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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

AT 8:30 \_\_\_\_\_ M  
WILLIAM T. WALSH, CLERK

UNITED STATES OF AMERICA	:	Hon. Esther Salas
	:	
v.	:	Criminal No. 12-298 (ES)
	:	
	:	18 U.S.C. §§ 1962,
	:	1959, 1951, 2119, 924(c)
	:	21 U.S.C. § 846
	:	
FARAD ROLAND,	:	
a/k/a "B.U.," a/k/a "Uzi"	:	
MARK WILLIAMS	:	
a/k/a "B.G." and	:	
MALIK LOWERY	:	
a/k/a "LEEK"	:	
-----X		

SUPERSEDING INDICTMENT

COUNT ONE  
(Racketeering)

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

The Enterprise

1. At various times relevant to this Superseding  
Indictment, in the District of New Jersey and elsewhere,  
defendants FARAD ROLAND, a/k/a "B.U.," a/k/a "Uzi," MARK  
WILLIAMS, a/k/a "B.G.," MALIK LOWERY, a/k/a "LEEK," A.R., L.P.,  
K.L., A.B., A.W., D.S., F.B., AL.B., D.B., I.H. and others, were  
members and associates of a criminal organization, hereinafter  
referred to as the "South Side Cartel," that operated principally  
in Essex County, New Jersey.

2. As early as in or about 2002, a group variously

known as the "Carter Boyz" or the "Up the Hill Boyz" controlled the drug distribution of heroin and crack cocaine in an area along Hawthorne Avenue in Newark, New Jersey.

3. That group consisted mostly of individuals who had grown up in and around the Hawthorne Avenue area of Newark. The group maintained a base of operation for their drug trafficking activities at buildings located at 494 to 500 Hawthorne Avenue in Newark, known as the "Carter Buildings" and the "Twin Towers."

4. After 2002, the leaders of the "Carter Boyz," defendant Farad Roland, and his brother, A.R., among others, became members of the Bloods street gang.

5. In or around 2005 or 2006, the group variously known as the "Carter Boyz" and the "Up The Hill Boyz" formally adopted the name "South Side Cartel" and became a subset of the "793" Bloods street gang<sup>1</sup>.

6. The South Side Cartel has followed many of the same traditions and protocols of the Bloods street gang, 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

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<sup>1</sup>Reference to the South Side Cartel at all times herein includes the group previously known as the "Carter Boyz" and the "Up the Hill Boyz" as described above.

South Side Cartel;

c. Use of a system of rules and regulations which govern the Bloods, its membership, entry into the Bloods and conduct of members. These regulations establish a hierarchical membership structure, from senior rank to junior rank, such as "OOOG" (Triple OG; "OG" is short for "Original Gangster"); "OOG" (Double OG); "OG"; "Baby OG"; followed by captains, five star generals, lieutenants, sergeants and individual members, who are called soldiers;

d. Rules governing the Bloods that establish penalties for those who violate the rules and/or "disrespect" higher ranking members of the Bloods. Such penalties can include being stripped of one's 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 as "food."

7. The criminal activity of the South Side Cartel also included retaliation against persons who "disrespect" South Side Cartel members in general or the set itself, or who threaten or who are perceived to pose a threat to the gang's authority, power, or control of a neighborhood.

8 The South Side Cartel, including its leadership, membership and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that

is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The South Side Cartel was engaged in, and its activities affected, interstate and foreign commerce.

**Purposes of The South Side Cartel Enterprise**

9. The purposes of the South Side Cartel included the following:

a. enriching the members and associates of the enterprise, including those who were in prison, through, among other things, acts in violation of the laws of the United States and the State of New Jersey involving murder, kidnapping, assault with a dangerous weapon, robbery, threats of violence, and trafficking in controlled substances;

b. preserving and protecting the power and influence of the enterprise, and its members and associates, both in and out of prison, through the use of acts in violation of the laws of the United States and the State of New Jersey involving murder, attempted murder, conspiracy to commit murder, kidnapping, assault with a dangerous weapon, robbery, threats of violence, and trafficking in controlled substances; and

c. promoting and enhancing the enterprise and its members' and associates' reputation, both in and out of prison, as well as the South Side Cartel in general.

