

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10-</u>
v.	:	DATE FILED: <u>9-22-2010</u>
RAMEL MOTEN,	:	VIOLATIONS:
a/k/a "Smiz,"	:	18 U.S.C. § 1962(d) (conspiracy to
a/k/a "Smelly,"	:	participate in a racketeering enterprise -
MERRELL HOBBS,	:	1 count)
a/k/a "Rel,"	:	21 U.S.C. § 846 (conspiracy to distribute
a/k/a "Murder,"	:	280 grams or more of cocaine base
OMAR ROANE,	:	("crack") - 1 count)
a/k/a "Little O,"	:	18 U.S.C. § 1959(a)(3) (assault in aid of
TERRANCE HAMM,	:	racketeering activity - 6 counts)
a/k/a "Tae,"	:	18 U.S.C. § 1959(a)(5) (attempted murder
REGINALD STEPHENS,	:	in aid of racketeering - 1 count)
a/k/a "Big Reg,"	:	18 U.S.C. § 1951 (attempted robbery
DAMON TURNER,	:	which interferes with commerce - 4
a/k/a "Dame,"	:	counts)
BRYAN HILL,	:	18 U.S.C. § 2119 (carjacking - 2 counts)
a/k/a "B,"	:	21 U.S.C. § 841 (distribution and
WARREN STOKES,	:	possession with intent to distribute
a/k/a "Geez,"	:	cocaine base ("crack") - 20 counts)
ALLEN PARKER,	:	21 U.S.C. § 841 (distribution and
a/k/a "AP,"	:	possession with intent to distribute
KHALIL ALLEN,	:	marijuana - 3 counts)
a/k/a "Boo Allen,"	:	21 U.S.C. § 841 (possession with intent to
ANDRE TILLER,	:	distribute cocaine - 1 count)
a/k/a "Dre,"	:	21 U.S.C. § 843(b) (use of a telephone in
TAYALE SHELTON,	:	furtherance of a drug crime - 2 counts)
a/k/a "Ty,"	:	18 U.S.C. § 924(c) (use and carrying of a
HIKEEM TORRENCE,	:	firearm during and in relation to a crime
a/k/a "Hak,"	:	of violence - 14 counts)
CAROL MILES	:	18 U.S.C. § 922(g)(1) (possession of a
SHYHEEM DAVIS,	:	firearm and/or ammunition by a
a/k/a "Shy,"	:	convicted felon - 15 counts)

:

MELIKA PARKER

RONEISHA SCOTT : 18 U.S.C. § 922(a)(1)(A) (engaging in the
 : illegal dealing of firearms - 1 count)
 : 21 U.S.C. § 856 (maintaining a drug-
 : involved premises - 2 counts)
 : 26 U.S.C. § 5861 (receipt of non-
 : registered short barreled rifle - 2 counts)
 : 18 U.S.C. § 2 (aiding and abetting) Notice
 : of forfeiture
 : **UNDER SEAL**

INDICTMENT

COUNT ONE

CONSPIRACY TO PARTICIPATE IN A RACKETEERING (RICO) ENTERPRISE
18 U.S.C. § 1962(d)

THE GRAND JURY CHARGES THAT:

THE RACKETEERING ENTERPRISE

1. At all times material to this indictment, the defendants

RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Smelly,”
MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”
OMAR ROANE,
a/k/a “Little O,”
TERRANCE HAMM,
a/k/a “Tae,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
WARREN STOKES,
a/k/a “Geez,”
ALLEN PARKER,
a/k/a “AP,”
KHALIL ALLEN,

**a/k/a “Boo Allen,”
ANDRE TILLER,
a/k/a “Dre,”
TAYALE SHELTON,
a/k/a “Ty,”
HIKEEM TORRENCE,
a/k/a “Hak,” and
SHYHEEM DAVIS,
a/k/a “Shy,”**

and others known and unknown to the grand jury, were members and associates of the “Harlem Boys,” a criminal organization whose members and associates engaged in narcotics distribution and acts of violence, including acts involving attempted murder and robbery, and which operated principally in the Bartram Village Housing Development (BVHD) and its surrounding areas, in Philadelphia, Pennsylvania.

2. The “Harlem Boys,” including its leadership, members, and associates, constituted an “enterprise,” as that term is 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 and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate commerce.

PURPOSES OF THE ENTERPRISE

3. The purposes of the enterprise included the following:

a. Enriching the members and associates of the enterprise through, among other things, murder, robbery, the sale of firearms, and the distribution of controlled substances, including cocaine base (“crack”) and marijuana, and prescription medications including oxycodone and xanax.

b. Preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, threats of violence, assaults, and murder.

c. Keeping victims in fear of the enterprise and in fear of its members and associates through threats of violence and violence.

d. Promoting and enhancing the enterprise by providing financial support and information to members of the enterprise, including those who were incarcerated for committing acts of violence, robbery, narcotics distribution, and other offenses.

THE DEFENDANTS AND THEIR ROLES IN THE ENTERPRISE

4. The defendants participated in the operation and management of the enterprise as follows:

(a) Defendant RAMEL MOTEN, a/k/a “Smiz,” a/k/a “Smelly,” participated in the “Harlem Boys” as a supplier and distributor of illegal narcotics and as a lead gunman for the enterprise. Defendant MOTEN frequently provided firearms to other “Harlem Boys” for use in robberies.

(b) Defendant MERRELL HOBBS, a/k/a “Rel,” a/k/a “Murder,” participated in the “Harlem Boys” as a distributor of illegal narcotics and as a gunman for the enterprise. Defendant HOBBS committed a carjacking and several assaults with a deadly weapon, frequently with other enterprise members.

(c) Defendant OMAR ROANE, a/k/a “O,” a/k/a “Little O,” participated in the “Harlem Boys” as a distributor of illegal narcotics and as a gunman for the enterprise. Defendant ROANE committed a carjacking and several assaults with a deadly weapon, frequently with other enterprise members.

(d) Defendant TERRANCE HAMM, a/k/a “Tae,” participated in the “Harlem Boys” as a supplier and distributor of illegal narcotics and as a gunman for the enterprise.

(e) Defendant REGINALD STEPHENS, a/k/a “Big Reg,” participated in the “Harlem Boys” as a distributor of illegal narcotics and as a gunman for the enterprise.

(f) Defendant DAMON TURNER, a/k/a “Dame,” participated in the “Harlem Boys” as a distributor of illegal narcotics and as a gunman for the enterprise. Defendant TURNER frequently controlled the drug sales from the Village Deli, located directly across the street from the entrance to BVHD.

(g) Defendant BRYAN HILL, a/k/a “B,” participated in the “Harlem Boys” as a distributor of illegal narcotics and as a gunman for the enterprise.

(h) Defendant WARREN STOKES, a/k/a “Geez,” participated in the “Harlem Boys” as a distributor of illegal narcotics and as a gunman for the enterprise.

(i) Defendant ALLEN PARKER, a/k/a “AP,” participated in the “Harlem Boys” as a gunman for the enterprise.

(j) Defendant KHALIL ALLEN, a/k/a “Boo Allen,” participated in the “Harlem Boys” as a distributor of illegal narcotics for the enterprise.

(k) Defendant ANDRE TILLER, a/k/a “Dre,” participated in the “Harlem Boys” as a distributor of illegal narcotics for the enterprise.

(l) Defendant TAYALE SHELTON, a/k/a “Ty,” participated in the “Harlem Boys” as a distributor of illegal narcotics and as a gunman for the enterprise.

(m) Defendant HIKEEM TORRENCE, a/k/a “Hak,” participated in the “Harlem Boys” as a distributor of illegal narcotics and as a gunman for the enterprise.

(n) Defendant SHYHEEM DAVIS, a/k/a “Shy,” participated in the “Harlem Boys” as a distributor of illegal narcotics and as a gunman for the enterprise.

