

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>10-620</u>
v.	:	DATE FILED: <u>September 7, 2011</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 - 8 counts)
a/k/a "Tay,"		18 U.S.C. § 1959(a)(4) (threatening to
REGINALD STEPHENS,	:	commit a crime of violence in aid of
a/k/a "Big Reg,"		racketeering activity - 1 count)
DAMON TURNER,	:	18 U.S.C. § 1959(a)(5) (attempted murder
a/k/a "Dame,"		in aid of racketeering - 2 counts)
BRYAN HILL,	:	18 U.S.C. § 1951 (attempted robbery
a/k/a "B,"		which interferes with commerce - 4
a/k/a "Bashir,"	:	counts)
WARREN STOKES,		18 U.S.C. § 2119 (carjacking - 2 counts)
a/k/a "Geez,"	:	21 U.S.C. § 841 (distribution and
ALLEN PARKER,		possession with intent to distribute
a/k/a "AP,"	:	cocaine base ("crack") - 20 counts)
KHALIL ALLEN,		21 U.S.C. § 841 (distribution and
a/k/a "Boo Allen,"	:	possession with intent to distribute
ANDRE TILLER,		marijuana - 4 counts)
a/k/a "Dre,"	:	21 U.S.C. § 841 (possession with intent to
TAYALE SHELTON,		distribute cocaine - 1 count)
a/k/a "Ty,"	:	21 U.S.C. § 843(b) (use of a telephone in
HIKEEM TORRENCE,		furtherance of a drug crime - 2 counts)
a/k/a "Hak,"	:	18 U.S.C. § 924(c) (use and carrying of a
CAROL MILES		firearm during and in relation to a crime
SHYHEEM DAVIS,	:	of violence - 18 counts)
a/k/a "Shy,"		18 U.S.C. § 924(c) (use and carrying of a
MELIKA PARKER	:	firearm during and in relation to a drug
RONEISHA SCOTT		trafficking crime - 2 counts)
	:	18 U.S.C. § 922(g)(1) (possession of a
	:	firearm and/or ammunition by a
	:	convicted felon - 17 counts)

ANTHONY FREEMAN, a/k/a "Ant,"	:	18 U.S.C. § 922(a)(1)(A) (engaging in the illegal dealing of firearms - 1 count)
KAREEM PITTMAN, a/k/a "Bar,"	:	21 U.S.C. § 856 (maintaining a drug-involved premises - 3 counts)
CHARLES HAMM, a/k/a "Pooh"	:	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
	:	<u>UNDER SEAL</u>

SUPERSEDING 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 superseding 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 "Tay,"
REGINALD STEPHENS,
a/k/a "Big Reg,"
DAMON TURNER,
a/k/a "Dame,"
BRYAN HILL,
a/k/a "B,"
a/k/a "Bashir,"
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,”
SHYHEEM DAVIS,
a/k/a “Shy,”
ANTHONY FREEMAN,
a/k/a “Ant,” and
KAREEM PITTMAN,
a/k/a “Bar,”**

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, and in the District of New Jersey.

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 “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 “Tay,” 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 the BVHD.

(g) Defendant BRYAN HILL, a/k/a “B,” a/k/a “Bashir,” 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.

(o) Defendant ANTHONY FREEMAN, a/k/a “Ant,” participated in the “Harlem Boys” as a distributor of illegal narcotics and as a gunman for the enterprise.

(p) Defendant KAREEM PITTMAN, a/k/a “Bar,” participated in the “Harlem Boys” as a distributor of illegal narcotics 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 Drive, 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, and also distributed controlled substances in the District of New Jersey, 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.

(k) Members utilized various methods of communication, including cellular telephones and letters, to discuss the business of the enterprise, including drug distribution and violent acts.

THE RACKETEERING CONSPIRACY

6. From at least as early as in or about October 2001, to on or about October 6, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, 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 “Tay,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
a/k/a “Bashir,”
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,”
SHYHEEM DAVIS,
a/k/a “Shy,”
ANTHONY FREEMAN,
a/k/a “Ant,” and
KAREEM PITTMAN,
a/k/a “Bar,”

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 affect 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 cocaine base (“crack”) 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 cocaine base (“crack”) 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 cocaine base (“crack”) and marijuana.

