

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Stanley R. Chesler
	:	
v.	:	
	:	
VINCENT YOUNG,	:	
a/k/a "No Good,"	:	
a/k/a "Good,"	:	
a/k/a "Big Head,"	:	
ALTARIQ GUMBS,	:	Criminal No. 07-143 (SRC)
a/k/a "Killer Reek,"	:	
a/k/a "Killer,"	:	
a/k/a "Reek,"	:	
a/k/a "Jersey,"	:	
a/k/a "Sankofa,"	:	
MARY HOLMES,	:	18 U.S.C. § 1963
a/k/a "Mary Brim,"	:	18 U.S.C. § 1962(d)
a/k/a "Ma,"	:	18 U.S.C. § 1959(a)(5)
TORIEN BROOKS,	:	18 U.S.C. § 1959(a)(3)
a/k/a "B.G.,"	:	18 U.S.C. § 1959(a)(1)
a/k/a "T-Bird,"	:	18 U.S.C. § 922(g)(1)
a/k/a "Reek Boy,"	:	18 U.S.C. § 924(c)
ANTWON BREEDLOVE,	:	18 U.S.C. § 2119(1)
a/k/a "Haywire,"	:	18 U.S.C. § 2
EMMANUEL JONES,	:	21 U.S.C. § 841(a)
a/k/a "Killer,"	:	21 U.S.C. § 841(b)(1)(C)
a/k/a "Killer E,"	:	21 U.S.C. § 846
a/k/a "Emo,"	:	
SALEEN NEAL,	:	
a/k/a "S Bang,"	:	
HALEEK STATE,	:	
a/k/a "H.O.,"	:	
LARRY MAYO,	:	
a/k/a "Little Dark Angel,"	:	
a/k/a "D.A.,"	:	
JOHN BENNING,	:	
a/k/a "Hood,"	:	
TEQUAN RYALS,	:	
a/k/a "T Brim,"	:	
MICHAEL MCCLOUD,	:	
a/k/a "Ike Brim,"	:	
RICKY COLEMAN,	:	
a/k/a "Pool Stick,"	:	
a/k/a "Sticks,"	:	
MARCKESE STEWART,	:	
a/k/a "Shark," and	:	
RICHARD FIELDS,	:	
a/k/a "P.O."	:	

SECOND SUPERSEDING INDICTMENT

The Grand Jury in and for the District of New Jersey,
sitting at Newark, charges:

COUNT ONE

(Racketeering Conspiracy)

1. At various times relevant to this Second Superseding Indictment, defendants VINCENT YOUNG, a/k/a "No Good," a/k/a "Good," a/k/a "Big Head" ("VINCENT YOUNG"), ALTARIQ GUMBS, a/k/a "Killer Reek," a/k/a "Killer," a/k/a "Reek," a/k/a "Jersey," a/k/a "Sankofa" ("ALTARIQ GUMBS"), MARY HOLMES, a/k/a "Mary Brim," a/k/a "Ma" ("MARY HOLMES"), TORIEN BROOKS, a/k/a "B.G.," a/k/a "T-Bird," a/k/a "Reek Boy" ("TORIEN BROOKS"), ANTWON BREEDLOVE, a/k/a "Haywire" ("ANTWON BREEDLOVE"), EMMANUEL JONES, a/k/a "Killer," a/k/a "Killer E," a/k/a "Emo" ("EMMANUEL JONES"), SALEEN NEAL, a/k/a "S Bang" ("SALEEN NEAL"), HALEEK STATE, a/k/a "H.O." ("HALEEK STATE"), LARRY MAYO, a/k/a "Little Dark Angel," a/k/a "D.A." ("LARRY MAYO"), JOHN BENNING, a/k/a "Hood" ("JOHN BENNING"), TEQUAN RYALS, a/k/a "T Brim" ("TEQUAN RYALS"), MICHAEL MCCLOUD, a/k/a "Ike Brim" ("MICHAEL MCCLOUD"), RICKY COLEMAN, a/k/a "Pool Stick," a/k/a "Sticks" ("RICKY COLEMAN"), MARCKESE STEWART, a/k/a "Shark" ("MARCKESE STEWART"), and RICHARD FIELDS, a/k/a "P.O." ("RICHARD FIELDS"), together with other persons, known and unknown, were leaders, members and associates of the criminal organization that was known and referred to as the Fruit

Town and Brick City Brims Set of the Bloods street gang. Members and associates of the Fruit Town and Brick City Brims Set of the Bloods street gang engaged in criminal acts, including murder, attempted murder, conspiracy to commit murder, kidnapping, extortion, conspiracy to commit extortion, assault, drug trafficking, witness intimidation and bribery.

2. The Fruit Town and Brick City Brims Set of the Bloods street gang constituted an enterprise, as defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact that was 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 its objectives.

Background of the Fruit Town and Brick City Brims Set

3. In the early 1970s, a street gang was formed in Los Angeles, California called the Bloods. As time passed, the Bloods spread to areas surrounding Los Angeles and other locations, and broke into units or sub-groups, called "sets," each identified or affiliated with a certain street, neighborhood or area. Each set may, in turn, be comprised of sub-sets.

4. During the early 1970s, a set of the Bloods, called the Fruit Town Brims, "FTB" or "Brims" was established in Los Angeles. VINCENT YOUNG was a member of the Los Angeles-based

Fruit Town Brims. In or about 1993, VINCENT YOUNG traveled to New Jersey and while there, he killed a person who he believed had threatened members of the Bloods street gang. VINCENT YOUNG was convicted of aggravated manslaughter and sentenced to a New Jersey state prison term. While at East Jersey State Prison in Rahway, New Jersey, VINCENT YOUNG founded and became the leader of a New Jersey-based set of the Fruit Town Brims.

5. After being transferred to Northern State Prison in Newark, New Jersey, VINCENT YOUNG recruited fellow inmates to become members of his New Jersey-based Fruit Town Brims set, thereby increasing the membership of his Fruit Town Brims set.

6. One of the fellow inmates who VINCENT YOUNG recruited to join the Fruit Town Brims was ALTARIQ GUMBS, who was from the Essex County, New Jersey area. After ALTARIQ GUMBS joined the Fruit Town Brims, VINCENT YOUNG promoted ALTARIQ GUMBS to a leadership position in the New Jersey-based Fruit Town Brims set.

