OJB/BAK/2010R00733/2014R00375

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Madeline Cox Arleo
	:	
v.	:	
	:	
COREY HAMLET,	:	Crim. No. 14-220
a/k/a "C-Blaze,"	:	
a/k/a "Blaze,"	:	
a/k/a "Blizzie,"	:	
a/k/a "Castor Troy,"	:	18 U.S.C. § 922(g)(1)
KWASI MACK,	:	18 U.S.C. §§ 924(c)(1)(A), 924(o)
a/k/a "Welchs,"	:	18 U.S.C. § 1959(a)
a/k/a "The Prince,"	:	18 U.S.C. § 1962(d)
a/k/a "Mini Me,"	:	21 U.S.C. § 841
COREY BATTS,	:	21 U.S.C. § 846
a/k/a "C-Murder,"	:	21 U.S.C. §§ 848(a), 848(c)
a/k/a "Cee,"	:	
TONY PHILLIPS,	:	
a/k/a "Blue,"	:	
HAKEEM VANDERHALL,	:	
a/k/a "Keem,"	:	
a/k/a "Sugar Bear,"	:	
ERIC CONCEPCION,	:	
a/k/a "Eddie Arroyo,"	:	
a/k/a "E-Wax,"	:	
a/k/a "Wax,"	:	
JUSTIN CARNEGIE,	:	
a/k/a "Dew Hi,"	:	
a/k/a "Dew,"	:	
a/k/a "D,"	:	
AHMED SINGLETON,	:	
a/k/a "Gangsta-Moo,"	:	
a/k/a "Gangsta,"	:	
a/k/a "Mooshie,"	:	
JAMAR HAMILTON,	:	
a/k/a "Gunner,"	:	
a/k/a "Jamaal A. Hamilton,"	:	
RASHAN WASHINGTON,	:	
a/k/a "Shoota,"	:	
HANEE CURETON,	:	
a/k/a "City,"	:	
a/k/a "Fat Boy,"	:	

KHALIL STAFFORD, :
a/k/a "Stod," :
a/k/a "Homicide," :
AARON TERRELL, :
a/k/a "Push," :
JAMES S. GUTIERREZ, :
a/k/a "Bad News," and :
LATEEF GRIMSLEY, :
a/k/a "Bird" :

FOURTH SUPERSEDING INDICTMENT

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

COUNT ONE
(Racketeering Conspiracy)

The Racketeering Enterprise

1. At various times relevant to this Fourth Superseding Indictment, in the District of New Jersey, and elsewhere, defendants COREY HAMLET, a/k/a "C-Blaze," a/k/a "Blaze," a/k/a "Blizzie," a/k/a "Castor Troy," KWASI MACK, a/k/a "Welchs," a/k/a "The Prince," a/k/a "Mini Me," COREY BATTS, a/k/a "C-Murder," a/k/a "Cee," TONY PHILLIPS, a/k/a "Blue," HAKEEM VANDERHALL, a/k/a "Keem," a/k/a "Sugar Bear," ERIC CONCEPCION, a/k/a "Eddie Arroyo," a/k/a "E-Wax," a/k/a "Wax," JUSTIN CARNEGIE, a/k/a "Dew Hi," a/k/a "Dew," a/k/a "D," AHMED SINGLETON, a/k/a "Gangsta-Moo," a/k/a "Gangsta," a/k/a "Mooshie," JAMAR HAMILTON, a/k/a "Gunner," a/k/a "Jamaal A. Hamilton," RASHAN WASHINGTON, a/k/a "Shoota," HANEE CURETON, a/k/a "City," a/k/a "Fat Boy," KHALIL STAFFORD, a/k/a "Stod," a/k/a "Homicide," AARON TERRELL, a/k/a "Push," JAMES S. GUTIERREZ, a/k/a "Bad News," and others, known and unknown,

were members and associates of a criminal organization known as the New Jersey set of the Grape Street Crips (the "NJ Grape Street Crips"). The NJ Grape Street Crips, including its leadership, members, and associates, constituted an enterprise, as defined in Title 18, United States Code, Section 1961(4), namely, 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 and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

History, Rules, and Traditions of the NJ Grape Street Crips

2. The NJ Grape Street Crips is a set of the Grape Street Crips gang that originated in the Jordan Downs public-housing complex, which is located between Grape Street and 103rd Street in Watts, Los Angeles, California.

3. The NJ Grape Street Crips have followed many of the same traditions and protocols of the Grape Street Crips and other Crip street gangs, including:

a. visible demonstrations of gang affiliation, such as an identification with the colors purple and blue, which appear in clothing, hats, and bandanas worn by NJ Grape Street Crips members;

b. symbolic use of the number "103," including yearly celebrations on October 3, also styled as "10/3" or "ten-trey day," in reference

to the founding of the Grape Street Crips at the Jordan Downs public-housing complex located on 103rd Street in Los Angeles;

c. greeting each other with the phrases "Watts up" or "Watts Grapin," in reference to the gang's founding in Watts, Los Angeles;

d. tattoos, slogans, and hand gestures signifying membership in the NJ Grape Street Crips; and

e. the use of a system of rules and regulations governing admission to and membership in the NJ Grape Street Crips.

4. The rules governing the NJ Grape Street Crips establish, among other things:

a. a hierarchical power structure in which members are given designations or ranks signifying their status within the gang, which ranks include, from senior rank to junior rank, "OOOG" (Triple OG; "OG" is short for "Original Gangster"); "OOG" (Double OG); "OG"; "G"; "BG" (Baby Gangster); followed by overseers, enforcers, and individual members, who are referred to as soldiers;

b. a system of discipline and punishment for those members who violated rules, failed to carry out orders from higher-ups, or "disrespected" the gang, in which offending members could be stripped of rank, placed on probationary status, and/or physically assaulted or killed; and

c. a system of incentives in which members who desired to maintain, or rise in, rank and stature within the NJ Grape Street Crips were expected and required to "put in work," which meant engaging in murders,

shootings, physical assaults, intimidation, drug trafficking, robberies, extortion, and other criminal activities.

Organization of the NJ Grape Street Crips Enterprise

5. Within the NJ Grape Street Crips, the primary unit of organization was by neighborhood and/or public-housing complex in and around Newark, New Jersey.

6. Members and associates of the NJ Grape Street Crips engaged in, or controlled, drug trafficking and other criminal activities in various neighborhoods and public-housing complexes in and around Newark, New Jersey, including, among others:

a. the area of 6th Avenue and North 5th Street (the "6th Avenue Location");

b. the Pennington Court public-housing complex located at the intersection of Pennington Street and Pacific Street (the "Pennington Court Location");

c. the Oscar Miles public-housing complex located at the intersection of Court Street and Broome Street (the "Court Street Location");

d. the Millard Terrell Homes public-housing complex located at the intersections of Riverview Court and Chapel Street (the "Riverview Court Location");

e. the John W. Hyatt public-housing complex located at the intersection of Hawkins Street and Horatio Street (the "Hyatt Court Location"); and

f. the James Baxter public-housing complex formerly located near Nesbitt and Orange Streets (the "Baxter Terrace Location").

7. Each of these neighborhoods and public-housing complexes was controlled by a leader who was responsible for overseeing the NJ Grape Street Crips operations and for authorizing criminal activity on behalf of the enterprise.

8. The members, associates, and leaders of each of these neighborhoods and public-housing complexes fell under the overall leadership of COREY HAMLET, a/k/a "C-Blaze," a/k/a "Blaze," a/k/a "Blizzie," a/k/a "Castor Troy," who was the head of the NJ Grape Street Crips. One of HAMLET's top deputies was KWASI MACK, a/k/a "Welchs," a/k/a "The Prince," a/k/a "Mini Me."

Purposes of the NJ Grape Street Crips Enterprise

9. The purposes of the NJ Grape Street Crips included the following:

a. promoting and enhancing the enterprise and the activities of its members and associates, both in and out of prison, which activities included, but were not limited to, drug trafficking, murder, robbery, extortion, and other criminal activities;

b. preserving and protecting the power, territory, reputation, and profits of the enterprise and of its members and associates, both in and out of prison, through the use of intimidation, violence, threats of violence, assaults, and murder;

c. keeping victims and community members in fear of the enterprise and its members and associates through violence and threats of violence;

d. providing assistance to gang members and associates who are imprisoned after having committed crimes on behalf of the gang;

e. hindering, obstructing, and preventing law enforcement from identifying participants in the gang's criminal activity, from apprehending the offenders of those crimes, and from successfully prosecuting and punishing those offenders; and

f. threatening, assaulting, or murdering individuals who cooperated (or were believed to have cooperated) with law enforcement against the enterprise.

Members and Associates of the Enterprise

10. COREY HAMLET, a/k/a "C-Blaze," a/k/a "Blaze," a/k/a "Blizzie," a/k/a "Castor Troy" ("HAMLET"), was the leader of the NJ Grape Street Crips. Among other things, HAMLET directed and authorized acts of violence against rivals of the NJ Grape Street Crips, as well as members and associates of the NJ Grape Street Crips.