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

(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 cocaine base (“crack”).

(9) On or about February 17, 2006, defendant CHARLES HAMM possessed with intent to distribute cocaine.

(10) On or about July 24, 2006, defendant CHARLES HAMM possessed with intent to distribute cocaine.

(11) On or about August 1, 2006, defendant RAMEL MOTEN possessed with intent to distribute cocaine.

(12) On or about August 10, 2006, defendants OMAR ROANE, MERRELL HOBBS, RAMEL MOTEN, REGINALD STEPHENS, BRYAN HILL, DAMON TURNER, and D.S., a person known to the grand jury, 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.

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

(14) On or about October 3, 2006, defendant BRYAN HILL distributed cocaine base (“crack”).

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

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

(17) On or about October 24, 2006, defendant ANDRE TILLER distributed cocaine base (“crack”).

(18) On or about November 14, 2006, defendant TERRANCE HAMM distributed cocaine base (“crack”).

(19) On or about November 28, 2006, defendant REGINALD STEPHENS possessed with intent to distribute marijuana.

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

(21) On or about February 16, 2007, defendant OMAR ROANE distributed cocaine base (“crack”).

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

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

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

(25) On or about April 5, 2007, defendants TERRANCE HAMM, REGINALD STEPHENS, and OMAR ROANE distributed cocaine base (“crack”) from defendant MELIKA PARKER’S apartment.

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

(27) 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 a bowl, plate, and razor blades containing cocaine base (“crack”) residue, and drug packaging materials.

(28) 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.

(29) 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.

(30) On or about January 19, 2008, defendants OMAR ROANE 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.

(31) 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.

(32) On or about February 27, 2008, defendant BRYAN HILL possessed a Smith & Wesson .357 caliber revolver, model 66, serial number BSN6262, loaded with five 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.

(33) 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 defendant ANTHONY FREEMAN.

(34) 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.

(35) On or about June 17, 2009, defendant OMAR ROANE robbed at gunpoint T.P., a person known to the grand jury.

(36) 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.

(37) In or about September 2009, defendant RAMEL MOTEN threatened to commit a crime of violence against T.P., a person known to the grand jury who had been the victim of a robbery committed by defendant OMAR ROANE, that is, defendant MOTEN threatened to kill T.P. and her family, in order to deter T.P., from testifying against defendant OMAR ROANE, at a preliminary hearing in the Court of Common Pleas, Philadelphia County, Pennsylvania.

(38) In or about September 2009, defendant ANTHONY FREEMAN threatened to commit a crime of violence against T.P. in order to deter T.P., from testifying against defendant OMAR ROANE, at the state preliminary hearing.

(39) On or about September 23, 2009, defendants MERRELL HOBBS and KAREEM PITTMAN distributed cocaine base (“crack”).

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

(41) 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 cocaine base (“crack”) and marijuana, and a stolen Colt Police Model .38 caliber revolver, serial number 717055, and five rounds of .38 ammunition.

(42) On or about October 10, 2009, defendants 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 defendant MOTEN.

(43) On or about October 22, 2009, defendants WARREN STOKES and TAYALE SHELTON distributed cocaine base (“crack”).

(44) 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 cocaine base (“crack”), drug paraphernalia, drug proceeds and a Smith & Wesson, Model CTG revolver, serial number 843731, loaded with six live rounds of ammunition.

(45) 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.

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

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

(48) 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.

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

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

(51) On or about December 30, 2009, defendants RAMEL MOTEN and WARREN STOKES possessed with intent to distribute cocaine base (“crack”), and drug paraphernalia, inside defendant MELIKA PARKER’S apartment.

(52) On or about January 5, 2010, defendant RAMEL MOTEN illegally possessed two firearms, a Marlin, Model 444S short-barreled semi-automatic rifle, serial number 19174064, 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 340-45883, loaded with 10 rounds of

.40 caliber ammunition. On the same date, defendant MOTEN illegally transferred these firearms without a license.

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

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

(55) 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.

(56) On or about April 6, 2010, defendants TERRANCE HAMM and DAMON TURNER distributed cocaine base (“crack”).

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

(58) 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.

(59) On or about April 15, 2010, defendant DAMON TURNER distributed cocaine base (“crack”).