MANNER AND MEANS OF THE ENTERPRISE

5. Among the manner, means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:

(a) Members of the enterprise and their associates committed, attempted, and threatened to commit acts of violence, including murder and robbery, to protect and expand the enterprise’s criminal operations.

(b) Members of the enterprise and their associates promoted a climate of fear through violence and threats of violence.

(c) Members of the enterprise and their associates used and threatened to use physical violence against various individuals.

(d) Members supported each other by carrying firearms and assisting each other in robberies and shootings. Targets for robberies found by one member of the enterprise were frequently targeted by multiple members of the enterprise, who agreed to share in the profits of the robberies.

(e) Members obtained, possessed, used, and carried firearms, during and in relation to the commission of crimes that benefitted the enterprise, and traded guns among themselves as needed to use during acts of violence, such as robberies, carjackings, and assaults, as well as when selling controlled substances for the “Harlem Boys.”

(f) Members committed and conspired, attempted, and threatened to commit, acts of violence against individuals from outside the BVHD who entered the BVHD

without the consent of the enterprise. Members committed and conspired to commit acts of violence against persons whom they believed might be trying to sell controlled substances within the BVHD, but also committed and conspired to commit acts of violence against persons whom they believed did not “belong” within BVHD.

(g) Many of the members of the enterprise marked their bodies with several distinguishing tattoos, including “54,” often split with one number on each hand or forearm, referring to the location of the BVHD on 54th Street, and “YHM,” for the “Young Hit Men.” Several of the members of the enterprise also obtained a tattoo bearing the letters “SWP,” signifying their geographic origin in southwest Philadelphia.

(h) Members of the enterprise marked the territory that they controlled within the BVHD by placing graffiti on the walls of buildings, including “54,” and “BVP,” located on the sides of several buildings within the BVHD.

(i) Members distributed, sold, and possessed with intent to distribute controlled substances, primarily cocaine base (“crack”), but also marijuana, cocaine, and prescription medications, such as oxycodone and Xanax, within 1000 feet of a public elementary school in Philadelphia, that is, the Richard Allen Preparatory School, located at 5700 Lindbergh Boulevard, as well as on or near the playground and basketball courts within the BVHD, with the permission, and under the supervision, of the enterprise, the proceeds of which were used directly and indirectly to benefit the enterprise.

(j) Members used apartments inside the BVHD rented by women who were paid by members of the enterprise in cash, drugs, or both. Members used these apartments to cook and store cocaine base (“crack”) and firearms, and as sales locations for controlled substances.

THE RACKETEERING CONSPIRACY

6. From at least as early as in or about October 2001, to on or about the date of the return of this indictment, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
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MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”
OMAR ROANE,
a/k/a “Little O,”
TERRANCE HAMM,
a/k/a “Tae,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
WARREN STOKES,
a/k/a “Geez,”
ALLEN PARKER,
a/k/a “AP,”
KHALIL ALLEN,
a/k/a “Boo Allen,”
ANDRE TILLER,
a/k/a “Dre,”
TAYALE SHELTON,
a/k/a “Ty,”
HIKEEM TORRENCE,
a/k/a “Hak,” and
SHYHEEM DAVIS,
a/k/a “Shy,”**

being persons employed by and associated with an enterprise alternatively known as the “Harlem Boys,” “5-4’s,” and “Young Hit Men,” (hereafter “Harlem Boys”) as more fully described in paragraphs 1 through 5 of this count, which enterprise was engaged in, and the activities of which affected, interstate commerce, conspired and agreed, together, and with others known and unknown

to the grand jury, to violate Title 18, United States Code, Section 1962(c), that is, to knowingly and unlawfully conduct and participate, directly and indirectly, in the conduct of the affairs of such enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Section 1961(1) and (5), which consisted of multiple acts involving:

a. the receiving, concealing, selling, and otherwise dealing in controlled substances, and conspiracy to distribute controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1);

b. murder, which is chargeable under Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502, 901, and 903, of the laws of the Commonwealth of Pennsylvania; and

c. robbery, which is chargeable under Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 3701, 901 and 903, of the laws of the Commonwealth of Pennsylvania;

and multiple acts indictable under:

a. Title 18, United States Code, Section 1951(a) (robbery).

THE AGREEMENT

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

OVERT ACTS

In furtherance of the conspiracy, and to effect the objects of the conspiracy, the defendants, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

(1) On or about October 20, 2001, defendant BRYAN HILL and RAMEL MOTEN, then a juvenile, possessed with intent to distribute crack cocaine and marijuana, and possessed an Intratec .22 caliber semi-automatic handgun with an obliterated serial number.

(2) On or about May 21, 2002, defendant REGINALD STEPHENS possessed with intent to distribute approximately 3 grams of crack cocaine and marijuana.

(3) On or about February 21, 2004, defendant REGINALD STEPHENS, while armed with a firearm, assaulted and shot an unknown male, at 5519 Lindbergh Boulevard in Philadelphia.

(4) On or about July 29, 2004, defendant BRYAN HILL possessed a Bryco Arms, Model Jennings Nine, .9mm semi-automatic pistol, loaded with 13 live rounds of ammunition.

(5) On or about December 29, 2004, defendant RAMEL MOTEN possessed with intent to distribute crack cocaine and marijuana.

(6) On or about January 11, 2005, defendant ANDRE TILLER distributed, and possessed with intent to distribute crack cocaine.

(7) On or about February 10, 2005, defendant BRYAN HILL possessed with intent to distribute approximately 13.5 grams of marijuana, numerous empty ziplock packets, and a Colt, Model Official Police, .38 caliber revolver, serial number 843587, loaded with four live rounds of ammunition.

(8) On or about January 3, 2006, defendant ANDRE TILLER distributed and possessed with intent to distribute crack cocaine.

(9) On or about August 10, 2006, defendants OMAR ROANE and MERRELL HOBBS, carjacked K.S.'s vehicle, by pointing a gun at K.S., stealing K.S.'s car keys, and firing shots in the direction of K.S. and others as they drove away in the carjacked vehicle.

(10) On or about August 11, 2006, defendant DAMON TURNER possessed with intent to distribute five grams or more of crack cocaine.

(11) On or about October 3, 2006, defendant BRYAN HILL distributed crack cocaine.

(12) On or about October 5, 2006, defendants OMAR ROANE and ALLEN PARKER, while armed with a firearm, assaulted and shot at J.C., a person known to the grand jury.

(13) On or about October 10, 2006, defendant KHALIL ALLEN possessed with intent to distribute marijuana.

(14) On or about October 24, 2006, defendant ANDRE TILLER distributed crack cocaine.

(15) On or about November 14, 2006, defendant TERRANCE HAMM distributed crack cocaine.

(16) On or about November 28, 2006, defendant REGINALD STEPHENS possessed with intent to distribute approximately 20 grams of marijuana.

(17) On or about November 28, 2006, defendant OMAR ROANE possessed with intent to distribute approximately 20 grams of marijuana.

(18) On or about February 16, 2007, defendant OMAR ROANE distributed crack cocaine.

(19) On or about February 22, 2007, defendant TERRANCE HAMM distributed crack cocaine.

(20) On or about February 27, 2007, defendant TERRANCE HAMM took cash as payment for crack cocaine, then refused to deliver the drugs, and threatened to shoot the individual who supplied the cash when he attempted to get the money back.

(21) On or about March 27, 2007, defendant REGINALD STEPHENS distributed crack cocaine from the apartment controlled by defendant MELIKA PARKER, 5400 Harley Terrace, Apartment 3A in Philadelphia.

(22) On or about April 5, 2007, defendants TERRANCE HAMM, REGINALD STEPHENS, and OMAR ROANE distributed crack cocaine from defendant MELIKA PARKER'S apartment.

(23) On or about June 19, 2007, defendant DAMON TURNER distributed marijuana.

(24) On or about June 26, 2007, defendant DAMON TURNER possessed a Norinco MAK-90, semi-automatic assault rifle, serial number 9428727, loaded with 13 live rounds of ammunition, and drug paraphernalia, including bowl, plate, and razor blades containing crack cocaine residue, and drug packaging materials.

