UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA v. LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," Defendants.	**SEALED INDICTMENT** 26 Cr. 26 CRIM 357

The Grand Jury charges:

Overview

1. Medicaid is a public health insurance program funded by American taxpayers that provides low-income Americans access to essential medical care. In addition to covering costs of medical treatment, Medicaid also funds certain healthcare-related transportation for low-income Americans, including transportation to and from clinics that assist those suffering from severe opioid addiction so that vulnerable Medicaid recipients may receive the care they need to treat and recover from their addiction. These clinics typically provide patients with methadone to relieve opioid withdrawal symptoms.

2. At all times relevant to this Indictment, members of a racketeering enterprise known as the "War Room," including LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, exploited this vital public health program for personal gain. They did so by recruiting vulnerable Medicaid-eligible methadone clinic patients in the Bronx and

Manhattan to obtain medical authorization for reimbursable rides, then using the patients' identities to log rides that were never provided, and finally paying the patients in cash and drugs so that they could continue logging fake rides in the patients' names repeatedly for years. Members and associates of the War Room, including LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, executed this fraud using cellphone-based applications meant to log and track real trips, and they created the illusion of legitimate rides with GPS-spoofing tools that falsified location and route data. The War Room then funneled the falsified ride data to multiple New York-area transportation companies, which submitted millions of dollars' worth of fraudulent claims to Medicaid and paid a cut of the fraud proceeds to TREJO, GARNER, STEVENSON, and BELIS, for their work generating fake ride data.

3. To protect their profits and expand their reach, members and associates of the War Room, including LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, engaged in additional criminal acts. They laundered their fraud proceeds through a web of limited liability companies ("LLCs") and bank accounts; they fueled addiction by paying patients kickbacks in drugs; and they used violence against rivals—to include committing an armed robbery and assault of the leader of a rival Medicaid fraud ring. The War Room's crimes undermined a vital health-care program and preyed on the addiction of vulnerable Medicaid patients for personal profit.

The New York State Medicaid Program

4. The federal government, using taxpayer dollars, contributes funding to Medicaid to subsidize medical costs for low-income individuals living in New York. This program is

administered by New York State. To qualify for these Medicaid subsidies, an individual must demonstrate that their income falls below certain limits.

5. For qualifying individuals, Medicaid will pay for certain medical costs in whole or in part. Among other things, Medicaid will pay for non-emergency transportation costs related to medical care, such as transportation to and from a medical provider if the beneficiary needs to travel for an appointment.

6. Medicaid's transportation benefits extend to beneficiaries who require transportation to and from appointments at methadone clinics, where beneficiaries receive medical care or services to treat opioid use disorder.

7. After transportation services are provided to a qualifying individual, the transportation provider may submit a claim for reimbursement to Medicaid. If Medicaid approves a claim submitted by a transportation provider, payment for the transportation will be sent directly to the transportation provider according to a schedule based on the length of travel and other factors.

8. To receive reimbursement for transportation claims, Medicaid transportation providers in New York are required to record, maintain, and submit detailed information about each ride provided, including, (i) the Medicaid beneficiary's name and identification number; (ii) the date of the ride; (iii) the origin of the trip and time of pickup; (iv) the destination of the trip and time of drop off; (v) the driver's name and license number; (vi) the vehicle's license plate number; and (vii) an attestation from the driver that the trip was completed.