7. In or about 1999, VINCENT YOUNG gave ALTARIQ GUMBS permission to start a sub-set of the New Jersey-based Fruit Town Brims set, which would operate primarily in the Essex County, New Jersey area. The "Brick City Brims" was the name given to the Essex County sub-set of the larger Fruit Town Brims set. Members of the Brick City Brims sub-set were members of the larger Fruit Town Brims set. Although ALTARIQ GUMBS was the leader of the Brick City Brims sub-set, VINCENT YOUNG ultimately controlled the

Brick City Brims sub-set as the leader of the Fruit Town Brims Set (together hereinafter, the "Fruit Town and Brick City Brims Set" or the "Set"). Members of the Brick City Brims, among other things, ultimately reported to VINCENT YOUNG, abided by the protocols of the Fruit Town and Brick City Brims Set as set forth below, were required to know VINCENT YOUNG's life history as set forth below and routinely sent financial support to VINCENT YOUNG.

8. Initially, the Fruit Town and Brick City Brims Set was comprised of inmates who conducted the enterprise's business primarily within New Jersey prisons. As incarcerated Fruit Town and Brick City Brims Set members and associates were released from prison, however, they also established operations and engaged in criminal activity outside of prison at locations in New Jersey in which they resided, including Jersey City, Newark, and Paterson. Although the gang began to operate and grow outside of prison, VINCENT YOUNG and ALTARIQ GUMBS continued to control the Fruit Town and Brick City Brims Set from prison.

The Fruit Town and Brick City Brims Set
Establish a Structure and Protocols

9. VINCENT YOUNG established a hierarchical membership structure for the gang in cities, prisons and jails throughout New Jersey, from senior rank to junior rank, which eventually included "OOOG" (Triple OG; "OG" is short for "Original Gangster"), "OOG" (Double OG), "OG," "Baby OG," captains, five

star generals, lieutenants, sergeants and individual members, who are called soldiers or "Brims." The positions of "OOOG" through "sergeant" are sometimes referred to as leadership or "status" positions.

10. The Fruit Town and Brick City Brims Set has followed and continues to follow many of the same traditions and protocols as the West Coast Bloods, including:

a. An identification with the color red, which appears prominently in clothing, hats and bandanas worn by Bloods members;

b. Tattoos signifying their membership in the Fruit Town and Brick City Brims Set and the Bloods, including a tattoo of the State of New Jersey;

c. A long-term and often lethal rivalry with the Crips street gang, whose signature color is blue;

d. Use of a system of verbal codes, written codes and hand signals to communicate with each other and to signify their association with the Bloods or a set of the Bloods; and

e. Use of a system of rules and regulations which govern the Bloods, its membership and entry into the Bloods.

11. The rules governing entry into the Bloods sometimes require those seeking membership to commit acts of violence against another person, or to be beaten or "jumped in" by one or more fellow Bloods members.

12. The rules governing the Bloods also establish penalties for those who violate the rules or "disrespect" higher ranking members of the Bloods. Such penalties include being "disciplined" or physically assaulted by fellow members, being stripped of one's leadership status within the Bloods, being placed on probationary status within the Bloods and/or being labeled "food." All members of the Bloods are directed to violently attack and/or kill any person labeled "food."

13. The rules governing the Fruit Town and Brick City Brims Set require members to learn and be quizzed about the history of the West Coast Bloods (known as the "69"), including the life history of VINCENT YOUNG, which details his childhood, the crimes he committed, including the above-mentioned murder he committed in New Jersey, and his struggles against the Crips street gang. Failure to recite this history to the satisfaction of a ranking member could result in a member being physically disciplined.

Objectives of the Enterprise

14. At all times relevant to this Second Superseding Indictment, the objectives of the Fruit Town and Brick City Brims Set enterprise included the following:

a. enriching the members and associates of the enterprise, including those who were in prison and jail through, among other things, acts in violation of the laws of the United States and the State of New Jersey including, but not limited to,

acts involving murder, kidnapping, aggravated assault with a deadly weapon, robbery, bribery, extortion, threats of violence, trafficking in controlled substances and intimidation of witnesses;

b. preserving and protecting the power and influence of the enterprise and its members and associates, both in and out of prison and jail, through, among other things, acts in violation of the laws of the United States and the State of New Jersey including, but not limited to, acts involving murder, kidnapping, aggravated assault with a deadly weapon, robbery, bribery, extortion, threats of violence, trafficking in controlled substances and intimidation of witnesses; and

c. promoting and enhancing the enterprise and its members' and associates' activities by, among other things, providing financial support, drugs and information to members and associates of the Fruit Town and Brick City Brims Set both in and out of prison and jail, as well as the Bloods street gang in general.

Roles of the Defendants

15. At various times relevant to this Second Superseding Indictment:

a. VINCENT YOUNG was the founder and leader of the Fruit Town and Brick City Brims Set. During the time relevant to this Second Superseding Indictment, he rose in status from OG to

OOG. Among other activities, he directed other members and associates of the Fruit Town and Brick City Brims Set, both in and out of prison and jail, in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

b. ALTARIQ GUMBS was the leader of the Brick City Brims sub-set and second in command of the Fruit Town and Brick City Brims Set. Beginning in or about 2008, ALTARIQ GUMBS unsuccessfully attempted to become the leader of the Fruit Town and Brick City Brims Set. During the time relevant to this Second Superseding Indictment, he rose in status from captain to OOG. Among other activities, he directed other members and associates of the Fruit Town and Brick City Brims Set, both in and out of prison and jail, in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

c. MARY HOLMES was a status member of the Fruit Town and Brick City Brims Set, who held "First Lady" status, meaning that she was the highest ranking female in New Jersey. She functioned as the *de facto* minister of information, passing along gang-related information from incarcerated members and associates of the Set to other incarcerated members and associates of the Set, as well as to and from those members and associates who were not incarcerated. Among other activities, she directed other members and associates of the Fruit Town and Brick City Brims Set in carrying out unlawful and other activities in furtherance of

the enterprise's affairs;

d. TORIEN BROOKS was a status member of the Fruit Town and Brick City Brims Set who was responsible for furthering the affairs of the enterprise and participated in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

e. ANTWON BREEDLOVE was a status member of the Fruit Town and Brick City Brims Set who was responsible for furthering the affairs of the enterprise and participated in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

f. EMMANUEL JONES was a status member of the Fruit Town and Brick City Brims Set who was responsible for furthering the affairs of the enterprise and participated in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

g. SALEEN NEAL was a status member of the Fruit Town and Brick City Brims Set who was responsible for furthering the affairs of the enterprise and participated in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