(25) On or about October 11, 2007, defendant OMAR ROANE illegally possessed a firearm, that is, a Sig Sauer, Model P229, .357 caliber semi-automatic pistol, serial number AE 27373.

(26) On or about January 11, 2008, defendants OMAR ROANE and MERRELL HOBBS, while armed with a firearm, assaulted and pistol-whipped A.G., a person known to the grand jury, causing bodily injury to A.G.

(27) On or about January 19, 2008, defendants OMAR ROANE, MERRELL HOBBS, and ALLEN PARKER, while armed with firearms, assaulted Z.F., a person known to the

grand jury, by shooting at him, while he was seated inside his vehicle near the entrance to the BVHD.

(28) On or about January 22, 2008, defendant TERRANCE HAMM illegally possessed a firearm, that is, a Heckler & Koch, Model USP 45, .45 caliber semi-automatic pistol, serial number obliterated, and 21 rounds of .45 caliber ammunition.

(29) On or about February 27, 2008, defendant BRYAN HILL possessed a Smith & Wesson .357 caliber revolver, model 66, serial number BSN6262, loaded with six rounds of live ammunition. At the same time and location, defendant ALLEN PARKER possessed a Smith & Wesson .9mm semi-automatic pistol, serial number PDH9434, loaded with nine rounds of live ammunition.

(30) On or about September 19, 2008, defendant RAMEL MOTEN gave a firearm, that is, a Rossi 38 Special, .38 caliber handgun, loaded with five rounds of live ammunition, to A.F., a person known to the grand jury.

(31) On or about September 19, 2008, defendant RAMEL MOTEN, carjacked a vehicle driven by M.M., a person known to the grand jury, by pointing a gun at M.M., and forcing M.M. out of the car.

(32) On or about May 27, 2008, defendant ALLEN PARKER attempted to rob K.D., a person known to the grand jury, while K.D. was seated inside his vehicle, which K.D. had just driven into the BVHD. Defendant PARKER shot at and hit K.D.'s vehicle during the attempted robbery.

(33) In or around June 2009, defendant RAMEL MOTEN brandished a firearm at K.S., a person known to the grand jury, and others unknown to the grand jury.

(34) On or about September 23, 2009, defendant MERRELL HOBBS distributed crack cocaine.

(35) On or about September 26, 2009, defendant SHYHEEM DAVIS attempted to rob at gunpoint, M.M. 2, a person known to the grand jury.

(36) On or about October 7, 2009, inside apartment 3A at 5403 Harley Terrace in Philadelphia, defendants MERRELL HOBBS, WARREN STOKES, and RAMEL MOTEN possessed with intent to distribute crack cocaine and marijuana, and a stolen Colt Police Model .38 caliber revolver, serial number 717055.

(37) On or about October 9, 2009, defendant RAMEL MOTEN used a shotgun to shoot at a person unknown to the grand jury, who was hired by defendant MOTEN to sell drugs for MOTEN.

(38) On or about October 22, 2009, defendants WARREN STOKES and TAYALE SHELTON distributed crack cocaine.

(39) On or about October 23, 2009, inside apartment 3A, 5403 Harley Terrace, in Philadelphia, defendant RAMEL MOTEN and others known to the grand jury, possessed with intent to distribute approximately 10 grams of crack cocaine, drug paraphernalia, drug proceeds and a Smith & Wesson, Model CTG revolver, serial number 843731, loaded with six live rounds of ammunition.

(40) On or about November 2, 2009, defendant RAMEL MOTEN illegally possessed a firearm, that is, a Xinshidai Company, 12 gauge pump-action shotgun, serial number 0302101, loaded with four live rounds of 12 gauge.

(41) On or about November 3, 2009, defendant RAMEL MOTEN illegally possessed 25 12 gauge shotgun shells.

(42) On or about November 9, 2009, defendant WARREN STOKES shot and injured T.W., a person known to the grand jury.

(43) On or about November 24, 2009, defendant RAMEL MOTEN attempted to rob at gunpoint M.S., a person known to the grand jury, and shot at and struck M.S., during the attempted robbery.

(44) On or about December 10, 2009, defendant KHALIL ALLEN possessed with intent to distribute crack cocaine.

(45) On or about December 30, 2009, defendant SHYHEEM DAVIS possessed with intent to distribute marijuana.

(46) On or about December 30, 2009, defendants RAMEL MOTEN and WARREN STOKES possessed with intent to distribute crack cocaine, and drug paraphernalia, inside MELIK PARKER'S apartment.

(47) On or about January 5, 2010, defendant RAMEL MOTEN illegally possessed two firearms, a Marlin, Model 444S short-barreled semi-automatic rifle, serial number 1917407, loaded with one 7.62 x 39 mm round of ammunition in the barrel, and a Sturm Ruger & Co., Inc., Model P94, .40 caliber semi-automatic pistol, serial number 340-4588, loaded with 10 rounds of .40 caliber ammunition. On the same date, defendant MOTEN illegally transferred these firearms without a license.

(48) On or about February 2, 2010, defendant MERRELL HOBBS possessed with intent to distribute crack cocaine.

(49) On or about March 10, 2010, defendant TERRANCE HAMM possessed approximately \$6,085, which he intended to use to purchase cocaine or crack cocaine for distribution.

(50) On or about March 29, 2010, defendant TAYALE SHELTON attempted to rob at gunpoint, inside the BVHD, K.S., a person known to the grand jury.

(51) On or about April 6, 2010, defendants TERRANCE HAMM and DAMON TURNER distributed crack cocaine.

(52) On or about April 6, 2010, defendant TERRANCE HAMM illegally possessed a box of .45 caliber ammunition.

(53) On or about April 7, 2010, defendant RAMEL MOTEN attempted to threaten and intimidate T.W., a person known to the grand jury, who had been a victim of a shooting by defendant WARREN STOKES, by attending a court hearing and attempting to make threatening gestures and statements toward T.W.

(54) On or about April 15, 2010, defendant DAMON TURNER distributed crack cocaine.

(55) On or about May 12, 2010, defendant DAMON TURNER distributed crack cocaine.

(56) On or about May 27, 2010, defendant RAMEL MOTEN illegally possessed a firearm, that is, a Winchester, Model 52, .22 caliber bolt-action long rifle, serial number 12117, with an attached Tasco scope. On the same date, defendant MOTEN illegally transferred this firearm without a license.

(57) On or about June 2, 2010, defendant HIKEEM TORRENCE possessed with intent to distribute crack cocaine.

(58) On or about June 7, 2010, defendants RAMEL MOTEN and OMAR ROANE illegally possessed a firearm, that is, a Smith & Wesson, Model D.A. 45, .45 caliber revolver, serial

number 45256. On the same date, defendants MOTEN and ROANE illegally transferred this firearm without a license.

(59) On or about July 19, 2010, defendants RAMEL MOTEN and OMAR ROANE illegally possessed a firearm, that is, a Norinco Model 320, .9mm semi-automatic short-barreled rifle, serial number MSA11733. On the same date, defendants MOTEN and ROANE illegally transferred this firearm without a license.

NOTICE OF SPECIAL SENTENCING FACTORS

8. Beginning in or about October 2001 and continuing through and including the date of this indictment, within the Eastern District of Pennsylvania and elsewhere, the defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
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MERRELL HOBBS,
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a/k/a “Little O,”
TERRANCE HAMM,
a/k/a “Tae,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
WARREN STOKES,
a/k/a “Geez,”
ALLEN PARKER,
a/k/a “AP,”
KHALIL ALLEN,
a/k/a “Boo Allen,”
ANDRE TILLER,
a/k/a “Dre,”
TAYALE SHELTON,**

**a/k/a “Ty,”
HIKEEM TORRENCE,
a/k/a “Hak,” and
SHYHEEM DAVIS,
a/k/a “Shy,”**

knowingly and intentionally conspired to distribute and possess with the intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A).