(60) On or about May 12, 2010, defendant DAMON TURNER distributed cocaine base (“crack”).

(61) On or about May 24, 2010, defendants RAMEL MOTEN, OMAR ROANE, and others known and unknown to the grand jury, while armed with firearms, entered the home of M.R. and D.C., persons known to the grand jury, pointed their firearms at M.R. and D.C., and assaulted and pistol-whipped M.R., causing bodily injury to M.R.

(62) On or about May 27, 2010, defendants RAMEL MOTEN and ALLEN PARKER 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.

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

(64) 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.

(65) 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.

(66) On or about August 3, 2010, defendant RAMEL MOTEN and OMAR ROANE shot and injured D.J. and K.B., persons known to the grand jury.

(67) On or about August 17, 2010, defendant RAMEL MOTEN illegally possessed a firearm, that is, German Sports Guns, Model GSG AK-47, .22 caliber semi-automatic

rifle, serial number A342916, and 525 rounds of .22 caliber ammunition. On the same date, defendant MOTEN illegally transferred this firearm without a license.

(68) On or about September 5, 2010, defendant HIKEEM TORRENCE and Q.D., a person known to the grand jury, assaulted with a deadly weapon M.F., a person known to the grand jury, by pointing a firearm at M.F., forcing M.F. to remove his clothing, and stealing M.F.'s clothing and other personal items.

(69) On or about September 16, 2010, defendants RAMEL MOTEN, HIKEEM TORRENCE, and others known and unknown to the grand jury, shot and injured D.C., a person known to the grand jury.

(70) On or about September 25, 2010, defendants RAMEL MOTEN and HIKEEM TORRENCE shot and injured M.R., a person known to the grand jury.

(71) On or about October 6, 2010, defendant RAMEL MOTEN possessed with intent to distribute cocaine base ("crack").

(72) On or about October 6, 2010, defendant RAMEL MOTEN possessed three firearms, that is, a Cobra Enterprises, Inc., Model FS380, .380 caliber semi-automatic pistol, serial number FS044493; an Israel Weapon IND-IWI, Model Desert Eagle, .40 caliber semi-automatic pistol, serial number obliterated, and 11 rounds of .40 caliber ammunition; and a Leinad Inc., Model PM12, .380 caliber semi-automatic pistol, serial number 12-0015400 and six rounds of .380 ammunition.

(73) On or about October 6, 2010, defendant TERRANCE HAMM possessed with intent to distribute cocaine base ("crack").

(74) On or about October 6, 2010, defendant DAMON TURNER possessed with intent to distribute cocaine.

(75) On or about October 6, 2010, defendant TAYALE SHELTON possessed with intent to distribute cocaine base (“crack”).

(76) On or about October 6, 2010, defendant CAROL MILES possessed with intent to distribute cocaine base (“crack”).

(77) Beginning on or about October 7, 2009, and continuing through and until October 6, 2010, defendant KAREEM PITTMAN, knowingly and intentionally made available for use the premises known as 5403 Harley Terrace, Apartment 3A, in Philadelphia, of which he was an occupant, for the purpose of unlawfully manufacturing, storing, and distributing cocaine base (“crack”).

NOTICE OF SPECIAL SENTENCING FACTORS

8. Beginning in or about October 2001 and continuing through and including October 6, 2010, within the Eastern District of Pennsylvania and elsewhere, 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 “Tay,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”**

**a/k/a “Bashir,”
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,”
SHYHEEM DAVIS,
a/k/a “Shy,”
ANTHONY FREEMAN,
a/k/a “Ant,” and
KAREEM PITTMAN,
a/k/a “Bar,”**

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 (“crack”), a Schedule II controlled substances, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), (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 on or about October 6, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and the District of New Jersey, 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 “Tay,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
a/k/a “Bashir,”
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 SHELDON,
a/k/a “Ty,”
HIKEEM TORRENCE,
a/k/a “Hak,”
CAROL MILES,
SHYHEEM DAVIS,
a/k/a “Shy,”
MELIKA PARKER,**

