



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*

October 30, 2025

BY ECF AND EMAIL

The Honorable Denise Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The Honorable Sarah Netburn
Chief United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

The Honorable Robert W. Lehrburger
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Maliek Lugg, et al., S1 25 Cr. 484 (DLC)*

Dear Judge Cote, Judge Netburn, and Judge Lehrburger:

Since at least 2020, an organized criminal group has engaged in prolific narcotics trafficking in Washington Square Park and the surrounding area, operating what is essentially a round-the-clock, open-air drug market in the heart of Manhattan's Greenwich Village. Their illegal drugs have caused numerous non-fatal overdoses and, in 2024 alone, the tragic deaths of at least two overdose victims. This morning, a single-count Superseding Indictment S1 25 Cr. 484 (DLC) (the "Indictment") was unsealed, charging 19 members of this narcotics trafficking conspiracy (referred to in the Indictment as the WSP Enterprise) with conspiring to distribute narcotics resulting in death. Last night and early this morning, fourteen members of the WSP Enterprise were arrested or brought into federal custody.¹ Thirteen of those defendants are

¹ Maliek Lugg and Sean Thom are detained in state custody on other offenses. We anticipate that Lugg will arrive on a federal writ this morning and that Thom will arrive on a federal writ on Monday, November 3, 2025. Tommy Brown, Jr., has been previously arrested and arraigned on the underlying indictment in this case and is in custody at the Metropolitan Detention Center ("MDC"). Nazzir Washington, Bishara Strother, Robert Johnson, and Henry Rodriguez remain at large.

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expected to make their initial appearances later today; one is expected to appear on Monday, November 3, 2025. The Government respectfully submits this letter to provide the Court and defense counsel with a summary of the Indictment and in support of the Government's position that pretrial detention is warranted for each of the 19 defendants.

The facts described below come from, among other sources, New York City Police Department ("NYPD") reports, surveillance videos, publicly available social media posts, records and communications obtained from judicially authorized search warrants for social media accounts and electronic devices, and anticipated witness testimony.

I. Procedural History

On October 28, 2025, a grand jury sitting in this district returned the Indictment, which charges Maliek Lugg, a/k/a "Scarface," a/k/a "Scar," John Livigni, a/k/a "Johnny," Curtis Miller, a/k/a "Butter," a/k/a "Birdie," a/k/a "Light," Tommy Brown, Jr., a/k/a "Ayo," a/k/a "Bizzy," Christian Cortez, a/k/a "Bhris," Jared Covington, a/k/a "KG," Nazzir Washington, a/k/a, "Nazzi," Vito Haskins, a/k/a "Youngin," Felix Cuevas, a/k/a "Cuzzo," Manny Pina, Andre Bethea, a/k/a "Black," Sean Thom, a/k/a "Bobby," Bishara Strother, a/k/a "Wawa," Robert Johnson, a/k/a "Black Rob," Henry Rodriguez, a/k/a "Hollywood," Peter Rodriguez, a/k/a "Heavy," Daniel Negron a/k/a "Bolo," Brandi Felci, and Blake Jake Tannenbaum, each with one count of conspiracy to distribute narcotics resulting in death, in violation of 21 U.S.C. §§ 846 and 841(b)(1)(A). Each of the 19 defendants charged in the Indictment is a member of the WSP Enterprise.

Earlier this month, Tommy Brown, Jr., was indicted on the underlying indictment on one count of possession with intent to distribute narcotics, in violation of 21 U.S.C. § 841(b)(1)(C) and 18 U.S.C. § 2. This charge arises from Brown's September 17, 2025 arrest, where NYPD officers responded to a 911 call reporting that an individual meeting Brown's description was brandishing a firearm in front of a particular multifamily house in the vicinity of Eagle Avenue in the Bronx (the "Eagle Avenue House"). Brown was arrested while attempting to flee on foot from approaching officers, who seized nearly half a kilogram of cocaine (but no firearm) from Brown's backpack. On October 23, 2025, Brown, who had initially consented to detention, sought bail before Judge Cote. After hearing argument on the matter, Judge Cote denied that application.

Jared Covington was previously charged by complaint in this district, *see* 25 Mag. 3007, with one count of possession with intent to distribute narcotics, in violation of 21 U.S.C. § 841(b)(1)(B) and 18 U.S.C. § 2. This charge arises from Covington's arrest during the execution of a search warrant on September 19, 2025, which was authorized following Brown's arrest on September 17, 2025, of a particular apartment in the Eagle Avenue House. When law enforcement officers entered the apartment in the morning of September 19, 2025, Covington was found inside the apartment. While performing a safety sweep, officers recovered an approximately 49.6-gram rock of cocaine base, in a form commonly known as "crack," from inside Covington's pants pocket. Covington has been on home detention since his arrest on September 19. Covington was arrested on an arrest warrant issued upon the return of the Indictment this morning.

As detailed, Maliek Lugg, John Livigni, Curtis Miller, Christian Cortez, Jared Covington, Vito Haskins, Felix Cuevas, Manny Pina, Andre Bethea, Peter Rodriguez, Daniel Negron, Brandi Felci, and Blake Jake Tannenbaum were arrested or brought into federal custody late last night

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and early this morning and will be presented today. We anticipate Sean Thom, who is arriving on a federal writ from state custody in upstate New York, will be presented on Monday.

II. The WSP Enterprise

The WSP Enterprise operates in Washington Square Park and the surrounding area of Sixth Avenue between Bleecker Street and West 14th Street (collectively the “Washington Square Park Area”), located in the Greenwich Village neighborhood of New York City. This area contains Washington Square Park, with its iconic chess tables, three playgrounds, two dog runs, a fountain, and the historic Washington Square Arch, as well as the West 4th Street Subway Station, used by approximately 30,000 people every day.

From at least in or about 2020 through the present, the WSP Enterprise has pervaded the Washington Square Park Area, brazenly flooding an area that is meant to serve as a common space for students and families, as well as one of the City’s busiest transportation hubs, with illegal and dangerous drugs. Used syringes and needles, discarded drug packaging, and other drug paraphernalia are strewn throughout the Park. And similar evidence of extensive drug distribution can be found in the West 4th Street Subway Station where drug users who purchase narcotics in the Washington Square Park Area often bring them for use.

