

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

:

v.

: CRIMINAL NO. _____

LINDA WESTON,

a/k/a "Mom"

a/k/a "Brenda Williams"

JEAN MCINTOSH,

a/k/a "Shay"

a/k/a "Jean Pierce"

a/k/a "Laronda Smith,"

GREGORY THOMAS, SR.,

a/k/a "Big Greg"

EDDIE WRIGHT,

a/k/a "Pastor Wright"

NICKLAUS WOODARD,

a/k/a "Nick"

: DATE FILED: _____

: VIOLATIONS:

**18 U.S.C. § 1962(d) (conspiracy to
participate in a racketeering enterprise -
1 count)**

: 18 U.S.C. § 371 (conspiracy - 1 count)

18 U.S.C. § 249(a)(2) (hate crime - 4

: counts)

18 U.S.C. § 1201 (kidnaping -9 counts)

: 18 U.S.C. § 1959(a)(1) (violent crime in

aid of racketeering (kidnaping) - 7

counts)

**18 U.S.C. § 1959(a)(3) (violent crime in
aid of racketeering (conspiracy to assault
with dangerous weapon - 6 counts)**

**18 U.S.C. § 1584(a) (involuntary
servitude - 1 count)**

**18 U.S.C. § 1589(a)(1) (forced human
labor - 1 count)**

**18 U.S.C. § 1959(a)(1) (murder in aid of
racketeering - 2 counts)**

**18 U.S.C. §§ 1591, 1594 (sex trafficking -
2 counts)**

**18 U.S.C. § 924(c)(3) (use of a firearm in
furtherance of a violent crime - 4 counts)**

**18 U.S.C. § 641 (theft from government -
6 counts)**

**18 U.S.C. § 1001 (false statements - 5
counts)**

**42 U.S.C. § 1383 a(a)(2) (false statements
to SSA - 4 counts)**

**18 U.S.C. § 1343 (wire fraud - 125
counts)**

18 U.S.C. § 1341 (mail fraud - 18 counts)

18 U.S.C. § 2 (aiding and abetting)

FILED UNDER SEAL

INDICTMENT

COUNT ONE

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

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this indictment:

The Social Security Benefit System

1. The Social Security Administration (SSA) was an agency of the United States authorized to distribute monetary benefits to qualified recipients in order to ameliorate the tragic consequences of old age, disability, loss of earnings power and dependency on public or private charity.

2. In distributing monetary benefits to qualified recipients, the SSA administered two programs under the Social Security Act:

- a. The Old-Age, Survivors, and Disability Insurance program (OASDI) pursuant to Title II of the Social Security Act;
- b. The Supplemental Security Income (SSI) program pursuant to Title XVI of the Social Security Act.

3. Pursuant to Title II of the Social Security Act, Section 223 required SSA to provide monthly Disability Benefits (DIB) to individuals who previously made contributions to the program while employed and who meet specific disability requirements. DIB benefits were paid from the Retirement/Survivors Trust Fund and the Disability Trust Fund. The object

of the DIB program was to replace part of the earnings lost because of a physical or mental impairment. Minor children may be entitled to receive SSA benefits as a dependent of a wage earner who is retired, disabled, or deceased. In order for minor child to be eligible he or she must be 18 years of age or younger. The monthly benefits payable to a minor child were determined by the wage earner's Federal Insurance Contributions Act (FICA) tax.

4. Supplemental Security Income (SSI) under Title XVI of the Social Security Act was a federally administered cash assistance program designed to provide a floor of income for the aged, blind, or disabled who have paid little or nothing to the Social Security system by way of employment contributions and who have little or no income and resources. People who receive social security payments under Title II may also be eligible for SSI payments.

5. The Representative Payee Program, enacted by Congress in 1936, authorized the SSA to pay benefits of a minor child or disabled person to a "representative payee," if and when doing so would be in the best interests of the minor child or disabled person. A representative payee is an individual or organization authorized to receive and manage benefits on behalf of someone deemed incapable of doing so on his own. The Representative Payee Program was available under both Title II (OASDI) and Title XVI (SSI) programs.

6. SSA required that an individual assume several duties and obligations on behalf of a beneficiary when appointed as a representative payee. The primary duty of a representative payee was to determine the needs of the beneficiary, and to use the benefits in the best interests of the beneficiary. The representative payee must use SSA benefits for the basic needs of the beneficiary, such as food, clothing, and shelter.

7. In order to be approved as a Representative Payee by SSA, a person must

apply to SSA and truthfully answer questions designed to assess the suitability of the person for administering payments made on behalf of the beneficiary. Among other things, the applicant must disclose whether he or she has ever been convicted of a felony. The law expressly prohibited an individual with a felony conviction from acting as a representative payee. The applicant must also truthfully report his or her relationship with the beneficiary, the address of the applicant and the beneficiary, and the current living arrangements of the beneficiary.