Methods and Means of the Enterprise

10. Among the methods and means by which the defendants and other members and associates of The South Side Cartel conducted and participated in the conduct of the affairs of The South Side Cartel were the following:

a. The South Side Cartel used violence, including acts involving murder and assault with a dangerous weapon, to avenge attacks or perceived slights against other members and associates of the South Side Cartel and the Bloods street gang; to punish enterprise members and associates who had fallen into disfavor; to punish enterprise members and associates who had been disloyal; to retaliate against rival gangs; to silence enterprise members and associates who were perceived to be cooperating with law enforcement against members and associates of the South Side Cartel and the Bloods street gang; and to enrich the enterprise and its members and associates by carjackings and other robberies.

b. Participation in criminal activity by a member or associate, particularly violent acts directed at rival gangs or as directed by the gang leadership, increased the respect accorded to that member or associate, resulted in that member or associate maintaining or increasing position in the gang, and could result in a promotion to a leadership position.

c. Members of the South Side Cartel were

specifically directed to carry or have immediate access to firearms, in order to protect themselves and threaten others in furtherance of the interests of the criminal enterprise.

d. Defendants and other members and associates of the South Side Cartel controlled the illegal drug trafficking along an area of Hawthorne Avenue in Newark, New Jersey. South Side Cartel members would distribute controlled substances, including heroin and cocaine base ("crack cocaine"), from areas within and around 494-500 Hawthorne Avenue in Newark, New Jersey. These buildings, in which the South Side Cartel members stored and distributed illegal controlled substances and kept firearms, were known as the "Carter Buildings," or the "Twin Towers."

**Roles of Defendants and Other Members and  
Associates of the South Side Cartel**

11. The members and associates of the South Side Cartel, under the leadership of defendant FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," and his brother A.R., including, MARK WILLIAMS, a/k/a "B.G." and MALIK LOWERY, a/k/a "LEEK," participated in unlawful and other activities in furtherance of the conduct of the South Side Cartel's affairs, as further described below:

a. Defendant FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," was the co-leader of the South Side Cartel and held a high-ranking position within the 793 set of the Bloods street gang. Among other activities, he carried out, and directed other

members and associates of the South Side Cartel in carrying out, unlawful and other activities in furtherance of the conduct of the South Side Cartel's affairs, including murder, assault, robbery and drug distribution.

b. Defendant MARK WILLIAMS, a/k/a "B.G.," was a member of the South Side Cartel who participated in the affairs of the South Side Cartel by, among other things, engaging in murder, assault, kidnapping and robbery.

c. Defendant MALIK LOWERY, a/k/a "LEEK," was a member of the South Side Cartel who participated in the affairs of the South Side Cartel by, among other things, engaging in murder, robbery and drug distribution.

**The Racketeering Violation**

12. From in or around March, 2004 through in or around March, 2011, in Essex County, in the District of New Jersey and elsewhere, defendants

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"  
MARK WILLIAMS, a/k/a "B.G.," and  
MALIK LOWERY, a/k/a "LEEK,"

together with others, known and unknown, being persons associated with the South Side Cartel, described above, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully and knowingly conducted and participated, directly and indirectly, in the conduct of the affairs of the South Side Cartel through a pattern of

racketeering activity, that is, through the commission of the following acts: Racketeering Acts One through Eleven, as set forth below.

The Pattern of Racketeering Activity

13. The pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisted of the following acts:

14. Racketeering Act One:  
Murder of A.B.

Defendants FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," MARK WILLIAMS, a/k/a "B.G.," and MALIK LOWERY, a/k/a "Leek," committed the following acts, either one of which alone constitutes the commission of Racketeering Act One:

a. Conspiracy to Murder A.B.

On or about October 20, 2007, in Essex County, in the District of New Jersey and elsewhere, defendants FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," MARK WILLIAMS, a/k/a "B.G.," and MALIK LOWERY, a/k/a "LEEK," did purposely conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, namely, A.B., contrary to N.J.S.A. Sections 2C:11-3 (a)(1) & (2), in violation of N.J.S.A. Section 2C:5-2.

b. Murder of A.B.

On or about October 20, 2007, in Essex County, in the District of New Jersey and elsewhere, defendants FARAD

ROLAND, a/k/a "B.U.," a/k/a "UZI," MARK WILLIAMS, a/k/a "B.G.," and MALIK LOWERY, a/k/a "LEEK," did purposely and knowingly cause the death and serious bodily injury resulting in death of another person, namely, A.B., in violation of N.J.S.A. Sections 2C:11-3 (a)(1) & (2) and 2C:2-6.