The Government estimates that in the past five years, the WSP Enterprise has distributed millions of doses of opioids including fentanyl, fentanyl analogues, and heroin, as well as millions of doses of crack cocaine, into this area. During this time period, police officers and emergency medical personnel have responded to over 65 reports of apparent drug overdoses in the Washington Square Park Area—a figure that would be far higher but for the work of shelters and advocacy centers that routinely distribute Narcan in the Park and surrounding area. As discussed further below, the WSP Enterprise’s deadly narcotics have also resulted in at least two overdose deaths in 2024—the death of 18-year-old Victim-1 on or about June 3, 2024, and the death of 43-year-old Victim-2 on or about November 24, 2024.

The components of the WSP Enterprise, described in more detail in the Indictment, have several established agreements, understandings, and practices that govern how they operate and coexist within the same territory. (*See* Indictment ¶¶ 15-17). For example, they use different colors and types of containers to package their drugs, so users can identify whose drugs they are buying. In addition, the dealers, by mutual understanding, are located in different parts of the Washington Square Park Area and have come to an agreement (primarily orchestrated by defendant John Livigni) not to encroach on each other’s territory. (*See id.* at ¶ 15(a)). Members of the WSP Enterprise also share workers, warn each other about law enforcement’s presence in the area, steer customers to each other, supply each other with product when someone runs out, and jointly respond to threats that might impact any dealer in the WSP Enterprise, among other collaborative activities that advance their common goal of lucrative drug dealing. (*See id.* ¶ 15(b)-(f)).

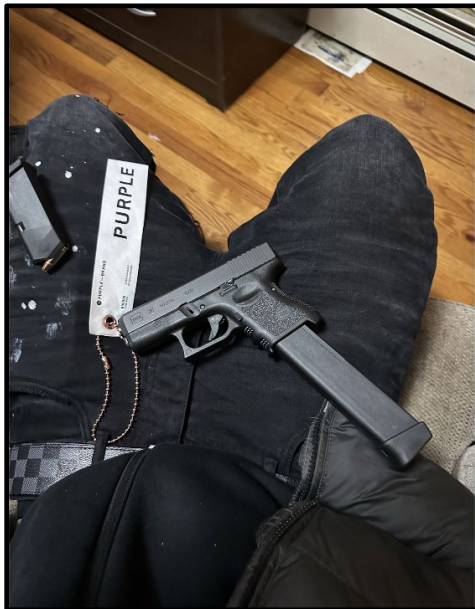
As noted, members of the WSP Enterprise work together to evade law enforcement. They warn each other of the immediate presence of law enforcement, and they also engage in more clandestine efforts to avoid arrest. For example, members of the WSP Enterprise keep photographs of officers of the NYPD’s Sixth Precinct, which has jurisdiction over the Washington Square Park Area, in their cellphones and track and save the Sixth Precinct’s social media posts announcing

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recent arrests in the area. The Government also has found evidence that members of the WSP Enterprise have unauthorized photographs taken within the Sixth Precinct's headquarters of posters depicting NYPD persons of interest in Washington Square Park, as well as photographs of the Sixth Precinct's monthly officer-duty schedule.

The WSP Enterprise dealers further their drug-dealing business by protecting their operations with firearms and other weapons. The Government has found evidence in social media posts and the defendants' phones, searched pursuant to judicially authorized warrants, that numerous members of the WSP Enterprise possess firearms. For example, the below images, which are from a phone used by Maliek Lugg, depict Lugg in the presence and possession of firearms. The photo on the left has metadata indicating a "capture time" of October 11, 2023, and the photo on the right has metadata indicating a "capture time" of October 30, 2021:



Lugg's use and possession of firearms is further confirmed by a confidential source who has informed the Government that Lugg had, on at least some occasions, a firearm with him in Washington Square Park, as well as a public social media post from February 4, 2024, in which several individuals (including Lugg, the third person from the right), are displaying firearms (outlined in red):



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In addition to Lugg, other members of the WSP Enterprise appear to have possessed firearms based on confidential sources and the Government's review of phones searched pursuant to judicially authorized search warrants. In particular, a confidential source reported that certain conspirators who sold crack in yellow bags and were managers who worked for John Livigni carried firearms on them. The Government has also found photographs of firearms, depicted below, in cellphones seized from Curtis Miller (on the left, with metadata indicating the image was created on December 5, 2024) and Sean Thom (on the right, with metadata indicating the image was created on February 27, 2024):



Moreover, as noted above, Tommy Brown, Jr. was initially arrested based on a 911 call reporting that an individual matching his description was brandishing a firearm in front of the Eagle Avenue House, which, as described below, is the address where, based on criminal history records and other reports, at least three defendants in addition to Brown—Jared Covington, Nazzir Washington, and Vito Haskins—reside or have recently resided.

As described more fully below, the members of the WSP Enterprise share another proclivity in common that ensures the proliferation and persistence of their criminal conspiracy notwithstanding extensive law enforcement efforts to safeguard the Washington Square Park Area—disregard and disrespect for court orders and conditions of release. The defendants in this case have been arrested *at least 80 times* for state drug-related offenses in the last five years alone. Some defendants have been arrested over a half dozen times. Upon release from those arrests, many of the defendants have returned to selling drugs in the Washington Square Park Area, despite their pending charges, or terms of state bail, probation, or parole.

Most disturbing of all, the defendants have no remorse for the deadly consequences of their illegal drug operations. Users routinely suffer non-fatal overdoses in full view of the principal

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areas of the defendants' operation.² And even though the WSP Enterprise was well aware of the two overdose deaths charged in this case (indeed, one of the victims was a long-time customer of, and sometimes worker for, the drug dealers in the WSP Enterprise), the defendants continued their pattern of dealing drugs, getting arrested, dealing drugs, and getting arrested. Since the death of Victim-2 on November 24, 2024 (less than six months after the death of Victim-1 on June 3, 2024), the defendants have been arrested in the Sixth Precinct *at least 30 times*.