8. It was the regular practice of the SSA to issue benefit payments either in the form of checks issued by the United States Department of the Treasury, on behalf of the SSA, sent through the U.S. Postal Service (USPS), or by electronic transfer of funds from the United States Department of the Treasury on behalf of the SSA into a bank account designated by the representative payee with the representative payee directing the method of payment.

The Victims

9. T.B. was a female who was born with mental retardation and other developmental disabilities that substantially limited her ability to care for her daily needs. As a result of this condition, T.B. received disability and SSI benefits administered by the SSA.

10. E.S. was a male who was born with mental retardation and other mental developmental disabilities and physical disabilities that substantially limited his ability to care for his daily needs. As a result of this condition, E.S. received SSI benefits administered by the SSA.

11. H.K. was a male who was born with spastic diplegia, cerebral palsy, mental retardation and development disabilities that substantially limited his ability to care for his daily needs. As a result of his condition, H.K. received SSI benefits administered by the

SSA.

12. D.M was a male who was born with mental retardation and other developmental disabilities that substantially limited his ability to care for his daily needs . As a result of this condition, D.M. received SSI and disability benefits administered by the SSA.

13. D.S. was a female who had been diagnosed with multiple physical and mental disabilities that substantially limited her ability to care for her daily needs. As a result of these conditions, D.S. received disability benefits administered by the SSA.

14. M.L. was a female who had been diagnosed with schizophrenia that substantially limited her ability to care for her daily needs. As a result of this condition, M.L. received disability benefits administered by the SSA.

15. B.W. was born in 1991 and was the niece of defendant LINDA WESTON.

16. B.R. was a minor who was a resident of Florida. N.S. and E.Sa. were minors who were residents of Philadelphia, PA.

GENERAL ALLEGATIONS

17. The defendants, LINDA WESTON, a/k/a "Mom," a/k/a "Brenda Williams," JEAN MCINTOSH, a/k/a "Shay," a/k/a "Jean Pierce," a/k/a "Laronda Smith," GREGORY THOMAS, SR., a/k/a "Big Greg," EDDIE WRIGHT, a/k/a/ "Pastor Wright," and NICKLAUS WOODARD, a/k/a "Nick," are all members and associates of the Weston Family.

18. Defendants, working variously together and with other members and associates known and unknown of the WESTON FAMILY (the WESTON FAMILY consisted of members of the Weston Family and their associates, hereinafter the "WF"), lured several mentally disabled people into locations rented by defendant LINDA WESTON and others in

Philadelphia, Pennsylvania, Norfolk, Virginia, and West Palm Beach, Florida.

19. Defendant LINDA WESTON targeted mentally disabled individuals who were estranged from their families and offered them a place to stay. In some instances WESTON pretended to have a romantic interest in her victims as a means of luring them into her home.

20. Once defendant LINDA WESTON convinced them to move in, she became their representative payee with Social Security and began to collect their disability benefits and in some instances, their state benefits. If the individual was not collecting social security benefits, defendant LINDA WESTON took them to the social security office, instructed them on how to act, and made them apply for social security benefits.

21. After ensuring that she would receive their disability benefits, defendant LINDA WESTON and WF members and associates confined these individuals to, among other areas, rooms, basements, closets, attics, and apartments. While confined to these locations, the captives were often kept isolated and in the dark. Some of the attics were unfinished and contained exposed pink fiberglass insulation. Some of the mentally disabled captives were kept locked in these attics and forced to sit and sleep directly on top of this insulation. On several occasions captives were forced to remain in these attics naked.

22. In order to ensure the continuous flow of these monthly disability benefits to her and her family, defendant LINDA WESTON employed techniques designed to control the disabled individuals and to prevent them or others from reporting the WF's fraudulent scheme to law enforcement or the SSA. These techniques (hereafter referred to in this indictment as "abusive control and confinement techniques") included the following actions committed by

defendants WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT and NICHOLAS WOODARD, acting individually and in concert, and at their direction:

- a. confined the disabled individuals to locked basements, rooms, closets, attics, and apartments;
- b. sedated the disabled individuals by putting drugs in the food and drink served to them by WESTON and others, at WESTON's direction;
- c. subdued the disabled victims by serving them a low calorie, high starch diet consisting almost exclusively of Ramen noodles, beans and stew and generally limited them to, at most, one meal a day;
- d. punished the disabled individuals by slapping, punching, kicking, stabbing, burning and hitting them with closed hands, belts, sticks, bats, and hammers or other objects, including the butt of a pistol, when the individuals tried to escape, stole food, or otherwise protested their confinement and treatment.

