

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALONZO LAMAR HARRIS, a/k/a L,
CHARLES GREEN, a/k/a C,
AKUAN JOHNSON, a/k/a Bleek,
VINCENT HARRELL, a/k/a VI,
KENNETH WILSON, a/k/a KB,
JEROME BELL, a/k/a Little Bleek,
RACHEL MILLARD, a/k/a R,
JOLENE BARRETT,
MISTI EVANS, and
AMANDA KAMP

Defendants.

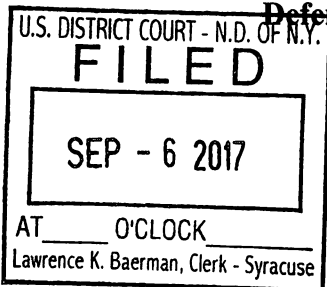
) Criminal No. 3:17-CR-254 (GTS)

) **Indictment**

) Violations: 21 U.S.C. §§ 841(a)(1) and
) 846 [Methamphetamine
) Conspiracy]; 18 U.S.C.
) § 1956(h) [Money Laundering]

) 2 Counts & Forfeiture Allegation

) County of Offense: Broome and elsewhere



THE GRAND JURY CHARGES:

COUNT 1

[Methamphetamine Conspiracy]

Between in or about January 2015 and on or about September 5, 2017, in Broome County in the Northern District of New York, and elsewhere, the defendants, **ALONZO LAMAR HARRIS, a/k/a L, CHARLES GREEN, a/k/a C, AKUAN JOHNSON, a/k/a Bleek, VINCENT HARRELL, a/k/a VI, KENNETH WILSON, a/k/a KB, JEROME BELL, a/k/a Little Bleek, RACHEL MILLARD, a/k/a R, JOLENE BARRETT, MISTI EVANS and AMANDA KAMP** and others conspired to knowingly and intentionally distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

As to defendants **ALONZO LAMAR HARRIS, a/k/a L, CHARLES GREEN, a/k/a C, AKUAN JOHNSON, a/k/a Bleek, VINCENT HARRELL, a/k/a VI, KENNETH WILSON,**

a/k/a KB, JEROME BELL, a/k/a Little Bleek, RACHEL MILLARD, a/k/a R, JOLENE BARRETT, and MISTI EVANS that violation involved 50 grams or more of d-methamphetamine hydrochloride, a Schedule II controlled substance, the salts of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

As to defendant **AMANDA KAMP**, that violation involved d-methamphetamine hydrochloride, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 2
[Money Laundering Conspiracy]

Between in or about January 2015 and August 2017, in Broome County in the Northern District of New York, and elsewhere, the defendants **ALONZO LAMAR HARRIS, a/k/a L, CHARLES GREEN, a/k/a C, AKUAN JOHNSON, a/k/a Bleek, JEROME BELL, a/k/a Little Bleek, and RACHEL MILLARD**, and others conspired to commit money laundering, by knowing that the property involved in one or more financial transactions represented the proceeds of some form of unlawful activity, conducting and attempting to conduct financial transactions affecting interstate and foreign commerce, that is Western Union wire transfers and bank transfers and deposits, which transactions involved the proceeds of one or more specified unlawful activities, that is distribution of methamphetamine in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit that offense, in violation of Title 21, United States Code, Section 846, with the intent to promote the carrying on of such specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

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

ALLEGATIONS REGARDING PRIOR FELONY DRUG CONVICTIONS

1. Count One is re-alleged herein and incorporated by reference.

2. Defendant **AKUAN JOHNSON**, is subject to increased punishment, pursuant to Title 21, United States Code, Section 841(b)(1)(A) because of the following prior conviction for a felony drug offense which has become final: on or about August 5, 1997, in Queens County Court, **JOHNSON** was convicted of Attempted Criminal Sale of a Controlled Substance in the 3rd degree (case N11018-97), in violation of New York State Penal Law, Section 220.39(1), and on that date was sentenced to 30 days imprisonment and 5 years probation; and on or about April 1, 2004, in Orange County Court, **JOHNSON** was convicted of Criminal Possession Controlled Substance/Narcotic (Case 00495-2003), in violation of New York State Penal Law, Section 220.16(12), and on that date was sentenced to 54 months to 9 years imprisonment.

3. Defendant **VINCENT HARRELL**, is subject to increased punishment, pursuant to Title 21, United States Code, Section 841(b)(1)(A) because of the following prior conviction for a felony drug offense which has become final: on or about May 30, 2002, in Broome County Court, **HARRELL** was convicted of Criminal Possession Controlled Substance – 2nd Degree (Case 2002-0097), in violation of New York State Penal Law, Section 220.18(1), and on that date was sentenced to 5 years imprisonment.