III. The Members of the WSP Enterprise

As described in the Indictment, the WSP Enterprise is comprised of two primary, but closely interrelated groups of drug dealers—(1) members and associates of the “Mac Ballers” subset of the Bloods (referred to in the Indictment as the “Bloods Team”), and (2) dealers who work for John Livigni (referred to in the Indictment as the “Livigni Team”)—as well as additional dealers who are not directly affiliated with either the Bloods Team or the Livigni Team but nonetheless had a close working relationship with those teams (referred to in the Indictment as the “Associate Dealers”). The Bloods Team, the Livigni Team, and the Associate Dealers each employ common workers, typically drug users in the Washington Square Park Area, who are also members of the charged conspiracy. Each of these sub-groups of the WSP Enterprise, as well as the individual defendants, are discussed below.

A. The Bloods Team

The Bloods Team has been dealing drugs—fentanyl, fentanyl analogues, heroin, and crack cocaine—in the Washington Square Park Area since at least in or about 2020. Six of the defendants—Maliek Lugg, Tommy Brown, Jr., Jared Covington, Christian Cortez, Nazzir Washington, and Vito Haskins—are members of the Bloods Team. Four of these defendants—Brown, Covington, Washington, and Haskins—presently live or have recently lived in the Eagle Avenue House, where Brown and Covington were arrested last month. We believe three members of the Bloods Team are related: Brown and Covington are half-brothers, and Brown and Lugg are cousins.

The Bloods Team principally sells drugs in the northwest corner of Washington Square Park and at times near the West 4th Street Subway Station. The Bloods have an agreement with the Livigni Team to only sell drugs in their own respective territories. Different members of the Bloods Team sell drugs in different types of packaging, including clear bags, red bags, clear clone-like capsules, and purple bags, as set forth more fully below. The Bloods Team uses workers, many of whom are also customers, including defendants Daniel Negron, Brandi Felci, and Blake Jake Tannenbaum, among others, to distribute their illegal narcotics. Below are photographs of drugs, drug paraphernalia, and cash seized from members of the Bloods Team:

² Body worn camera depicting one of the non-fatal drug overdoses charged in the Indictment, which occurred on November 11, 2024 in Washington Square Park (*see* Indictment at ¶ 33), will be provided to the Court under seal and to defense counsel on an Attorney's Eyes Only basis to protect victim privacy concerns.

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February 12, 2025 Arrest of Christian Cortez



May 16, 2024 Arrest of Maliek Lugg

Each member of the Bloods Team is discussed below:

Maliek Lugg, a/k/a “Scar,” a/k/a “Scarface.” Maliek Lugg, 24, is a member of the Bloods, who has been dealing dope (*i.e.*, varying mixtures of opioids like fentanyl, fentanyl analogues, and heroin) and crack in Washington Square Park and at times on Sixth Avenue since at least in or about 2022. Lugg is known for selling crack and dope in purple bags, and he wears purple-themed or Purple branded clothing.³ Lugg has been in custody at Rikers Island on state narcotics trafficking charges since March 21, 2025. As discussed further below, the illegal narcotics—fentanyl, fentanyl analogues, and heroin—that led to the death of Victim-1 on June 3, 2024, were supplied by Lugg in Lugg’s signature purple bags of dope. Ripped up purple bags (among other drug packaging) were also found at the scene of Victim-2’s death, just a few blocks from Washington Square Park, on November 24, 2024.

Between 2024 and 2025, Lugg has been arrested for selling drugs in the Washington Square Park Area five times and has pleaded guilty in two of those cases. In addition to those five arrests, Lugg was arrested for distributing drugs in a police holding cell—which was detected after other inmates appeared to be overdosing—following one of those arrests; he was arrested an additional time for selling drugs in midtown Manhattan in February 2025; and he was arrested for menacing with a weapon, attempted robbery, and related offenses in the Bronx in January 2025.

As noted above, confidential sources,³ a review of Lugg’s cellphone, and public social media posts indicate that Lugg carries a firearm.

Tommy Brown, Jr., a/k/a “Ayo,” a/k/a “Bizzy.” Tommy Brown, Jr., 30, is presently detained at the MDC for his recent arrest on federal narcotics charges. Brown is a member of the Bloods Team, who has been selling drugs in Washington Square Park since in or around 2022, approximately one year after he was released from serving a 75-month sentence on racketeering charges in this District. *See* 15 Cr. 607 (JPC). Brown was first arrested in the Washington Square Park Area in December 2022. While Brown was initially arrested for shoplifting, the NYPD found 16 vials of crack on Brown during a search incident to his arrest. Brown was again arrested in the

³ For example, the first photograph on page 4 of this letter, which is taken from Lugg’s cellphone, depicts a firearm that someone is holding on their lap, next to a label that says “PURPLE,” which appears to be attached to the person’s pants.

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Washington Square Park Area for selling crack to an undercover officer in June 2023. In August 2023, Brown was ordered detained for violating the conditions of his federal supervised release, and was in custody until July 2024. Less than a year later, in April 2025, Brown was again arrested near Washington Square Park after NYPD officers observed Brown engaged in a hand-to-hand drug sale, after which six vials of crack were found on him.

Jared Covington, a/k/a “KG.” Jared Covington, 33, is presently on home detention for his recent arrest on federal narcotics charges. Covington is a member of the Bloods Team, who has been dealing drugs in the Washington Square Park Area since at least 2018, when he was arrested for selling crack to an undercover officer on McDougal Street between Bleecker and West Houston. Covington’s continued participation in the WSP Enterprise is confirmed by payment records showing transactions between Covington and Christian Cortez, Vito Haskins, Maliek Lugg, and Curtis Miller throughout 2024, as well as text messages recovered from a cellphone used by Cortez in which, in 2022, Cortez sent Covington an Uber to Washington Square Diner, after Covington referenced being “in the field.”

Covington has been arrested approximately 21 times (five times on felony charges), but has never been convicted. Three of these arrests, including his 2018 arrest described above, have occurred in the Washington Square Park Area. As noted above, Covington was recently arrested on federal charges after law enforcement officers found him with a crack rock weighing approximately 49.6 grams in his pants pocket, while officers were executing a search warrant of Brown’s apartment in the Eagle Avenue House on September 19, 2025. Law enforcement officers also recovered the following from the apartment: (1) three bundles of glassine envelopes of suspected heroin; (2) one box of Narcan; (3) a capsule of apparent crack; (4) a scale that is commonly used to weigh drugs; (5) empty vials used to store narcotics; (6) mail and a high-school diploma in the name of “Jared Covington;” (7) the birth certificate and driver’s license of Brown; and (8) two bundles of an undetermined amount of cash, including hundred-, fifty-, and twenty-dollar bills, which were packed inside a pair of socks, located underneath a mattress in one of the bedrooms.