**RONEISHA SCOTT
ANTHONY FREEMAN,
a/k/a “Ant,”
KAREEM PITTMAN,
a/k/a “Bar, and
CHARLES HAMM,
a/k/a “Pooh,”**

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 and 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”) distribution gang (referred to here as the “Harlem Boys,”) which distributed 280 grams or more, that is, more than 100 kilograms, of cocaine base (“crack”), worth at least \$3.5 million, between approximately October 2001 and October 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, including defendant CHARLES HAMM and others 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, CHARLES HAMM, and others known and unknown to the grand jury, “cooked,” or converted cocaine into cocaine base (“crack”), in various locations inside and outside the BVHD, and then distributed it themselves and through various co-conspirators to customers of the “Harlem Boys,” located both inside and outside of the BVHD. In addition, defendant CHARLES HAMM brought cocaine base (“crack”) from the BVHD to the District of New Jersey which he distributed himself and through various co-conspirators including defendants RAMEL MOTEN, OMAR ROANE, and ANTHONY FREEMAN, to customers.

5. The leaders and organizers of the “Harlem Boys” used “Harlem Boys” members to sell cocaine base (“crack”), 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, ALLEN PARKER, DAMON TURNER, HIKEEM TORRENCE, TAYALE SHELTON, SHYHEEM DAVIS, KHALIL ALLEN, ANDRE TILLER, CAROL MILES, ANTHONY FREEMAN, and KAREEM PITTMAN.

6. Defendants MELIKA PARKER, RONEISHA SCOTT, and KAREEM PITTMAN, 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 cocaine base (“crack”), 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 cocaine base (“crack”) for firearms with persons known and unknown to the grand jury.

8. Members of the “Harlem Boys” used cellular telephones and letters 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, New Jersey and elsewhere:

(1) On or about October 20, 2001, defendant BRYAN HILL possessed with intent to distribute cocaine base (“crack”) 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 cocaine base (“crack”) 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, 5400 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 cocaine base (“crack”) and marijuana.

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

(6) On or about February 10, 2005, defendant BRYAN HILL possessed with intent to distribute 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 cocaine base (“crack”).

(8) On or about February 17, 2006, defendant CHARLES HAMM possessed with intent to distribute cocaine.

(9) On or about July 24, 2006, defendant CHARLES HAMM possessed with intent to distribute cocaine.

(10) On or about August 1, 2006, defendant RAMEL MOTEN possessed with intent to distribute cocaine.

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

(12) On or about October 3, 2006, defendant BRYAN HILL distributed cocaine base (“crack”).

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

(14) On or about October 24, 2006, defendants ANDRE TILLER and CAROL MILES distributed cocaine base (“crack”).

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

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

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

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

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

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

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

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

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

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

(25) 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 cocaine base (“crack”) residue, and packaging materials.

(26) On or about September 23, 2009, defendants MERRELL HOBBS and KAREEM PITTMAN distributed cocaine base (“crack”).

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

(28) 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.

(29) On or about October 22, 2009, defendants WARREN STOKES and TAYALE SHELTON distributed cocaine base (“crack”).

(30) On or about October 23, 2009, defendant RAMEL MOTEN possessed with intent to distribute approximately 10 grams of cocaine base (“crack”). 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.

(31) 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 cocaine base (“crack”) and cocaine base (“crack”) 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 cocaine base (“crack”).

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

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

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

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

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

(37) On or about April 6, 2010, defendants TERRANCE HAMM and DAMON TURNER distributed cocaine base (“crack”).

(38) On or about April 15, 2010, defendant DAMON TURNER distributed cocaine base (“crack”).

(39) On or about May 12, 2010, defendant DAMON TURNER distributed cocaine base (“crack”).

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

(41) On or about October 6, 2010, defendant RAMEL MOTEN possessed with intent to distribute cocaine base (“crack”).

(42) On or about October 6, 2010, defendant TERRANCE HAMM possessed with intent to distribute cocaine base (“crack”).

(43) On or about October 6, 2010, defendant DAMON TURNER possessed with intent to distribute cocaine.

(44) On or about October 6, 2010, defendant TAYALE SHELTON possessed with intent to distribute cocaine base (“crack”).

(45) On or about October 6, 2010, defendant CAROL MILES possessed with intent to distribute cocaine base (“crack”).