11. KWASI MACK, a/k/a "Welchs," a/k/a "The Prince," a/k/a "Mini Me" ("MACK"), was a member of the NJ Grape Street Crips who served as one of the top deputies of the NJ Grape Street Crips. Among other responsibilities, MACK communicated with the leader of the NJ Grape Street Crips and acted as an enforcer of the rules of the NJ Grape Street Crips.

12. COREY BATTS, a/k/a "C-Murder," a/k/a "Cee" ("BATTS"), was a member of the NJ Grape Street Crips who was a leader of the Court Street Location.

13. TONY PHILLIPS, a/k/a "Blue" ("PHILLIPS"), was a member of the NJ Grape Street Crips who operated in and around the Court Street Location.

14. HAKEEM VANDERHALL, a/k/a "Keem," a/k/a "Sugar Bear" ("VANDERHALL"), was a member of the NJ Grape Street Crips who was a leader of the 6th Avenue Location.

15. ERIC CONCEPCION, a/k/a "Eddie Arroyo," a/k/a "E-Wax," a/k/a "Wax" ("CONCEPCION"), was a member of the NJ Grape Street Crips who operated in and around the 6th Avenue Location.

16. JUSTIN CARNEGIE, a/k/a "Dew Hi," a/k/a "Dew," a/k/a "D" ("CARNEGIE"), was a member of the NJ Grape Street Crips who operated, among other places, in and around the 6th Avenue Location and Orange, New Jersey.

17. AHMED SINGLETON, a/k/a "Gangsta-Moo," a/k/a "Gangsta," a/k/a "Mooshie" ("SINGLETON"), was a member of the NJ Grape Street Crips who operated, among other places, in and around the 6th Avenue Location, Orange, New Jersey, and Irvington, New Jersey.

18. JAMAR HAMILTON, a/k/a "Gunner," a/k/a "Jamaal A. Hamilton" ("HAMILTON"), was a member and associate of the NJ Grape Street Crips who operated in and around the 6th Avenue Location.

19. RASHAN WASHINGTON, a/k/a "Shoota" ("WASHINGTON"), was a member of the NJ Grape Street Crips who operated in and around the 6th Avenue Location.

20. HANEE CURETON, a/k/a "City," a/k/a "Fat Boy" ("CURETON"), was an associate of the NJ Grape Street Crips who operated, among other places, in and around the Baxter Terrace Location.

21. KHALIL STAFFORD, a/k/a "Stod," a/k/a "Homicide" ("STAFFORD"), was a member of the NJ Grape Street Crips who operated, among other places, in and around the Baxter Terrace Location.

22. AARON TERRELL, a/k/a "Push" ("TERRELL"), was a member of the NJ Grape Street Crips who operated, among other places, in and around the Baxter Terrace Location and in and around the Riverview Court Location.

23. JAMES S. GUTIERREZ, a/k/a "Bad News" ("GUTIERREZ"), was a member of the NJ Grape Street Crips who operated, among other places, in and around the Riverview Court Location.

24. Lateef Grimsley, a/k/a "Bird" ("coconspirator Grimsley"), who is not charged in Count One, but is charged in Count Twenty-Four, was an associate of the NJ Grape Street Crips.

The Racketeering Conspiracy

25. Beginning at least in or about 2003, and continuing through the date of this Fourth Superseding Indictment, in the District of New Jersey, and elsewhere, the defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me,"
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"
TONY PHILLIPS,
a/k/a "Blue,"
HAKEEM VANDERHALL,
a/k/a "Keem,"
a/k/a "Sugar Bear,"
ERIC CONCEPCION,
a/k/a "Eddie Arroyo,"
a/k/a "E-Wax,"
a/k/a "Wax,"
JUSTIN CARNEGIE,
a/k/a "Dew Hi,"
a/k/a "Dew,"
a/k/a "D,"
AHMED SINGLETON,
a/k/a "Gangsta-Moo,"
a/k/a "Gangsta,"
a/k/a "Mooshie,"
JAMAR HAMILTON,
a/k/a "Gunner,"
a/k/a "Jamaal A. Hamilton,"
RASHAN WASHINGTON,
a/k/a "Shoota,"
HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy,"
KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide,"
AARON TERRELL,
a/k/a "Push," and
JAMES S. GUTIERREZ,
a/k/a "Bad News,"

together with others known and unknown, each being a person employed by and associated with the NJ Grape Street Crips, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired and agreed with each other and others 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 NJ Grape Street Crips enterprise 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:

a. multiple acts involving murder, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:5-1(a), and 2C:5-2;

b. multiple acts indictable under Title 18, United States Code, Section 1952 (use of interstate facilities to further unlawful activity);

c. acts involving robbery, contrary to N.J.S.A. 2C:15-1, 2C:5-1(a), and 2C:5-2;

d. acts indictable under Title 18, United States Code, Section 1512(a)(2) and 1512(d) (tampering with a witness, victim, or an informant);

e. acts indictable under Title 18, United States Code, Section 894(a) (collection of extensions of credit by extortionate means); and

f. multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance punishable under the laws of the United States, in

violation of Title 21, United States Code, Section 846 (conspiracy to distribute and possess with intent to distribute controlled substances), Section 841 (distribution and possession with intent to distribute controlled substances), and Section 843(b) (use of a communications facility to violate the Controlled Substances Act).

26. It was 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.

Manner and Means of the Enterprise

27. Among the manner and means by which the defendants and other members and associates of the NJ Grape Street Crips conducted and participated in the conduct of the affairs of the NJ Grape Street Crips were the following:

a. It was part of the conspiracy that the defendants and other members and associates of the NJ Grape Street Crips committed and agreed to commit acts of intimidation and violence, including murder, attempted murder, assault with a deadly weapon, extortion, and robbery against rival gang members or others; to avenge attacks or perceived slights against other members and associates of the NJ Grape Street Crips; to punish enterprise members and associates who had been disloyal; to retaliate against rivals; to silence individuals who were perceived to be cooperating with law enforcement against members and associates of NJ Grape Street Crips; and to

maintain and enhance the reputation of the NJ Grape Street Crips for the purpose of protecting and otherwise assisting their drug trafficking business.

b. It was further part of the conspiracy that participation in criminal activity by a member, particularly violent acts directed at rivals or as directed by the gang leadership, increased the respect accorded to that member, resulted in that member's maintaining and increasing position in the gang, and could result in a promotion to a leadership position.

c. It was further part of the conspiracy that HAMLET and other members of the NJ Grape Street Crips targeted Victim-1 and associates of Victim-1—including members of the NJ Grape Street Crips whom HAMLET believed were too close to Victim-1—for extortion and violent crimes, including murder, attempted murder, and assault with a deadly weapon.

d. It was further part of the conspiracy that HAMLET authorized and directed members of the NJ Grape Street Crips to kill Victim-1, Victim-2, and Victim-5 and that, based on HAMLET's authorization and direction, members of the NJ Grape Street Crips killed Victim-2 and Victim-5 and attempted to kill Victim-1 by repeatedly shooting Victim-1.

e. It was further part of the conspiracy that HAMLET and other members of the NJ Grape Street Crips targeted Victim-6 and that, based on HAMLET's authorization and direction, a member of the NJ Grape Street Crips shot Victim-6 and killed Victim-7 and Victim-8.

f. It was further part of the conspiracy that members and associates of the NJ Grape Street Crips were directed to carry or have

immediate access to firearms, and did in fact carry and use firearms, in order to protect themselves, their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of the criminal enterprise.

g. It was further part of the conspiracy that members and associates of the NJ Grape Street Crips trafficked in illegal drugs, including cocaine, cocaine base ("crack-cocaine"), and heroin. As referred to herein, a "brick" is a street term that refers to a package of heroin containing five "bundles" of heroin, which, in turn, is a package containing ten individual "hits," or doses, of heroin. These individual doses are packaged in glassine envelopes that are referred to as "decks" or "bags" of heroin. Thus, one "brick" contains fifty "decks," or doses, of heroin. As referred to herein, a "clip" is a street term that refers to a package of crack-cocaine containing ten individual "hits," or doses, of crack-cocaine.

h. It was further part of the conspiracy that members and associates of the NJ Grape Street Crips used social media, including Instagram and YouTube, and hip-hop songs to disseminate the rules and protocols of the enterprise, to intimidate witnesses and other members of the community, and to bolster the reputation of the NJ Grape Street Crips for violence and drug trafficking.

i. It was further part of the conspiracy that members and associates of the NJ Grape Street Crips sought to conceal their criminal activities by, among other means, obstructing justice and threatening and intimidating witnesses. As described herein, members and associates of the NJ

Grape Street Crips used the phrase "187AllRats." Because "187" is a reference to California Penal Code Section 187, which defines the crime of murder, the phrase "187AllRats" means that individuals who cooperate with law enforcement should be murdered.

j. It was further part of the conspiracy that members and associates of the NJ Grape Street Crips operating at the 6th Avenue Location utilized and shared a dedicated cell phone to accept orders for distribution quantities of crack-cocaine. CONCEPCION, HAMILTON, WASHINGTON, and others each took turns using the cell phone to distribute quantities of crack-cocaine.