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

COUNT TWO

**CONSPIRACY TO DISTRIBUTE COCAINE BASE (“CRACK”) AND MARIJUANA
21 U.S.C. § 846**

THE GRAND JURY FURTHER CHARGES THAT:

1. From in or about October 2001 to in or about July 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Smelly,”
MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”
OMAR ROANE,
a/k/a “Little O,”
TERRANCE HAMM,
a/k/a “Tae,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
WARREN STOKES,
a/k/a “Geez,”
KHALIL ALLEN,
a/k/a “Boo Allen,”
ANDRE TILLER,
a/k/a “Dre,”
TAYALE SHELDON,
a/k/a “Ty,”
HIKEEM TORRENCE,
a/k/a “Hak,”
CAROL MILES,
SHYHEEM DAVIS,
a/k/a “Shy,”
MELIKA PARKER, and
RONEISHA SCOTT**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute 280 grams or more of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and knowingly and intentionally distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(D).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant TERRANCE HAMM was the original leader and organizer of a cocaine base (“crack cocaine”) distribution gang (referred to above and herein as the “Harlem Boys,” which distributed in excess of 280 grams, that is, more than 100 kilograms of crack cocaine, worth at least \$3.5 million, between approximately October 2001 and August 2010. In approximately April 2007, defendants RAMEL MOTEN and OMAR ROANE took over as the main leaders and organizers of the “Harlem Boys.”

3. Defendants TERRANCE HAMM, RAMEL MOTEN, and OMAR ROANE, and others known and unknown to the grand jury obtained bulk quantities of cocaine from suppliers known and unknown to the grand jury, located in the Eastern District of Pennsylvania and elsewhere.

4. Defendants TERRANCE HAMM, RAMEL MOTEN, OMAR ROANE, MERRELL HOBBS, and others known and unknown to the grand jury, “cooked,” or converted cocaine into crack cocaine, in various locations inside and outside the BVHD, and then distributed it through various co-conspirators to customers of the “Harlem Boys,” located both inside and outside of the BVHD.

5. The leaders and organizers of the “Harlem Boys” used “Harlem Boys” members to sell crack cocaine, marijuana, and other illegal narcotics and controlled substances inside the BVHD, and at the commercial establishments across Lindbergh Boulevard from the BVHD, including the Village Deli. Members of the “Harlem Boys” who participated as sellers of illegal narcotics for the organization, included leaders, defendants RAMEL MOTEN and TERRANCE HAMM, as well as: defendants MERRELL HOBBS, OMAR ROANE, REGINALD STEPHENS, BRYAN HILL, WARREN STOKES, DAMON TURNER, HIKEEM TORRENCE, TAYALE SHELTON, SHYHEEM DAVIS, KHALIL ALLEN, ANDRE TILLER, and CAROL MILES.

6. Defendants MELIKA PARKER and RONEISHA SCOTT, and persons known and unknown to the grand jury, allowed, and made available for the use of the “Harlem Boys,” their respective residences, as places to “cook,” store, and sell crack cocaine, by and for the “Harlem Boys.”

7. Defendants RAMEL MOTEN, OMAR ROANE, TERRANCE HAMM, and DAMON TURNER obtained firearms for use in protecting the narcotics and the proceeds earned from the sale of narcotics by stealing them or purchasing them illegally and by trading crack cocaine for firearms with persons known and unknown to the grand jury.

8. Members of the “Harlem Boys” used cellular telephones to communicate with each other and with customers of the “Harlem Boys.”

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the defendants and others known and unknown to the grand jury, committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere:

(1) On or about October 20, 2001, defendant BRYAN HILL possessed with intent to distribute crack cocaine and marijuana, and possessed an Intratec .22 caliber semi-automatic handgun with an obliterated serial number.

(2) On or about May 21, 2002, defendant REGINALD STEPHENS possessed with intent to distribute approximately 3 grams of crack cocaine and marijuana.

(3) Beginning in or about at least May 2002, and continuing through in or about August 2010, defendant MELIKA PARKER managed and controlled Apartment 3A, 5410 Harley Terrace in Philadelphia, Pennsylvania, of which she was the lessee, for the purpose of unlawfully manufacturing, storing, distributing, and using controlled substances.

(4) On or about December 29, 2004, defendant RAMEL MOTEN possessed with intent to distribute crack cocaine and marijuana.

(5) On or about January 11, 2005, defendant ANDRE TILLER distributed, and possessed with intent to distribute crack cocaine.

(6) On or about February 10, 2005, defendant BRYAN HILL possessed with intent to distribute approximately 13.5 grams of marijuana. On the same date, defendant HILL also possessed numerous empty ziplock packets, and a Colt, Model Official Police, .38 caliber revolver, serial number 843587, loaded with four live rounds of ammunition.

(7) On or about January 3, 2006, defendant ANDRE TILLER distributed and possessed with intent to distribute crack cocaine.

(8) On or about August 11, 2006, defendant DAMON TURNER possessed with intent to distribute crack cocaine.

(9) On or about October 3, 2006, defendant BRYAN HILL distributed crack cocaine.

(10) On or about October 10, 2006, defendant KHALIL ALLEN possessed with intent to distribute marijuana.

(11) On or about October 24, 2006, defendants ANDRE TILLER and CAROL MILES distributed crack cocaine.

(12) On or about November 14, 2006, defendant TERRANCE HAMM distributed crack cocaine.

(13) On or about November 28, 2006, defendant REGINALD STEPHENS possessed with intent to distribute approximately 20 grams of marijuana.

(14) On or about November 28, 2006, defendant OMAR ROANE possessed with intent to distribute approximately 20 grams of marijuana.

(15) On or about February 16, 2007, defendant OMAR ROANE distributed crack cocaine.

(16) On or about February 22, 2007, defendant TERRANCE HAMM distributed crack cocaine.

(17) On or about February 22, 2007, defendant BRYAN HILL used a communication facility, that is, a telephone, to set up a sale of crack cocaine.

(18) On or about March 27, 2007, defendant REGINALD STEPHENS distributed crack cocaine from the apartment controlled by defendant MELIKA PARKER, at 5400 Harley Terrace, Apartment 3A.

(19) On or about April 5, 2007, TERRANCE HAMM, REGINALD STEPHENS, and OMAR ROANE distributed crack cocaine from the apartment controlled by defendant MELIKA PARKER, at 5400 Harley Terrace, Apartment 3A.

(20) On or about April 16, 2007, defendant DAMON TURNER used a communication facility, that is, a telephone, to set up a sale of crack cocaine.

(21) On or about June 19, 2007, defendant DAMON TURNER distributed marijuana.

(22) On or about June 26, 2007, defendant DAMON TURNER possessed a Norinco MAK-90, semi-automatic assault rifle, serial number 9428727, loaded with 13 live rounds of ammunition, a bowl, plate, and razor blades containing crack cocaine residue, and packaging materials.

(23) On or about September 23, 2009, defendant MERRELL HOBBS distributed crack cocaine.

(24) On or about October 7, 2009, defendants MERRELL HOBBS, WARREN STOKES, and RAMEL MOTEN possessed with intent to distribute crack cocaine and marijuana, and a stolen Colt Police Model .38 caliber revolver, serial number 717055.

(25) On or about October 9, 2009, defendant RAMEL MOTEN used a shotgun to shoot at a person unknown to the grand jury, who was hired by defendant MOTEN to sell drugs for MOTEN.

(26) On or about October 22, 2009, defendants WARREN STOKES and TAYALE SHELTON distributed crack cocaine.

(27) On or about October 23, 2009, defendant RAMEL MOTEN possessed with intent to distribute approximately 10 grams of crack cocaine. On the same date, defendant MOTEN

also possessed and a Smith & Wesson, Model CTG revolver, serial number 843731, loaded with six live rounds of ammunition.

