selling in SDR Park.

15. Antonio Torrecilla, a/k/a "Tone"

Antonio Torrecilla, a/k/a "Tone," is a supplier of narcotics. Unlike the other defendants, each of whom sold drugs to customers in the SDR Park area, Torrecilla supplied leaders of the DTO, including Newman, Jahfari Johnson, and Rosser, with substantial quantities of narcotics, including crack cocaine, heroin, and fentanyl.

Between 2004 and 2021, Torrecilla was incarcerated on a manslaughter conviction in connection with a shooting in the Bronx in which he shot and killed someone. After being released, but while on parole—which expired in February 2024—Torrecilla was arrested in November 2023 in possession of a loaded firearm and approximately 133 capsules of crack cocaine and 10 glassines of heroin. Further, in October 2025, Torrecilla was arrested in Brooklyn on assault charges related to endangering the welfare of a thirteen-year-old child; that case was adjourned in contemplation of dismissal in July 2026.

III. Pretrial Detention is Warranted

The Government is seeking detention for all fifteen defendants charged in the Indictment based on their danger to the community and their risk of flight.

Where, as here, a defendant is charged with a controlled substance offense with a maximum term of imprisonment that is ten years or more, there is a mandatory presumption "that no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of the community." 18 U.S.C. § 3142(e)(3)(A). The defendants in this case cannot overcome this presumption in favor of detention. Furthermore, the (1) nature and circumstances of the offenses charged, (2) weight of the evidence against each defendant, (3) history and characteristics of each defendant, including criminal history, and (4) the nature and seriousness of the danger to any person or the community that would be posed by the defendants' release weigh heavily in favor of detention in this case. *See* 18 U.S.C. § 3142(g). Consistent with the factors set forth in 18 U.S.C. §§ 3142(e)(3)(A) and (g), each of the defendants must be detained to protect the community and prevent their flight from prosecution.

The defendants bear the burden of producing evidence to rebut the presumption in favor of detention in this case. *United States v. Mercedes*, 254 F.3d 433, 436 (2d Cir. 2001). But even if a defendant satisfies that initial burden, the presumption does not vanish; instead, it "remains a factor to be considered among those weighed by the district court." *Id*.

Members of the DTO charged in the Indictment are alleged to have run and participated in an organization that trafficked large quantities of narcotics, perpetrated significant acts of violence, and possessed firearms in furtherance of drug trafficking. The defendants were arrested numerous times for both their drug sales and their violence, but nonetheless continued to engage in these crimes. The threat of law enforcement investigation and prosecution has done little to stop the DTO from operating. Many of the defendants have been charged and convicted of narcotics trafficking and violent crimes, yet returned to the same conduct undeterred. In short, the defendants' narcotics trafficking, even in the face of investigations, arrests, criminal charges, pretrial releases, and terms of probation and parole has continued undeterred. They are clearly flight risks and dangers to the community.

Finally, the high mandatory minimum sentences faced by the defendants arrested today create an incentive to flee. *See United States v. English*, 629 F.3d 311, 318 (2d Cir. 2011). Matthew Newman and Sean Sims face mandatory minimum sentences of 20 years. Jahfari Johnson, Michael Durham, Ravell Rosser, Ashante Inniss, Cameron Barnhill, Basil Simms, Ibrahim Toure, Jaden Wayne, Joseph Crispin, and Marvin Ward face mandatory minimum sentences of 15 years. And Tyre Banks, Trayvon Johnson, and Antonio Torrecilla face mandatory minimum sentences of 10 years.

* * *

For the reasons set forth above, the Government respectfully submits that the Court should detain all of the defendants pending trial.

Respectfully submitted,

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cc: Counsel of Record (by email)