15. Racketeering Act Two:  
Murder of M.S.

Defendant FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," committed the following acts, either one of which alone constitutes the commission of Racketeering Act Two:

a. Conspiracy to Murder Patrons Outside the Oasis Bar

On or about March 27, 2008, in Essex County, in the District of New Jersey and elsewhere, defendant FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI" did purposely conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, contrary to N.J.S.A. Sections 2C:11-3 (a)(1) & (2), in violation of N.J.S.A. Section 2C:5-2.

b. Murder of M.S.

On or about March 27, 2008, in Essex County, in the District of New Jersey and elsewhere, defendant FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," did purposely and knowingly cause the death and serious bodily injury resulting in death of another person, namely, M.S., in violation of N.J.S.A. Sections 2C:11-3 (a)(1) & (2) and 2C:2-6.

16. Racketeering Act Three:  
Murder of K.P.

On or about March 27, 2008, in Essex County, in the District of New Jersey and elsewhere, defendant FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," did purposely and knowingly cause the death and serious bodily injury resulting in death of another person, namely, K.P., in violation of N.J.S.A. Sections 2C:11-3 (a)(1) & (2) and 2C:2-6.

17. Racketeering Act Four:  
Robbery of Mercedes Benz Vehicle

On or about December 28, 2007, in Essex County, in the District of New Jersey and elsewhere, defendants FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," and MARK WILLIAMS, a/k/a "B.G.," in the course of committing a theft of a 2003 Mercedes Benz, threatened another person with and purposely put another person in fear of immediate bodily injury, in violation of N.J.S.A. Sections 2C:15-1 (a)(2) and 2C:2-6.

18. Racketeering Act Five:  
Robbery of BMW Vehicle

On or about January 3, 2008, in Essex County, in the District of New Jersey and elsewhere, defendants MARK WILLIAMS, a/k/a "B.G.," and MALIK LOWERY, a/k/a "LEEK," in the course of committing a theft of a 2008 BMW, threatened another person with and purposely put another person in fear of immediate bodily injury, in violation of N.J.S.A. Sections 2C:15-1 and 2C:2-6.

19. Racketeering Act Six:  
Robbery of T.H.

Defendants FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," and MALIK LOWERY, a/k/a "LEEK," committed the following acts, either one of which alone constitutes the commission of Racketeering Act Seven:

a. Robbery of T.H. under New Jersey Law

On or about February 3, 2008, in Essex County, in the District of New Jersey and elsewhere, defendants FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," and MALIK LOWERY, a/k/a "LEEK," in the course of committing a theft, threatened another person with and purposely put another person in fear of immediate bodily injury, in violation of N.J.S.A. Sections 2C:15-1 (a) (2) and 2C:2-6.

b. Robbery of T.H. (Hobbs Act)

On or about February 3, 2008, in Essex County, in the District of New Jersey and elsewhere, defendants FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," and MALIK LOWERY, a/k/a "LEEK," did knowingly and wilfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by robbery, in that the defendant did unlawfully take and obtain personal property consisting of cocaine and a firearm, from the person of and in the presence of T.H., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property in his

custody and committed and threatened physical violence to persons and property in furtherance thereof, in violation of Title 18, United States Code, Section 1951(a) and Section 2.

20. Racketeering Act Seven:  
Drug Distribution

On or about February 3, 2008 through in or about February 8, 2008, in Essex County, in the District of New Jersey and elsewhere, defendant MALIK LOWERY, a/k/a "LEEK," did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance which contained cocaine and cocaine base ("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.

21. Racketeering Act Eight:  
Kidnapping and Robbery of W.D.

Defendant MARK WILLIAMS, a/k/a "B.G.," committed the following acts, either one of which alone constitutes the commission of Racketeering Act Eight:

a. Kidnapping

On or about September 29, 2008, in the Essex County, in the District of New Jersey and elsewhere, defendant MARK WILLIAMS, a/k/a "B.G.," and others did unlawfully remove W.D. from the place he was found and unlawfully confine W.D. with the purpose of holding W.D. for ransom and reward and as a shield and hostage, in violation of N.J.S.A. Sections 2C:13-1(a) and 2C:2-6.

b. Robbery of W.D. under New Jersey Law

On or about September 29, 2008, in Essex County, in the District of New Jersey and elsewhere, defendant MARK WILLIAMS, a/k/a "B.G.," and others, in the course of committing a theft, threatened another person with and purposely put another person in fear of immediate bodily injury, in violation of N.J.S.A. Sections 2C:15-1 (a) (2) and 2C:2-6.