Overt Acts

28. In furtherance of the conspiracy and to achieve its objectives, the defendants and their coconspirators committed the following overt acts, among others, in the District of New Jersey, and elsewhere:

a. From in and around May 2003 through in and around October 2003, HAMLET engaged in multiple acts of heroin and ecstasy distribution in and around Newark, New Jersey.

b. In and around 2005, HAMLET sent Coconspirator-1 to rob several drug traffickers in the Weequahic section of Newark, New Jersey. Coconspirator-1 and other members of the NJ Grape Street Crips, each of whom was armed with a firearm, robbed the drug traffickers of approximately $10,000 on HAMLET's behalf.

c. From at least in and around 2003 through in or around 2009, numerous members and associates of the NJ Grape Street Crips, including, but not limited to, HAMLET, MACK, CURETON, STAFFORD, and TERRELL, engaged in multiple acts of heroin and cocaine distribution, and possession with intent to distribute heroin and cocaine, in and around the Baxter Terrace Location.

d. From in or about April 2006, while detained in local jails and federal prisons, HAMLET continued to serve as the leader of the NJ Grape Street Crips, through his trusted deputies, including MACK, who, among other things, would hold gang meetings and collect money from fellow gang members to provide to HAMLET. HAMLET also decided, among other things, which gang members would be promoted to higher ranks. For example, in or around this time, HAMLET had a message sent to CONCEPCION promoting Coconspirator-1 to the rank of "G."

e. On or about August 4, 2006, BATTS possessed a quantity of heroin at or around the Court Street Location.

f. On or about February 13, 2007, BATTS facilitated the sale of approximately three (3) "bricks" of heroin at or around the Court Street Location.

g. On or about June 8, 2007, BATTS possessed five (5) bricks of heroin at or around the Court Street Location, specifically, in the area of Court Street and Dr. Martin Luther King, Jr. Boulevard in Newark, New Jersey.

h. On or about December 21, 2009, SINGLETON possessed a 9mm caliber Ruger P89 semi-automatic firearm that was used in a shooting that same day.

i. On or about January 1, 2010, while fleeing from police officers, SINGLETON dropped the same 9mm caliber Ruger P89 semi-automatic firearm set forth in Overt Act 28(h).

j. On or about January 6, 2010, in order to avoid police officers, SINGLETON hid inside a closet in which he also had hidden a .38 caliber Smith & Wesson Model 442 revolver.

k. On or about May 10, 2010, CARNEGIE and Coconspirator-2 stored, among other things, a loaded Romarm SA Cugir 7.62x39 assault rifle, an American Industries Calico M100 .22LR carbine, 7.62x39 caliber ammunition, .22 caliber ammunition, and $2,952 in United States currency.

l. In or about 2010, HAMLET received from Coconspirator-3, an associate of the NJ Grape Street Crips, approximately fifty (50) bricks of heroin, which HAMLET then resold for profit.

m. In or about 2010, HAMLET spoke with Coconspirator-4 about the sale of bricks of heroin that HAMLET had received from CURETON.

n. After in or about May 2010, HAMLET began to demand that Victim-1 and Victim-1's associates make cash payments to HAMLET because HAMLET believed that associates of Victim-1 were responsible for shooting at HAMLET in or about May 2010.

o. On or about May 30, 2012, HAMLET had a telephone conversation with MACK, who was detained at the Essex County Correctional Facility, in which HAMLET stated that he would provide MACK with money to retain a lawyer if MACK asked HAMLET to do so.

p. The following day, on or about May 31, 2012, MACK had a telephone conversation in which he told CARNEGIE, "Get that shit from Wax, put that up, grab that grand from the nigga, um, Keem," instructing CARNEGIE to pick up money from CONCEPCION and VANDERHALL to use for MACK to retain an attorney in connection with a pending criminal case.

q. In or about 2012, HAMLET received from Coconspirator-5 dozens of bricks of heroin, which HAMLET then resold for profit.

r. In or about 2012, HAMLET threatened Coconspirator-1 with bodily harm because HAMLET believed that Coconspirator-1 may have been cooperating with authorities.

s. In or about summer 2012, on separate occasions, HAMLET picked up from VANDERHALL and CONCEPCION United States currency that constituted profits from the sale of crack-cocaine by members and associates of the NJ Grape Street Crips in or around the 6th Avenue Location.

t. In or about September 2012, HAMLET posted a photograph on social media showing his back, where HAMLET had a tattoo of,

among other things, the phrase "100% grape," the phrase "watts up," and a hand making a NJ Grape Street Crips gang sign.

u. In or about October 2012, HAMLET travelled to Los Angeles to meet with members of the Grape Street Crips in Watts, Los Angeles, California.

v. In or about early 2013, HAMLET authorized BATTS to murder Victim-2, a member of the NJ Grape Street Crips, in part, because Victim-2 was associating with Victim-1.

w. On or about May 3, 2013, BATTS and PHILLIPS murdered Victim-2 by repeatedly shooting Victim-2 in the head.

x. On or about May 3, 2013, BATTS and PHILLIPS discarded Victim-2's dead body on a street in Newark, New Jersey.

y. On or about July 11, 2013, HAMLET posted a photograph of himself posing with MACK taken at the Court Street Location and wrote, "The wait is over!!!!!!!! My #miniMe done touched down. #GameChanger # WBL #103RD #WELCHES #SHHHHH!!!!!!!!!!," thereby communicating to his followers that MACK, one of his closest enforcers, was out of jail and back out on the streets.

z. On or about July 27, 2013, MACK spoke by telephone with Coconspirator-6, while the latter was incarcerated at the Essex County Correctional Facility. During that call, MACK ordered Coconspirator-6 to physically assault Victim-3 because BATTS was upset with Victim-3.

aa. In or about August 2013, HAMLET posted on social media a photograph of himself at the Pennington Court Location and wrote, among other things, "#IfYouNotFromThereDontGoThere," thereby communicating to his followers that HAMLET and the NJ Grape Street Crips exclusively controlled the Pennington Court Location.

bb. In or about August 2013, BATTS told HAMLET that he (BATTS) had information about the whereabouts of Victim-1. In response, HAMLET told BATTS, in sum and substance, not to miss when shooting Victim-1.

cc. On or about August 20, 2013, CARNEGIE used a social media account to post a photograph of an individual with his jaw and neck blown away from his face. In the text accompanying the photograph, CARNEGIE wrote, "@AllSnitches I bet ur ass won't talk again #187AllRats."

dd. On or about August 23, 2013, MACK spoke with a member of the NJ Grape Street Crips who was incarcerated at the Essex County Correctional Facility. In that call, MACK was advised that another member of the NJ Grape Street Crips incarcerated at the Essex County Correctional Facility was claiming to have a senior status within the gang. In response, MACK stated that MACK had not approved of the individual's promotion and that the individual "ain't shed enough blood for this shit," meaning that the individual had not shot or killed enough individuals to be deserving of the senior status within the gang.

ee. Between at least in or about August 2013, through on or about October 7, 2013, BATTS and MACK had numerous telephone conversations regarding the distribution of heroin.

ff. In or about September 2013, HAMLET posted on social media a photograph of himself and MACK at the Pennington Court Location and wrote, "You can tell from the look #ThisAintWhatYouWant #BatteriesNotIncluded #NoCompromise," thereby informing his followers that MACK, one of his closest enforcers, was back out on the streets.

gg. On or about September 18, 2013, HAMLET posted on social media a photograph of MACK and wrote, "Follow my mini me @WelchsGrape103 the chosen one. #NoCompromise #WBL #FuckYourFeelings #Fastlane #Animal #BabyLoc #MyHandsCallForIt," thereby informing his followers that MACK was HAMLET's "chosen one."

hh. On or about September 29, 2013, WASHINGTON used a social media account to post a photograph of MACK and WASHINGTON and wrote, among other things, "TEAMKAR," which referred to "Team Kill All Rats," thereby informing his followers that the NJ Grape Street Crips kill individuals who cooperate with law enforcement.

ii. On or about October 3, 2013, BATTS spoke by telephone with MACK about heroin stamped with the label "My My My" and "30 II Life."

jj. On or about October 3, 2013, BATTS spoke by telephone with a heroin customer who asked BATTS for "two" (2) bricks of the heroin stamped with the label "Breaking Bad."

kk. On or about October 3, 2013, BATTS agreed to sell PHILLIPS fifty (50) bricks of heroin.

ll. On or about October 3, 2013, MACK spoke by telephone with BATTS about their plan to purchase heroin after MACK delivered a bag of United States currency to BATTS.