4. Defendant **KENNETH WILSON**, is subject to increased punishment, pursuant to Title 21, United States Code, Section 841(b)(1)(A) because of the following prior convictions for a felony drug offense which has become final: (1) on or about July 22, 1991, in New York County, **WILSON** was convicted of Attempted Criminal Possession Controlled Substance – 3rd Degree (Case 15327-90), in violation of New York State Penal Law, Section 220.16(1), and on that date was sentenced to 6 months imprisonment; (2) on or about March 7, 1997, in New York County, **WILSON** was convicted of Attempted Criminal Possession Controlled Substance – 5th Degree (Case 8052-96), in violation of New York State Penal Law, Section 220.06, and on that date was

sentenced to 18 months to 3 years; (3) on or about February 4, 1999, in New York County, **WILSON** was convicted of Criminal Sale of Controlled Substance – 5th Degree (Case 8179-98), in violation of New York State Penal Law, Section 220.31, and on that date was sentenced to 3 years to 6 years; (4) on or about December 21, 2000, in Broome County, **WILSON** was convicted of Attempted Criminal Possession Controlled Substance – 3rd Degree (Case 2000-0738), in violation of New York State Penal Law, Section 220.16(1), and on that date was sentenced to 3 years to 6 years; and (5) on or about October 28, 2004, in Broome County, **WILSON** was convicted of Attempted Criminal Possession Controlled Substance – 3rd Degree (Case 2004-0466), in violation of New York State Penal Law, Section 220.16(1), and on that date was sentenced to 42 months to 7 years.

5. Defendant **JEROME BELL**, is subject to increased punishment, pursuant to Title 21, United States Code, Section 841(b)(1)(A) because of the following prior convictions for a felony drug offense which has become final: (1) on or about June 25, 2002, in Broome County, **BELL** was convicted of Attempted Criminal Sale Controlled Substance – 3rd Degree (2002-0061), in violation of New York State Penal Law, Section 220.39(1), and on that date was sentenced to one year imprisonment; and (2) on or about February 7, 2005, in Broome County, **BELL** was convicted of Criminal Sale Controlled Substance – 5th Degree (Case 2004-0616), in violation of New York State Penal Law, Section 220.31, and on that date was sentenced to 3 years to 6 years imprisonment.

FORFEITURE ALLEGATION

I. FIRST FORFEITURE ALLEGATION

The allegation contained in Count One of this Indictment is hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 841 and 846, the defendants, **ALONZO LAMAR HARRIS, a/k/a L, CHARLES GREEN, a/k/a C, AKUAN JOHNSON, a/k/a Bleek, VINCENT HARRELL, a/k/a VI, KENNETH WILSON, a/k/a KB, JEROME BELL, a/k/a Little Bleek, RACHEL MILLARD, a/k/a R, JOLENE BARRETT, AMANDA KAMP and MISTI EVANS**, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses. The property to be forfeited includes, but is not limited to, the following:

A. Money Judgment

A money judgment in the amount of the unrecovered proceeds obtained by each defendant.

B. Property:

Any property used, and intended to be used, in any manner or part, to commit, and to facilitate the commission of the offense.

II. SECOND FORFEITURE ALLEGATION

The allegation contained in Count Two of this Indictment is hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(1).

Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956(h), the defendants, **ALONZO LAMAR**

HARRIS, a/k/a L, CHARLES GREEN, a/k/a C, AKUAN JOHNSON, a/k/a Bleek, JEROME BELL, a/k/a Little Bleek, and RACHEL MILLARD, shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

A. Money Judgment

A money judgment in an amount of United States currency representing such sums involved in the financial transactions which constitute violations of the money laundering offenses charged in Count Two, or funds traceable thereto.

B. Property:

Any property used, and intended to be used, in any manner or part, to commit, and to facilitate the commission of the offense.

III. SUBSTITUTE ASSETS

If any of the property described in the First and Second Forfeiture Allegations set forth above as being subject to forfeiture, as a result of any act or omission of the defendants:

- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third party;
- 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 divided without difficulty,

it is the intention of the United States of America, 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), to seek forfeiture of any other property of the defendant up to the value of the forfeiture judgment.

Dated: September 6, 2017

*Name Redacted

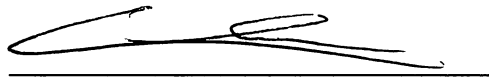
A TRUE BILL,

A large black rectangular redaction box covering the signature of the Grand Jury Foreperson.

Grand Jury Foreperson

GRANT C. JAQUITH
Acting United States Attorney

By:

A handwritten signature in black ink, appearing to be 'N. Commandeur', written over a horizontal line.

Nicolas Commandeur
Assistant United States Attorney
Bar Roll No. 518984