h. HALEEK STATE was a status member of the Fruit Town and Brick City Brims Set who was responsible for furthering the affairs of the enterprise and participated in carrying out

unlawful and other activities in furtherance of the enterprise's affairs;

i. LARRY MAYO was a status member of the Fruit Town and Brick City Brims Set who was responsible for furthering the affairs of the enterprise and participated in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

j. JOHN BENNING was a status member of the Fruit Town and Brick City Brims Set who was responsible for furthering the affairs of the enterprise and participated in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

k. TEQUAN RYALS was a status member of the Fruit Town and Brick City Brims Set who was responsible for furthering the affairs of the enterprise and participated in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

l. MICHAEL MCCLOUD was a status member of the Fruit Town and Brick City Brims Set who was responsible for furthering the affairs of the enterprise and participated in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

m. RICKY COLEMAN was a status member of the Fruit Town and Brick City Brims Set who was responsible for furthering

the affairs of the enterprise and participated in carrying out unlawful and other activities in furtherance of the enterprise's affairs;

n. MARCKESE STEWART was a member or associate of the Fruit Town and Brick City Brims Set who, under the direction of its leadership, participated in unlawful and other activities in furtherance of the enterprise's affairs; and

o. RICHARD FIELDS was a member or associate of the Fruit Town and Brick City Brims Set who, under the direction of its leadership, participated in unlawful and other activities in furtherance of the enterprise's affairs.

Racketeering Conspiracy Violation

16. From at least as early as January 1999 through in or about December 2009, in Hudson County, Essex County and Passaic County, New Jersey, in the District of New Jersey and elsewhere, defendants VINCENT YOUNG, a/k/a "No Good," a/k/a "Good," a/k/a "Big Head," ALTARIQ GUMBS, a/k/a "Killer Reek," a/k/a "Killer," a/k/a "Reek," a/k/a "Jersey," a/k/a "Sankofa," MARY HOLMES, a/k/a "Mary Brim," a/k/a "Ma," TORIEN BROOKS, a/k/a "B.G.," a/k/a "T-Bird," a/k/a "Reek Boy," ANTWON BREEDLOVE, a/k/a "Haywire," EMMANUEL JONES, a/k/a "Killer," a/k/a "Killer E," a/k/a "Emo," SALEEN NEAL, a/k/a "S Bang," HALEEK STATE, a/k/a "H.O.," LARRY MAYO, a/k/a "Little Dark Angel," a/k/a "D.A.," JOHN BENNING, a/k/a "Hood," TEQUAN RYALS, a/k/a "T Brim," MICHAEL MCCLOUD,

a/k/a "Ike Brim," RICKY COLEMAN, a/k/a "Pool Stick," a/k/a "Sticks," MARCKESE STEWART, a/k/a "Shark," and RICHARD FIELDS, a/k/a "P.O.," together with others known and unknown, being persons employed by and associated with the Fruit Town and Brick City Brims Set, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired 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 Fruit Town and Brick City Brims Set through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering activity consisted of multiple acts indictable under:

18 U.S.C. § 1951 (Interference with commerce by threats or violence by extortion)

and multiple acts involving:

A. Murder, contrary to N.J.S.A. Sections 2C:5-1, 2C:5-2 and 2C:11-3;

B. Kidnapping, in violation of N.J.S.A. Sections 2C:5-1, 2C:5-2 and 2C:13-1;

C. Robbery, in violation of N.J.S.A. Sections 2C:5-1, 2C:5-2 and 2C:15-1;

D. Bribery, in violation of N.J.S.A. Sections 2C:5-1, 2C:5-2 and 2C:28-5(d);

E. Extortion, in violation of N.J.S.A. Sections 2C:5-1, 2C:5-2 and 2C:20-5; and multiple acts involving trafficking in controlled substances, including conspiracy to distribute and the distribution of cocaine base (or "crack" cocaine), heroin and marijuana, in violation of Sections 841 and 846 of Title 21, United States Code.

17. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Methods and Means of the Enterprise

18. Among the methods and means by which the defendants and other members and associates of the Fruit Town and Brick City Brims Set conducted and participated in the conduct of the affairs of the enterprise are the following:

a. In furtherance of the conspiracy, VINCENT YOUNG and other members and associates created, operated and controlled the Fruit Town and Brick City Brims Set by among other things, establishing a means of recruiting new members and associates, of developing and enforcing rules of conduct for members and associates, of generating and distributing income for the enterprise and its members and associates, and of protecting and enhancing the criminal activities of the enterprise and its

members and associates;

b. In furtherance of the conspiracy, leaders, members and associates of the Fruit Town and Brick City Brims Set maintained and expanded the power and authority of the enterprise by committing and threatening to commit acts of violence, including murders, shootings, extortions and armed robberies;

c. In furtherance of the conspiracy, members and associates of the Fruit Town and Brick City Brims Set maintained or increased their position in the gang by engaging in criminal activity, as directed by leaders, on behalf of the enterprise;

d. In furtherance of the conspiracy, leaders, members and associates of the Fruit Town and Brick City Brims Set carried firearms in order to protect themselves, threaten others, and otherwise maintain and further the interests of the criminal enterprise;

e. In furtherance of the conspiracy, leaders, members and associates of the Fruit Town and Brick City Brims Set established and maintained discipline within the enterprise by committing or threatening to commit acts of violence to punish members and associates who violated the Set's rules and codes, and to silence enterprise members and associates who they believed were cooperating with law enforcement against members and associates of the Fruit Town and Brick City Brims Set;

f. In furtherance of the conspiracy, leaders, members and associates of the Fruit Town and Brick City Brims Set established and maintained street level drug distribution operations in New Jersey in, among other locations, Jersey City, Newark, and Paterson;

g. In furtherance of the conspiracy, leaders, members and associates of the Fruit Town and Brick City Brims Set protected and expanded those street level drug distribution operations by robbing, extorting or threatening rival drug dealers and others who impeded, or were believed to have impeded, the successful drug distribution activities of the members and associates of the Fruit Town and Brick City Brims Set;

h. In furtherance of the conspiracy, members and associates of the Fruit Town and Brick City Brims Set smuggled controlled substances and other contraband to incarcerated Fruit Town and Brick City Brim Set leaders, members and associates, which they distributed inside prisons and jails;