While the Government did not seek Covington’s detention when he was presented on the complaint charging him with possession of the crack rock, the Government did so in part to protect the integrity of its investigation into the larger WSP Enterprise and in part because the Government did not have all the information it currently has on Covington and his criminal history.⁴ Given these developments, and the nature of the charge in the S1 Superseding Indictment, the Government now seeks Covington’s detention.

Christian Cortez, a/k/a “Bhris.” Christian Cortez, 23, is a member of the Bloods Team, who has been dealing drugs in the Washington Square Park Area since at least 2021. Cortez is known for selling red bags of crack in the park, which match the appearance of red bags that were found (among other drug packaging) at the scene of Victim-2’s death. Payment records indicate that Cortez has transacted with many members of the WSP Enterprise, including Maliek Lugg,

⁴ The Government also understands from Pretrial Services that Covington was not fully compliant with his location restrictions during, at least, the first two weeks of his home detention, although Pretrial Services did not raise these issues with the Court.

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Jared Covington, Vito Haskins, Curtis Miller, Robert Johnson, Andre Bethea, Sean Thom, Blake Jake Tannenbaum, John Livigni, Felix Cuevas, and Bishara Strother.

Records from phones seized from Cortez indicate that Cortez has taken or otherwise obtained photographs of and from within, the Sixth Precinct, including group photographs of NYPD officers, zoomed-in photographs of particular NYPD officers, persons-of-interest rosters from the Sixth Precinct, and photographs of the Sixth Precinct officer-duty schedule. Cortez's phone also contains screenshots of tweets from the NYPD's Sixth Precinct's X, f/k/a Twitter, account discussing recent drug seizures in the park.

Cortez has been arrested approximately 11 times, including 7 times in the Washington Square Park Area, and has two misdemeanor convictions and three pending cases. Cortez's first arrest in the Washington Square Park Area was in June 2021, when Cortez was arrested after NYPD officers observed him engage in multiple hand-to-hand transactions. Incident to Cortez's arrest, officers found 205 plastic vials of crack. Less than a year later, in February 2022, Cortez was arrested in the park for reckless driving of a scooter and was found in possession of 106 capsules of crack. In December 2023, Cortez was again arrested in the park for engaging in a hand-to-hand transaction. Incident to his arrest, officers found, among other things, plastic baggies containing approximately 30 grams of powder cocaine and 120 glassine envelopes of fentanyl and fentanyl analogues. Cortez was in custody from January 2024 to July 2024. About six months later, Cortez was arrested on East 14th Street in Manhattan and found in possession of a scale with crack residue, 27 multicolored Ziplock bags containing crack residue, 15 red glassine envelopes of fentanyl, and at least two bags containing approximately 4.49 grams of crack. In August 2025 and September 2025, Cortez was again arrested in Washington Square Park and found with narcotics and large quantities of small baggies for individually packaging narcotics (many of which were red in color).

Most recently, on or about October 14, 2025, Cortez was arrested on West 4th Street for stealing an E-Bike and threatening a victim with a switchblade on October 10, 2025. Incident to his arrest, Cortez was found in possession of 6 white vials of suspected crack, 28 green vials of crack, and a large crack rock. Cortez, who was released from state custody on or about October 20, 2025, was seen in Washington Square Park within days of his release.

Nazzir Washington, a/k/a "Nazzi." Nazzir Washington, 21, is a member of the Bloods Team, who has been dealing drugs in the Washington Square Park Area since in or about 2022. Since 2019, Washington has been arrested approximately 16 times, at least three of which were in the Washington Square Park Area. In February 2024, Washington was arrested with Bishara Strother and Robert Johnson for engaging in multiple hand-to-hand drug sales on West 4th Street and Sixth Avenue. They were found in possession of 48 green baggies of crack, 8 green envelopes containing heroin, and 2 twist bags of crack. Washington also had two knives, and 70 small baggies for packaging. A few months later, in May 2024, Washington was arrested for unlawfully operating a bicycle in Washington Square Park and was found in possession of crack and promethazine, as well as 90 single-dollar bills and 19 five-dollar bills. In November 2024, Washington was arrested on Sixth Avenue and Waverly Place after officers observed him engage in multiple hand-to-hand transactions. Officers heard Washington say that he had swallowed something. When he was searched, officers did not find narcotics but found 84 single-dollar bills and 17 five-dollar bills. On March 4, 2025, Washington pleaded guilty in connection with his

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February 2024 arrest to criminal sale of a controlled substance in the third degree, in violation of New York Penal Law § 220.39. Washington has not yet been sentenced.

Vito Haskins, a/k/a “Youngin.” Vito Haskins, 20, is a member of the Bloods Team, who has been dealing drugs in the Washington Square Park Area since in or around 2023. Payment records for Haskins indicate that Haskins has transacted with numerous members of the WSP Enterprise, including Maliek Lugg, Jared Covington, Christian Cortez, Felix Cuevas, Daniel Negron, and Blake Jake Tannenbaum.

Haskins has been arrested approximately 10 times since 2020. Haskins was first arrested in the Washington Square Park Area in January 2024, after he was observed in possession of a switchblade in plain view. Incident to his arrest, Haskins was found in possession of more than 75 plastic baggies used to individually package drugs, of which nearly 50 were purple in color. On August 7, 2024, Haskins was arrested at the northwest corner of Waverly Place and Washington Square West and was found in possession of three public benefit cards, each bearing different names (none his). Most recently, on March 13, 2025, Haskins was arrested on a complaint charging him with fleeing from uniformed police officers on December 18, 2024. Haskins, after selling crack to an undercover officer, fled from arresting officers in his car, went in the opposite direction of traffic, and hit a bicyclist, who was thrown into a parked car; Haskins then continued to flee from the scene. This case is still open.