mm. On or about October 3, 2013, HAMLET, MACK, BATTS, CARNEGIE, WASHINGTON, and other members of the NJ Grape Street Crips celebrated "ten-trey day" at the 6th Avenue Location.

nn. On or about October 3, 2013, MACK possessed a semi-automatic pistol at the "ten-trey day" celebration at the 6th Avenue Location.

oo. On or about October 3, 2013, HAMLET posted a message on social media disputing a then-ongoing rumor that HAMLET had purportedly cooperated with law enforcement and indicating that HAMLET would be retaliating against the individual whom he believed was spreading the rumor by writing, specifically: "This a lil tune for the #lame #Ducks #CornBalls who can't leave there [sic] block and do the social media gangster shit. I salute you!!!!!! #NeverHadACoDefendant #IDoMyTime #Trial #12InTheJuryBox..... I deserve everything I got. See where you dumb niggas Fucked up is allowing a #Goon to get money..... Watching #LawAndOrder or #CSI don't qualify you to

be a detective..... Oh well let the games begin. Lmfao ya skirt will get pulled up #DontFeedTheAnimals."

pp. On or about October 3, 2013, HAMLET posted a photograph of himself and MACK at the "ten-trey day" celebration and wrote, "If you see us ever fighting a #Bear please help the #Bear!!!!! #HardBite #Hyeanas #FaceYaFears..... Lmfao," thereby boasting to his followers that HAMLET and MACK were not to be crossed.

qq. On or about October 4, 2013, BATTS spoke by telephone with Coconspirator-7 about individuals who were disseminating paperwork purportedly indicating that HAMLET had cooperated with a prior law enforcement investigation. Specifically, BATTS told coconspriator-7 that "only G's know," meaning that only NJ Grape Street Crips with the rank of "G" knew about the purported paperwork. BATTS further stated, "Your man from Johnson . . . handed the paperwork out to niggas in the South Ward," referring to his belief that Victim-1 had distributed the purported paperwork on HAMLET to individuals in Newark's South Ward.

rr. On or about October 5, 2013, MACK spoke by telephone with BATTS. During that call, BATTS admitted that he had missed an opportunity to kill Victim-1 at the Court Street Location.

ss. In a subsequent conversation later in the day on or about October 5, 2013, MACK ordered BATTS to have loaded firearms on stand-by and to have junior gang members patrolling the Court Street Location in case Victim-1 were to return.

tt. On or about October 7, 2013, MACK, CARNEGIE, WASHINGTON, and TERRELL used a 2000 blue Jeep Cherokee and a Ruger Model P95DC 9mm semi-automatic pistol to repeatedly shoot at unknown victims in retaliation for the then-recent murder of Coconspirator-8, a member of the NJ Grape Street Crips.

uu. On or about October 7, 2013, MACK possessed a Ruger Model P95DC 9mm semi-automatic pistol, bearing serial number 311-70017, that was used in the shooting set forth in Overt Act 28(tt). MACK fled from police officers who attempted to arrest him.

vv. On or about October 7, 2013, VANDERHALL helped CARNEGIE, WASHINGTON, and TERRELL flee from police after MACK's arrest for possession of the firearm described in Overt Acts 28(tt) and 28(uu).

ww. On or about October 12, 2013, MACK, while incarcerated at the Essex County Correctional Facility, spoke by telephone with Coconspirator-9, a member of the NJ Grape Street Crips. During that conversation, MACK told Coconspirator-9 that CARNEGIE, WASHINGTON, and TERRELL had to be disciplined by being physically assaulted because none of them had helped MACK get away from or fight the police officers who had arrested him, as described in Overt Act 28(uu). MACK specifically instructed Coconspirator-9 to inform HAMLET that these gang members had to be disciplined.

xx. On or about October 13, 2013, MACK, while incarcerated at the Essex County Correctional Facility, spoke by telephone with

CARNEGIE. During that call, MACK told CARNEGIE that CARNEGIE, WASHINGTON, and TERRELL had to be disciplined by being physically assaulted because none of them had helped MACK get away from or fight the police officers who had arrested him, as described in Overt Act 28(uu).

yy. During the call on or about October 13, 2013, MACK told CARNEGIE that officials at the Essex County Correctional Facility were not going to house MACK on the tier designated for Crip gang members because MACK had "too much influence."

zz. During the call with MACK on or about October 13, 2013, CARNEGIE confirmed that HAMLET had been informed that MACK, CARNEGIE, WASHINGTON, and TERRELL had retaliated against others for the murder of Coconspirator-8.

aaa. On or about October 14, 2013, while incarcerated at the Essex County Correctional Facility, MACK told an associate, "I'm in the field. I'm beefin with niggas. I'm at war. I'm a gangsta." MACK further stated that rival gang members would kill MACK in order to advance their own status within their gang because, according to MACK, "You know how much blood's on my hands?"

bbb. On or about October 18, 2013, TERRELL used a social media account to post a photograph showing TERRELL at the Riverview Court Location with two individuals flanking him and aiming firearms at the camera, next to which TERRELL wrote: "My lil nigga's going 2 kill for me ABG 2 the end," thereby informing his followers that junior gang members were willing to

commit acts of violence on TERRELL's behalf. The term "ABG" stands for "Anybody Gets It," a violent subset of the NJ Grape Street Crips.

ccc. On or about October 22, 2013, HAMLET posted another message on social media disputing the rumor that HAMLET had purportedly cooperated with law enforcement and indicating that HAMLET would be retaliating against the individual whom HAMLET believed to be responsible for disseminating the rumor by writing, specifically: "This the last time I'm addressing this. For all you dick sucking niggas who slander me and back bite..... I never #Told #Ratted #Snitched on #NoOne ... #IDoMyTime #Trial #12InABox..... No-one on the planet is in jail because of me!!!!!!!!!!! For all you lames who saw this paperwork know it's a fraud and question my manhood can come get a sample !!!!!!!!!! If I don't speak please believe it's like that!!!!!!!!! You corny country nigga will never be on my level!!!!!!!!!!!!!!!! I play by the rules!!!!!!!!!! That's why a live nigga will never respect the antics of you cowards!!!!!! #Google the names you pet detective.... nothing adds up. But your [sic] got the right idea just the wrong nigga!!!!!! But now that you have my attention I'll play with you..... GM ig. Lmfao."

ddd. Shortly thereafter, between on or about October 22, 2013, and on or about October 24, 2013, HAMLET used social media to show his followers the power that he held, and the vast number of gang members and associates whom he could mobilize, as the leader of the NJ Grape Street Crips, by posting several photographs showing HAMLET standing in front of dozens of members and associates of the NJ Grape Street Crips, including

MACK and CARNEGIE, and by writing, among other things, "Fuck with me you know I got it!!!!!!!!!!!!!! #Literally," "Not all animals are allowed in the jungle!!!!!!!!!! #Hyenas and #Jackals #StayHungry #BreadBread or #Starve," and "#NoPasses #NoCompromise #NoWhereToRun!!!!!!!!!! #TeamTapYouOut."

eee. In or about October 2013, HAMLET met with Victim-1 at the Short Hills Mall, in Millburn, New Jersey, to discuss the ongoing dispute between HAMLET and Victim-1.

fff. On or about October 25, 2013, HAMLET used social media to inform his followers that Victim-1 was a "snitch" because Victim-1 had purportedly given a statement that led to the incarceration of one of HAMLET's associates, by posting on social media a report from the Essex County Prosecutor's Office purportedly showing that Victim-1 had provided a statement to law enforcement in a murder investigation.

ggg. On or about October 27, 2013, BATTS and other members of the NJ Grape Street Crips attempted to murder Victim-1 and Victim-4, who were shot multiple times while seated in a vehicle on a street in Newark, New Jersey. During the course of the attempted murder, BATTS sustained a gunshot wound to his hand when Coconspirator-10, a fellow gang member, accidentally shot BATTS through the hand while aiming at Victim-1 and Victim-4.

hhh. On or about October 27, 2013, following the attempted murder described in Overt Act 28(ggg), fellow gang members drove BATTS to

Saint Michael's Hospital in Newark, New Jersey, where BATTS provided a false name to police who interviewed him about his gunshot wound.

iii. On or about October 29, 2013, following the attempted murder described in Overt Act 28(ggg), HAMLET posted on social media a postcard that stated, "Rumors are carried by Haters spread by Fools & accepted by Idiots." In this post, HAMLET wrote, "#Sayless."

jjj. On or about November 3, 2013, BATTS, while incarcerated at the Essex County Correctional Facility, told an associate: "It's war time. . . . I was, I was hunting all week," referring to the attempted murder of Victim-1.

kkk. On or about November 6, 2013, BATTS, while incarcerated at the Essex County Correctional Facility, told an associate: "[Victim-1 and Victim-4] would have been done if they would never hit me. I'm talking about niggas was done, like, like, literally, done, like, no coming back, like." BATTS then said, "[Coconspirator-10] saved that nigga man. He saved that nigga man," referring to Coconspirator-10 who had accidentally shot BATTS in the hand, as described in Overt Act 28(ggg).