(28) Beginning on a date unknown to the grand jury, but prior to on or about November 10, 2009, and continuing through in or about August 2010, defendant RONEISHA SCOTT possessed crack cocaine and crack cocaine residue, and knowingly and intentionally made available for use the premises known as 2701 S. 54th Drive, Apartment 2B, in Philadelphia, of which she was the lessee, for the purpose of unlawfully manufacturing, storing, and distributing crack cocaine.

(29) On or about December 10, 2009, defendant KHALIL ALLEN possessed with intent to distribute crack cocaine.

(30) On or about December 30, 2009, defendant SHYHEEM DAVIS possessed with intent to distribute marijuana.

(31) On or about December 30, 2009, defendants RAMEL MOTEN and WARREN STOKES possessed with intent to distribute crack cocaine inside the premises leased by defendant MELIKA PARKER.

(32) On or about February 2, 2010, defendant MERRELL HOBBS possessed with intent to distribute crack cocaine.

(33) On or about March 10, 2010, defendant TERRANCE HAMM possessed approximately \$6,085, which he intended to use to purchase cocaine or crack cocaine for distribution.

(34) On or about April 6, 2010, defendants TERRANCE HAMM and DAMON TURNER distributed crack cocaine.

(35) On or about April 15, 2010, defendant DAMON TURNER distributed crack cocaine.

(36) On or about May 12, 2010, defendant DAMON TURNER distributed crack cocaine.

(37) On or about June 2, 2010, defendant HIKEEM TORRENCE possessed with intent to distribute crack cocaine.

All in violation of Title 21, United States Code, Section 846.

COUNT THREE

**POSSESSION WITH INTENT TO DISTRIBUTE COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 3, 2006, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**ANDRE TILLER,
a/k/a “Dre,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing
a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FOUR

**CARJACKING
18 U.S.C. § 2119 and 2**

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 10, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,” and
OMAR ROANE,
a/k/a “Little O,”**

and others known and unknown to the grand jury, with intent to cause death and serious bodily harm, took, and aided and abetted the taking of, from the person and presence of another, by force and violence, and by intimidation, a motor vehicle, that is, a 2006 Ford 500 SEL, VIN 1FAFP24176G155462, that had been transported, shipped, and received in interstate commerce.

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

COUNT FIVE

**CARRYING AND USING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 10, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,” and
OMAR ROANE,
a/k/a “Little O,”**

knowingly carried and used a firearm, and aided and abetted the carrying and use of a firearm, that is, a semiautomatic handgun, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, armed carjacking, in violation of Title 18, United States Code, Section 2119.

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

COUNT SIX

**POSSESSION WITH INTENT TO DISTRIBUTE COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 11, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**DAMON TURNER,
a/k/a “Dame,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing
a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SEVEN

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 3, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRYAN HILL,
a/k/a “B,”
a/k/a “Bashir,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT EIGHT

**ASSAULT WITH A DEADLY WEAPON IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(3)**

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this indictment, which paragraphs are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise, as defined in Title 18, United States Code, Section 1959(b)(2), namely, the “Harlem Boys,” that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this indictment, 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), namely, acts involving murder, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502, 901, and 903, of the laws of the Commonwealth of Pennsylvania; robbery, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 3701, 901 and 903, of the laws of the Commonwealth of Pennsylvania; and narcotics trafficking in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under Section 1951(a) (robbery), of Title 18, United States Code.

3. On or about October 5, 2006, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**OMAR ROANE,
a/k/a “Little O,” and
ALLEN PARKER,
a/k/a “AP,”**

knowingly and intentionally assaulted with a dangerous weapon, and aided and abetted the assault with a dangerous weapon of, J.C., a person known to the grand jury, by shooting at him, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2702(a)(1) and (4).

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

COUNT NINE

**CARRYING AND USE OF A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 5, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**OMAR ROANE,
a/k/a “Little O,” and
ALLEN PARKER,
a/k/a “AP,”**

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, a handgun, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, aggravated assault in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(3).

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

COUNT TEN

**POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**KHALIL ALLEN,
a/k/a “Boo,”
a/k/a “Boo Allen,”**

knowingly and intentionally possessed with intent to distribute for remuneration, a mixture and
substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

COUNT ELEVEN

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 24, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**ANDRE TILLER,
a/k/a “Dre,” and
CAROL MILES**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT TWELVE

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 14, 2006, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**TERRANCE HAMM,
a/k/a “Tae,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT THIRTEEN

**POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 28, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**REGINALD STEPHENS,
a/k/a “Big Reg,”**

knowingly and intentionally possessed with intent to distribute for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

COUNT FOURTEEN

**POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 28, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**OMAR ROANE,
a/k/a “Little O,”**

knowingly and intentionally possessed with intent to distribute for remuneration a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

COUNT FIFTEEN

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 16, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**OMAR ROANE,
a/k/a “O,”
a/k/a “Little O,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTEEN

**MAINTAINING A DRUG-INVOLVED PREMISES
21 U.S.C. § 856(a)(2)**

THE GRAND JURY FURTHER CHARGES THAT:

From in or about May 2002, through in or about August 2010, in the Eastern District of Pennsylvania, defendant

MELIKA PARKER

managed and controlled the premises, located at 5400 Harley Terrace, Apartment 3A, in Philadelphia, as a lessee and occupant, and knowingly and intentionally made available for use these premises for the purpose of unlawfully manufacturing, storing, and distributing controlled substances, that is, cocaine base (“crack”), a Schedule II controlled substance, and marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT SEVENTEEN

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 22, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**TERRANCE HAMM,
a/k/a “Tae,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT EIGHTEEN

**USE OF A COMMUNICATION FACILITY IN FURTHERANCE OF A DRUG CRIME
21 U.S.C. § 843(b)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 22, 2007, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRYAN HILL,
a/k/a “B,”
a/k/a “Bashir,”**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute controlled substances, described in Count Two of this indictment, in violation of Title 21, United States Code, Section 846, a drug felony, in that the defendant used a telephone to arrange for the sale of cocaine base (“crack”), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 843(b).

COUNT NINETEEN

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2007, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**REGINALD STEPHENS,
a/k/a “Big Reg,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT TWENTY

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 5, 2007, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**TERRANCE HAMM,
a/k/a “Tae,”
REGINALD STEPHENS,
a/k/a “Big Reg,” and
OMAR ROANE,
a/k/a “O,”
a/k/a “Little O,”**

knowingly and intentionally distributed, and aided and abetted in the distribution of, a mixture and
substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled
substance.

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

COUNT TWENTY-ONE

**USE OF A COMMUNICATION FACILITY IN FURTHERANCE OF A DRUG CRIME
21 U.S.C. § 843(b)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 16, 2007, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

**DAMON TURNER,
a/k/a “Dame,”**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute controlled substances, described in Count Two of this indictment, in violation of Title 21, United States Code, Section 846, a drug felony, in that the defendant used a telephone to arrange for the sale of cocaine base (“crack”), a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 843(b).

COUNT TWENTY-TWO

**DISTRIBUTION OF MARIJUANA
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 19, 2007, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**DAMON TURNER,
a/k/a “Dame,”**

knowingly and intentionally distributed for remuneration a mixture and substance containing a
detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

COUNT TWENTY-THREE

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 26, 2007, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**DAMON TURNER,
a/k/a “Dame,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce, a firearm, that is, a Norinco, model MAN 90, 7.62 x 39 mm semiautomatic rifle, serial number 9428727 (E-41), loaded with 13 rounds of live ammunition.

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

COUNT TWENTY-FOUR

**POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 26, 2007, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**DAMON TURNER,
a/k/a “Dame,”**

possessed a firearm, that is, a Norinco, model MAN 90, 7.62 x 39 mm semiautomatic rifle, serial number 9428727 (E-41), loaded with 13 rounds of live ammunition, in furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

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

COUNT TWENTY-FIVE

**ENGAGING IN THE ILLEGAL DEALING OF FIREARMS
18 U.S.C. § 922(a)(1)(A)**

THE GRAND JURY FURTHER CHARGES THAT:

From on or about October 11, 2007, to on or about July 19, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,” and
OMAR ROANE,
a/k/a “Little O,”**

willfully engaged in the business of dealing in firearms without being licensed to do so under the provisions of Chapter 44, Title 18, United States Code.

