NB:MEM/JAM F. #2017R00509

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK -----X

#### UNITED STATES OF AMERICA

- against -

KARL JORDAN, JR., also known as "Little D" and "Noid," and RONALD WASHINGTON, also known as "Tinard,"

Defendants.

----X

THE GRAND JURY CHARGES:

COUNT ONE

(Murder of Jason Mizell While Engaged in Narcotics Trafficking)

1. On or about October 30, 2002, within the Eastern District of New York

and elsewhere, the defendants KARL JORDAN, JR., also known as "Little D" and "Noid,"

and RONALD WASHINGTON, also known as "Tinard," together with others, while

engaged in an offense punishable under Section 841(b)(1)(A) of Title 21, United States

Code, to wit: a conspiracy to distribute five kilograms or more of a mixture or substance

containing cocaine, a Schedule II controlled substance, did knowingly and intentionally kill

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05  $\mathbf{2}$ Cr. N. (T. 18, U.S.C., §§ 924(j)(1), 2 and 3551 et seq.; T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C), 846 and 848(e)(1)(A))

INDICTMENT

GLASSER, J.

# BULSARA, M.J.

and counsel, command, induce and cause the intentional killing of an individual, to wit: Jason Mizell, also known as "Jam Master Jay," and such killing did result.

(Title 21, United States Code, Section 848(e)(1)(A); Title 18, United States Code, Sections 2 and 3551 et seq.)

#### <u>COUNT TWO</u> (Firearm Related Murder of Jason Mizell)

2. On or about October 30, 2002, within the Eastern District of New York and elsewhere, the defendants KARL JORDAN, JR., also known as "Little D" and "Noid," and RONALD WASHINGTON, also known as "Tinard," together with others, in the course of a violation of Title 18, United States Code, Section 924(c), to wit: the knowing and intentional use of one or more firearms during and in relation to a drug trafficking crime, to wit: a conspiracy to distribute five kilograms or more of a mixture or substance containing cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(i)(II), did knowingly and intentionally cause the death of a person through the use of one or more firearms, which killing was murder as defined in Title 18, United States Code, Section 1111, in that the defendants, together with others, with malice aforethought, did unlawfully kill Jason Mizell, also known as "Jam Master Jay."

(Title 18, United States Code, Sections 924(j)(1), 2 and 3551 et seq.)

### <u>COUNT THREE</u> (Conspiracy to Distribute and Possess with Intent to Distribute Cocaine)

3. In or about and between March 2017 and June 2017, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant KARL JORDAN, JR., also known as "Little D" and "Noid," together with others,

did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(C); Title 18, United States Code, Sections 3551 et seq.)

#### COUNT FOUR (Distribution of Cocaine)

4. On or about April 19, 2017, within the Eastern District of New York and elsewhere, the defendant KARL JORDAN, JR., also known as "Little D" and "Noid," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

#### <u>COUNT FIVE</u> (Distribution of Cocaine)

5. On or about April 24, 2017, within the Eastern District of New York and elsewhere, the defendant KARL JORDAN, JR., also known as "Little D" and "Noid," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

#### COUNT SIX (Distribution of Cocaine)

6. On or about May 2, 2017, within the Eastern District of New York and elsewhere, the defendant KARL JORDAN, JR., also known as "Little D" and "Noid," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

#### COUNT SEVEN (Distribution of Cocaine)

7. On or about May 9, 2017, within the Eastern District of New York and elsewhere, the defendant KARL JORDAN, JR., also known as "Little D" and "Noid," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 <u>et seq</u>.)

#### COUNT EIGHT (Distribution of Cocaine)

8. On or about May 18, 2017, within the Eastern District of New York and elsewhere, the defendant KARL JORDAN, JR., also known as "Little D" and "Noid," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

#### COUNT NINE (Distribution of Cocaine)

9. On or about May 24, 2017, within the Eastern District of New York and elsewhere, the defendant KARL JORDAN, JR., also known as "Little D" and "Noid," together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)

#### COUNT TEN (Distribution of Cocaine)

10. On or about June 9, 2017, within the Eastern District of New York and elsewhere, the defendant KARL JORDAN, JR., also known as "Little D" and "Noid," together with others, did knowingly and intentionally distribute and possess with intent to

distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Sections 2 and 3551 et seq.)



ACTING UNITED STATES ATTORNEY EASTERN DISTRICT OF NEW YORK

#### A TRUE BILL