

IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

**OCTOBER 2011 GRAND JURY
(Impaneled 10/20/11)**

THE UNITED STATES OF AMERICA

12-CR-6104CJS

SUPERSEDING INDICTMENT

-vs-

Violations:

Title 21, United States Code, Section 846;
Title 18, United States Code, Section 1956(h)
(2 Counts and 4 Forfeiture Allegations)

RONALD WALKER a/k/a Kelly a/k/a Kellz
(Counts 1, 2),
MENDEECEES HARRIS a/k/a One a/k/a Uno
(Count 1), and
TYRUS HARRIS a/k/a Sat
(Count 1)

COUNT 1

(Narcotics Conspiracy)

The Grand Jury Charges That:

Between in or about 2005 and in or about August 2012, the exact dates being unknown to the Grand Jury, in the Western District of New York, and elsewhere, the defendants, **RONALD WALKER a/k/a Kelly a/k/a Kellz**, **MENDEECEES HARRIS a/k/a One a/k/a Uno**, and **TYRUS HARRIS a/k/a Sat**, did knowingly, willfully and unlawfully

combine, conspire and agree together and with others, known and unknown to the Grand Jury, to commit the following offenses, that is, to possess with intent to distribute, and to distribute, five (5) kilograms or more of a mixture and substance containing cocaine, a Schedule II controlled substance, and one (1) kilogram or more of a mixture and substance containing heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Money Laundering Conspiracy)

The Grand Jury Further Charges That:

1. From at least in or about 2007, up to and including in or about August 2012, in the Western District of New York, and elsewhere, the defendant, **RONALD WALKER a/k/a Kelly a/k/a Kellz**, did knowingly, willfully and unlawfully combine, conspire and agree with others, known and unknown to the Grand Jury, to commit the following offenses, that is, to violate Title 18, United States Code, Sections 1956(a)(1)(B)(i), 1956(a)(1)(B)(ii) and 1957(a).

2. It was a part and an object of the conspiracy that the defendant **RONALD WALKER a/k/a Kelly a/k/a Kellz**,, and others known

and unknown to the Grand Jury, would and did knowingly conduct and attempt to conduct financial transactions affecting interstate commerce which involved the proceeds of specified unlawful activity, that is, the unlawful distribution of cocaine and heroin, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to do so, in violation of Title 21, United States Code, Section 846, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of the aforementioned specified unlawful activity and while knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

3. It was a further part and an object of the conspiracy that the defendant **RONALD WALKER a/k/a Kelly a/k/a Kellz**, and others known and unknown to the Grand Jury, would and did knowingly conduct and attempt to conduct financial transactions affecting interstate commerce which involved the proceeds of specified unlawful activity, that is, the unlawful distribution of cocaine and heroin, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to do so, in violation of Title 21, United States Code, Section 846, knowing that the transactions were designed in whole and in part to avoid a transaction reporting

requirement under State and Federal law and while knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

4. It was a further part and an object of the conspiracy that the defendant **RONALD WALKER a/k/a Kelly a/k/a Kellz**, and others known and unknown to the Grand Jury, knowing that the funds and monetary instruments involved in the transactions constituted, and were derived from, proceeds obtained from a criminal offense, within the United States, would and did knowingly engage and attempt to engage in monetary transactions, namely, the deposit, withdrawal, transfer and exchange, in and affecting interstate commerce, of funds and monetary instruments by, through and to a financial institution, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, namely, the unlawful distribution of cocaine and heroin, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to do so, in violation of Title 21, United States Code, Section 846, in violation of Title 18, United States Code, Section 1957(a).

All in violation of Title 18, United States Code, Section 1956(h).

FIRST FORFEITURE ALLEGATION

The Grand Jury Alleges That:

Upon conviction of the offense alleged in Count 1 of this Superseding Indictment, the defendants, **RONALD WALKER a/k/a Kelly a/k/a Kellz, MENDEECEES HARRIS a/k/a One a/k/a Uno,** and **TYRUS HARRIS a/k/a Sat,** shall forfeit to the United States any and all property, and interest therein, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said violation, including, but not limited to, the following:

A. MONETARY AMOUNT

The sum of \$2,500,000 United States currency, or in the event that sum is not available, then a money judgment for the same amount, which amount represents the proceeds the defendants obtained, directly or indirectly, as a result of the offense described in Count 1 of this Superseding Indictment.