22. Racketeering Act Nine:  
Conspiracy to Distribute Crack Cocaine and Heroin

From at least as early as in or about March, 2004 through in or about July, 2010, in Essex County, in the District of New Jersey and elsewhere, the defendants, FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," MARK WILLIAMS, a/k/a "B.G.," and MALIK LOWERY, a/k/a "LEEK," 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 cocaine base ("crack cocaine"), a Schedule II controlled substance, and one kilogram or more of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a) (1) and (B) (1) (A).

23. Racketeering Act Ten:  
Distribution of Cocaine Base ("Crack Cocaine") and Heroin

On or about March 25, 2004, in the Essex County, in the District of New Jersey and elsewhere, defendants FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," and MALIK LOWERY, a/k/a "LEEK," did knowingly and intentionally distribute and possess with intent to

distribute a mixture and substance which contained cocaine base ("crack cocaine"), a Schedule II controlled substance and heroin, a Schedule I 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.

24. Racketeering Act Eleven:  
Distribution of Heroin

On or about May 31, 2006, in the Essex County, in the District of New Jersey and elsewhere, defendant FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," did knowingly and intentionally distribute and possess with intent to distribute a mixture and substance which contained heroin, a Schedule I 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.

All in violation of Title 18, United States Code, Sections 1962(c) and 2.

COUNT TWO

(Racketeering Conspiracy)

1. Paragraphs one through eleven and thirteen through twenty-four of Count One of this Superseding Indictment are hereby realleged and incorporated as if fully set forth herein.

2. From in or around March, 2004 through in or around March, 2011 in Essex County, in the District of New Jersey and elsewhere, defendants

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"  
MARK WILLIAMS, a/k/a "B.G.," and  
MALIK LOWERY, a/k/a "LEEK,"

together with other persons, being persons associated with the South Side Cartel described above, an enterprise, which 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 South Side Cartel through a pattern of racketeering activity, as that term is defined by Title 18, United States Code, Sections 1961(1) and (5). The pattern of racketeering activity through which defendants agreed to conduct the affairs of the South Side Cartel consisted of the acts set forth in paragraphs fourteen through twenty-four of Count One of this Superseding Indictment, which are realleged and incorporated as if fully set forth herein.

3. It was a part of the conspiracy that defendants

agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the South Side Cartel.

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

COUNT THREE

(Violent Crime In Aid of Racketeering - Murder of A.B.)  
(Defendants Roland, Williams and Lowery)

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

2. At all times relevant to Count Three of this Superseding Indictment, in the District of New Jersey and elsewhere, defendants FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," MARK WILLIAMS, a/k/a "B.G.," and MALIK LOWERY, a/k/a "LEEK," were members or associates of the South Side Cartel, as more fully described in paragraphs one through eleven of Count One of this Superseding Indictment. 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.

3. At all times relevant to Count Three of this Superseding Indictment, the South Side Cartel, 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. acts involving murder, kidnapping and robbery under the laws of the state of New Jersey;

b. Hobbs Act robbery, in violation of Title 18,

United States Code, Section 1951(a); and

c. distribution of controlled substances and conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

4. On or about October 20, 2007, in Essex County, in the District of New Jersey and elsewhere, defendants

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"  
MARK WILLIAMS, a/k/a "B.G.," and  
MALIK LOWERY, a/k/a "LEEK,"

for the purpose of gaining entrance to and maintaining and increasing position in the South Side Cartel, which enterprise was engaged in racketeering activity, did knowingly and purposely murder A.B., contrary to N.J.S.A. Sections 2C:11-3 (a)(1) & (2) and 2C:2-6.

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

COUNT FOUR

(Possession, Use and Carrying of a Firearm for Violent Crime)  
(Defendants Roland, Williams and Lowery)

1. On or about October 20, 2007, in Essex County, in the District of New Jersey, and elsewhere, defendant,

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"  
MARK WILLIAMS a/k/a "B.G.," and  
MALIK LOWERY, a/k/a "LEEK"

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the Murder in Aid of Racketeering alleged in Count Three of this Superseding Indictment, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was discharged.

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

**COUNT FIVE**

(Violent Crime In Aid of Racketeering - Murder of M.S.)  
(Defendant Roland)

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

2. The allegations contained in paragraphs one through three of Count Three of this Superseding Indictment are hereby realleged and incorporated by reference as though set forth fully herein.

3. On or about March 27, 2008, in Essex County, in the District of New Jersey and elsewhere, defendant

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"

for the purpose of gaining entrance to and maintaining and increasing position in the South Side Cartel, which enterprise was engaged in racketeering activity, did knowingly and purposely murder M.S., contrary to N.J.S.A. Sections 2C:11-3 (a)(1) & (2) and 2C:2-6.

