

Exhibit E

Trinitarios and also a confidential informant for law enforcement.

(Title 18, United States Code, Sections 1512(a)(1)(C),
1512(a)(3)(A), and 1512(k).)

COUNT TWO
**(Murder of a Federal Informant
to Prevent Communication to Law Enforcement)**

The Grand Jury further charges:

2. On or about December 28, 2019, in the Southern District of New York and elsewhere, WILLIAM JONES, a/k/a "Principe," the defendant, and others known and unknown, did kill Frederick Delacruz, which killing is murder in the first degree as defined in Title 18, United States Code, Section 1111(a), with the intent to prevent the communication by Delacruz to a law enforcement officer of the United States of information relating to the commission and possible commission of a Federal offense, and aided and abetted the same, to wit, JONES, who is a member of the Trinitarios street gang and racketeering enterprise, and others drove Delacruz, who was a member of the Trinitarios and also a confidential informant for law enforcement, from the Bronx, New York to Suffolk County, New York where JONES and others caused Delacruz to be shot and killed.

(Title 18, United States Code, Sections 1512(a)(1)(C),
1512(a)(3)(A), and 2.)

COUNT THREE

**(Conspiracy to Murder a Federal Informant
to Retaliate for Providing Information to Law Enforcement)**

The Grand Jury further charges:

3. In or about December 2019, in the Southern District of New York and elsewhere, WILLIAM JONES, a/k/a "Principe," the defendant, and others known and unknown, did combine, conspire, and agree to kill Frederick Delacruz, which killing would have been murder in the first degree as defined in Title 18, United States Code, Section 1111(a), with the intent to retaliate against Delacruz for providing to a law enforcement officer information relating to the commission and possible commission of Federal offenses, to wit, JONES, who is a member of the Trinitarios street gang and racketeering enterprise, and others agreed to kill Delacruz, who was a member of the Trinitarios and also a confidential informant for law enforcement.

(Title 18, United States Code, Sections 1513(a)(1)(B),
1513(a)(2)(A), and 1513(f).)

COUNT FOUR

**(Murder of a Federal Informant
to Retaliate for Providing Information to Law Enforcement)**

The Grand Jury further charges:

4. On or about December 28, 2019, in the Southern District of New York and elsewhere, WILLIAM JONES, a/k/a "Principe," the defendant, and others known and unknown, did kill

Frederick Delacruz, which killing is murder in the first degree as defined in Title 18, United States Code, Section 1111(a), with the intent to retaliate against Delacruz for providing to a law enforcement officer information relating to the commission and possible commission of Federal offenses, and aided and abetted the same, to wit, JONES, who is a member of the Trinitarios street gang and racketeering enterprise, and others drove Delacruz, who was a member of the Trinitarios and also a confidential informant for law enforcement, from the Bronx, New York to Suffolk County, New York where JONES and others caused Delacruz to be shot and killed.

(Title 18, United States Code, Sections 1513(a)(1)(B),
1513(a)(2)(A), and 2.)

COUNT FIVE
(Murder Through the Use of a Firearm)

The Grand Jury further charges:

5. On or about December 28, 2019, in the Southern District of New York and elsewhere, WILLIAM JONES, a/k/a "Principe," the defendant, and others known and unknown, willfully and knowingly, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the murder of Frederick Delacruz, as charged in Count Two and Count Four of this Indictment, did use and carry a firearm, and, in furtherance of such crimes, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, and

in the course of such crimes did cause the death of a person through the use of a firearm, namely the death of Frederick Delacruz, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, JONES and others JONES and others caused Delacruz to be shot and killed in Suffolk County, New York.

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

SPECIAL FINDINGS
REGARDING THE MURDER OF FREDERICK DELACRUZ

6. Counts One through Five of the Indictment are realleged and incorporated by reference as though fully set forth herein. As to Counts One through Five of the Indictment, alleging the murder of Frederick Delacruz, WILLIAM JONES, a/k/a "Principe," the defendant:

a. was 18 years of age or older at the time of the offenses; and

b. intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)); and

c. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death

to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)).

FORFEITURE ALLEGATIONS AS TO COUNTS ONE, TWO, THREE, and FOUR

7. As a result of committing the offenses alleged in Counts One, Two, Three, and Four of this Indictment, WILLIAM JONES, a/k/a "Principe," the defendant, 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 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.

Substitute Assets Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the 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 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, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



 FOREPERSON



 AUDREY STRAUSS
 United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

WILLIAM JONES,
a/k/a "Principe,"
Defendant.

SEALED INDICTMENT

21 Cr. ____

(18 U.S.C. §§ 1512, 1513, 924(j), and
2.)

AUDREY STRAUSS
United States Attorney.

A TRUE BILL


Foreperson.