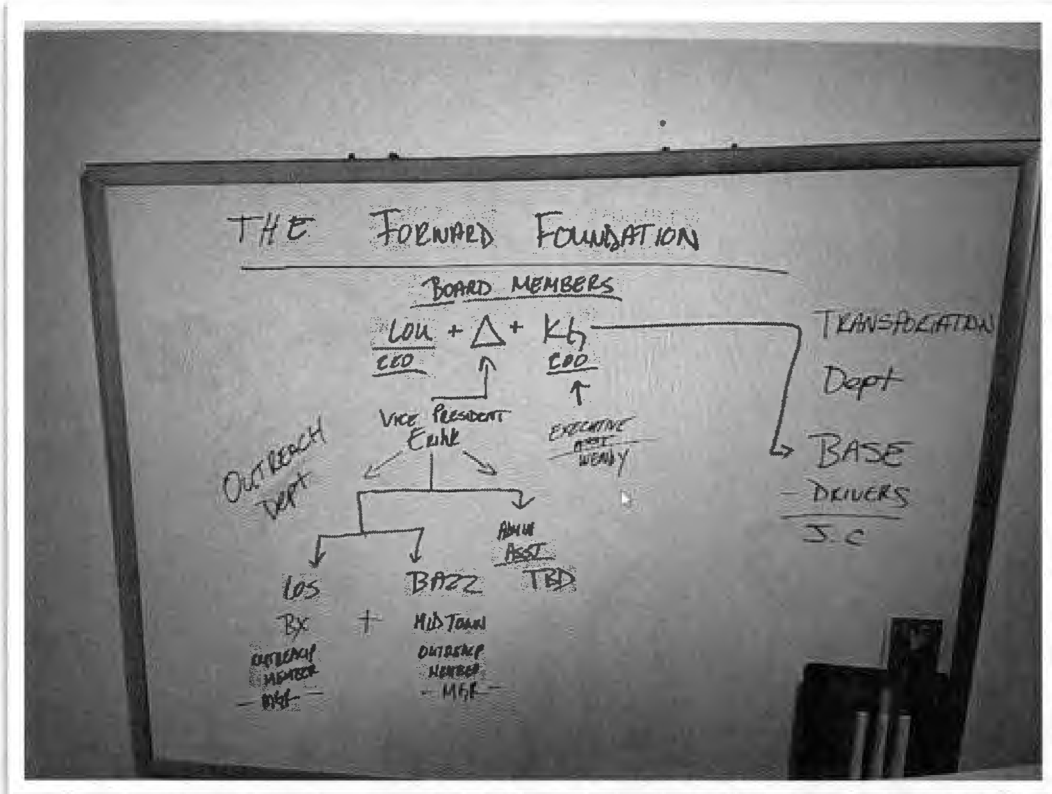
9. To generate documentation to support the claims submitted to Medicaid, many transportation providers use software applications installed on cellphones, which are used by individual drivers to log each ride. Such applications record various information about each ride

a driver provides, contemporaneously as the ride is happening. The information recorded by such applications includes, among other things, the passenger's name and Medicaid information, the date and time of the ride, and the GPS coordinates of the pickups and drop offs.

The War Room

10. At all times relevant to this Indictment, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, operated a criminal enterprise responsible for generating fake ride data submitted by New York-area transportation companies in support of millions of dollars in reimbursement claims to Medicaid for methadone clinic transportation services. The criminal enterprise operated out of an office located at TREJO's residence, which the defendants referred to as the "War Room." The War Room organization engaged in, among other things, acts involving wire fraud, healthcare fraud, violations of the Anti-Kickback Statute, narcotics distribution, robbery, firearms use, and money laundering. The War Room operated principally in the Bronx and the New York City metropolitan area.

11. To obfuscate their criminal activity, TREJO, GARNER, STEVENSON, and BELIS operated the War Room under the guise of a legitimate charity, the "Forward Foundation." An organizational chart drawn on a white board located inside the War Room at TREJO's residence, depicted below, identifies each defendant's nominal role. TREJO, identified as "Lou," is the "CEO." GARNER, identified as "KG," is the "COO." STEVENSON, identified as "Bazz," is an "outreach member m[ana]g[e]r." BELIS, identified as "Erihk," is "Vice President."



12. According to tax records for the Forward Foundation prepared by TREJO in 2023, the Forward Foundation purportedly "provide[s] resources, support, and assistance to individuals in need as well as develop[s] programs and raise[s] public awareness related to affordable housing and social programs." In reality, the Forward Foundation was a front for the criminal activities of the War Room, which perpetrated a massive fraud scheme causing millions of dollars of taxpayer losses to Medicaid. They also laundered fraud proceeds, trafficked narcotics to vulnerable, drug-addicted Medicaid patients, and committed violence against rival fraud rings.