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

COUNT SIX

(Violent Crime In Aid of Racketeering - Murder of K.P.)  
(Defendant Roland)

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

2. The allegations contained in paragraphs one through three of Count Three of this Superseding Indictment are hereby realleged and incorporated by reference as though set forth fully herein.

3. On or about March 27, 2008, in Essex County, in the District of New Jersey and elsewhere, defendant

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"

for the purpose of gaining entrance to and maintaining and increasing position in the South Side Cartel, which enterprise was engaged in racketeering activity, did knowingly and purposely murder K.P., contrary to N.J.S.A. Sections 2C:11-3 (1) & (2) and 2C:2-6.

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

**COUNT SEVEN**

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

1. On or about March 27, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant,  
FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"  
during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the Murder in Aid of Racketeering alleged in Count Five of this Superseding Indictment, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was discharged.

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

**COUNT EIGHT**

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

1. On or about March 27, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant,

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the Murder in Aid of Racketeering alleged in Count Six of this Superseding Indictment, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was discharged.

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

**COUNT NINE**  
(Carjacking)  
(Defendants Roland and Williams)

1. On or about December 28, 2007, in Essex County, in the District of New Jersey, and elsewhere, defendants

FARAD ROLAND, a/k/a "B.U.," and  
MARK WILLIAMS, a/k/a "B.G.,"

with intent to cause death and serious bodily harm took a motor vehicle, that is, a 2003 Mercedes Benz, with a vehicle identification number ("VIN") ending in 5917, that had been transported, shipped and received in interstate and foreign commerce, from the person and presence of another by force and violence and by intimidation.

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

**COUNT TEN**

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

1. On or about December 28, 2007, in Essex County, in the District of New Jersey, and elsewhere, defendants

FARAD ROLAND, a/k/a "B.U.," and  
MARK WILLIAMS, a/k/a "B.G.,"

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, the Carjacking alleged in Count Nine of this Superseding Indictment, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was brandished.

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

COUNT ELEVEN  
(Carjacking)  
(Defendants Williams and Lowery)

1. On or about January 3, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendants

MARK WILLIAMS, a/k/a "B.G.," and  
MALIK LOWERY, a/k/a "LEEK,"

with intent to cause death and serious bodily harm took a motor vehicle, that is, a 2008 BMW, with a vehicle identification number ("VIN") ending in 1788, that had been transported, shipped and received in interstate and foreign commerce, from the person and presence of another by force and violence and by intimidation.

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

**COUNT TWELVE**

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

1. On or about January 3, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendants,

MARK WILLIAMS, a/k/a "B.G." and  
MALIK LOWERY, a/k/a "LEEK,"

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, the Carjacking alleged in Count Thirteen of this Superseding Indictment, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was brandished.

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

**COUNT THIRTEEN**

(Hobbs Act Robbery of T.H.)  
(Defendants Roland and Lowery)

1. On or about February 3, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendants

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI," and  
MALIK LOWERY, a/k/a "LEEK,"

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, in that the defendants did unlawfully take and obtain personal property consisting of a controlled substance, namely, cocaine and a firearm, from the persons of and in the presence of T.H., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property in his custody.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

**COUNT FOURTEEN**

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

1. On or about February 3, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendants,

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"  
MALIK LOWERY, a/k/a "LEEK"

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, the Robbery alleged in Count Thirteen of this Superseding Indictment, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was brandished.

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

**COUNT FIFTEEN**

(Violent Crimes In Aid of Racketeering - Assault with a Dangerous  
Weapon of L.P.)  
(Defendant Roland)

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

2. The allegations contained in paragraphs one through three of Count Three of this Superseding Indictment are hereby realleged and incorporated by reference as though set forth fully herein.

3. On or about June 24, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"  
for the purpose of gaining entrance to and maintaining and increasing position in the South Side Cartel, an enterprise engaged in racketeering activity, did knowingly and purposely assault L.P. with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:12-1 (b)(2) and 2C:2-6.

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

**COUNT SIXTEEN**

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

1. On or about June 24, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant,

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the Assault with a Dangerous Weapon in Aid of Racketeering alleged in Count Fifteen of this Superseding Indictment, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was discharged.