(46) Beginning on or about October 7, 2009, and continuing through and until October 6, 2010, defendant KAREEM PITTMAN, knowingly and intentionally made available for use the premises known as 5403 Harley Terrace, Apartment 3A, in Philadelphia, of which he was an occupant, for the purpose of unlawfully manufacturing, storing, and distributing cocaine base (“crack”).

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

**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,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,” and
BRYAN HILL,
a/k/a “B,”
a/k/a “Bashir,”**

and D.S., a person known 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

**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,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,” and
BRYAN HILL,
a/k/a “B,”
a/k/a “Bashir,”**

and D.S., a person known to the grand jury, 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 superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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

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

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

**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 “Tay,”**

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 “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 “Tay,”**

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 “Tay,”
REGINALD STEPHENS,
a/k/a “Big Reg,” and
OMAR ROANE,
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 superseding 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 MAK 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 August 17, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
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 superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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 superseding 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 superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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 superseding 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
ALLEN PARKER,
a/k/a “AP,”**

and others known and unknown to the grand jury, 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
ALLEN PARKER,
a/k/a “AP,”**

and others known and unknown to the grand jury, 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 “Tay,”**

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 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, that is, a Smith & Wesson .357 caliber revolver, model 66, serial number BSN6262, loaded with five 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 “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 “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

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

THE GRAND JURY FURTHER CHARGES THAT:

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

**ANTHONY FREEMAN,
a/k/a “Ant,”**

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 Rossi 38 Special, .38 caliber handgun, serial number 101919, loaded with five rounds of ammunition.

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

COUNT THIRTY-FIVE

ATTEMPTED HOBBS ACT ROBBERY

18 U.S.C. §1951(a)

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 17, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**OMAR ROANE,
a/k/a “Little O,”**

committed robbery, which unlawfully obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, in that the defendant took and obtained and attempted to take and obtain property, that is, money, a cellular telephone, and controlled substances, from a person known to the grand jury as T.P., against her will, by means of actual and threatened force, violence and fear of injury, immediate and future, to T.P.’s person and property.

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

COUNT THIRTY-SIX

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

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 17, 2009, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

**OMAR ROANE,
a/k/a “Little O,”**

carried and used a firearm, that is, a semiautomatic pistol, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, 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-SEVEN

**THREATEN TO COMMIT A CRIME OF VIOLENCE IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(4)**

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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 superseding 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 September 2009 in Philadelphia, in the Eastern District of

Pennsylvania, for the purpose of maintaining and increasing his position in the enterprise, defendant

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

knowingly and intentionally threatened to commit a crime of violence against T.P., a person known to the grand jury, by threatening to kill T.P. and her family if she testified against defendant OMAR ROANE at a preliminary hearing in the Court of Common Pleas, Philadelphia County, Pennsylvania, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2706(a)(1).

All in violation of Title 18, United States Code, Sections 1959(a)(4).

COUNT THIRTY-EIGHT

**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, defendants

**MERRELL HOBBS,
a/k/a “Rel,”
a/k/a “Murder,” and
KAREEM PITTMAN,
a/k/a “Bar,”**

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-NINE

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

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 26, 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 FORTY

**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 26, 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 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 FORTY-ONE

**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

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

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-TWO

**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 “Smelly,”**

knowingly possessed, and aided and abetted the possession of a firearm, that is, a Colt Model Police, .38 caliber handgun, serial number 717055, loaded with five 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-THREE

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

THE GRAND JURY FURTHER CHARGES THAT:

From on or about October 7, 2009, to on or about October 6, 2010, in the Eastern District of Pennsylvania, defendant

**KAREEM PITTMAN,
a/k/a “Bar,”**

managed and controlled the premises located at 5403 Harley Terrace, Apartment 3A, in Philadelphia, as an 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 FORTY-FOUR

**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 superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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 superseding 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 “Smelly,”**

and others known and unknown to the grand jury, 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-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 October 10, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

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

knowingly carried and used a firearm, that is, a shotgun, during and in relation to a crime of violence for which they 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-SIX

**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-SEVEN

**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 “Smelly,”**

knowingly and intentionally possessed with intent to distribute 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)(C).