lll. On or about November 10, 2013, BATTS and Coconspirator-11 were together at the Court Street Location. While at the Court Street Location, BATTS possessed a Colt .45 caliber firearm, bearing serial number 39322-LW, and wore a flak-jacket. Coconspirator-11 was in possession of a Hi-Point S&W .40 caliber semi-automatic firearm with a defaced serial number and a quantity of cocaine.

mmm. Following the meeting, described in Overt Act 28(eee), between HAMLET and Victim-1 at the Short Hills Mall, which Victim-5, a member of the NJ Grape Street Crips, had helped set up, HAMLET authorized and directed fellow gang members to kill Victim-5 because, among other reasons, HAMLET believed that Victim-5 was too close to Victim-1 and that Victim-5 had been disloyal to HAMLET and the NJ Grape Street Crips.

nnn. On or about November 12, 2013, WASHINGTON lured Victim-5 into a Jeep Cherokee, the same vehicle used in the shooting described in Overt Act 28(tt).

ooo. On or about November 12, 2013, after WASHINGTON purposely left Victim-5 alone inside the Jeep Cherokee at or around the 6th Avenue Location, TERRELL shot Victim-5 once in the head.

ppp. On or about November 12, 2013, coconspirator Grimsley managed a heroin packaging operation on behalf of CURETON located in Newark, New Jersey (the "Heroin Mill"). Inside the Heroin Mill, CURETON, coconspirator Grimsley, and others had stored, among other things, more than one kilogram of heroin and numerous items used to cut and package heroin for distribution, including grinders, scales, rubber-bands, tape, and glassine envelopes with the stamp "Obama Care" in red ink.

qqq. On or about November 21, 2013, STAFFORD stored numerous glassine envelopes containing heroin with the stamp "Obama Care" in red ink inside his residence.

rrr. On or about November 27, 2013, BATTS, while incarcerated at the Essex County Correctional Facility, told an associate: "I was just in the streets mobbing . . . . Word is bond, I wanted to kill, yo, I was on a killing mission."

sss. In or about November 2013, HAMLET told Coconspirator-4 that Victim-6, a relative and associate of Victim-1, had to be killed.

ttt. On or about March 3, 2014, Coconspirator-12, driving a car in which HAMLET was a passenger ("Coconspirator-12's car"), pulled up next to a car driven by Victim-6 ("Victim-6's car"), which also had multiple passengers inside.

uuu. On or about March 3, 2014, HAMLET pointed a firearm at Victim-6 and the passengers inside Victim-6's car, prompting Victim-6 to speed off in an attempt to escape.

vvv. A short time later, on or about March 3, 2014, after HAMLET had gotten out of Coconspirator-12's car, Coconspirator-12 located Victim-6 and began to chase another vehicle in which Victim-6 and several other individuals were driving ("Victim-6's second car").

www. A short time later, on or about March 3, 2014, after Victim-6's second car crashed near the intersection of Irvine Turner Blvd. and Spruce Street, numerous shots were fired from Coconspirator-12's car in the direction of Victim-6, injuring Victim-6, killing Victim-7, who was a passenger in Victim-6's second car, and killing Victim 8, who was an innocent bystander.

xxx. On or about April 28, 2014, HAMLET spoke by telephone with Coconspirator-13, a member of the NJ Grape Street Crips, about collecting a debt that Coconspirator-13 owed to HAMLET.

yyy. On or about May 8, 2014, HAMLET received a telephone call from an individual during which the individual attempted to confirm that a third party had paid a sum of money to HAMLET, but HAMLET responded, "I don't do no phone shit but . . . you done dumbed it up," meaning that HAMLET did not discuss his criminal activities over the telephone.

zzz. In or about May 2014, members of the NJ Grape Street Crips operating at the 6th Avenue Location stored numerous firearms and assault rifles on a garage roof-top, including (i) a black .410 caliber assault rifle; (ii) a black .45 caliber Thompson semi-automatic carbine; (iii) a black 7.62 caliber assault rifle; and (iv) a black 9mm Cobray semi-automatic pistol.

aaaa. Between at least in or about May 2013 and in or about May 2015, VANDERHALL, CONCEPCION, HAMILTON, WASHINGTON, and others engaged in multiple acts of crack-cocaine distribution to other crack-cocaine distributors at or around the 6th Avenue Location.

bbbb. On or about December 5, 2013, members of the NJ Grape Street Crips stored seventeen (17) clips of crack-cocaine in a hidden compartment inside a 2000 blue Jeep Cherokee used by WASHINGTON—the same vehicle used in the shooting described in Overt Act 28(tt).

cccc. On or about June 20, 2014, CONCEPCION spoke by telephone with a drug customer who asked CONCEPCION, "How long it's going

to take you to get to the Ave? I need you. I got a sale." CONCEPCION responded, "I'm about to come right now."

dddd. On or about July 5, 2014, CARNEGIE spoke by telephone with HAMILTON. During the call, HAMILTON told CARNEGIE that the heroin stamped "twenty-four seven" was "rocking" and "that's the one, um, you were fucking with before." CARNEGIE told HAMILTON to "bring me something through, you heard?" HAMILTON agreed.

eeee. Later that same day, CARNEGIE spoke by telephone with HAMILTON, who agreed to bring CARNEGIE an additional three (3) bricks of heroin.

ffff. On or about July 20, 2014, HAMILTON agreed by telephone to provide a drug customer with ten (10) clips of crack-cocaine.

gggg. On or about July 20, 2014, CONCEPCION spoke by telephone with HAMILTON. During the call, HAMILTON told CONCEPCION that HAMILTON had given the drug phone to Coconspirator-14 and that Coconspirator-14 had sold fifty (50) clips of crack-cocaine the previous day.

hhhh. On or about July 21, 2014, HAMILTON spoke by telephone with Coconspirator-14. During the call, Coconspirator-14 told HAMILTON, "I got like twenty," meaning that Coconspirator-14 had twenty (20) clips of crack-cocaine remaining for sale.

iiii. On or about July 21, 2014, CONCEPCION spoke by telephone with HAMILTON. During the call, HAMILTON told CONCEPCION, "I got twenty-nine balls," referring to having twenty-nine (29) clips of crack-

cocaine remaining for sale. HAMILTON then confirmed that another coconspirator had "finished" selling his allotment of crack-cocaine.

jjjj. On or about July 22, 2014, CONCEPCION spoke by telephone with HAMILTON. During the call, CONCEPCION told HAMILTON that he (CONCEPCION) was "balling up a hundred," referring to one-hundred (100) clips of crack-cocaine. HAMILTON responded, "You need to do that man, I got like six," referring to having six (6) clips of crack-cocaine remaining for sale.

kkkk. On or about July 22, 2014, CONCEPCION and VANDERHALL had a conversation about the quality of a shipment of cocaine. In that call, VANDERHALL told CONCEPCION that the crack-cocaine "ain't completely dry all the way," after it had been cooked from powder cocaine into crack-cocaine. CONCEPCION told VANDERHALL "that shit on the money" and that VANDERHALL should "just let it dry."

llll. On or about August 19, 2014, VANDERHALL exchanged text messages with CONCEPCION. VANDERHALL told CONCEPCION, "U got it now if so give me 40 now an put 50 to the side for me," referring, respectively, to forty (40) and fifty (50) clips of crack-cocaine.

mmmm. On or about August 19, 2014, VANDERHALL ordered other members of the NJ Grape Street Crips to physically assault Victim-9.

nnnn. In or about August 2014, GUTIERREZ spoke by telephone with another individual. During the call, GUTIERREZ stated, "If he a

rat, it's a wrap. Cause I play the game how the game go, my nigga. I stick to the rules, you heard, son? I don't break the rules, my nigga, for nobody. And if he a rat, then--."

oooo. In or around August 2014, during an interview posted on www.YouTube.com concerning the content of his then-recently released hip-hop mixtape, CARNEGIE stated, "187 on all rats. That's like—y'all gonna hear about that shit all through the mixtape. If y'all don't hear anything else, y'all gonna hear about how we be straight rat killin on that shit. It ain't no love over here. If a nigga associating with them, they could die too." Across his back, CARNEGIE has a tattoo of the phrase "187 on all Rats," which appears above two smoking handguns and a skull with a gunshot wound through the skull's forehead.

pppp. In or about August 2014, CARNEGIE and SINGLETON appeared in and published a hip-hop video to inform their listeners that:

A. the NJ Grape Street Crips kill individuals who cooperate with law enforcement, by showing CARNEGIE and SINGLETON orchestrate the murder of a cooperating witness after CARNEGIE and SINGLETON were acquitted of murder charges, and by CARNEGIE stating specifically: "This is Dew Hi, live from the trap, nigga. And there's nothing more than I hate than a rat nigga. When I pull up, I hold a strap nigga. Cause whoever's standing next to you is getting blacked nigga. Associating with em,

you gonna die too. Send them youngins at you all, and they high too. AK-47. Bullets fly too. Man down"; and