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

COUNT TWENTY-SIX

**ASSAULT WITH A DEADLY WEAPON IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(3)**

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this indictment, which paragraphs are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise, as defined in Title 18, United States Code, Section 1959(b)(2), namely, the “Harlem Boys,” that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this indictment, 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), namely, acts involving murder, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502, 901, and 903, of the laws of the Commonwealth of Pennsylvania; robbery, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 3701, 901 and 903, of the laws of the Commonwealth of Pennsylvania; and narcotics trafficking in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under Section 1951(a) (robbery), of Title 18, United States Code.

3. On or about January 11, 2008, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**OMAR ROANE,
a/k/a “Little O,” and
MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”**

knowingly and intentionally assaulted with a dangerous weapon, and aided and abetted the assault with a dangerous weapon of, A.G., a person known to the grand jury, by pistol-whipping him, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2702(a)(1) and (4).

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

COUNT TWENTY-SEVEN

**CARRYING AND USING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 11, 2008, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**OMAR ROANE,
a/k/a “Little O,” and
MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”**

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, a handgun, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, aggravated assault in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(3).

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

COUNT TWENTY-EIGHT

**ASSAULT WITH A DEADLY WEAPON IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(3)**

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this indictment, which paragraphs are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise, as defined in Title 18, United States Code, Section 1959(b)(2), namely, the “Harlem Boys,” that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this indictment, 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), namely, acts involving murder, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502, 901, and 903, of the laws of the Commonwealth of Pennsylvania; robbery, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 3701, 901 and 903, of the laws of the Commonwealth of Pennsylvania; and narcotics trafficking in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under Section 1951(a) (robbery), of Title 18, United States Code.

3. On or about January 19, 2008, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**OMAR ROANE,
a/k/a “Little O,” and
MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”**

knowingly and intentionally assaulted with a dangerous weapon, and aided and abetted the assault with a dangerous weapon of, Z.F., a person known to the grand jury, by shooting at him and his vehicle, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2702(a)(1) and (4).

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

COUNT TWENTY-NINE

**CARRYING AND USING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 19, 2008, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**OMAR ROANE,
a/k/a “Little O,” and
MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”**

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, a handgun, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, aggravated assault in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(3).

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

COUNT THIRTY

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 22, 2008, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**TERRANCE HAMM,
a/k/a “Tae,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce, a firearm and ammunition, that is, a Heckler & Koch, model USP 45, .45 caliber semiautomatic pistol with an obliterated serial number, loaded with 21 live rounds of .45 caliber ammunition.

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

COUNT THIRTY-ONE

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 27, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**BRYAN HILL,
a/k/a “B,”
a/k/a “Bashir,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce, a firearm and ammunition, that is, a Smith & Wesson .357 caliber revolver, model 66, serial number BSN6262, loaded with six rounds of live ammunition.

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

COUNT THIRTY-TWO

**CARJACKING
18 U.S.C. § 2119**

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 19, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

with intent to cause death and serious bodily harm, took from the person and presence of another, by force and violence, and by intimidation, a motor vehicle, that is, a 2006 Chrysler PT Cruiser, VIN 3A4FY58B46T358116, that had been transported, shipped, and received in interstate commerce.

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

COUNT THIRTY-THREE

**CARRYING AND USING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 19, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

knowingly carried and used a firearm, that is, a black semiautomatic handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Section 2119.

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

COUNT THIRTY-FOUR

**ATTEMPTED HOBBS ACT ROBBERY
18 U.S.C. § 1951(a)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 27, 2009, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**ALLEN PARKER,
a/k/a “AP,”**

and others unknown to the grand jury, attempted to commit robbery, which unlawfully obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, in that defendant PARKER, and others unknown to the grand jury, attempted to take and obtain property, that is, money and controlled substances, from a person known to the grand jury as K.D., against his will, by means of actual and threatened force, violence and fear of injury, immediate and future, to K.D.’s person and property.

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

COUNT THIRTY-FIVE

**CARRYING AND USING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 27, 2009, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**ALLEN PARKER,
a/k/a “AP,”**

carried and used a firearm, that is, a handgun, during and in relation to a crime of violence for
which he may be prosecuted in a court of the United States, that is, attempted Hobbs Act robbery,
in violation of Title 18, United States Code, Section 1951(a).

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

COUNT THIRTY-SIX

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 23, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT THIRTY-SEVEN

**ATTEMPTED HOBBS ACT ROBBERY
18 U.S.C. § 1951(a)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 27, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**SHYHEEM DAVIS,
a/k/a “Shy,”**

attempted to commit robbery, which unlawfully obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, in that the defendant attempted to take and obtain property, that is, money and controlled substances, from a person known to the grand jury as M.M. 2, against his will, by means of actual and threatened force, violence and fear of injury, immediate and future, to M.M. 2’s person and property.

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

COUNT THIRTY-EIGHT

**CARRYING AND USING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 27, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**SHYHEEM DAVIS,
a/k/a “Shy,”**

carried and used a firearm, that is, a .32 caliber revolver, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, attempted Hobbs Act robbery, in violation of Title 18, United States Code, Section 1951(a).

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

COUNT THIRTY-NINE

**POSSESSION WITH INTENT TO DISTRIBUTE COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2009, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**MERRELL HOBBS
a/k/a “Rel,”
a/k/a “Murder,”
WARREN STOKES,
a/k/a “Geez,” and
RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute of, a mixture and substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FORTY

**POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 7, 2009, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

**MERRELL HOBBS
a/k/a “Rel,”
a/k/a “Murder,”
WARREN STOKES,
a/k/a “Geez,” and
RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

knowingly possessed, and aided and abetted the possession of a firearm, that is, a Colt .38 caliber handgun, serial number 717055, loaded with six live rounds of ammunition, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

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

COUNT FORTY-ONE

**ASSAULT WITH A DEADLY WEAPON IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(3) and 2**

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this indictment, which paragraphs are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise, as defined in Title 18, United States Code, Section 1959(b)(2), namely, the “Harlem Boys,” that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this indictment, 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), namely, acts involving murder, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502, 901, and 903, of the laws of the Commonwealth of Pennsylvania; robbery, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 3701, 901 and 903 of the laws of the Commonwealth of Pennsylvania; and narcotics trafficking in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under Section 1951(a) (robbery), of Title 18, United States Code.

3. On or about October 10, 2009, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

knowingly and intentionally assaulted with a dangerous weapon, and aided and abetted the assault with a dangerous weapon of, a person unknown to the grand jury who was hired by defendant MOTEN to sell drugs for MOTEN, by shooting at him with a shotgun, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2702(a)(1) and (4).

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

COUNT FORTY-TWO

**CARRYING AND USING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 10, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly”**

knowingly carried and used a firearm, that is, a shotgun, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, assault with a deadly weapon in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(3).

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

COUNT FORTY-THREE

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 22, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**WARREN STOKES,
a/k/a “Geez,” and
TAYALE SHELTON,
a/k/a “Ty,”**

knowingly and intentionally distributed, and aided and abetted in the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FORTY-FOUR

**POSSESSION WITH INTENT TO DISTRIBUTE COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2009, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

knowingly and intentionally possessed with intent to distribute 5 grams or more, that is,
approximately 10 grams, of a mixture and substance containing a detectable amount of cocaine base
 (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FORTY-FIVE

**POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2009, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

possessed a firearm, that is, a Smith & Wesson .38 caliber revolver, model CTG, serial number 843731, loaded with six live rounds of .38 caliber ammunition, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

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

COUNT FORTY-SIX

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2009, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

having been convicted in courts of the Commonwealth of Pennsylvania and the State of New Jersey
of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and
affecting interstate and foreign commerce, a firearm, that is, a Smith & Wesson .38 caliber revolver,
model CTG, serial number 843731, loaded with six live rounds of .38 caliber ammunition.

