UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

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,"
ANTONIO TORRECILLA,
a/k/a "Tone,"

Defendants.

SEALED INDICTMENT

26 Cr. 558

COUNT ONE
(Conspiracy to Distribute Narcotics)

The Grand Jury charges:

1. From at least in or around 2023, up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, 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," the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

2. It was a part and an object of the conspiracy that 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," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances involved in the offense were (i) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United

States Code, Section 841(b)(1)(A); (ii) one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A); (iii) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(A); (iv) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A); (v) and a quantity of mixtures and substances containing a detectable amount of smokeable synthetic cannabinoids, in a form commonly known as "K2" or "spice," in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT TWO
(Firearm Use, Carrying, and Possession)

The Grand Jury further charges:

4. From at least in or around 2023, up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, MATTHEW NEWMAN, a/k/a "Money," and SEAN SIMS, a/k/a "Vito," the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count One of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm, which was brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), and (iii), and 2.)

COUNT THREE
(Firearm Use, Carrying, and Possession)

The Grand Jury further charges:

5. From at least in or around 2023, up to and including the date of the filing of this Indictment, in the Southern District of New York and elsewhere, 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," 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," and MARVIN WARD, a/k/a "Marv," during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the drug trafficking crime charged in Count One of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, and aided and abetted the use, carrying, and possession of a firearm.

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

FORFEITURE ALLEGATIONS

6. As a result of committing the offense alleged in Count One of this Indictment, 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," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or

indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

7. As a result of committing the offense alleged in Count Two of this Indictment, MATTHEW NEWMAN, a/k/a "Money," and SEAN SIMS, a/k/a "Vito," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in, or intended to be used in, said offenses.

8. As a result of committing the offense alleged in Count Three of this Indictment, 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," 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," and MARVIN WARD, a/k/a "Marv," shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in, or intended to be used in, said offenses.

Substitute Assets Provision

9. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third person;

(c) has been placed beyond the jurisdiction of the Court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 924;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

[redacted]
FOREPERSON 11/18/26

James M. McDonald
JAMES M. MCDONALD
United States Attorney