i. In furtherance of the conspiracy, leaders, members and associates of the Fruit Town and Brick City Brims Set earned income for the Set and for themselves through their criminal activities, including drug trafficking, robbery and extortion;

j. In furtherance of the conspiracy, members and associates of the Fruit Town and Brick City Brims Set used the proceeds from their criminal activities to, among other things,

pay dues that were then provided to or otherwise used to assist incarcerated Set members, including, but not limited to, VINCENT YOUNG, ALTARIQ GUMBS, TORIEN BROOKS and EMMANUEL JONES;

k. In furtherance of the conspiracy, leaders of the Fruit Town and Brick City Brims Set, including VINCENT YOUNG and ALTARIQ GUMBS, exercised control over Set members and associates both inside and outside prison and jail through the use of letters, including coded letters, through direct contact with other Bloods members and associates, through the use of prison telephone systems and through the use of unauthorized cellular telephones;

l. In furtherance of the conspiracy, members and associates of the Fruit Town and Brick City Brims Set and their associates met on a regular basis to, among other things, report on business related to the gang, including, their committing acts of violence, engaging in narcotics trafficking, physically disciplining members, reinforcing gang rules, identifying persons believed to be cooperating with law enforcement, responding to law enforcement activity, bailing out members and associates who had been arrested, purchasing minute cards for incarcerated members of the gang who had access to unauthorized cellular telephones and depositing funds into the commissary accounts of incarcerated members;

m. In furtherance of the conspiracy, incarcerated leaders, members and associates of the Fruit Town and Brick City Brims Set used unauthorized cellular telephones to facilitate their leadership over the Set, to coordinate the smuggling of contraband into jail and prison facilities, to discuss the laundering of the proceeds of their illicit activities and to promote and discuss enterprise activity; and

n. In furtherance of the conspiracy, leaders, members and associates of the Fruit Town and Brick City Brims Set routinely reviewed and distributed discovery materials that were provided in connection with criminal proceedings in state and federal courts, at times intimidated and threatened potential witnesses and bribed potential witnesses with things of value to influence the outcome of judicial proceedings.

Overt Acts

19. In furtherance of the conspiracy and to achieve the objectives thereof, at least one of the conspirators performed or caused to be performed at least one of the following overt acts, among others, in the District of New Jersey, and elsewhere:

- a. On or about April 21, 2000, VINCENT YOUNG possessed Fruit Town and Brick City Brims Set-related photographs, letters and phone numbers in his cell in Northern State Prison in Newark, New Jersey;

- b. Prior to June 5, 2001, VINCENT YOUNG wrote a letter ordering a rival Bloods member to be assaulted with a knife;
- c. In or about 2004, VINCENT YOUNG permitted a member of a rival Bloods set to become a member of the Fruit Town and Brick City Brims Set so that this individual could expand the Set's operations in Jersey City;
- d. On or about July 6, 2004, TORIEN BROOKS and other Fruit Town and Brick City Brims Set members and associates conspired and attempted to murder individuals they believed to be Crips in retaliation for the killing of a Fruit Town and Brick City Brims Set member;
- e. On or about July 19, 2004, TORIEN BROOKS and EMMANUEL JONES murdered M.T. and assaulted M.W., T.F. and A.C. with .40 caliber and .45 caliber firearms in connection with a dispute involving a Fruit Town and Brick City Brims Set member;
- f. On or about July 25, 2004, TORIEN BROOKS attempted to murder an individual, whose relative was associated with a rival Bloods set, by shooting at him/her with a .45 caliber firearm;

- g. In or about October 2004, TEQUAN RYALS and other Fruit Town and Brick City Brims Set members and associates assaulted and pistol-whipped another Set member who they believed was cooperating with law enforcement in the investigation into the above-mentioned murder of M.T.;
- h. On or about February 25, 2005, TORIEN BROOKS attempted to murder an individual by shooting him/her with a 9mm firearm;
- i. On or about April 11, 2005, TORIEN BROOKS, HALEEK STATE, LARRY MAYO and JOHN BENNING agreed to kidnap and murder, and did kidnap, an individual who had been involved in a dispute with members of the Fruit Town and Brick City Brims Set;
- j. On or about May 5, 2006, MICHAEL MCCLOUD stabbed a member of the Fruit Town and Brick City Brims Set in the neck with a sharp object because the Set member was believed to have violated certain rules governing the Set;
- k. On or about August 27, 2006, TEQUAN RYALS participated in a Fruit Town and Brick City Brims Set meeting;
- l. Prior to October 3, 2006, EMMANUEL JONES declared that a Set member was "food" (meaning that Bloods

members were directed to violently attack and/or kill the member labeled "food"), due to a dispute over that Set member's leadership status within the Set;

- m. On or about October 3, 2006, a member of the Fruit Town and Brick City Brims Set assaulted the Set member who had been labeled "food" by EMMANUEL JONES with the wooden handle of a mop, causing that member to fall down a flight of stairs and suffer serious bodily injury;
- n. On or about October 16, 2006, RICHARD FIELDS sold a quantity of cocaine base (or "crack" cocaine) to an undercover officer in an area where the Fruit Town and Brick City Brims Set routinely conducted its street level drug distribution operations;
- o. On or about November 2, 2006, MARCKESE STEWART possessed two firearms;
- p. On or about November 26, 2006, MARCKESE STEWART, RICHARD FIELDS, MICHAEL MCCLOUD and other Fruit Town and Brick City Brims Set members and associates agreed to murder and attempted to murder an individual who had "disrespected" a member of the Set by shooting repeatedly at him/her;

- q. On or about November 27, 2006, VINCENT YOUNG possessed an unauthorized cellular telephone, a cellular telephone charger and a red pair of sneakers in his cell in Northern State Prison in Newark, New Jersey;
- r. On or about March 27, 2007, MARCKESE STEWART possessed a 12-gauge shotgun;
- s. On or about June 15, 2007, VINCENT YOUNG possessed an unauthorized cellular telephone and charger in his cell in Northern State Prison in Newark, New Jersey;
- t. On or about December 19, 2007, VINCENT YOUNG possessed an unauthorized cellular telephone and charger in his cell in Northern State Prison in Newark, New Jersey;
- u. On or about December 20, 2007, RICHARD FIELDS stored twenty rounds of assault rifle ammunition, as well as narcotics paraphernalia, including a digital scale, a straw and a razor blade, in his bedroom in Paterson, New Jersey;
- v. On or about February 26, 2008, VINCENT YOUNG possessed marijuana in his cell in Northern State Prison in Newark, New Jersey;