B. SPECIFIC ASSETS

a) The sum of approximately \$488,900.00 in United States currency seized from Safe Deposit Box #214 at the Sovereign Bank branch at 89-01 Northern Blvd., Jackson Heights, New York, on August 23, 2012,

b) The sum of approximately \$300,200.00 in United States currency seized from Safe Deposit Box #004035006589 at the Bank of America branch at 792 Atlantic Avenue, Baldwin Harbor, New York, on August 23, 2012,

c) The sum of approximately \$122,000.00 in United States currency seized from Safe Deposit Box #187 at the JPMorgan Chase Bank South Freeport branch at 180 Atlantic Avenue, Freeport, New York, on August 23, 2012,

d) The sum of approximately \$384,800.00 in United States currency seized from the premises of 98-40 57th Avenue, Apt. 6C, Corona, New York, on August 23, 2012,

e) The sum of approximately \$230,510.00 in United States currency seized from 104-40 Queens Boulevard, #8F, Forest Hills, New York, on August 23, 2012,

f) One 2012 Land Rover Range Rover, bearing VIN# SALMF1E41CA363223, seized from the premises at 104-40 Queens Boulevard, Parking Garage, Forest Hills, New York, on August 23, 2012,

g) Articles of jewelry with a total appraised value of \$406,950.00, including the following items seized at 104-40 Queens Boulevard, #8F, Forest Hills, New York, on August 23, 2012:

1. one Men's Hublot Big Bang watch in stainless steel. Automatic Chronograph with black dial and sapphire crystal, valued at \$12,000.00
2. one Men's Hublot "King Power" in 18kt rose gold, valued at \$45,000.00
3. one Men's Cartier Pasha watch bearing #604669MX, valued at \$8,000.00
4. one Lady's Rolex Oyster Perpetual Pearlmaster bearing serial # P199844, valued at \$35,000.00
5. one Men's Rolex Oyster Perpetual Day-Date Pearlmaster Chronometer bearing serial # M423338, valued at \$60,000.00
6. one Men's Rolex Oyster Perpetual Day-Date Chronometer in 18kt yellow gold bearing serial # V135268, valued at \$40,000.00
7. one Men's Cartier Santos Chronograph in stainless steel bearing # 503150NX, valued at \$25,000.00
8. one Men's watch faux Audemars Piquet Royal Oak Off-Shore Chronograph in stainless steel, valued at \$30,000.00
9. one Diamond Cross and Chain, valued at \$5,500.00
10. one 14-carat white gold diamond bracelet, valued at \$50,000.00
11. one 14-carat white gold diamond chain, valued at \$6,000.00
12. one 14-carat two-tone diamond pendant, valued at \$18,000.00
13. one 14-carat chain, valued at \$7,000.00

14. one 18-carat yellow gold Christ head with diamonds and set with approximately 330 round brilliant diamonds, valued at \$20,000.00

and the following items seized at 98-40 57th Avenue, Apt. 6C, Corona, New York, on August 23, 2012:

15. one Men's Rolex watch bearing serial # V140227, valued at \$33,650.00
 16. one Men's Cartier Roadster Chronograph Automatic watch bearing #692863CE 2618, valued at \$10,300.00
 17. one Men's 14kt yellow gold diamond band, valued at \$1,500.00
- h) The premises and real property located at Condominium Unit 1409, 4561 Olde Perimeter Way, Atlanta, Georgia, County of DeKalb, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, as more particularly described in a certain warranty deed recorded in the DeKalb County Clerk's Office in Liber 22109 of Deeds at Page 00336,
- i) The premises and real property located at 4122 Shoals Point, Union City, Georgia, County of Fulton, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, as more particularly described in a special warranty deed recorded in the Fulton County Clerk's Office in Liber 48470 of Deeds at Page 43,
- j) The premises and real property located at 2039 McCulloh Street, Baltimore, Maryland, County of Baltimore City, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, as more particularly described in the Land Records of Baltimore City, Maryland, in Liber 09542 of Deeds at Page 450,
- k) The premises and real property located at 106-11 Northern Boulevard, Corona, New York, County of Queens, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, as more particularly described in a certain deed recorded in the Office of the City Register of the City of New York under Document ID: 2011081000432002,

- 1) The premises and real property located at 106-13 Northern Boulevard, Corona, New York, County of Queens, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, as more particularly described in a certain deed recorded in the Office of the City Register of the City of New York under Document ID: 2011050400545001.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of a defendant

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), including but not limited to:

All property listed in the First Forfeiture Allegation paragraphs a, b, c, d, e, f, g, h, i, j, k and l.

All pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(p), and Title 28, United States Code, Section 2461(c).

SECOND FORFEITURE ALLEGATION

The Grand Jury Further Alleges That:

Upon conviction of the offense alleged in Count 1 of this Superseding Indictment, the defendant, **MENDEECEES HARRIS a/k/a One a/k/a Uno**, shall forfeit to the United States any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation, including, but not limited to, the following:

- a) One 2011 Audi R8, bearing VIN# WUASUAFGXBN001737, seized from the premises of 3535 Kings College Place, Bronx, New York, on August 23, 2012.

All pursuant to Title 21, United States Code, Section 853(a) (1) .