The Fake Rides Scheme

13. To generate fake ride data to support fraudulent Medicaid claims, members and associates of the War Room, including LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, recruited Medicaid-eligible patients from methadone clinics located in the Bronx and

Manhattan to sign up for medical transportation rides that are reimbursable by Medicaid, but which were not actually provided to the patients. In exchange for the use of their information for fake rides, the patients were paid weekly kickbacks in cash, drugs, or a combination of cash and drugs. TREJO, GARNER, and STEVENSON, were responsible for, among other things, recruiting and enticing Medicaid-eligible patients suffering from drug addiction, with drugs and cash in exchange for using their identities to create fake rides from which the defendants would illegally profit.

14. For these Medicaid-eligible patients, members of the War Room, including LOUIS TREJO, a/k/a "Machete," the defendant, entered the patients' names and information into cellphones equipped with a ride-tracking application meant to be used by transportation company drivers to log actual rides for reimbursement by Medicaid. Members of the War Room then used the cellphones to log rides for the successfully recruited patients, without providing any actual transportation services.

15. To cover up the fact that the ride data was fabricated, the members of the War Room used a GPS "spoofing" application installed on the cellphones to falsify the GPS coordinates associated with the pickup and drop-off locations, to make the location data appear as if the rides had been provided. LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," and ERIHK BELIS, a/k/a "Eddie," the defendants, were responsible for, among other things, operating the cellphones and falsifying ride data. Using these methods, the War Room's fraud scheme generated data for hundreds of fake rides per week, which was provided to various New York-area transportation companies, which in turn submitted the fake data to Medicaid to justify the fraudulent claims.

16. Members and associates of the War Room, including LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and

ERIHK BELIS, a/k/a "Eddie," the defendants, were compensated handsomely by the transportation companies for whom they generated fake ride data, and then laundered the proceeds to conceal their source and nature. For example, between in or about November 2023 and in or about September 2025, three New York-area transportation companies—Transportation Company-1, Transportation Company-2, and Transportation Company-3—paid nearly $2 million to the War Room by sending wire payments and checks to bank accounts in the name of an LLC controlled by STEVENSON. STEVENSON then transferred the fraud proceeds to TREJO and GARNER, who in turn moved the funds through a network of LLCs and nearly a dozen bank accounts they controlled.

17. The War Room's fake rides scheme generated millions of dollars in fraudulent Medicaid claims for New York-area transportation companies. For example, from in or about 2023 through in or about 2025, Transportation Company-1, Transportation Company-2, and Transportation Company-3 collectively submitted at least over $12 million in "unmatched" Medicaid claims—that is, claims for medical transportation services for which no medical provider submitted corresponding claims reflecting actual medical services.

The January 12, 2024 Home Invasion Robbery and Assault

18. The War Room's fake rides scheme was so lucrative that multiple fraud rings competed for the same patients at the same methadone clinics. To protect the War Room's profits and expand their reach, in or about October 2023, LOUIS TREJO, a/k/a "Machete," and KENNETH GARNER, a/k/a "KG," the defendants, directed, employed, and used members and associates of the War Room to commit a home invasion robbery against the leader of a rival Medicaid fraud ring ("Victim-1") at Victim-1's home in Teaneck, New Jersey, believing that Victim-1 kept millions of dollars in cash fraud proceeds and drugs inside his home. TREJO and

GARNER provided the crew of War Room members and associates who would commit the robbery with a tracking device and ordered them to affix it to Victim-1's vehicle. For multiple weeks thereafter, TREJO, GARNER, and members of the War Room tracked Victim -1's movements in preparation for the robbery.

19. On or about January 12, 2024, members and associates of the War Room—along with robbery crew members they recruited—executed the planned home invasion at the direction of LOUIS TREJO, a/k/a "Machete," and KENNETH GARNER, a/k/a "KG," the defendants. Masked and armed with a gun, members of the robbery crew entered Victim-1's residence while others waited outside as lookouts. Inside, the robbers used zip ties to tie up the occupants of the residence, including Victim-1, pistol-whipped one of the occupants, intentionally cut Victim-1's hands, and held the victims at gunpoint for multiple hours. The robbery crew did not find the large stash of cash or drugs that GARNER and TREJO expected, but fled with approximately $25,000 in cash and other assorted items. Later that day, the robbery crew members met with TREJO and GARNER to debrief the operation.

COUNT ONE
(Racketeering Conspiracy – All Defendants)

THE WAR ROOM ENTERPRISE

20. The allegations contained in paragraphs one through nineteen are realleged and incorporated herein as if fully set forth in this paragraph.

21. At all times relevant to this Indictment, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, were members and associates of The War Room organization. At all times relevant to this Indictment, The War Room organization, including its leadership, membership, and associates, constituted an "enterprise," as defined by

Title 18, United States Code, Sections 1961(4), that is, a group of individuals associated in fact, although not a legal entity, that engaged in, and the activities of which affected, interstate and foreign commerce (hereinafter "the War Room Enterprise" or "the Enterprise"). The War Room Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the War Room Enterprise.

21. LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, were members and associates of the War Room Enterprise and participated in unlawful and other activities in furtherance of the conduct of the War Room Enterprise's affairs.

PURPOSES OF THE WAR ROOM ENTERPRISE

22. The purposes of the War Room Enterprise included the following:

a. enriching the members and associates of the Enterprise through, among other things, financial frauds, the distribution of narcotics, and robbery;

b. preserving and protecting the power and territory of the Enterprise, through acts involving assault, robbery, and threats of violence against rival fraud operators;

c. promoting and enhancing the Enterprise and the reputation and activities of its members and associates; and

d. providing assistance to members and associates of the Enterprise who committed crimes for and on behalf of the Enterprise, including by providing cellphones and other tools to assist members and associates of the Enterprise in committing such crimes.

MEANS AND METHODS OF THE WAR ROOM ENTERPRISE

23. Among the means and methods by which members and associates of the Enterprise conducted and participated in the conduct of the affairs of the Enterprise were the following:

a. members and associates of the Enterprise committed financial frauds by fabricating records to support fraudulent claims for medical transportation services to Medicaid, a federal healthcare benefit program, and by paying kickbacks to Medicaid patients for the use of the patients' information in the fabricated records;

b. members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including robbery, to protect and to expand the Enterprise's criminal operations, and to retaliate against rival organizations engaged in similar fraud schemes;

c. members and associates of the Enterprise distributed narcotics and controlled substances, including fentanyl and heroin;

d. members and associates of the Enterprise obtained, possessed, and used firearms and ammunition to further their illegal activities on behalf of the enterprise; and

e. members and associates of the Enterprise laundered the proceeds of the Enterprise's financial frauds.

THE RACKETEERING CONSPIRACY

24. From at least in or about 2023 through at least in or about 2025, in the Southern District of New York and elsewhere, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, each being a person employed by and associated with the War Room Enterprise, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern

of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), which pattern of racketeering activity consisted of:

a. multiple offenses involving the distribution of narcotics and controlled substances, including fentanyl and heroin, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute) and 846 (conspiracy), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing); and

b. multiple acts indictable under:

(i) Title 18, United States Code, Section 1343 (relating to wire fraud) and Title 18, United States Code, Section 2 (aiding and abetting and willfully causing);

(ii) Title 18, United States Code, Sections 1951 (relating to interference with commerce, robbery, or extortion) and 2 (aiding and abetting, and willfully causing);

(iii) Title 18, United States Code, Sections 2314 (relating to interstate transportation of stolen property) and 2 (aiding and abetting, and willfully causing); and

(iv) Title 18, United States Code, Sections 1956 (relating to the laundering of monetary instruments) and 2 (aiding and abetting, and willfully causing);

(v) N.J.S.A. Sections 2C:12-1(b)(2) (robbery), 2C:5-2 (conspiracy), and 2C:2-6 (aiding and abetting).

25. It was part of the conspiracy that LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, each agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO

(Assault with a Dangerous Weapon in Aid of Racketeering – TREJO & GARNER)

The Grand Jury further charges:

26. At all times relevant to this Indictment, the War Room Enterprise, as described in paragraphs 19 through 25 of this Indictment, including its leadership, membership, and associates, constituted an "enterprise," as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of Enterprise.

27. The War Room Enterprise, through its members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1959(b)(1), namely: multiple offenses involving the distribution of narcotics and controlled substances, including fentanyl and heroin, chargeable under Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute) and 846 (conspiracy), and Title 18, United States Code, Section 2 (aiding and abetting, and willfully causing); and multiple acts indictable under: Title 18, United States Code, Section 1343 (relating to wire fraud) and 2 (aiding and abetting, and willfully causing); and Title 18, United States Code, Section 1956 (relating to money laundering) and 2 (aiding and abetting, and willfully causing).

28. On or about January 12, 2024, in the Southern District of New York, the District of New Jersey, and elsewhere, LOUIS TREJO, a/k/a "Machete," and KENNETH GARNER, a/k/a "KG," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value from the War Room Enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in

the Enterprise, an enterprise engaged in racketeering activity, as described above, knowingly and intentionally assaulted an individual with a dangerous weapon, and aided and abetted the same, to wit, in the vicinity of Tryon Avenue in Teaneck, New Jersey, TREJO and GARNER aided and abetted other members and associates of the Enterprise's armed home invasion robbery, during which the occupants of the home were restrained, held at gunpoint, and two occupants, including Victim-1, were assaulted with a knife, hammer, and firearm, in violation of N.J.S.A. Sections 2C:12-1(b)(2) and 2C:2-6.

(Title 18, United States Code, Sections 1959(a)(3) and 2.)

COUNT THREE
(Firearms Use, Carrying, and Possession – TREJO & GARNER)

The Grand Jury further charges:

29. On or about January 12, 2024, in the Southern District of New York, the District of New Jersey, and elsewhere, LOUIS TREJO, a/k/a "Machete," and KENNETH GARNER, a/k/a "KG," the defendants, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the assault with a dangerous weapon in aid of racketeering charged in Count Two of this Indictment, knowingly used and carried a firearm, and in furtherance of such crime, possessed a firearm, which was brandished, and aided and abetted the same.

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

COUNT FOUR

(Conspiracy to Commit Wire Fraud and Healthcare Fraud – All Defendants)

The Grand Jury further charges:

30. From at least in or about 2023 through at least in or about 2025, in the Southern District of New York and elsewhere, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER,

a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud and healthcare fraud, in violation of Title 18, United States Code, Sections 1343 and 1347.

31. It was a part and an object of the conspiracy that LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, TREJO, GARNER, STEVENSON, and BELIS, agreed to engage in a scheme to create and submit fraudulent claims to Medicaid for medical transportation services that were never provided, and sent and received electronic communications, to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

32. It was a further part and an object of the conspiracy that LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, together with others known and unknown, knowingly and willfully would and did execute, and attempt to execute, a scheme and artifice to defraud a health care benefit program and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, a health care benefit program, as that term is defined in Title 18, United States Code, Section

24(b), in connection with the delivery of and payment for health care benefits, items, and services, to wit, TREJO, GARNER, STEVENSON, and BELIS, agreed to and did engage in a scheme to create and submit fraudulent claims to Medicaid for medical transportation services that were never provided, in violation of Title 18, United States Code, Section 1347.

(Title 18, United States Code, Section 1349.)

COUNT FIVE
(Wire Fraud – All Defendants)

The Grand Jury further charges:

33. From at least in or about 2023 through at least in or about 2025, in the Southern District of New York and elsewhere, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, together with others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, TREJO, GARNER, STEVENSON, and BELIS engaged in a scheme to create and submit fraudulent claims to Medicaid for medical transportation services that were never provided, and sent and received electronic communications, to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT SIX
(Health Care Fraud – All Defendants)

The Grand Jury further charges:

34. From at least in or about 2023 through at least in or about 2025, in the Southern District of New York and elsewhere, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, together with others known and unknown, knowingly and willfully executed, and attempted to execute, a scheme and artifice to defraud a health care benefit program, as that term is defined in Title 18, United States Code, Section 24(b), and to obtain, by means of false and fraudulent pretenses, representations, and promises, money and property owned by, and under the custody and control of, a health care benefit program, in connection with the delivery of and payment for health care benefits, items, and services, to wit, TREJO, GARNER, STEVENSON, and BELIS engaged in a scheme to create and submit fraudulent claims to Medicaid for medical transportation services that were never provided, in violation of Title 18, United States Code, Section 1347.

(Title 18, United States Code, Sections 1347 and 2.)

COUNT SEVEN
(Conspiracy to Violate the Anti-Kickback Statute – All Defendants)

The Grand Jury further charges:

35. From at least in or about 2023 through at least in or about 2025, in the Southern District of New York and elsewhere, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United

States, to wit, to violate the Anti-Kickback Statute, in violation of Title 42, United States Code, Sections 1320a-7b(b)(1)(A), 1320a-7b(b)(1)(B), 1320a-7b(b)(2)(A), and 1320a-7b(b)(2)(B).

36. It was a part and an object of the conspiracy that LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, would and did willfully and knowingly solicit and receive remuneration (including kickbacks, bribes, and rebates), directly and indirectly, overtly and covertly, in cash and in kind, from one and more persons, in return for referring an individual to a person for the furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part under a Federal health care program, in violation of Title 42, United States Code, Sections 1320a-7b(b)(1)(A).

37. It was a further part and object of the conspiracy that LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, would and did willfully and knowingly solicit and receive remuneration (including kickbacks, bribes, and rebates), directly and indirectly, overtly and covertly, in cash and in kind, from one and more persons, in return for purchasing, leasing, ordering, and arranging for and recommending the purchasing, leasing, and ordering of a good, facility, service, and item for which payment may be made in whole and in part under a Federal health care program, in violation of Title 42, United States Code, Sections 1320a-7b(b)(1)(B).

38. It was a further part and object of the conspiracy that LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, would and did willfully and knowingly offer and pay remuneration (including kickbacks, bribes, and rebates),

directly and indirectly, overtly and covertly, in cash and in kind, to one and more persons, to induce such persons to refer an individual to a person for the furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part under a Federal health care program, in violation of Title 42, United States Code, Sections 1320a-7b(b)(2)(A).

39. It was a further part and object of the conspiracy that LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, and others known and unknown, would and did willfully and knowingly offer and pay remuneration (including kickbacks, bribes, and rebates), directly and indirectly, overtly and covertly, in cash and in kind, to one and more persons, to induce such persons to purchase, lease, order, and arrange for and to recommend the purchasing, leasing, and ordering of a good, facility, service, and item for which payment may be made in whole and in part under a Federal health care program, in violation of Title 42, United States Code, Sections 1320a-7b(b)(2)(B).

<u>Overt Acts</u>

40. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about November 1, 2023, KENNETH GARNER, a/k/a "KG," the defendant, sent a text message to LOUIS TREJO, a/k/a "Machete," and ERIHK BELIS, a/k/a "Eddie," the defendants, stating "Fellas, bazz will be by in the bazz mobile at 9 o'clock. Who does he scoop first ?"

b. On or about November 7, 2023, GARNER sent a text message to TREJO and BELIS, stating "With careful thought. Maybe we should start taking patients to the new clinic.

We can't drag the ninos like before and a good part of them will go with compensation. The list of 10-12 we have. Let's start busing them to the clinic. It's all we got."

c. On or about November 9, 2023, GARNER sent a text message to TREJO and BELIS, stating, "You hitting the field this morning with Louie?" and "In case to have bazz also scoop you[.]"

d. On or about November 20, 2023, GARNER sent a text message to TREJO, stating "Louie Headed to warroom," to which TREJO replied, "Give me an hour gotta head to base and fix a vehicle . . . ."

e. On or about January 19, 2024, BELIS sent a text message to GARNER and TREJO, stating "Hi guys! What tmrw looking like ? We got clinic?," to which TREJO replied, "Admin day tomorrow champ."

f. From on or about February 2, 2024 through on or about February 5, 2024, Leading Consulting Solutions, an LLC controlled by HAROLD STEVENSON, a/k/a "Bazz," the defendant, transmitted approximately $2,700 to Auto Warehouse Miami, an LLC owned and controlled by TREJO.

(Title 18, United States Code, Section 371.)

COUNT EIGHT
(Conspiracy to Distribute Narcotics – TREJO & GARNER)

The Grand Jury further charges:

41. From at least in or about 2023 through at least in or about 2024, in the Southern District of New York and elsewhere, LOUIS TREJO, a/k/a "Machete," and KENNETH GARNER, a/k/a "KG," the defendants, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other to violate the controlled-substance laws of the United States.

42. It was a part and an object of the conspiracy that LOUIS TREJO, a/k/a "Machete," and KENNETH GARNER, a/k/a "KG," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

43. The controlled substances that LOUIS TREJO, a/k/a "Machete," and KENNETH GARNER, a/k/a "KG," the defendants, and others known and unknown, conspired to distribute and possessed with intent to distribute were mixtures and substances containing detectable amounts of fentanyl and heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT NINE
(Conspiracy to Commit Money Laundering – TREJO, GARNER, & STEVENSON)

44. From at least in or about 2023 through at least in or about 2025, in the Southern District of New York and elsewhere, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," and HAROLD STEVENSON, a/k/a "Bazz," the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1956(a)(3)(B).

45. It was a part and an object of the conspiracy that LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," and HAROLD STEVENSON, a/k/a "Bazz," the defendants, and others known and unknown, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, would and did conduct and attempt to conduct such a financial transaction, which transaction affected interstate and foreign commerce and involved the use of a financial institution which was engaged in, and the activities of which affected, interstate and foreign commerce, and which in fact involved the proceeds of specified

unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, and health care fraud, in violation of Title 18, United States Code, Section 1347, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

46. It was further a part and an object of the conspiracy that LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," and HAROLD STEVENSON, a/k/a "Bazz," the defendants, and others known and unknown, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, to wit, wire fraud, in violation of Title 18, United States Code, Section 1343, and health care fraud, in violation of Title 18, United States Code, Section 1347, would and did conduct and attempt to conduct a financial transaction, which transaction affected interstate and foreign commerce and involved the use of a financial institution which was engaged in, and the activities of which affected, interstate and foreign commerce, involving property represented to be the proceeds of specified unlawful activity, to wit, the proceeds of wire fraud, in violation of Title 18, United States Code, Section 1343, and health care fraud, in violation of Title 18, United States Code, Section 1347, in violation of Title 18, United States Code, Section 1956(a)(3)(B).

(Title 18, United States Code, Section 1956(h).)

FORFEITURE ALLEGATIONS

47. As a result of committing the racketeering offense alleged in Count One of this Indictment, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the

defendant acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property constituting and derived from proceeds obtained, directly and indirectly, from the offense alleged in Count One of this Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

48. As a result of committing the firearms offenses alleged in Counts Two and Three of this Indictment, LOUIS TREJO, a/k/a "Machete," and KENNETH GARNER, a/k/a "KG," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offenses.

49. As a result of committing the wire fraud offenses alleged in Counts Four and Five of this Indictment, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

50. As a result of committing the healthcare fraud offenses charged in Counts Four, Six and Count Seven of this Indictment, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER,

a/k/a "KG," HAROLD STEVENSON, a/k/a "Bazz," and ERIHK BELIS, a/k/a "Eddie," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), any and all property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

51. As a result of committing the narcotics offense alleged in Count Eight of this Indictment, LOUIS TREJO, a/k/a "Machete," and KENNETH GARNER, a/k/a "KG," shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

52. As a result of committing the money laundering offense alleged in Count Nine of this Indictment, LOUIS TREJO, a/k/a "Machete," KENNETH GARNER, a/k/a "KG," and HAROLD STEVENSON, a/k/a "Bazz," the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Assets Provision

53. If any of the above-described forfeitable property, as a result of any act or omission of a defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), Title 21, United States Code, Section 853(p), 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 above forfeitable property.

(Title 18, United States Code, Sections 924, 981, 982, 1963;
Title 21, United States Code, Section 853; and
[redacted]tle 28, United States Code, Section 2461.)

FOREPERSON

JAMES M. MCDONALD
United States Attorney