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

**COUNT SEVENTEEN**

(Violent Crimes In Aid of Racketeering - Assault with a Dangerous  
Weapon of W.D.)  
(Defendant Williams)

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

2. The allegations contained in paragraphs one through three of Count Three of this Superseding Indictment are hereby realleged and incorporated by reference as though set forth fully herein.

3. On or about September 29, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant

MARK WILLIAMS, a/k/a "B.G.,"

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

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

**COUNT EIGHTEEN**

(Violent Crimes In Aid of Racketeering - Kidnapping of W.D.)  
(Defendant Williams)

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

2. The allegations contained in paragraphs one through three of Count Three of this Superseding Indictment are hereby realleged and incorporated by reference as though set forth fully herein.

3. On or about September 29, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant

MARK WILLIAMS, a/k/a "B.G.,"

for the purpose of gaining entrance to and maintaining and increasing position in the South Side Cartel, an enterprise engaged in racketeering activity, did kidnap W.D., contrary to N.J.S.A. Sections 2C:13-1(a) and 2C:2-6.

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

**COUNT NINETEEN**

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

1. On or about September 29, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant,

MARK WILLIAMS, a/k/a "B.G.,"

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the Assault with a Dangerous Weapon in Aid of Racketeering alleged in Count Seventeen of this Superseding Indictment, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was discharged.

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

COUNT TWENTY

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

1. On or about September 29, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant,

MARK WILLIAMS, a/k/a "B.G.,"

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the Kidnapping in Aid of Racketeering alleged in Count Eighteen of this Superseding Indictment, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was discharged.

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

COUNT TWENTY-ONE

(Violent Crimes In Aid of Racketeering - Assault with a Dangerous  
Weapon of M.D.)  
(Defendant Williams)

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

2. The allegations contained in paragraphs one through three of Count Three of this Superseding Indictment are hereby realleged and incorporated by reference as though set forth fully herein.

3. On or about October 26, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant

MARK WILLIAMS, a/k/a "B.G.,"

for the purpose of gaining entrance to and maintaining and increasing position in the South Side Cartel, an enterprise engaged in racketeering activity, did knowingly and intentionally assault M.D. with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:12-1(b)(2) and 2C:2-6.

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

COUNT TWENTY-TWO

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

1. On or about October 26, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant,

MARK WILLIAMS, a/k/a "B.G.,"

during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the Assault with a Dangerous Weapon in Aid of Racketeering alleged in Count Twenty-Two of this Superseding Indictment, did knowingly use, carry, and in furtherance of such crime, possess a firearm, which was discharged.

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

**COUNT TWENTY-THREE**

(Violent Crimes In Aid of Racketeering - Assault with a Dangerous  
Weapon of R.B.)  
(Defendant Roland)

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

2. The allegations contained in paragraphs one through three of Count Three of this Superseding Indictment are hereby realleged and incorporated by reference as though set forth fully herein.

3. On or about February 12, 2009, in Essex County, in the District of New Jersey, and elsewhere, defendant

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"  
for the purpose of gaining entrance to and maintaining and increasing position in the South Side Cartel, an enterprise engaged in racketeering activity, did knowingly and intentionally assault R.B. with a dangerous weapon, specifically a firearm, contrary to N.J.S.A. Sections 2C:12-1(b)(2) and 2C:2-6.

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

**COUNT TWENTY-FOUR**

(Conspiracy to Distribute Cocaine Base ("Crack Cocaine")  
and Heroin)

(Defendants Roland, Williams and Lowery)

1. From at least as early as in or about March 2004 through in or about July 2010, in Essex County, in the District of New Jersey and elsewhere, the defendants,

FARAD ROLAND, a/k/a "B.U.," a/k/a "UZI,"  
MARK WILLIAMS, a/k/a "B.G.," and  
MALIK LOWERY, a/k/a "LEEK,"

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 cocaine base ("crack cocaine"), a Schedule II controlled substance, and one kilogram or more of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

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

  
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PAUL J. FISHMAN  
UNITED STATES ATTORNEY

CASE NUMBER: 12-298 (ES)

**United States District Court  
District of New Jersey**

**UNITED STATES OF AMERICA**

**v.  
FARAD ROLAND,  
a/k/a "B.U.," a/k/a "Uzi,"  
MARK WILLIAMS,  
a/k/a "B.G.,"  
MALIK LOWERY,  
a/k/a "LEEK"**

**SUPERSEDING INDICTMENT**

18 U.S.C. §§ 1962, 1959, 1951, 2119  
18 U.S.C. § 924 (c)  
18 U.S.C. § 2  
21 U.S.C. § 846

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