B. The Livigni Team

The Livigni Team of drug dealers is led by John Livigni, who has been trafficking narcotics in the Washington Square Park Area for approximately 25 years. The Livigni Team has dealt crack, fentanyl, and heroin on Sixth Avenue from Waverly Place to the Path Station on 9th Street between Fifth Avenue and Sixth Avenue, until recently moving up Sixth Avenue to the blocks between 9th and 12th Street. The Livigni Team, through John Livigni, is responsible for orchestrating agreements among the various members of the WSP Enterprise not to encroach on each other’s drug-dealing territory.

As noted, the Livigni Team is run by John Livigni, who employs approximately 4 to 5 “managers,” who work for Livigni. Livigni’s managers, including Felix Cuevas and Manny Pina, work in shifts, distributing drugs through lower-level drug dealers, including the same dealers that work for the Bloods Team and the Associate Dealers—Daniel Negron, Brandi Felci, and Blake Jake Tannenbaum, among others.

The Livigni Team is primarily associated with yellow bags of crack, but also sells dope in light blue, white, and pink bags. Based on lab testing done in connection with arrests and undercover buys, the Government understands that the Livigni Team, like the Bloods, uses fentanyl and heroin in their dope and that the Livigni Team sells significantly more drugs for less money than the Bloods. The yellow bags of crack and light blue bags of dope sold by the Livigni Team match the appearance of some of the drugs that were found at the scene of the death of Victim-2.

Below are photographs of drugs, drug paraphernalia, and cash seized from Cuevas:

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August 10, 2024 Arrest of Felix Cuevas



January 17, 2025 Arrest of Felix Cuevas

Each member of the Livigni Team is discussed below:

John Livigni, a/k/a “Johnny.” John Livigni, 47, is the leader of the Livigni Team, who has been dealing drugs in the Washington Square Park Area for approximately 25 years. Livigni has appointed and supervises approximately 4 to 5 “managers,” who distribute drugs through lower-level dealers. Livigni is personally responsible for orchestrating agreements and mutual understandings with the Bloods Team and with most of the Associate Dealers in the Park regarding the division of drug dealing territory. According to a confidential source, prior to Victim-2’s death, Victim-2 gave Livigni Victim-2’s prepaid debit card containing Victim-2’s federal benefits, in return for Victim-2 having ongoing daily access to the Livigni Team’s drugs.

Payment records for Livigni indicate that Livigni has transacted with members of the Bloods Team, including Maliek Lugg, Vito Haskins, and Christian Cortez, as well as Associate Dealers, namely Sean Thom and Andre Bethea.

Livigni has been arrested over 50 times between 1994 and 2023 and, specifically, has been arrested approximately 15 times in the Sixth Precinct for drug offenses, weapons charges, and larceny, among other offenses, dating back to 1997. Livigni’s most recent arrest in the Washington Square Park Area was in March 2021, when he was arrested on a grand larceny charge.

Felix Cuevas, a/k/a “Cuzzo.” Felix Cuevas, 26, has been dealing drugs in the Washington Square Park Area since at least in or about 2024. Payment records for Cuevas indicate that Cuevas has transacted with John Livigni and Manny Pina, as well as members of the Bloods Team, Christian Cortez and Vito Haskins.

Cuevas has been arrested three times, twice in the Washington Square Park Area. On August 10, 2024, Cuevas was arrested at Sixth Avenue and West 8th Street for engaging in hand-to-hand drug transactions. Cuevas was found with 79 white and blue bags of fentanyl and heroin and 30 yellow bags of crack (as depicted above), and has pleaded guilty to one count of criminal possession of a controlled substance in the fifth degree, in violation of New York Penal Law § 220.06. Just a few months later, on January 10, 2025, Cuevas was arrested again, at the same location, with 51 yellow bags of crack and 91 purple, pink, and blue bags of fentanyl (as depicted above). Cuevas pleaded guilty in this case to criminal possession of a controlled substance in the

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third degree, in violation of New York Penal Law § 220.16. Cuevas is scheduled to be sentenced in these cases on December 11, 2025.

Manny Pina. Manny Pina, 23, has been dealing drugs in the Washington Square Park Area since approximately 2023. Payment records for Pina indicate that Pina has had dozens of transactions with John Livigni between at least January 2023 and September 2025 and with Felix Cuevas between at least October 2024 and June 2025. Pina also has transactions with Maliek Lugg of the Bloods Team, and Pina's phone number is saved in a phone that was seized from Lugg in February 2024 and searched pursuant to a judicially authorized warrant.

Pina has been arrested ten times between 2019 and 2024, including three times in the Washington Square Park Area. On June 21, 2023, Pina was arrested for, with another individual, selling three bags of crack (at least two of which were yellow) to an undercover officer at Sixth Avenue and West 8th Street. Incident to his arrest, Pina was found in possession of 13 additional yellow bags of crack and a gravity knife. In connection with this offense, on January 9, 2024, Pina pleaded guilty to one count of criminal possession of a controlled substance in the seventh degree, in violation of New York Penal Law § 220.03, and was sentenced to a conditional discharge. Two months after being sentenced, on March 14, 2024, Pina was arrested in the Sixth Precinct for fare jumping and was found in possession of a gravity knife and a scalpel. A few months later, on July 27, 2024, Pina was arrested for a third time in the Sixth Precinct, on Eighth Street between Sixth and Fifth Avenue, for driving a scooter that was reported to be stolen with a license plate that was reported to be stolen. A knife was also recovered from Pina's pants pocket incident to his arrest.

C. The Associate Dealers

In addition to the dealers belonging to the Bloods Team and the Livigni Team, the following defendants are prominent narcotics traffickers in the Washington Square Park Area associated with the Washington Square Enterprise, but not holding membership in either of those Teams. Many of these individuals have agreements with John Livigni not to deal drugs in the Livigni Team's territory. These dealers also share workers with the Bloods Team and the Livigni Team, including, among others, Daniel Negron, Brandi Felci, and Blake Jake Tannenbaum. These dealers are discussed in detail below:

Curtis Miller, a/k/a "Butter," a/k/a "Birdie," a/k/a "Light." Curtis Miller, 38, has been dealing drugs in the Washington Square Park Area since at least in or about 2022. Since 2023, Miller has been arrested in the Washington Square Park Area on at least five occasions and, in each instance, officers recovered heroin and, in some cases, also crack. Most recently, Miller was arrested twice in January 2025 and again in April 2025. First, in January 2025, Miller was arrested after he was observed exiting a car and throwing a bag of what appeared to be narcotics to another individual, after which that individual was seen engaging in several hand-to-hand sales. Officers searched Miller's car and seized, among other things, 160 glassines that tested positive for heroin and fentanyl. Officers also recovered narcotics from the other individual, and the packaging of those drugs matched Miller's, consistent with the bag Miller threw containing narcotics. An image of a photograph of drugs seized from Miller's car is below:

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Just a few days later in January 2025, Miller was arrested after he was observed selling narcotics in the Washington Square Park Area. When officers searched Miller, they recovered 95 glassine envelopes of heroin, 157 Ziplock baggies of crack, and a twist bag of crack. Finally, in April 2025, Miller was again observed engaging in what appeared to be a hand-to-hand narcotics transaction with two individuals. Officers apprehended one of those individuals, who was found with a twist bag of crack. Officers also apprehended Miller and requested a strip search, but Miller was able to flush suspected narcotics before officers could recover them.

One of the phones seized incident to one of Miller's January 2025 arrests has been searched pursuant to a judicially authorized warrant, and contains, among other things, pictures of the Washington Square Park Area (confirming Miller's presence there on several occasions), a gun (as shown above), large stacks of cash, marijuana, glassines of what appears to be heroin, and notes containing lists of names of known drug dealers followed by amounts, consistent with ledgers used to track drug purchases. In addition, that phone contains screenshots of tweets from the NYPD's Sixth Precinct's X, f/k/a Twitter, account discussing recent drug seizures in the park. It also contains messages with various individuals that appear to be coordinating drug transactions.

Payment records for Miller further confirm his participation in the conspiracy, as those records indicate that Miller has transacted with numerous members of the WSP Enterprise, including Jared Covington, Sean Thom, Maliek Lugg, Bishara Strother, Robert Johnson, Vito Haskins, and Christian Cortez.

Bishara Strother, a/k/a "Wawa." Bishara Strother, 48, has been dealing drugs in the Washington Square Park Area since at least 2023. The Government understands, based on information from a confidential source, that Strother sells narcotics directly and supplies other dealers within the WSP Enterprise when they need to re-up and their typical supply is not nearby. Payment records for Strother reflect transactions with several other members of the WSP Enterprise, including Christian Cortez, Sean Thom, Daniel Negron, Curtis Miller, and Robert Johnson.

Strother has been arrested almost 30 times, including approximately 10 times in the Washington Square Park Area since 2019. Strother is currently awaiting sentencing on convictions in connection with at least four of those arrests. Most recently, Strother was arrested in March 2025 after selling crack to an undercover officer, after which he attempted to flee on a scooter to avoid being apprehended. Then, in June 2025, he was arrested after officers observed him

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engaging in what appeared to be a hand-to-hand narcotics transaction, and officers recovered a bag containing 284 bags of crack, one twist bag of crack, one twist bag of methamphetamine, and 23 glassines of heroin.

Andre Bethea, a/k/a “Black.” Andre Bethea, 60, has been dealing drugs in the Washington Square Park Area for at least 11 years. Bethea was incarcerated between December 2021 and January 2025 for convictions stemming from three arrests for drug dealing in the Washington Square Park Area and a December 2021 search of Bethea’s premises at a hotel on Saint Marks Street, just a few blocks from Washington Square Park, where NYPD officers recovered a large quantity of cocaine, crystal, meth, crack, heroin, pills, scales with narcotics residue, and packaging materials. In connection with these arrests, Bethea was convicted of criminal possession of a controlled substance in the fifth degree, in violation of New York Penal Law § 220.06(5); attempted criminal possession of a narcotic drug in the fourth degree, in violation of New York Penal Law § 220.09(1); and attempted criminal sale of a controlled substance in the third degree, in violation of New York Penal Law § 220.39(1).

Bethea’s term of imprisonment did not deter him, and he promptly returned to dealing in the Park following his release to parole on or about January 30, 2025. Bethea, who is currently on parole, has been observed in Washington Square Park on several occasions, and on or about October 8, 2025, Bethea has been observed by NYPD officers in the Washington Square Park Area engaging in what appeared to be a narcotics sale.

Bethea’s participation in the conspiracy is further confirmed by payment records indicating that Bethea transacted with various others in the WSP Enterprise, including Christian Cortez and John Livigni. In addition, phone records indicate that Bethea communicates regularly with Curtis Miller.

Sean Thom, a/k/a “Bobby.” Sean Thom, 40, has been dealing narcotics in the Washington Square Park Area since at least 2021. Thom has been arrested for suspected narcotics trafficking in the Washington Square Park Area on at least four occasions, and is currently serving a two-year sentence on charges related to his drug dealing in the Washington Square Park Area.

A review of two of Thom’s phones seized incident to previous arrests in the Washington Square Park Area have revealed, among other things, photographs of Washington Square Park (confirming Thom’s presence there on several occasions); photographs of defendant Brandi Fleci in the Park; photographs of guns (discussed above); photographs of messages on other phones (potentially burner phones or phones used by co-conspirators) discussing the quality of narcotics, coordinating the pick-up of narcotics, and discussing someone who is incarcerated with “Light,” a known alias of Curtis Miller; and photographs of police speaking to apparent dealers or users in the Park.

Payment records for Thom show that he has transacted with numerous members of the WSP Enterprise, including Curtis Miller, Robert Johnson, Christian Cortez, Bishara Strother, and John Livigni, dating back to 2021. The Government understands that Thom, like other Associate Dealers, agreed with Livigni not to let his workers sell in certain territory where Livigni’s workers sell.

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Robert Johnson, a/k/a “Black Rob.” Robert Johnson, 54, has been dealing drugs in the Washington Square Park Area since at least 2023.

Johnson has been arrested 39 times, including at least two arrests in the Washington Square Park Area. In February 2024, Johnson was arrested with Nazzir Washington and Bishara Strother for engaging in multiple hand-to-hand drug sales on West 4th Street and Sixth Avenue. They were found in possession of 48 green baggies of crack, 8 green envelopes containing heroin, and 2 twist bags of crack. Johnson was later convicted of criminal possession of a controlled substance in the seventh degree, in violation of New York Penal Law § 220.03. Then in July 2025, Johnson was arrested again after engaging in what appeared to be several hand-to-hand narcotics transactions from his car in the Washington Square Park Area. He was arrested and a search of his car revealed 40 green bags of crack, one plastic bag containing a crack rock, 14 clear bags of crack, 61 green glassines of heroin, and approximately \$841.68 in cash. Charges are pending.

Payment records for Johnson reflect that Johnson transacted with various members of the WSP Enterprise, including Bishara Strother, Sean Thom, Christian Cortez, and Peter Rodriguez.

Henry Rodriguez, a/k/a “Hollywood.” Henry Rodriguez, 43, has been dealing drugs in the Washington Square Park Area since at least 2023. The Government understands from a confidential source that Henry Rodriguez and his brother, Peter Rodriguez (discussed below), sold drugs near the chess tables in Washington Square Park.

Henry Rodriguez has been arrested in the Washington Square Park Area in connection with suspected narcotics trafficking on at least nine occasions since 2023. In August 2023, he was arrested for engaging in suspected hand-to-hand narcotics transactions, and officers recovered 15 bags of crack, two decks of suspected heroin, four oxycodone pills, one loose crack rock, and one large crack rock. Then, in October 2023, he was arrested again for engaging in suspected hand-to-hand narcotics transactions and found in possession of crack, heroin, oxycodone, and a knife. The next month, in November 2023, he was arrested for engaging in suspected hand-to-hand narcotics transactions and found in possession of nine pink baggies of crack, one white plastic baggie of crack, one clear plastic bag of crack, and 20 blue decks of heroin. In February 2024, he was arrested for engaging in suspected hand-to-hand narcotics transactions and found in possession of 18 yellow oxycodone pills, 21 blue glassine envelopes of heroin, and 14 plastic baggies of crack. In May 2024, he was arrested after selling drugs to an undercover officer, and officers recovered three pink bags of crack, seven clear and multicolored bags of crack, and nine oxycodone pills. In October 2024, he was again arrested after engaging what appeared to be a hand-to-hand narcotics transaction, and was found with 38 bags of crack, 25 envelopes of heroin, and Percocet pill. In connection with this arrest, Henry Rodriguez was convicted of attempted criminal possession of a controlled substance in the third degree, possession of a narcotic drug with intent to sell, in violation of New York Penal Law § 220.16(1), and sentenced to 6 months’ imprisonment.

This term of incarceration did not deter him, and in January 2025 he was arrested for engaging in multiple hand-to-hand transactions consistent with narcotics trafficking. NYPD recovered 16 glassines of heroin. Then, most recently, in July 2025, he was again arrested after officers observed him hand another male an object in exchange for money, consistent with a narcotics transaction. Officers searched him and found 19 glassines containing solid material, a

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representative sample of which tested positive for fentanyl, and 4 Ziplock bags of crack. This case is pending.

Peter Rodriguez, a/k/a “Heavy.” Peter Rodriguez, 49, Henry Rodriguez’s brother as described above, has been dealing drugs in Washington Square Park since at least 2024. Peter Rodriguez has been arrested in the Washington Square Park Area on at least two occasions. The first was in February 2024, when law enforcement pulled him over in his vehicle for failing to use a signal and he was discovered to be driving with a suspended license; an inventory search of his vehicle revealed 51 plastic baggies of crack and 40 glassines of heroin. Then, in September 2025, Peter Rodriguez was again arrested after engaging in what appeared to be a narcotics transaction and was found in possession of crack.

D. The Workers

As noted above, many components of the WSP Enterprise employ the same lower-level drug dealers to distribute narcotics in the Washington Square Park Area, including Daniel Negrón, Brandi Felci, and Blake Jake Tannenbaum, who are also customers of the dealers and, as such, often are paid through a combination of cash and drugs.

Daniel Negrón, a/k/a “Bolo.” Daniel Negrón, 56, has been working for dealers associated with the Bloods Team, in particular Maliek Lugg, the Livigni Team, and some or all of the Associate Dealers since at least 2023. Payment records for Negrón indicate that Negrón has transacted with Lugg, Vito Haskins, who are both on the Bloods Team, and Bishara Strother, who is an Associate Dealer.

Negrón has been arrested approximately 34 times and has 16 convictions, 2 for felonies and 14 for misdemeanors. Negrón has been arrested in the Washington Square Park Area two times, both in 2025. On or about March 30, 2025, Negrón was arrested in Washington Square Park after being observed with a lit crack pipe. Incident to his arrest, NYPD officers recovered 19 purple vials of crack. In June 2025, Negrón was arrested in Washington Square Park after being observed providing drugs to Blake Jake Tannenbaum, who was also arrested. Negrón was arrested with 11 green Ziplock bags containing crack and Tannenbaum was arrested with a crack pipe with residue. Both of Negrón’s Washington Square Park cases are open.

Brandi Felci. Brandi Felci, 30, has been working for dealers associated with the Bloods Team, the Livigni Team, and some or all of the Associate Dealers since at least 2020. The Government understands that Felci worked extensively for Sean Thom, and Thom’s cellphone, which the Government searched pursuant to a judicially authorized search warrant, contains photographs of Felci in Washington Square Park, as well as Felci’s New York State electronic benefit transfer card.

Felci’s criminal history is extensive, even by the standards of the WSP Enterprise. Criminal history records indicate that from 2012 to 2025, Felci has been arrested approximately 70 times, has 32 misdemeanor convictions, and has had 40 bench warrants issued for her arrest. In the Sixth Precinct alone, Felci has been arrested over ten times since 2020. In connection with several of these arrests, Felci has been found with distribution quantities of individually packaged narcotics, as well as purple, pink, red, and blue bags of narcotics that match the description of drugs sold by the dealers in the WSP Enterprise.