B. the NJ Grape Street Crips would not cease their criminal activities even when charged with crimes by federal law enforcement, by CARNEGIE stating specifically: "Fuck the feds, they ain't stopping me. They tryina bury me with all that time, prosecutor has it out for me. I ain't sitting in the county, I'ma pop bail, I'ma go to trial, I'ma pick twelve, fuck these crackers, I ain't scared of no jail. Twenty-five to life, I ain't takin no L."

qqqq. On or about September 8, 2014, HAMLET posted on social media a photograph of the album cover of CARNEGIE and SINGLETON's mixtape, which included the songs referred to in Overt Act 28(pppp), and wrote, "I need everybody to checkout #MyBrothers . . . on there [sic] new.project #NoLackin #FastLane . . . #WeRunThisCity."

rrrr. On numerous occasions between at least in or about June 2014 through at least in or about August 2014, GUTIERREZ purchased distribution quantities of crack-cocaine from members and associates of the enterprise operating at the 6th Avenue Location and then sold that crack-cocaine to retail-level customers at or around the Riverview Court Location.

ssss. In or about September 2014, STAFFORD sold dozens of bricks of heroin stamped with the labels "Kiss my Ass" in red ink and "Spartacus" in green ink, in exchange for over $5,000 in United States currency.

tttt. In or about September 2014, CURETON sold dozens of bricks of heroin stamped with the labels "Kiss my Ass" in red ink and "Spartacus" in green ink, in exchange for over $5,000 in United States currency.

uuuu. On or about October 3, 2014, HAMLET and other members and associates of the NJ Grape Street Crips celebrated "ten-trey day" at the Pennington Court Location.

vvvv. On or about October 3, 2014, during the celebration, HAMLET and other gang members filmed a video threatening a Chicago-based rapper.

wwww. During the video, on or about October 3, 2014, HAMLET stated, "This your boy Castor Troy. Baby Loc. Hundred and third. Jordan Down. We got a message for you. We got a message. We Jersey. We got an issue for you, Chief."

xxxx. At this point in the video, on or about October 3, 2014, Coconspirator-15 stated, "I got an issue for you. You disrespect my block. All head shots. I ain't playing with you. South over Sosa. Shoot on sight, pussy! Play with me. Come through. We was waiting for you. We had the grips out and everything. Why you didn't come through?" When Coconspirator-15 used the phrases "all head shots" and "shoot on sight," he meant that the Chicago-based rapper should be killed. By using the phrase "we had the grips out," Coconspirator-15 meant that members of the NJ Grape

Street Crips had been armed with firearms waiting for the Chicago-based rapper.

yyyy. At this point in the video, on or about October 3, 2014, HAMLET then pushed Coconspirator-15 behind him and, while approaching the camera, said, "Jersey don't love you. You gets no money in my state. You gets no money in my state. Fuck you, Chief. Fuck you, Chief." HAMLET, Coconspirator-15, and the other gang members then flashed gang signs associated with the NJ Grape Street Crips.

zzzz. On or about March 17, 2015, during a trial at the Essex County Superior Court, SINGLETON attempted to intimidate Victim-10 by having members of the NJ Grape Street Crips in the courtroom while Victim-10 was called as a witness against SINGLETON. As a result of this intimidation, Victim-10 refused to testify against SINGLETON and the charges against him had to be dismissed. Shortly after the charges were dismissed, during a telephone call with a fellow gang member, SINGLETON bragged, "You know what, who, who you know cause ruckus on these motherfuckin streets, come home, do whatever the fuck they want, and still be out here son?"

aaaaa. On or about March 18, 2015, SINGLETON spoke with CARNEGIE, who was at the New Jersey Southern State Prison. During the call, SINGLETON told CARNEGIE about a dispute between SINGLETON and a younger member of the NJ Grape Street Crips who operated in and around the Georgia King Village public-housing complex (the "Ville"). SINGLETON told CARNEGIE that HAMLET had put Coconspirator-15 in charge

of the Ville. SINGLETON stated: "At the end of the day, if motherfuckin Mini-Me, Blizzie, and anybody say like, 'oh, this is what happened nigga,' like y'all ain't gonna second guess, y'all ain't question that shit or nothing, like," referring to the fact that other gang members would not question orders emanating from HAMLET or MACK.

bbbbb. On or about March 18, 2015, SINGLETON had a telephone conversation with VANDERHALL in which VANDERHALL stated that TERRELL needed $300 in U.S. currency to make bail in a criminal case. After VANDERHALL told SINGLETON that HAMLET and VANDERHALL had each agreed to provide $100 each, SINGLETON agreed to provide $100.

ccccc. Between at least in or around July 2013 and on or about May 5, 2015, SINGLETON and CARNEGIE engaged in multiple acts of heroin distribution to retail-level customers.

ddddd. On or about July 10, 2015, TERRELL conducted a heroin transaction at or around the Riverview Court Location.

eeeee. After the transaction, on or about July 10, 2015, TERRELL possessed, among other things, one (1) brick of heroin and tried to run away from police officers, who ultimately apprehended him.

fffff. On or about October 28, 2015, HAMLET used social media to post a postcard stating: "No Wonder Why The Game Fucked Up These Niggas Still Respect Known Snitchs [sic]." In this post, HAMLET wrote, "It's alot of you niggas that compromise your morals for a fucking dollar... And you wonder why I'm antisocial.... Niggas live by the he didn't tell on me rule....

Know if a snake bite once he gone repeat what he known when shit get thick.... We pick 12 over here!!!!," thereby informing his followers that members of the NJ Grape Street Crips who were charged in criminal cases chose to go to trial and would not cooperate with law enforcement.

ggggg. In or about November 2015, HAMLET instructed an individual ("Individual-1") interested in purchasing narcotics to speak with Coconspirator-16 and Coconspirator-17, both of whom were members of the NJ Grape Street Crips who sold heroin and crack-cocaine.

hhhhh. On or about November 20, 2015, while detained at the Essex County Correctional Facility, CARNEGIE and two coconspirators physically assaulted Victim-11 and Victim-12, in part, because Victim-11 and Victim-12 were associated with Victim-1.

All in violation of Title 18, United States Code, Section 1962(d).

NOTICE OF SPECIAL SENTENCING FACTORS REGARDING COUNT ONE

1. On or about May 3, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee," and
TONY PHILLIPS,
a/k/a "Blue,"

did knowingly and purposely cause the death and serious bodily injury resulting in death of another person, namely, Victim-2, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6, in violation of Title 18, United States Code, Section 1962.

2. From in or around March 2013 through on or about November 10, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me,"
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee," and
TONY PHILLIPS,
a/k/a "Blue,"

did knowingly and intentionally conspire and agree with each other and others to distribute, and to possess with intent to distribute, one kilogram or more of

a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a) and (b)(1)(A), in violation of Title 21, United States Code, Section 846.

3. From in or about May 2013 through in or about May 2015, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
HAKEEM VANDERHALL,
a/k/a "Keem,"
a/k/a "Sugar Bear,"
ERIC CONCEPCION,
a/k/a "Eddie Arroyo,"
a/k/a "E-Wax,"
a/k/a "Wax,"
JUSTIN CARNEGIE,
a/k/a "Dew Hi,"
a/k/a "Dew,"
a/k/a "D,"
AHMED SINGLETON,
a/k/a "Gangsta-Moo,"
a/k/a "Gangsta,"
a/k/a "Mooshie,"
JAMAR HAMILTON,
a/k/a "Gunner,"
a/k/a "Jamaal A. Hamilton,"
RASHAN WASHINGTON,
a/k/a "Shoota," and
JAMES S. GUTIERREZ,
a/k/a "Bad News,"

did knowingly and intentionally conspire and agree with each other and others to distribute, and to possess with intent to distribute, 280 grams or more of a mixture and substance containing a detectable amount of crack-cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code,

Sections 841(a) and (b)(1)(A), in violation of Title 21, United States Code, Section 846.

4. From in or about July 2013 through in or about May 2015, in Essex County, in the District of New Jersey, and elsewhere, defendants,

JUSTIN CARNEGIE,
a/k/a "Dew Hi,"
a/k/a "Dew,"
a/k/a "D," and
AHMED SINGLETON,
a/k/a "Gangsta Moo,"
a/k/a "Gangsta,"
a/k/a "Mooshie,"

did knowingly and intentionally conspire and agree with each other and others to distribute, and to possess with intent to distribute, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a) and (b)(1)(A), in violation of Title 21, United States Code, Section 846.