- w. From on or about March 4, 2008 through on or about March 5, 2008, TORIEN BROOKS, who was then incarcerated in the New Jersey prison system, and other members and associates of the Fruit Town and Brick City Brims Set conspired to smuggle narcotics into the New Jersey prison system for the benefit of incarcerated Set members;
- x. On or about September 9, 2008, ALTARIQ GUMBS sent MARY HOLMES a letter ordering a member of the Fruit Town and Brick City Brims Set to be disciplined by other members of the Set; in that same letter, ALTARIQ GUMBS ordered Set members to kill individuals in retaliation for their assault of a Set member;
- y. On or about September 27, 2008, EMMANUEL JONES, TEQUAN RYALS and another member of the Fruit Town and Brick City Brims Set agreed to smuggle narcotics into the Essex County Jail in Newark, New Jersey, for the benefit of EMMANUEL JONES, who was incarcerated there at the time;
- z. On or about October 15, 2008, ALTARIQ GUMBS, utilizing an unauthorized cellular telephone in an Arizona State Prison, discussed a plan whereby a member of the Fruit Town and Brick City Brims Set

would provide an individual ("CW-1") with heroin in exchange for CW-1 sending money to ALTARIQ GUMBS in an Arizona State Prison;

- aa. In furtherance of that plan, on or about October 17, 2008, RICKY COLEMAN, at the direction of ALTARIQ GUMBS, provided CW-1 with a quantity of heroin;
- bb. On or about October 17, 2008, ALTARIQ GUMBS, utilizing an unauthorized cellular telephone in an Arizona State Prison, told CW-1 to wire the proceeds of the sale of the heroin provided by RICKY COLEMAN to an Arizona State Prison commissary account;
- cc. On or about November 13, 2008, RICKY COLEMAN, at the direction of ALTARIQ GUMBS, sold CW-1 a quantity of heroin;
- dd. On or about November 21, 2008, ALTARIQ GUMBS, utilizing an unauthorized cellular telephone in an Arizona State Prison, told CW-1 to wire narcotics proceeds via Western Union to an Arizona State Prison commissary account and to conduct additional heroin transactions in New Jersey;
- ee. On or about December 10, 2008, TEQUAN RYALS and a co-conspirator sold CW-1 a quantity of heroin;

- ff. On or about December 10, 2008, TEQUAN RYALS and CW-1 discussed a plan whereby CW-1 would obtain a quantity of heroin and then turn over the profits of the subsequent sale of the heroin to a Fruit Town and Brick City Brims Set member who was incarcerated in Northern State Prison in Newark, New Jersey;
- gg. On or about December 11, 2008, CW-1 had a conversation with a Fruit Town and Brick City Brims Set member, in which they discussed CW-1 conducting a narcotics transaction and then turning over the proceeds to that other Set member, who was incarcerated at the time;
- hh. On or about December 15, 2008, CW-1 had a conversation with MARY HOLMES regarding conducting a narcotics transaction to benefit an incarcerated Set member;
- ii. On or about December 16, 2008, CW-1 and MARY HOLMES had another conversation regarding the narcotics transaction to benefit an incarcerated Set member, during which MARY HOLMES told CW-1 that the narcotics would be available at her house the following day;

- jj. On or about the following day, December 17, 2008, MARY HOLMES and a co-conspirator sold a quantity of heroin to CW-1 for the benefit of the Fruit Town and Brick City Brims Set member who was incarcerated in Northern State Prison in Newark, New Jersey;
- kk. On or about December 17, 2008, SALEEN NEAL and other members of the Fruit Town and Brick City Brims Set had a telephone call during which they discussed whether a fellow Set member should be killed for violating Set rules;
- ll. On or about December 18, 2008, TEQUAN RYALS and two co-conspirators conspired to sell and in fact sold CW-1 a quantity of heroin;
- mm. On or about December 27, 2008, ALTARIQ GUMBS, utilizing an unauthorized cellular telephone in an Arizona State Prison, made a telephone call to a Set member who was attending a Brick City Brims meeting in Newark. ALTARIQ GUMBS addressed the meeting via the speaker phone function of the Set member's cellular telephone. During the call, ALTARIQ GUMBS explained his philosophy of the gang, its purpose and its structure, among other topics. RICKY COLEMAN was a participant in the

meeting;

- nn. On or about December 30, 2008, SALEEN NEAL had a conversation with CW-1 in which SALEEN NEAL agreed to sell heroin to CW-1;
- oo. On or about January 14, 2009, SALEEN NEAL and a co-conspirator sold CW-1 a quantity of heroin;
- pp. From on or about January 15, 2009 through on or about January 16, 2009, SALEEN NEAL had conversations with CW-1 in which SALEEN NEAL agreed to sell heroin to CW-1;
- qq. On or about January 16, 2009, SALEEN NEAL and a co-conspirator sold CW-1 a quantity of heroin;
- rr. On or about January 22, 2009, SALEEN NEAL and a co-conspirator sold CW-1 a quantity of heroin;
- ss. On or about January 23, 2009, ALTARIQ GUMBS, utilizing an unauthorized cellular telephone in an Arizona State Prison, had a discussion with a Fruit Town and Brick City Brims Set associate in which he discussed smuggling an unauthorized cellular telephone and heroin into the Arizona State Prison where ALTARIQ GUMBS was incarcerated;
- tt. On or about January 25, 2009, SALEEN NEAL led a Fruit Town and Brick City Brims Set meeting in Jersey City in which he, among other things, told

the group that ALTARIQ GUMBS wanted them to collect money for VINCENT YOUNG's benefit. TEQUAN RYALS attended the meeting, and MARY HOLMES was called during the meeting on her cellular telephone;

- uu. On or about January 26, 2009, ALTARIQ GUMBS, utilizing an unauthorized cellular telephone in an Arizona State Prison, had a discussion with a member of the Fruit Town and Brick City Brims Set in which ALTARIQ GUMBS threatened to take away the member's status and to have the member physically assaulted if the member failed to get ALTARIQ GUMBS phone cards for his unauthorized cellular telephone;
- vv. From on or about February 5, 2009 through on or about February 8, 2009, ALTARIQ GUMBS, utilizing an unauthorized cellular telephone in an Arizona State Prison, TORIEN BROOKS, utilizing an unauthorized cellular telephone in East Jersey State Prison in Rahway, New Jersey, MARY HOLMES and others agreed to compel a Fruit Town and Brick City Brims Set member to recant a statement that the member made to the Paterson Police Department in a pending homicide investigation;