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

COUNT FORTY-SEVEN

**POSSESSION OF AMMUNITION BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 23, 2009, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

having been convicted in courts of the Commonwealth of Pennsylvania and the State of New Jersey
of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and
affecting interstate and foreign commerce, ammunition, that is, one Remington 12 gauge shotgun
shell.

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

COUNT FORTY-EIGHT

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 2, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

having been convicted in courts of the Commonwealth of Pennsylvania and the State of New Jersey of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce, a firearm, that is, a Xinshidai Company, 12 gauge pump-action shotgun, serial number 0302101, loaded with four live rounds of 12 gauge ammunition.

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

COUNT FORTY-NINE

**POSSESSION OF AMMUNITION BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 3, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

having been convicted in courts of the Commonwealth of Pennsylvania and the State of New Jersey of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce, ammunition, that is, seven Federal, six Winchester, and 12 Remington 12 gauge shotgun shells.

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

COUNT FIFTY

**ATTEMPTED MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(5)**

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this indictment, which paragraphs are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise, as defined in Title 18, United States Code, Section 1959(b)(2), namely, the “Harlem Boys,” that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this indictment, 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), namely, acts involving murder, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502, 901, and 903, of the laws of the Commonwealth of Pennsylvania; robbery, in violation of Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 3701, 901, and 903 of the laws of the Commonwealth of Pennsylvania; and narcotics trafficking in violation of Title 21, United States Code, Sections 841 and 846; and acts indictable under Section 1951(a) (robbery), of Title 18, United States Code.

3. On or about November 9, 2009, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendant

WARREN STOKES,
a/k/a “Geez,”

attempted to murder of T.W., a person known to the grand jury as T.W., in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2502(a) and 901.

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

COUNT FIFTY-ONE

**CARRYING AND USING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 9, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**WARREN STOKES,
a/k/a “Geez,”**

carried and used a firearm, that is, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, assault with a deadly weapon in aid of racketeering, in violation of Title 18, United States Code, Section 1959(a)(5).

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

COUNT FIFTY-TWO

**MAINTAINING A DRUG-INVOLVED PREMISES
21 U.S.C. § 856(a)(2)**

THE GRAND JURY FURTHER CHARGES THAT:

From on or about November 10, 2009, to in or about August 2010, in the Eastern District of Pennsylvania, defendant

RONEISHA SCOTT

managed and controlled the premises located at 2701 South 54th Drive, Apartment 2B, in Philadelphia, as a lessee and occupant, and knowingly and intentionally made available for use these premises for the purpose of unlawfully manufacturing, storing, and distributing controlled substances, that is, cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT FIFTY-THREE

**ATTEMPTED HOBBS ACT ROBBERY
18 U.S.C. § 1951(a)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

attempted to commit robbery, which unlawfully obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, in that the defendant attempted to take and obtain property, that is, money and controlled substances, from a person known to the grand jury as M.S., against his will, by means of actual and threatened force, violence and fear of injury, immediate and future, to M.S.’s person and property.

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

COUNT FIFTY-FOUR

**CARRYING AND USING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

carried and used a firearm, that is, a Strum Ruger & Co., Inc. .40 caliber semiautomatic pistol, model P94, serial number 340-4588, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, attempted Hobbs Act robbery, in violation of Title 18, United States Code, Section 1951(a).

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

COUNT FIFTY-FIVE

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 24, 2009, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

having been convicted in courts of the Commonwealth of Pennsylvania and the State of New Jersey
of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and
affecting interstate and foreign commerce, a firearm, that is, a Strum Ruger & Co., Inc. .40 caliber
semiautomatic pistol, model P94, serial number 340-4588.

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

COUNT FIFTY-SIX

**POSSESSION WITH INTENT TO DISTRIBUTE COCAINE
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 10, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KHALIL ALLEN,
a/k/a “Boo,”
a/k/a “Boo Allen,”**

knowingly and intentionally possessed with intent to distribute, a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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

COUNT FIFTY-SEVEN

**POSSESSION WITH INTENT TO DISTRIBUTE COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2**

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 30, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,” and
WARREN STOKES,
a/k/a “Geez,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-EIGHT

**POSSESSION OF AMMUNITION BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 30, 2009, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

having been convicted in courts of the Commonwealth of Pennsylvania and the State of New Jersey
of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and
affecting interstate and foreign commerce, ammunition, that is, five rounds of Federal .38 caliber
ammunition.

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

COUNT FIFTY-NINE

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

having been convicted in courts of the Commonwealth of Pennsylvania and the State of New Jersey of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce, a firearm and ammunition, that is, a Sturm Ruger & Co., Inc. .40 caliber semiautomatic pistol, model P94, serial number 340-4588, loaded with 10 rounds of .40 caliber ammunition.

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

COUNT SIXTY

**RECEIPT OF NON-REGISTERED SHORT-BARRELED RIFLE
26 U.S.C. §§ 5845(a), 5861(d) and (e), 5871**

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

knowingly received, possessed, and transferred a short barreled rifle not registered to him in the National Firearms Registration and Transfer Record that is, a Marlin, model 444S, short barreled semiautomatic rifle, serial number 1917406, loaded with one round of ammunition.

In violation of Title 26, United States Code, Sections 5845(a), 5861(d), 5861(e), and 5871.

COUNT SIXTY-ONE

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,”**

having been convicted in courts of the Commonwealth of Pennsylvania and the State of New Jersey of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce, a firearm, that is, a Marlin, model 444S, short barreled semiautomatic rifle, serial number 1917406, loaded with one round of ammunition.

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

COUNT SIXTY-TWO

**POSSESSION WITH INTENT TO DISTRIBUTE COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 2, 2010, in Philadelphia, in the Eastern District of
Pennsylvania, defendant

**MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing
a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTY-THREE

**ATTEMPTED HOBBS ACT ROBBERY
18 U.S.C. § 1951(a)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 29, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**TAYALE SHELTON,
a/k/a “Ty,”**

attempted to commit robbery, which unlawfully obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, in that the defendant attempted to take and obtain property, that is, money, from K.S., a person known to the grand jury, against his will, by means of actual and threatened force, violence and fear of injury, immediate and future, to K.S.’s person and property.

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

COUNT SIXTY-FOUR

**CARRYING AND USING A FIREARM DURING A VIOLENT CRIME
18 U.S.C. § 924(c)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 29, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**TAYALE SHELTON,
a/k/a “Ty,”**

carried and used a firearm, that is, a Rohm .22 caliber revolver, model RG 10, serial number 935322, loaded with one live round of .22 caliber ammunition, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, attempted Hobbs Act robbery, in violation of Title 18, United States Code, Section 1951(a).

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

COUNT SIXTY-FIVE

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2**

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 6, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**TERRANCE HAMM,
a/k/a “Tae,” and
DAMON TURNER,
a/k/a “Dame,”**

knowingly and intentionally distributed, and aided and abetted in the distribution of, a mixture and
substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled
substance.

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

COUNT SIXTY-SIX

**POSSESSION OF AMMUNITION BY A CONVICTED FELON
18 U.S.C. § 922(g)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 6, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**TERRANCE HAMM,
a/k/a “Tae,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce, ammunition, that is, 50 live rounds of .45 caliber ammunition.