COUNT FORTY-EIGHT

**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 “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-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 October 23, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
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 FIFTY

**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 “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 FIFTY-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 November 2, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
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 FIFTY-TWO

**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 “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-THREE

**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 superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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 superseding 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-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 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-FIVE

**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-SIX

**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 “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-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 November 24, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

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

carried and used a firearm, that is, a Sturm Ruger & Co., Inc. .40 caliber semiautomatic pistol, model P94, serial number 340-45883, 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 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-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 24, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**RAMEL MOTEN,
a/k/a “Smiz,”
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 Sturm Ruger & Co., Inc. .40 caliber semiautomatic pistol, model P94, serial number 340-45883.

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

COUNT FIFTY-NINE

**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 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 SIXTY

**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 “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 SIXTY-ONE

**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 “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 SIXTY-TWO

**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 “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 Sturm Ruger & Co., Inc. .40 caliber semiautomatic pistol, model P94, serial number 340-45883, loaded with 10 rounds of .40 caliber ammunition.

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

COUNT SIXTY-THREE

**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 "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-FOUR

**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 “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-FIVE

**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-SIX

**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-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 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 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-EIGHT

**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 “Tay,” 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-NINE

**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 “Tay,”**

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 SEVENTY

**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 SEVENTY-ONE

**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 SEVENTY-TWO

**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 superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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 superseding 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 May 24, 2010, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

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

and others known and unknown to the grand jury, knowingly and intentionally assaulted with a dangerous weapon, and aided and abetted the assault with a dangerous weapon of, M.R. and D.C., persons known to the grand jury, by pistol-whipping and pointing firearms at them, 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 SEVENTY-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 May 24, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

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

and persons known and unknown to the grand jury, 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, Sections 1959(a)(3) and 2.

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

COUNT SEVENTY-FOUR

**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 “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-FIVE

**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-SIX

**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 “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, 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-SEVEN

**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 “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-EIGHT

**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 “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.

COUNT SEVENTY-NINE

**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 superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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 superseding 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 August 3, 2010, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

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

and others known and unknown to the grand jury, knowingly and intentionally assaulted with a dangerous weapon, and aided and abetted the assault with a dangerous weapon of, D.J. and K.B., persons known to the grand jury, by shooting at them with a handgun, 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 EIGHTY

**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 3, 2010, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

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

and others known and unknown to the grand jury, knowingly 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, Sections 1959(a)(3) and 2.

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

COUNT EIGHTY-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 August 17, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

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

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, in and affecting interstate and foreign commerce, a firearm, that is, German Sports Guns, Model GSG AK-47, .22 caliber semi-automatic rifle, serial number A342916, and 525 rounds of .22 caliber ammunition.

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

COUNT EIGHTY-TWO

**ASSAULT WITH A DEADLY WEAPON IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(4)**

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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 superseding 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 September 5, 2010, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendant

HIKEEM TORRENCE,
a/k/a “Hak,”

and a person known to the grand jury as Q.D., knowingly and intentionally threatened to commit a crime of violence, and aided and abetted the threatening of a crime of violence, against M.F., a person known to the grand jury, by pointing firearms at him, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 2706(a)(1).

All in violation of Title 18, United States Code, Sections 1959(a)(4) and 2.

COUNT EIGHTY-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 5, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**HIKEEM TORRENCE,
a/k/a “Hak,”**

and a person known to the grand jury as Q.D., 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, threatening a crime of violence in aid of racketeering, in violation of Title 18, United States Code, Sections 1959(a)(4) and 2.

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

COUNT EIGHTY-FOUR

**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 superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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 superseding 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 September 16, 2010, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Smelly, and
HIKEEM TORRENCE,
a/k/a “Hak,”**

and others known and unknown to the grand jury, attempted to murder and aided and abetted the attempted murder of, a person known to the grand jury as D.C., 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) and 2.

COUNT EIGHTY-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 September 16, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Smelly, and
HIKEEM TORRENCE,
a/k/a “Hak,”**

and others known and unknown to the grand jury, 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 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, Sections 1959(a)(5) and 2.