- ww. On or about February 6, 2009, ALTARIQ GUMBS had a conversation with a member of the Fruit Town and Brick City Brims Set in which ALTARIQ GUMBS threatened to take away the member's status and to have the member and other members physically assaulted if they failed to provide ALTARIQ GUMBS with money and phone cards for his unauthorized cellular telephone;
- xx. On or about February 15, 2009, ALTARIQ GUMBS, utilizing an unauthorized cellular telephone in an Arizona State Prison, MARY HOLMES and others had a conversation in which ALTARIQ GUMBS discussed killing a member of the Fruit Town and Brick City Brims Set who, in ALTARIQ GUMBS' view, had "disrespected" him;
- yy. On or about February 15, 2009, ALTARIQ GUMBS, utilizing an unauthorized cellular telephone in an Arizona State Prison, called a Fruit Town and Brick City Brims Set member who was attending a Set meeting in Paterson. ALTARIQ GUMBS addressed the meeting via the speaker phone function of a meeting participant's cellular telephone. During the call, ALTARIQ GUMBS ordered the Fruit Town and Brick City Brims Set members to physically assault

the Set member who ALTARIQ GUMBS believed had
"disrespected" him;

zz. On or about February 15, 2009, MARY HOLMES, SALEEN
NEAL, JOHN BENNING and others participated in the
meeting of the Fruit Town and Brick City Brims Set
in Paterson, New Jersey, described above;

aaa. On or about February 22, 2009, ALTARIQ GUMBS,
utilizing an unauthorized cellular telephone in an
Arizona State Prison, and TORIEN BROOKS, utilizing
an unauthorized cellular telephone in East Jersey
State Prison in Rahway, New Jersey, had a
conversation in which they discussed the chain of
command and dues money of the Fruit Town and Brick
City Brims Set;

bbb. On or about February 23, 2009, ALTARIQ GUMBS,
utilizing an unauthorized cellular telephone in an
Arizona State Prison, and MARY HOLMES conspired to
send money via wire transfer to benefit ALTARIQ
GUMBS;

ccc. On or about February 24, 2009 through on or about
February 25, 2009, TEQUAN RYALS and CW-1 engaged
in a series of calls in which TEQUAN RYALS agreed
to sell CW-1 a quantity of heroin;

- ddd. On or about February 25, 2009, TEQUAN RYALS sold CW-1 a quantity of heroin;
- eee. On or about February 25, 2009 through on or about March 4, 2009, members of the Fruit Town and Brick City Brims Set, including SALEEN NEAL, TEQUAN RYALS and others, agreed to kill a member of the Fruit Town and Brick City Brims Set for violating Set rules;
- fff. On numerous occasions during March 2009, MARY HOLMES agreed to supply narcotics to other members and associates of the Fruit Town and Brick City Brims Set;
- ggg. On or about April 5, 2009, VINCENT YOUNG made a telephone call from the Federal Bureau of Prisons facility where he was incarcerated to a cellular telephone used by MARY HOLMES, who was attending a Fruit Town and Brick City Brims Set meeting in Paterson, New Jersey. VINCENT YOUNG addressed the meeting via the speaker phone function of MARY HOLMES's cellular telephone. During the call, among other things, VINCENT YOUNG discussed his leadership of the Set and instructed members to wire the proceeds of their narcotics distribution and other criminal activities to him in prison

through MARY HOLMES;

hhh. On or about June 4, 2009, ANTWON BREEDLOVE and RICKY COLEMAN agreed to sell a quantity of heroin to CW-1 and have the proceeds sent to a status member of the Fruit Town and Brick City Brims Set who was incarcerated in Northern State Prison in Newark, New Jersey;

iii. On or about June 7, 2009, ANTWON BREEDLOVE shot an individual using a .45 caliber firearm;

jjj. On or about July 7, 2009, ANTWON BREEDLOVE and another member of the Fruit Town and Brick City Brims Set possessed a .45 caliber firearm;

kkk. On or about September 8, 2009, RICKY COLEMAN possessed a .45 caliber gun;

All in violation of Title 18, United States Code, Sections 1962(d) and 1963.

Notice of Enhanced Sentencing Concerning Count One

20. On or about July 19, 2004, in Hudson County, in the District of New Jersey, and elsewhere, defendants EMMANUEL JONES, a/k/a "Killer," a/k/a "Killer E," a/k/a "Emo," and TORIEN BROOKS, a/k/a "B.G.," a/k/a "T-Bird," a/k/a "Reek Boy," did knowingly and purposely cause the death of M.T., in violation of N.J.S.A. Sections 2C:2-6 and 2C:11-3(a)(1) & (2).

Introduction to Counts Relating to the
Commission of Violent Crimes in Aid of Racketeering

1. The allegations contained in paragraphs 1 through 20 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. At all times relevant to this Second Superseding Indictment, in the District of New Jersey and elsewhere, the defendants set forth in Counts Two through Nine were leaders, members and associates of the Fruit Town and Brick City Brims Set, as more fully described in paragraphs 1 through 20 of Count One. This criminal organization constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. At all times relevant to this Second Superseding Indictment, the Fruit Town and Brick City Brims Set, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b) and 1961(1), namely:

a. acts involving murder, kidnapping, robbery, bribery and extortion under the laws of the State of New Jersey;

b. extortion, including conspiracy and attempts to extort others, in violation of Title 18, United States Code, Section 1951; and

c. narcotics distribution and conspiracy to commit narcotics distribution, in violation of Title 21, United States Code, Sections 841 and 846.

COUNT TWO

(Murder Conspiracy)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about July 19, 2004, in Hudson County, in the District of New Jersey, and elsewhere, defendants

EMMANUEL JONES,
a/k/a "Killer,"
a/k/a "Killer E,"
a/k/a "Emo," and
TORIEN BROOKS,
a/k/a "B.G.,"
a/k/a "T-Bird,"
a/k/a "Reek Boy,"

for the purpose of gaining entrance to and maintaining and increasing position in the Fruit Town and Brick City Brims Set, an enterprise engaged in racketeering activity, did knowingly and willfully conspire and agree with others to murder another person, contrary to N.J.S.A. Sections 2C:5-2, 2C:2-6 and 2C:11-3(a)(1) & (2).

In violation of Title 18, United States Code, Section 1959(a)(5).