THIRD FORFEITURE ALLEGATION:

The Grand Jury Further Alleges That:

Upon conviction of the offenses alleged in Counts 1 and 2 of this Superseding Indictment, the defendant, **RONALD WALKER a/k/a Kelly a/k/a Kellz**, shall forfeit to the United States, all of his right, title and interest in any firearm and ammunition involved or used in the commission of the offense, or found in the possession or under the immediate control of the defendant at the time of arrest, including, but not limited to:

One Taurus PT140 Handgun seized from the premises of 98-40 57th Avenue, Corona, New York, on August 23, 2012.

All pursuant to the provisions of Title 18, United States Code, Sections 924(d) and 3665, and Title 28, United States Code, Section 2461(c).

FOURTH FORFEITURE ALLEGATION

The Grand Jury Further Alleges That:

Upon conviction of the offense alleged in Count 2 of this Superseding Indictment, the defendant, **RONALD WALKER a/k/a Kelly a/k/a Kellz**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), the following property:

A. PROPERTY

All right, title and interest in any and all property involved in a violation of Title 18, United States Code, Section 1956 and/or 1957, or conspiracy to commit such offense, for which the defendant is convicted, and all property traceable to such property.

B. MONETARY AMOUNT

The sum of approximately \$2,500,000 United States currency, which sum of money is equal to the total amount of money involved in the money laundering offense for which the defendant is charged.

C. SPECIFIC ASSETS

The following specific assets which have been identified as property involved in a money laundering transaction or transactions:

a) The sum of approximately \$488,900.00 in United States currency seized from Safe Deposit Box #214 at the Sovereign Bank branch at 89-01 Northern Blvd., Jackson Heights, New York, on August 23, 2012,

b) The sum of approximately \$300,200.00 in United States currency seized from Safe Deposit Box #004035006589 at the Bank of America branch at 792 Atlantic Avenue, Baldwin Harbor, New York, on August 23, 2012,

c) The sum of approximately \$122,000.00 in United States currency seized from Safe Deposit Box #187 at the JPMorgan Chase Bank South Freeport branch at 180 Atlantic Avenue, Freeport, New York, on August 23, 2012,

d) The sum of approximately \$384,800.00 in United States currency seized from the premises of 98-40 57th Avenue, Apt. 6C, Corona, New York, on August 23, 2012,

e) The sum of approximately \$230,510.00 in United States currency seized from 104-40 Queens Boulevard, #8F, Forest Hills, New York, on August 23, 2012,

f) One 2012 Land Rover Range Rover, bearing VIN# SALMF1E41CA363223, seized from the premises at 104-40 Queens Boulevard, Parking Garage, Forest Hills, New York, on August 23, 2012,

g) Articles of jewelry with a total appraised value of \$406,950.00, including the following items seized at 104-40 Queens Boulevard, #8F, Forest Hills, New York, on August 23, 2012:

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4. one Lady's Rolex Oyster Perpetual Pearlmaster bearing serial # P199844, valued at \$35,000.00
5. one Men's Rolex Oyster Perpetual Day-Date Pearlmaster Chronometer bearing serial # M423338, valued at \$60,000.00
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11. one 14-carat white gold diamond chain, valued at \$6,000.00
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13. one 14-carat chain, valued at \$7,000.00
14. one 18-carat yellow gold Christ head with diamonds and set with approximately 330 round brilliant diamonds, valued at \$20,000.00

and the following items seized at 98-40 57th Avenue, Apt. 6C, Corona, New York, on August 23, 2012:

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 16. one Men's Cartier Roadster Chronograph Automatic watch bearing #692863CE 2618, valued at \$10,300.00
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- j) The premises and real property located at 2039 McCulloh Street, Baltimore, Maryland, County of Baltimore City, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, as more particularly described in the Land Records of Baltimore City, Maryland, in Liber 09542 of Deeds at Page 450,
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- l) The premises and real property located at 106-13 Northern Boulevard, Corona, New York, County of Queens, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, as more particularly described in a certain deed recorded in the Office of the City Register of the City of New York under Document ID: 2011050400545001.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant

- 1. cannot be located upon the exercise of due diligence;
- 2. has been transferred or sold to, or deposited with, a third person;
- 3. has been placed beyond the jurisdiction of the Court;
- 4. has been substantially diminished in value; or

5. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 28, United States Code, Section 2461(c), including but not limited to:

All property listed in the First Forfeiture Allegation paragraphs a, b, c, d, e, f, g, h, i, j, k and l.

All pursuant to Title 18, United States Code, Section 982 (a) (1), Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

DATED: Rochester, New York, October 4, 2012.

WILLIAM J. HOCHUL, JR.
United States Attorney

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A TRUE BILL:

S/Foreperson
FOREPERSON