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

COUNT EIGHTY-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 superseding indictment, the “Harlem Boys,” as more fully described in paragraphs 1 through 5 of Count One of this superseding 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 superseding 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 September 25, 2010, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Smelly,” and
HIKEEM TORRENCE,
a/k/a “Hak,”**

knowingly and intentionally assaulted with a dangerous weapon, and aided and abetted the assault with a dangerous weapon of, M.R., a person known to the grand jury, by shooting M.R., 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 EIGHTY-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 September 25, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**RAMEL MOTEN,
a/k/a “Smiz,”
a/k/a “Smelly,” and
HIKEEM TORRENCE,
a/k/a “Hak,”**

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 EIGHTY-EIGHT

**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 October 6, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

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

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, in and affecting interstate and foreign commerce, a firearm, that is, a Cobra Enterprises, Inc., Model FS380, .380 caliber semi-automatic pistol, serial number FS044493; an Israel Weapon IND-IWI, Model Desert Eagle, .40 caliber semi-automatic pistol, serial number obliterated, and 11 rounds of .40 caliber ammunition; and a Leinad Inc., Model PM12, .380 caliber semi-automatic pistol, serial number 12-0015400 and six rounds of .380 ammunition.

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

COUNT EIGHTY-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 6, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

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

knowingly and intentionally possessed with intent to distribute approximately 16 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)(C).

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 superseding 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 “Tay,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
a/k/a “Bashir,”
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,”
SHYHEEM DAVIS,
a/k/a “Shy,”
ANTHONY FREEMAN,
a/k/a “Ant,” and**

**KAREEM PITTMAN,
a/k/a “Bar,”**

(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 superseding 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 fo 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 superseding 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 “Tay,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
a/k/a “Bashir,”
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,
RONEISHA SCOTT,
ANTHONY FREEMAN,
a/k/a “Ant,” and**

**KAREEM PITTMAN,
a/k/a “Bar,”**

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 superseding indictment, including but not limited to each of the firearms and ammunition listed in the Notice of Forfeiture #3 in this superseding 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 superseding 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 superseding 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 “Tay,”
REGINALD STEPHENS,
a/k/a “Big Reg,”
DAMON TURNER,
a/k/a “Dame,”
BRYAN HILL,
a/k/a “B,”
a/k/a “Bashir,”
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,”
SHYHEEM DAVIS,
a/k/a “Shy,” and
ANTHONY FREEMAN,
a/k/a “Ant,”**

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 5 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 and five rounds of .38 ammunition.
- (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 19174064, 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 340-45883, 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, and five rounds of .38 ammunition.
- (19) a Norinco model 320, .9mm semi-automatic short-barreled rifle, serial number MSA11733.
- (20) Amadeo Rossi and Co., Model 68, .38 caliber revolver, serial number 101919, and five rounds of .38 caliber ammunition
- (21) Rhoem Gesellschaft, Model RG10, .22 caliber revolver, serial number 935322, and 1 round of .22 caliber ammunition.
- (22) German Sports Guns, Model GSG AK-47, .22 caliber semi-automatic rifle, serial number A342916, and 525 rounds of .22 caliber ammunition.
- (23) Cobra Enterprises, Inc., Model FS380, .380 caliber semi-automatic pistol, serial number FS044493.
- (24) Israel Weapon IND-IWI, Model Desert Eagle, .40 caliber semi-automatic pistol, serial number obliterated, and 11 rounds of .40 caliber ammunition.
- (25) Leinad Inc., Model PM12, .380 caliber semi-automatic pistol, serial number 12-0015400 and six rounds of .380 ammunition.
- (26) Bersa, Model Thunder 380, .380 caliber semi-automatic pistol, with an obliterated serial number, and 5 rounds of .380 caliber ammunition.
- (27) 7 rounds of assorted manufacturer and caliber ammunition; 22 rounds of Winchester Western .40 caliber ammunition; 18 rounds of Winchester Western .380 caliber ammunition; 1 Remington 12 gauge shotgun round; 50 rounds of unknown manufacturer .22 caliber ammunition; 4 rounds of Winchester Western .380 caliber ammunition; 5 rounds of unknown manufacturer 9mm ammunition; 2 rounds of Federal .380 ammunition; 90 rounds of Winchester Western .40 caliber ammunition; 2 rounds of Federal .22 caliber ammunition; 99 rounds of assorted manufacturer and caliber ammunition; 10 rounds of Winchester Western .40 caliber ammunition; 1 round of Federal .40 caliber ammunition; 1 round of Remington 12 gauge ammunition; and 5 rounds of assorted manufacturer and caliber .38 caliber ammunition.

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