COUNT THREE

(Murder of M.T.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about July 19, 2004, in Hudson County, in the District of New Jersey, and elsewhere, defendants

EMMANUEL JONES,
a/k/a "Killer,"
a/k/a "Killer E,"
a/k/a "Emo," and
TORIEN BROOKS,
a/k/a "B.G.,"
a/k/a "T-Bird,"
a/k/a "Reek Boy,"

for the purpose of gaining entrance to and maintaining and increasing position in the Fruit Town and Brick City Brims Set, an enterprise engaged in racketeering activity, did knowingly and intentionally murder M.T., contrary to N.J.S.A. Sections 2C:2-6 and 2C:11-3(a)(1) & (2), and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 1959(a)(1) and Section 2.

COUNT FOUR

(Assault with a Dangerous Weapon of M.T.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about July 19, 2004, in Hudson County, in the District of New Jersey, and elsewhere, defendants

EMMANUEL JONES,
a/k/a "Killer,"
a/k/a "Killer E,"
a/k/a "Emo," and
TORIEN BROOKS,
a/k/a "B.G.,"
a/k/a "T-Bird,"
a/k/a "Reek Boy,"

for the purpose of gaining entrance to and maintaining and increasing position in the Fruit Town and Brick City Brims Set, an enterprise engaged in racketeering activity, did knowingly and intentionally assault another person, M.T., with a dangerous weapon, specifically a firearm, in violation of N.J.S.A. Sections 2C:2-6 and 2C:12-1, and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 1959(a)(3) and Section 2.

COUNT FIVE

(Assault with a Dangerous Weapon of M.W.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about July 19, 2004, in Hudson County, in the District of New Jersey, and elsewhere, defendants

EMMANUEL JONES,
a/k/a "Killer,"
a/k/a "Killer E,"
a/k/a "Emo," and
TORIEN BROOKS,
a/k/a "B.G.,"
a/k/a "T-Bird,"
a/k/a "Reek Boy,"

for the purpose of gaining entrance to and maintaining and increasing position in the Fruit Town and Brick City Brims Set, an enterprise engaged in racketeering activity, did knowingly and intentionally assault another person, M.W., with a dangerous weapon, specifically a firearm, in violation of N.J.S.A. Sections 2C:2-6 and 2C:12-1, and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 1959(a)(3) and Section 2.

COUNT SIX

(Assault with a Dangerous Weapon of T.F.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about July 19, 2004, in Hudson County, in the District of New Jersey, and elsewhere, defendants

EMMANUEL JONES,
a/k/a "Killer,"
a/k/a "Killer E,"
a/k/a "Emo," and
TORIEN BROOKS,
a/k/a "B.G.,"
a/k/a "T-Bird,"
a/k/a "Reek Boy,"

for the purpose of gaining entrance to and maintaining and increasing position in the Fruit Town and Brick City Brims Set, an enterprise engaged in racketeering activity, did knowingly and intentionally assault another person, T.F., with a dangerous weapon, specifically a firearm, in violation of N.J.S.A. Sections 2C:2-6 and 2C:12-1, and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 1959(a)(3) and Section 2.

COUNT SEVEN

(Assault with a Dangerous Weapon of A.C.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about July 19, 2004, in Hudson County, in the District of New Jersey, and elsewhere, defendants

EMMANUEL JONES,
a/k/a "Killer,"
a/k/a "Killer E,"
a/k/a "Emo," and
TORIEN BROOKS,
a/k/a "B.G.,"
a/k/a "T-Bird,"
a/k/a "Reek Boy,"

for the purpose of gaining entrance to and maintaining and increasing position in the Fruit Town and Brick City Brims Set, an enterprise engaged in racketeering activity, did knowingly and intentionally assault another person, A.C., with a dangerous weapon, specifically a firearm, in violation of N.J.S.A. Sections 2C:2-6 and 2C:12-1, and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 1959(a)(3) and Section 2.

COUNT EIGHT

(Conspiracy to Commit Murder and Kidnapping)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 11, 2005, in Passaic County, in the District of New Jersey, and elsewhere, defendants

TORIEN BROOKS,
a/k/a "T-Bird,"
a/k/a "B.G.,"
a/k/a "Reek Boy,"
HALEEK STATE,
a/k/a "H.O.,"
LARRY MAYO,
a/k/a "Little Dark Angel,"
a/k/a "D.A.," and
JOHN BENNING,
a/k/a "Hood,"

for the purpose of gaining entrance to and maintaining and increasing position in the Fruit Town and Brick City Brims Set, an enterprise engaged in racketeering activity, did knowingly conspire and agree with each other and others to murder another person, M.M., and kidnap another person, M.M., contrary to N.J.S.A. Sections 2C:5-2, 2C:2-6, 2C:13-1b(1) to (3) and 2C:11-3(a)(1) & (2).

In violation of Title 18, United States Code, Section 1959(a)(5).

COUNT NINE

(Kidnapping of M.M.)

1. Paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about April 11, 2005 in Passaic County, in the District of New Jersey, and elsewhere, defendants

TORIEN BROOKS,
a/k/a "T-Bird,"
a/k/a "B.G.,"
a/k/a "Reek Boy,"
HALEEK STATE,
a/k/a "H.O.,"
LARRY MAYO,
a/k/a "Little Dark Angel,"
a/k/a "D.A.," and
JOHN BENNING,
a/k/a "Hood,"

for the purpose of gaining entrance to and maintaining and increasing position in the Fruit Town and Brick City Brims Set, an enterprise engaged in racketeering activity, did knowingly and intentionally kidnap M.M., contrary to N.J.S.A. Sections 2C:2-6 and N.J.S.A. 2C:13-1b(1) to (3), and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 1959(a)(1) and Section 2.

COUNT TEN

(Possession, Use and Carrying of a Firearm for Violent Crime)

On or about July 19, 2004, in Hudson County, in the District of New Jersey, and elsewhere, defendants

EMMANUEL JONES,
a/k/a "Killer,"
a/k/a "Killer E,"
a/k/a "Emo," and
TORIEN BROOKS,
a/k/a "B.G.,"
a/k/a "T-Bird,"
a/k/a "Reek Boy,"

during and in relation to a crime of violence, specifically the murder of M.T. alleged in Count Three, and the assault with a dangerous weapon of M.T. alleged in Count Four, for which the defendants could be prosecuted in a Court of the United States, did knowingly use, possess and carry two firearms, to wit, a .40 caliber semi-automatic pistol and a .45 caliber semi-automatic pistol, which were both discharged, in furtherance of that crime, and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 924(c) (1) (A) (iii) and Section 2.