5. From in or about November 2013 through in or about May 2015, in Essex County, in the District of New Jersey, and elsewhere, defendants,

HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy," and
KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide,"

did knowingly and intentionally conspire and agree with each other and others to distribute, and to possess with intent to distribute, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule

I controlled substance, contrary to Title 21, United States Code, Sections 841(a) and (b)(1)(A), in violation of Title 21, United States Code, Section 846.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO
(Use and Carrying of a Firearm During a Crime of Violence)
(Defendants Hamlet, Batts, and Phillips)

On or about May 3, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee," and
TONY PHILLIPS,
a/k/a "Blue,"

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that is, the RICO conspiracy alleged in Count One, specifically including the murder of Victim-2 as charged in Paragraph One of the Notice of Special Sentencing Factors Regarding Count One and as described in Overt Acts 28(v) through 28(x) in Count One, did knowingly use and carry firearms, and, in furtherance of that crime, did possess firearms, which were discharged.

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

COUNT THREE
(Violent Crime in Aid of Racketeering – Conspiracy to Commit Murder)
(Defendants Hamlet, Mack, and Batts)

1. The allegations contained in Paragraphs One through Twenty-Eight of Count One of this Fourth Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. At all times relevant to this Fourth Superseding Indictment, the NJ Grape Street Crips 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 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 the objectives of the enterprise.

3. At all times relevant to this Fourth Superseding Indictment, the NJ Grape Street Crips, the above-described enterprise, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is:

a. Multiple acts involving murder, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:5-1(a), and 2C:5-2;

b. Multiple acts indictable under Title 18, United States Code, Section 1952 (use of interstate facilities to further unlawful activity);

c. Acts involving robbery, contrary to N.J.S.A. 2C:15-1, 2C:5-1(a), and 2C:5-2;

d. Acts indictable under Title 18, United States Code, Section 1512(a)(2) and 1512(d) (tampering with a witness, victim, or an informant);

e. Acts indictable under Title 18, United States Code, Section 894(a) (collection of extensions of credit by extortionate means); and

f. Multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance punishable under the laws of the United States, in violation of Title 21, United States Code, Section 846 (conspiracy to distribute and possess with intent to distribute controlled substances), Section 841 (distribution and possession with intent to distribute controlled substances), and Section 843(b) (use of a communications facility to violate the Controlled Substances Act).

4. From at least in or about August 2013, through on or about October 27, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me," and
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

for the purpose of gaining entrance to, and maintaining and increasing position in, the NJ Grape Street Crips, an enterprise engaged in racketeering activity, did knowingly and purposely conspire and agree with others to murder Victim-1, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:5-2.

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

COUNT FOUR
(Attempted Murder in Aid of Racketeering)
(Defendants Hamlet, Mack, and Batts)

1. The allegations contained in Paragraphs One through Three of Count Three of this Fourth Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about October 27, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me," and
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

for the purpose of gaining entrance to, and maintaining and increasing position in, the NJ Grape Street Crips, an enterprise engaged in racketeering activity, together with others known and unknown, did knowingly and purposely attempt to murder Victim-1, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:5-1(a).

In violation of Title 18, United States Code, Section 1959(a)(5), and Title 18, United States Code, Section 2.

COUNT FIVE
(Attempted Murder in Aid of Racketeering)
(Defendants Hamlet, Mack, and Batts)

1. The allegations contained in Paragraphs One through Three of Count Three of this Fourth Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about October 27, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me," and
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

for the purpose of gaining entrance to, and maintaining and increasing position in, the NJ Grape Street Crips, an enterprise engaged in racketeering activity, together with others known and unknown, did knowingly and purposely attempt to murder Victim-4, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:5-1(a).

In violation of Title 18, United States Code, Section 1959(a)(5), and Title 18, United States Code, Section 2.

COUNT SIX
(Violent Crime in Aid of Racketeering – Conspiracy to Assault with a Dangerous Weapon)
(Defendants Hamlet, Mack, and Batts)

1. The allegations contained in Paragraphs One through Three of Count Three of this Fourth Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. From in or about August 2013, through on or about October 27, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me," and
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

for the purpose of gaining entrance to, and maintaining and increasing position in, the NJ Grape Street Crips, an enterprise engaged in racketeering activity, together with others known and unknown, did knowingly and purposely conspire to assault Victim-1 with a dangerous weapon, specifically, a firearm, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:5-2.

In violation of Title 18, United States Code, Section 1959(a)(6).

COUNT SEVEN
(Assault with a Dangerous Weapon in Aid of Racketeering)
(Defendants Hamlet, Mack, and Batts)

1. The allegations contained in Paragraphs One through Three of Count Three of this Fourth Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about October 27, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me," and
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

for the purpose of gaining entrance to, and maintaining and increasing position in, the NJ Grape Street Crips, an enterprise engaged in racketeering activity, did knowingly and purposely assault Victim-1 with a dangerous weapon, specifically, a firearm, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:2-6.

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

COUNT EIGHT
(Assault with a Dangerous Weapon in Aid of Racketeering)
(Defendants Hamlet, Mack, and Batts)

1. The allegations contained in Paragraphs One through Three of Count Three of this Fourth Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about October 27, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me," and
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

for the purpose of gaining entrance to, and maintaining and increasing position in, the NJ Grape Street Crips, an enterprise engaged in racketeering activity, did knowingly and purposely assault Victim-4 with a dangerous weapon, specifically, a firearm, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:2-6.

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

COUNT NINE
(Use and Carrying of a Firearm During a Crime of Violence)
(Defendants Hamlet, Mack, and Batts)

On or about October 27, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me," and
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, specifically, the attempted murders charged in Count Four and Count Five of this Fourth Superseding Indictment and the assaults in aid of racketeering charged in Count Seven and Count Eight of this Fourth Superseding Indictment, did knowingly use and carry a firearm, and, in furtherance of that crime, did possess a firearm, which was discharged.

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

COUNT TEN
(Conspiracy to Possess Firearms)
(Defendants Mack and Batts)

From on or about October 5, 2013, through on or about October 27, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me," and
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, specifically, the conspiracy to commit murder as charged in Count Three of this Fourth Superseding Indictment, did knowingly and intentionally conspire and agree with each other and others to use and carry firearms, and, in furtherance of that crime, to possess firearms.

In violation of Title 18, United States Code, Section 924(o).

COUNT ELEVEN
(Assault with a Dangerous Weapon in Aid of Racketeering)
(Defendant Mack)

1. The allegations contained in Paragraphs One through Three of Count Three of this Fourth Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about October 7, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendant

KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me,"

for the purpose of gaining entrance to, and maintaining and increasing position in, the NJ Grape Street Crips, an enterprise engaged in racketeering activity, did knowingly and purposely assault another with a dangerous weapon, specifically, a firearm, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:2-6.

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

COUNT TWELVE
(Violent Crime in Aid of Racketeering –
Conspiracy to Assault with a Dangerous Weapon)
(Defendants Mack, Carnegie, Washington, and Terrell)

1. The allegations contained in Paragraphs One through Three of Count Three of this Fourth Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about October 7, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me,"
JUSTIN CARNEGIE,
a/k/a "Dew Hi,"
a/k/a "Dew,"
a/k/a "D,"
RASHAN WASHINGTON,
a/k/a "Shoota," and
AARON TERRELL,
a/k/a "Push,"

for the purpose of gaining entrance to, and maintaining and increasing position in, the NJ Grape Street Crips, an enterprise engaged in racketeering activity, together with others known and unknown, did knowingly and purposely conspire to assault another with a dangerous weapon, specifically, a firearm, contrary to N.J.S.A. 2C:12-1(b)(2) and 2C:5-2.

In violation of Title 18, United States Code, Section 1959(a)(6).

COUNT THIRTEEN
(Conspiracy to Possess a Firearm)
(Defendants Mack, Carnegie, Washington, and Terrell)

On or about October 7, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me,"
JUSTIN CARNEGIE,
a/k/a "Dew Hi,"
a/k/a "Dew,"
a/k/a "D,"
RASHAN WASHINGTON,
a/k/a "Shoota," and
AARON TERRELL,
a/k/a "Push,"

during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, specifically, the conspiracy to assault with a dangerous weapon in aid of racketeering as charged in Count Twelve of this Fourth Superseding Indictment and the racketeering conspiracy charged in Count One of this Fourth Superseding Indictment, did knowingly and intentionally conspire and agree with each other and others, to use and carry a firearm, and, in furtherance of those crimes, to possess a firearm.

In violation of Title 18, United States Code, Section 924(o).

COUNT FOURTEEN
(Use and Carrying of a Firearm in Furtherance of a Crime of Violence)
(Defendant Mack)

On or about October 7, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendant

KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me,"

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, specifically, the assault in aid of racketeering charged in Count Eleven of this Fourth Superseding Indictment and the racketeering conspiracy charged in Count One of this Fourth Superseding Indictment, did knowingly use and carry a firearm, and, in furtherance of that crime, did possess a firearm, namely, a Ruger Model P95DC 9mm semi-automatic pistol, bearing serial number 311-70017, which was discharged.