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

COUNT SIXTY-SEVEN

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**DAMON TURNER,
a/k/a “Dame,”**

knowingly and intentionally distributed, a mixture and substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTY-EIGHT

**DISTRIBUTION OF COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 12, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**DAMON TURNER,
a/k/a “Dame,”**

knowingly and intentionally distributed, a mixture and substance containing a detectable amount of
cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTY-NINE

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1) and 2**

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 27, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,” and
ALLEN PARKER,
a/k/a “AP,”**

having been convicted in courts of the State of New Jersey and the Commonwealth of Pennsylvania, respectively, of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, and aided and abetted the possession of, in and affecting interstate and foreign commerce, a firearm, that is, a Winchester .22 caliber long, bolt action rifle, model 52, serial number 12117.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT SEVENTY

**POSSESSION WITH INTENT TO DISTRIBUTE COCAINE BASE (“CRACK”)
21 U.S.C. § 841(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 2, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**HIKEEM TORRENCE,
a/k/a “Hak,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing
a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SEVENTY-ONE

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1) and 2**

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 7, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,” and
OMAR ROANE,
a/k/a “Little O,”**

having been convicted in courts of the Commonwealth of Pennsylvania and the State of New Jersey of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, and aided and abetted the possession of, in and affecting interstate and foreign commerce, a firearm and ammunition, that is, a Smith & Wesson .45 caliber revolver, model D.A. 45, serial number 45256, loaded with two rounds of .45 caliber ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT SEVENTY-TWO

**POSSESSION OF A FIREARM BY A CONVICTED FELON
18 U.S.C. § 922(g)(1) and 2**

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 19, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,” and
OMAR ROANE,
a/k/a “Little O,”**

having been convicted in courts of the State of New Jersey and the Commonwealth of Pennsylvania, respectively, of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, and aided and abetted the possession of, in and affecting interstate and foreign commerce, a firearm, that is, a Norinco 9 mm semiautomatic short-barreled rifle, model 320, serial number MSA11733.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT SEVENTY-THREE

**RECEIPT OF NON-REGISTERED SHORT-BARRELED RIFLE
26 U.S.C. §§ 5845(a), 5861(d) and (e), 5871 and 18 U.S.C. § 2**

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 19, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Mel,”
a/k/a “Smelly,” and
OMAR ROANE,
a/k/a “Little O,”**

knowingly received, possessed, and transferred, and aided and abetted the receipt, possession, and transfer of, a short barreled rifle not registered to them in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5845(a), 5861(d), 5861(e), 5871 and Title 18, United States Code, Section 2.

NOTICE OF FORFEITURE #1

(RACKETEERING FORFEITURE)

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1962(d) set forth in Count One of this indictment, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Smelly,”
MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”
OMAR ROANE,
a/k/a “Little O,”
TERRANCE HAMM,
a/k/a “Tae,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
WARREN STOKES,
a/k/a “Geez,”
ALLEN PARKER,
a/k/a “AP,”
KHALIL ALLEN,
a/k/a “Boo Allen,”
ANDRE TILLER,
a/k/a “Dre,”
TAYALE SHELTON,
a/k/a “Ty,”
HIKEEM TORRENCE,
a/k/a “Hak,” and
SHYHEEM DAVIS,
a/k/a “Shy,”**

(a) have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

(b) have interests in, securities of, claims against, and property and contractual rights affording a source of influence over, the enterprise named and described in the indictment, which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); and

(c) have property constituting, and derived from, proceeds which the defendants obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963.

2. The interests of the defendants subject to forfeiture to the United States pursuant to Title 18, United States Code, Sections 1963(a)(1), (a)(2), and (a)(3), include, but are not limited to, an exact amount unknown to the grand jury, but in excess of \$3,500,000.

3. In the event that any property subject to forfeiture pursuant to Title 18, United States Code, Section 1963, or any property traceable to such property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred, sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendants, up to the value of the property subject to forfeiture.

4. The above named defendants are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Sections 1963(a)(1), (2), and (3), and 1963(m).

NOTICE OF FORFEITURE #2

(NARCOTICS FORFEITURE)

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1) set forth in this indictment, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Smelly,”
MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”
OMAR ROANE,
a/k/a “Little O,”
TERRANCE HAMM,
a/k/a “Tae,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
WARREN STOKES,
a/k/a “Geez,”
KHALIL ALLEN,
a/k/a “Boo Allen,”
ANDRE TILLER,
a/k/a “Dre,”
TAYALE SHELTON,
a/k/a “Ty,”
HIKEEM TORRENCE,
a/k/a “Hak,”
CAROL MILES,
SHYHEEM DAVIS,
a/k/a “Shy,”
MELIKA PARKER, and
RONEISHA SCOTT,**

shall forfeit to the United States under Title 21, United States Code, Section 853:

(a) any and all real and/or personal property which the defendants used in any manner or part to facilitate the commission of the violations of Title 21, United States Code, as charged in this indictment, including but not limited to each of the firearms and ammunition listed in the Notice of Forfeiture #3 in this indictment;

(b) any and all real and/or personal property constituting, or derived from, any proceeds obtained, directly and indirectly, as a result of the violations of Title 21, United States Code, as charged in this indictment, including, but not limited to, the sum of \$3,500,000.

2. If any property subject to forfeiture, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred, sold to, or deposited with, a third party;

(c) has been placed beyond the jurisdiction of the court;

(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants, up to the value of the property subject to forfeiture.

3. The above named defendants are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE #3

As a result of the violations of Title 18, United States Code, Sections 924(c), 922(g)(1), and 2, and Title 26, United States Code, Section 5861, set forth in this indictment, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Smelly,”
MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,”
OMAR ROANE,
a/k/a “Little O,”
TERRANCE HAMM,
a/k/a “Tae,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
WARREN STOKES,
a/k/a “Geez,”
ALLEN PARKER,
a/k/a “AP,”
KHALIL ALLEN,
a/k/a “Boo Allen,”
ANDRE TILLER,
a/k/a “Dre,”
TAYALE SHELTON,
a/k/a “Ty,”
HIKEEM TORRENCE,
a/k/a “Hak,” and
SHYHEEM DAVIS,
a/k/a “Shy,”**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of these offenses, including, but not limited to:

- (1) an Intratec .22 caliber semi-automatic handgun, serial number obliterated.

(2) a Bryco Arms, model Jennings Nine, .9mm semi-automatic pistol, and 13 rounds of ammunition.

(3) a Colt, model Official Police, .38 caliber revolver, serial number 843587, and four rounds of ammunition.

(4) a Norinco MAK-90, semi-automatic assault rifle, serial number 9428727, and 13 rounds of ammunition.

(5) a Sig Sauer, model P229, .357 caliber semi-automatic pistol, serial number AE 27373.

(6) a Heckler & Koch, model USP 45, .45 caliber semi-automatic pistol, serial number obliterated, and 21 rounds of .45 caliber ammunition.

(7) a Smith & Wesson, model 66, .357 caliber revolver, serial number BSN6262, and 6 rounds of ammunition.

(8) a Smith & Wesson, .9 mm semi-automatic pistol, serial number PDH9434, and nine rounds of ammunition.

(9) a Rossi 38 Special, .38 caliber handgun, and five rounds of ammunition.

(10) a Colt model Police .38 caliber revolver, serial number 717055.

(11) a Smith & Wesson model CTG revolver, serial number 843731, and six rounds of ammunition.

(12) a Xinshidai Company, 12 gauge pump-action shotgun, serial number 0302101, and four rounds of 12 gauge ammunition.

(13) 25 additional rounds of 12 gauge ammunition.

(14) a Marlin model 444S short-barreled semi-automatic rifle, serial number 1917407, and one 7.62 x 39 mm round of ammunition.

(15) a Sturm Ruger & Co., Inc. model P94, .40 caliber semi-automatic pistol, serial number 340-4588, and 10 rounds of .40 caliber ammunition.

(16) one box of .45 caliber ammunition.

(17) a Winchester model 52, .22 caliber bolt-action long rifle, serial number 12117.

(18) a Smith & Wesson model D.A. 45, .45 caliber revolver, serial number 45256.

(19) a Norinco model 320, .9mm semi-automatic short-barreled rifle, serial number MSA11733.

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

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney