

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ **SEP 29 2021** ★

LONG ISLAND OFFICE

CCC:JK
F. #2021R00258

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

SUPERSEDING
INDICTMENT

- against -

ANTHONY LEONARDI,
ROBERT LEONARDI,
WILLIE JUNIOR MAXWELL II,
 also known as "Fetty Wap,"
BRIAN SULLIVAN,
ANTHONY SYNTJE and
KAVAUGHN WIGGINS,
 also known as "KV,"

Cr. No. 21-452 (S-1)(JS)
(T. 21, U.S.C., §§ 841(b)(1)(A)(i),
841(b)(1)(A)(ii)(II), 841(b)(1)(A)(iii),
841(b)(1)(A)(vi) and 846; T. 18, U.S.C.,
§§ 924(c)(1)(A)(i), 2 and 3551 et seq.)

Defendants.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Distribute and Possess Controlled Substances)

1. In or about and between June 2019 and June 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants ANTHONY LEONARDI, ROBERT LEONARDI, WILLIE JUNIOR MAXWELL II, also known as "Fetty Wap," BRIAN SULLIVAN, ANTHONY SYNTJE and KAVAUGHN WIGGINS, also known as "KV," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute controlled substances, which offense involved (a) a substance containing heroin, a Schedule I controlled substance; (b) a substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimide

("fentanyl"), a Schedule II controlled substance; (c) a substance containing cocaine, a Schedule II controlled substance; and (d) a substance containing cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of heroin, fentanyl, cocaine and cocaine base involved in the conspiracy attributable to ANTHONY LEONARDI, ROBERT LEONARDI, SULLIVAN and WIGGINS as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was (a) one kilogram or more of a substance containing heroin, (b) 400 grams or more of a substance containing fentanyl, (c) five kilograms or more of a substance containing cocaine and (d) 280 grams or more of a substance containing cocaine base. The amount of cocaine involved in the conspiracy attributable to MAXWELL II and SYNTJE as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, was five kilograms or more of a substance containing cocaine.

(Title 21, United States Code, Sections 846, 841(b)(1)(A)(i), 841(b)(1)(A)(ii)(II), 841(b)(1)(A)(iii) and 841(b)(1)(A)(vi); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO

(Use of Firearms in Connection with a Drug Trafficking Crime)

2. In or about and between June 2019 and June 2020, both dates being approximate and inclusive, within the Eastern District of New York, the defendants ANTHONY LEONARDI, ROBERT LEONARDI, BRIAN SULLIVAN, ANTHONY SYNTJE and KAVAUGHN WIGGINS, also known as "KV," together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to a

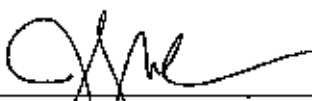
drug trafficking crime, to wit: the crime charged in Count One, and did knowingly and intentionally possess said firearms in furtherance of such drug trafficking crime.

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

A TRUE BILL



FOREPERSON



JACQUELYN M. KASULIS
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F#: 2021R00258
FORM DBD-34
REV. 21

No. _____

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.


ANTHONY LEONARDI,
ROBERT LEONARDI,
WILLIE JUNIOR MAXWELL II, also known as "Fetty Wap,"
BRIAN SULLIVAN,
ANTHONY SYNTJE and
KAVAUGHN WIGGINS, also known as "KV,"

Defendants.

SUPERSEDING INDICTMENT

(T. 21, U.S.C., §§ 841(b)(1)(A)(i), 841(b)(1)(A)(ii)(II),
841(b)(1)(A)(iii), 841(b)(1)(A)(vi) and 846;
T. 18, U.S.C., §§ 924(c)(1)(A)(i), 2 and 3551 et seq.)

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Christopher C. Caffarone, Assistant U.S. Attorney (631) 715-7868