COUNT ELEVEN

(Possession, Use and Carrying of a Firearm for Violent Crime)

On or about July 19, 2004, in Hudson County, in the District of New Jersey, and elsewhere, defendants

EMMANUEL JONES,
a/k/a "Killer,"
a/k/a "Killer E,"
a/k/a "Emo,"
TORIEN BROOKS,
a/k/a "B.G.,"
a/k/a "T-Bird,"
a/k/a "Reek Boy,"

during and in relation to a crime of violence, specifically the the assault with a dangerous weapon of M.W. alleged in Count Five, the assault with a dangerous weapon of T.F. alleged in Count Six, and the assault with a dangerous weapon of A.C. alleged in Count Seven, for which the defendants could be prosecuted in a Court of the United States, did knowingly use, possess and carry two firearms, to wit, a .40 caliber semi-automatic pistol and a .45 caliber semi-automatic pistol, which were both discharged, in furtherance of those crimes, and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii), 924(c)(1)(C)(i) and Section 2.

COUNT TWELVE

(Possession, Use and Carrying of a Firearm for Violent Crime)

On or about April 11, 2005, in Passaic County, in the District of New Jersey, and elsewhere, defendants

TORIEN BROOKS,
a/k/a "T-Bird,"
a/k/a "B.G.,"
a/k/a "Reek Boy,"
HALEEK STATE,
a/k/a "H.O.,"
LARRY MAYO,
a/k/a "Little Dark Angel,"
a/k/a "D.A.," and
JOHN BENNING,
a/k/a "Hood,"

during and in relation to a crime of violence, specifically the kidnapping of M.M. alleged in Count Nine, for which the defendants could be prosecuted in a Court of the United States, did knowingly use, possess and carry two firearms, which were both brandished, in furtherance of that crime and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Sections 924(c) (1) (A) (ii) and Section 2.

COUNT THIRTEEN

(Distribution of Cocaine Base)

On or about October 16, 2006, in Passaic County, in the District of New Jersey, and elsewhere, defendant

RICHARD FIELDS,
a/k/a "P.O.,"

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base (or "crack" cocaine), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

(Carjacking of P.D.)

On or about March 9, 2007, in Passaic County, in the District of New Jersey, and elsewhere, defendant

LARRY MAYO,
a/k/a "Little Dark Angel,"
a/k/a "D.A.,"

knowingly and with intent to cause serious bodily harm, did take a motor vehicle that had been transported, shipped and received in interstate and foreign commerce, namely, a 2000 Honda Civic, from the person and presence of P.D. by force, violence and intimidation, and did knowingly and willfully aid, abet, counsel and induce another in the commission of this offense.

In violation of Title 18, United States Code, Section 2119(1) and Section 2.

COUNT FIFTEEN

(Possession of a Firearm by a Convicted Felon)

On or about March 27, 2007, in Passaic County, in the District of New Jersey, and elsewhere, defendant

MARCKESE STEWART,
a/k/a "Shark,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess in and affecting commerce a firearm, namely, a Maverick by Mossberg 12-gauge shotgun, Model 88, with an altered and obliterated serial number.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIXTEEN

(Possession of Ammunition by a Convicted Felon)

On or about December 20, 2007, in Passaic County, in the District of New Jersey, and elsewhere, defendant

RICHARD FIELDS,
a/k/a "P.O.,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess in and affecting commerce ammunition, namely, twenty cartridges of 7.62x39mm 123 gr. full metal jacket lead core bullets.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVENTEEN

(Conspiracy to Distribute Heroin)

From in or about October 2008 through in or about December 2008, in Essex County, in the District of New Jersey, and elsewhere, defendants

ALTARIQ GUMBS,
a/k/a "Killer Reek,"
a/k/a "Killer,"
a/k/a "Reek,"
a/k/a "Jersey,"
a/k/a "Sankofa," and
RICKY COLEMAN,
a/k/a "Pool Stick,"
a/k/a "Sticks,"

did knowingly and intentionally conspire and agree with others to distribute and to possess with intent to distribute a quantity of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT EIGHTEEN

(Conspiracy to Distribute Heroin)

From on or about December 10, 2008 through on or about December 22, 2008, in Passaic County, in the District of New Jersey, and elsewhere, defendant

MARY HOLMES,
a/k/a "Mary Brim,"
a/k/a "Ma,"

did knowingly and intentionally conspire and agree with others to distribute and to possess with intent to distribute a quantity of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT NINETEEN

(Conspiracy to Distribute Heroin)

From in or about December 2008 to on or about February 25, 2009, in Hudson County, in the District of New Jersey, and elsewhere, defendant

TEQUAN RYALS,
a/k/a "T Brim,"

did knowingly and intentionally conspire and agree with others to distribute and to possess with intent to distribute a quantity of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT TWENTY

(Conspiracy to Distribute Heroin)


In or about January 2009, in Hudson County, in the District of New Jersey, and elsewhere, defendant

SALEEN NEAL,
a/k/a "S Bang,"

did knowingly and intentionally conspire and agree with others to distribute and to possess with intent to distribute a quantity of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 846.

A TRUE BILL


PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: _____

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

VINCENT YOUNG, ALTARIQ GUMBS, MARY HOLMES,
TORIEN BROOKS, ANTWON BREEDLOVE,
EMMANUEL JONES, SALEEN NEAL,
HALEEK STATE, LARRY MAYO, JOHN BENNING,
TEQUAN RYALS, MICHAEL MCCLOUD, RICKY COLEMAN,
MARCKESE STEWART, and RICHARD FIELDS

INDICTMENT FOR

18 U.S.C. § 1963, 18 U.S.C. § 1962(d),
18 U.S.C. § 1959(a)(5), 18 U.S.C. § 1959(a)(3),
18 U.S.C. § 1959(a)(1), 18 U.S.C. § 922(g)(1),
18 U.S.C. § 924(c), 18 U.S.C. § 2119(1),
18 U.S.C. § 2, 21 U.S.C. § 841(a),
21 U.S.C. § 841(b)(1)(C), 21 U.S.C. § 846

A True Bill,)

PAUL J. FISHMAN
U.S. ATTORNEY
NEWARK, NEW JERSEY

M. JAMPOL, L. COLONE, R. FRAZER
ASSISTANT U.S. ATTORNEYS
(973) 645-2700