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

COUNT FIFTEEN
(Conspiracy to Distribute Heroin)
(Defendants Mack, Batts, and Phillips)

From in or around March 2013 through on or about November 10, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants,

KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me,"
COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee," and
TONY PHILLIPS,
a/k/a "Blue,"

did knowingly and intentionally conspire and agree with each other and others to distribute, and to possess with intent to distribute, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a) and (b)(1)(A).

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

COUNT SIXTEEN THROUGH COUNT EIGHTEEN
(Distribution, and Possession with Intent to Distribute, Heroin)
(Defendant Batts)

On or about the dates set forth in the table below, in Essex County, in the District of New Jersey, and elsewhere, defendant

COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

did knowingly and intentionally distribute, and possess with intent to distribute, a quantity of heroin, a Schedule I controlled substance.

Count	Date
16	July 2, 2013
17	August 15, 2013
18	September 26, 2013

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

COUNT NINETEEN
(Use and Carrying of a Firearm in Furtherance of a Drug Trafficking Crime)
(Defendant Mack)

From on or about October 3, 2013, through on or about October 7, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendant

KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me,"

during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, specifically, the conspiracy to distribute, and possess with intent to distribute, heroin charged in Count Fifteen of this Fourth Superseding Indictment, did knowingly use and carry a firearm, and, in furtherance of that crime, did possess a firearm.

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

COUNT TWENTY
(Use and Carrying of a Firearm in Furtherance of a Drug-Trafficking Crime)
(Defendant Batts)

On or about November 10, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendant

COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

during and in relation to a drug-trafficking crime for which he may be prosecuted in a court of the United States, specifically, the conspiracy to distribute, and possess with intent to distribute, heroin charged in Count Fifteen of this Fourth Superseding Indictment, did knowingly use and carry a firearm, and, in furtherance of that crime, did possess a firearm, namely, a Colt .45 caliber firearm, bearing serial number 39322-LW.

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

COUNT TWENTY-ONE
(Conspiracy to Distribute Crack-Cocaine)
(Defendants Hamlet, Vanderhall, Concepcion, Carnegie, Singleton, Hamilton, Washington, and Gutierrez)

From in or about May 2013 through in or about May 2015, in Essex County, in the District of New Jersey, and elsewhere, defendants,

COREY HAMLET,
a/k/a "C-Blaze,"
a/k/a "Blaze,"
a/k/a "Blizzie,"
a/k/a "Castor Troy,"
HAKEEM VANDERHALL,
a/k/a "Keem,"
a/k/a "Sugar Bear,"
ERIC CONCEPCION,
a/k/a "Eddie Arroyo,"
a/k/a "E-Wax,"
a/k/a "Wax,"
JUSTIN CARNEGIE,
a/k/a "Dew Hi,"
a/k/a "Dew,"
a/k/a "D,"
AHMED SINGLETON,
a/k/a "Gangsta-Moo,"
a/k/a "Gangsta,"
a/k/a "Mooshie,"
JAMAR HAMILTON,
a/k/a "Gunner,"
a/k/a "Jamaal A. Hamilton,"
RASHAN WASHINGTON,
a/k/a "Shoota," and
JAMES S. GUTIERREZ,
a/k/a "Bad News,"

did knowingly and intentionally conspire and agree with each other and others to distribute, and to possess with intent to distribute, 280 grams or more of a mixture and substance containing a detectable amount of crack-cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a) and (b)(1)(A).

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

COUNT TWENTY-TWO
(Continuing Criminal Enterprise)
(Defendants Vanderhall, Concepcion, Hamilton, and Washington)

From in or around May 2013 through in or around May 2015, in Essex County, in the District of New Jersey, and elsewhere, defendants,

HAKEEM VANDERHALL,
a/k/a "Keem,"
a/k/a "Sugar Bear,"
ERIC CONCEPCION,
a/k/a "Eddie Arroyo,"
a/k/a "E-Wax,"
a/k/a "Wax,"
JAMAR HAMILTON,
a/k/a "Gunner,"
a/k/a "Jamaal A. Hamilton," and
RASHAN WASHINGTON,
a/k/a "Shoota,"

did knowingly and intentionally engage in a continuing criminal enterprise in that each defendant knowingly and intentionally violated Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and 843(b), which violations include, but are not limited to, the substantive violations alleged in Count One of this Fourth Superseding Indictment, including Overt Acts 28(aaaa) through 28(llll), and in Count Twenty-One of this Fourth Superseding Indictment, which Counts and Overt Acts are realleged and incorporated by reference as though fully set forth in this Count, and which violations were part of a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801 *et seq.*, undertaken by the defendants in concert with at least five other persons with respect to whom the defendants occupied positions of organizer, supervisor, and any position of management,

and from which such continuing series of violations the defendants obtained substantial income and resources.

All in violation of Title 21, United States Code, Sections 848(a) and 848(c).

COUNT TWENTY-THREE
(Conspiracy to Distribute Heroin)
(Defendants Carnegie and Singleton)

From in or about July 2013 through in or about May 2015, in Essex County, in the District of New Jersey, and elsewhere, defendants,

JUSTIN CARNEGIE,
a/k/a "Dew Hi,"
a/k/a "Dew,"
a/k/a "D," and
AHMED SINGLETON,
a/k/a "Gangsta Moo,"
a/k/a "Gangsta,"
a/k/a "Mooshie,"

did knowingly and intentionally conspire and agree with each other and others to distribute, and to possess with intent to distribute, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a) and (b)(1)(A).

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

COUNT TWENTY-FOUR
(Conspiracy to Distribute Heroin)
(Defendants Cureton, Stafford, and Grimsley)

From in or about November 2013, through in or about May 2015, in Essex County, in the District of New Jersey, and elsewhere, defendants,

HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy,"
KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide," and
LATEEF GRIMSLEY,
a/k/a "Bird,"

did knowingly and intentionally conspire and agree with each other and others to distribute, and to possess with intent to distribute, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a) and (b)(1)(A).

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

COUNT TWENTY-FIVE
(Distribution, and Possession with Intent to Distribute, Heroin)
(Defendant Stafford)

From in or about November 2013, through in or about September 2014, in Essex County, in the District of New Jersey, and elsewhere, defendant

KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide,"

did knowingly and intentionally distribute, and possess with intent to distribute, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

COUNT TWENTY-SIX
(Distribution, and Possession with Intent to Distribute, Heroin)
(Defendant Cureton)

From in or about November 2013, through in or about September 2014, in Essex County, in the District of New Jersey, and elsewhere, defendant

HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy,"

did knowingly and intentionally distribute, and possess with intent to distribute, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

COUNT TWENTY-SEVEN
(Felon in Possession of a Firearm)
(Defendant Mack)

From on or about October 3, 2013, through on or about October 7, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendant

KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Essex County, did knowingly possess in and affecting commerce a firearm, namely, a Ruger Model P95DC 9mm semi-automatic pistol, bearing serial number 311-70017.

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

COUNT TWENTY-EIGHT
(Felon in Possession of a Firearm)
(Defendant Batts)

On or about November 10, 2013, in Essex County, in the District of New Jersey, and elsewhere, defendant

COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court of New Jersey, Essex County, did knowingly possess in and affecting commerce a firearm, namely, a Colt .45 caliber firearm, bearing serial number 39322-LW.

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

FORFEITURE ALLEGATION
(Defendant Mack)

1. The allegations contained in Counts One through Fourteen, Count Nineteen, and Count Twenty-Seven of this Fourth Superseding Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense set forth in Counts One through Fourteen, Count Nineteen, and Count Twenty-Seven of this Fourth Superseding Indictment, defendant

KWASI MACK,
a/k/a "Welchs,"
a/k/a "The Prince,"
a/k/a "Mini Me,"

shall forfeit to the United States any firearms and ammunition involved in and used in the commission of that offense, including the following: a Ruger Model P95DC 9mm semi-automatic pistol, bearing serial number 311-70017.

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

FORFEITURE ALLEGATION
(Defendant Batts)

1. The allegations contained in Counts One through Fourteen, Count Twenty, and Count Twenty-Eight of this Fourth Superseding Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in set forth in Counts One through Fourteen, Count Twenty, and Count Twenty-Eight of this Fourth Superseding Indictment, defendant

COREY BATTS,
a/k/a "C-Murder,"
a/k/a "Cee,"

shall forfeit to the United States any firearms and ammunition involved in and used in the commission of that offense, including the following: a Colt .45 caliber firearm, bearing serial number 39322-LW.

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

_____

Foreperson

Paul J. Fishman/rah

PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 14-220

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

COREY HAMLET et al.

FOURTH SUPERSEDING INDICTMENT FOR

18 U.S.C. §§ 922(g)(1), 924(c)(1)(A),
1959(a), 1962(d), and 2
21 U.S.C. §§ 841, 846, and 848

A True Bill,

Foreperson

PAUL J. FISHMAN
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