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Most recently, on or about October 4, 2025, Felci was arrested for grand larceny on East 21st Street, a few blocks north of the Washington Square Park Area. Within days of her release from this arrest on or about October 23, 2025, Felci was observed in Washington Square Park.

Blake Jake Tannenbaum. Blake Jake Tannenbaum, 37, has been working for dealers associated with the Bloods Team, the Livigni Team, and some or all of the Associate Dealers since at least 2024. Payment records indicate that, since 2024, Tannenbaum has transacted with Vito Haskins approximately 31 times, with Maliek Lugg approximately 16 times, with Christian Cortez approximately 15 times, and with Bishara Strother approximately 7 times.

Since mid-2024, when Tannenbaum appears to have relocated from New Windsor, New York to the Washington Square Park Area, Tannenbaum has been arrested approximately eight times in the Washington Square Park Area.⁵ Tannenbaum has sustained five misdemeanor convictions for narcotics-related offenses and disorderly conduct in the Washington Square Park Area on or about August 15, 2025; May 30, 2025; April 9, 2025; February 14, 2025; and October 17, 2024. As noted above, Tannenbaum's arrests in the Washington Square Park Area include an arrest on or about June 11, 2025, with Daniel Negron, in which Negron was arrested with 11 green Ziplock bags containing crack and Tannenbaum was arrested with a crack pipe with residue.

IV. The Overdose Deaths of Victim-1 and Victim-2

The defendants' drug dealing has had deadly consequences. The fentanyl and fentanyl analogues distributed by the defendants caused at least two deaths in a six-month span in 2024, victimizing individuals as diverse as New York City itself. On June 3, 2024, the defendants' deadly drugs caused the death of Victim-1, who had only just graduated from high school in Aspen, Colorado, and arrived in the City for a prestigious theatre internship only days before. On November 24, 2024, the defendants' deadly drugs caused the death of Victim-2, who had been homeless and living in the Washington Square Park Area for years. Each death is discussed in more detail below:

The Overdose Death of Victim-1. On or about June 3, 2024, just two days after arriving in New York City for a summer internship, 18-year-old Victim-1 obtained dope from an individual ("Individual-1") who bought drugs from a worker for Maliek Lugg in the Washington Square Park Area. Individual-1 and Victim-1 used some of the dope together, and Individual-1 provided the remaining dope bags, which were purple, to Victim-1. The next day, on June 4, 2024, Victim-1 was found dead in a Manhattan apartment where Victim-1 was staying. Ripped up pieces of purple bags containing residue that tested positive for fentanyl, fentanyl analogues, and heroin, among other drug paraphernalia, were on a table in the bedroom of the apartment. Those pieces of purple bags are shown below:

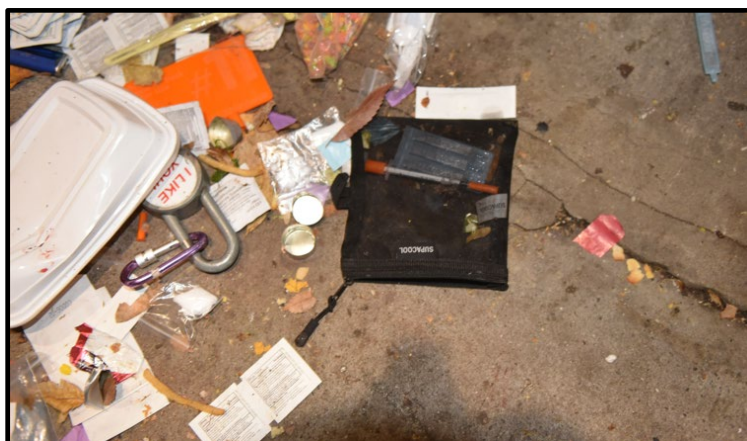
⁵ Arrest records indicate that between 2016 and May 2024, Tannenbaum was arrested approximately eight times in New Windsor, New York, for burglaries, larcenies, drug-related offenses, and disobeying court orders.

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The Overdose Death of Victim-2. On or about November 24, 2024, less than six months after Victim-1's death, an individual called 311 to report a person on the sidewalk—later identified as 43-year-old Victim-2—outside a residential building located on Greenwich Avenue, approximately one block away from the intersection of Sixth Avenue and West 8th Street in the Washington Square Park Area, where the Livigni Team is known to sell drugs. On the sidewalk where Victim-2 was found were yellow bags containing crack cocaine in a black pouch and empty light blue dope bags of the type sold by the Livigni Team, as well as pieces of purple dope bags and a red glassine envelope of the type sold by the Bloods Team—in particular, Maliek Lugg and Christian Cortez, respectively—among other drug paraphernalia, including a hypodermic needle and bags containing cotton balls. Images from photographs of these materials are below.



Prior to Victim-2's death, Victim-2 had provided a prepaid debit card containing Victim-2's federal benefits to John Livigni, in return for Victim-2 having ongoing daily access to the Livigni Team's drugs. Victim-2 was also known to buy drugs from Maliek Lugg and other WSP Enterprise dealers.

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V. Pretrial Detention is Warranted

The Government is seeking detention for all 19 defendants charged in the Indictment based on their danger to the community and their risk of flight.⁶

Where, as here, a defendant is charged with a controlled substance offense with a maximum term of imprisonment that is greater than ten years 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 WSP Enterprise charged in the Indictment are alleged to have run an organization that, for at least half-a-decade, trafficked large quantities of narcotics that resulted in two fatal overdoses in 2024 and numerous non-fatal overdoses. The defendants knew their drugs caused fatal and non-fatal overdoses, but nonetheless have continued to sell them. The threat of law enforcement investigation and prosecution has done little to stop the WSP Enterprise from operating. Many of the defendants have been charged and convicted of narcotics trafficking and returned to the same conduct undeterred, even while on bail, parole, or probation. Many defendants have a history of having bench warrants issued when they failed to show up to court appearances. 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).

* * *

⁶ As noted, Tommy Brown, Jr. has already been ordered detained by Judge Cote and is in custody at the MDC.

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

Respectfully submitted,

JAY CLAYTON
United States Attorney

By: /s/
Remy Grosbard
Adam Z. Margulies
Lauren E. Phillips
Assistant United States Attorneys
Southern District of New York

cc: Counsel of Record (by email)