23. Defendant LINDA WESTON put drugs in the disabled captives' food and drinks which caused them to sleep for long periods of time during the day and night.

24. Members of the WF prohibited the mentally disabled captives from regularly bathing or changing their clothes.

25. Defendant LINDA WESTON and other WF members required their female captives to perform household chores such as washing clothes, cooking, cleaning and babysitting the children for days at a time without compensation. On rare occasions when defendant WESTON allowed the female captives to wash, WESTON first sprayed them with a

mixture containing bleach and water and then forced them to shower together.

26. Defendant LINDA WESTON and other WF members provided buckets, containers, or portable toilets for the captives to relieve themselves, as they were not allowed to use the bathrooms in the house.

27. The WF directed the minor children and some of its mentally disabled captives to physically abuse the mentally disabled victims as an additional method of punishing the captives.

28. The WF moved the mentally disabled captives from state to state in order to elude detection by social service and law enforcement agencies.

29. Defendant LINDA WESTON, in an effort to obtain additional monies, instructed some of the mentally disabled captives to have children for her. Once the children were born, members of the WF took the children from the mentally disabled captives and raised the children as members of the WF. Defendant WESTON obtained social security benefits for one of these children. WESTON also encouraged several of her younger children to be sexually active with minors in her care in an effort to give birth to additional members of the WF.

THE RACKETEERING ENTERPRISE

At all times material to this indictment:

30. The defendants, LINDA WESTON, a/k/a "Mom," a/k/a "Brenda Williams," JEAN MCINTOSH, a/k/a "Shay," a/k/a "Jean Pierce," a/k/a "Laronda Smith," GREGORY THOMAS, SR., a/k/a "Big Greg," EDDIE WRIGHT, a/k/a "Pastor Wright," and NICKLAUS WOODARD, a/k/a "Nick," and others known and unknown to the Grand jury, were members and associates of the "Weston Family" (hereinafter referred to as the WF), a criminal

organization whose members and associates engaged in diverse criminal activities including, but not limited to, kidnaping, forced labor, social security fraud and sex trafficking.

31. The WF, including its leadership, membership and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise operated in, among other places, the Eastern District of Pennsylvania, the Commonwealth of Virginia, and the states of Texas, and Florida and points in between. This enterprise was engaged in, and its activities affected, interstate commerce.

PURPOSES OF THE ENTERPRISE

32. The purposes of the enterprise included the following:

- a. Enriching the members and associates of the WF through, among other things, social security fraud, state benefit fraud, sex trafficking, kidnaping, and forced labor.
- b. Promoting and enhancing the enterprise and its members' and associates' activities.
- c. Protecting the operations of the enterprise, its members and associates from detection by law enforcement and governmental agencies.

ROLES OF THE DEFENDANTS

33. The defendants participated in the operation and management of the WF. The defendants and other persons employed by and associated with the enterprise functioned in, among others, the following roles:

a. Defendant LINDA WESTON was the leader and organizer of the WF enterprise that operated from at least as early as the fall of 2001 through in or about October of 2011. WESTON enticed all of the mentally disabled adults into coming to live with the WF and controlled all aspects of the captivity of these individuals.

b. Defendant JEAN MCINTOSH was also a leader of the WF who acted as defendant LINDA WESTON's right hand woman. She assisted in confining, controlling, disciplining, housing, and transporting the captives, as well as concealing the activities of WESTON and the WF.

c. Defendant GREGORY THOMAS, SR. was a member of the WF who assisted in obtaining, confining, controlling, housing, and transporting the mentally disabled captives. Among other things, he installed locks on the doors and windows of every residence the captives were kept in to prevent them from escaping.

d. Defendant EDDIE WRIGHT assisted in, among other things, confining, controlling, housing, and transporting the mentally disabled captives.

e. Defendant NICKLAUS WOODARD assisted in, among other things, confining, controlling and disciplining the mentally disabled captives.

THE RACKETEERING CONSPIRACY

34. From at least the fall of 2001 through in or around October, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, the defendants

**LINDA WESTON,
a/k/a "Mom"
a/k/a "Brenda Williams"
JEAN MCINTOSH ,
a/k/a "Shay"**

a/k/a "Jean Pierce"
a/k/a "Laronda Smith"
GREGORY THOMAS, SR.,
a/k/a "Big Greg"
EDDIE WRIGHT,
a/k/a "Pastor Wright"
NICKLAUS WOODARD,
a/k/a "Nick"

being persons employed by and associated with an enterprise known as the WF, which engaged in, and the activities of which affected, interstate commerce, conspired and agreed, with each other, and with others known and unknown to the Grand jury, to violate 18 U.S.C. § 1962(c), that is, to knowingly and unlawfully conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that term is defined by 18 U.S.C. § 1961(1) and (5), consisting of multiple acts involving:

- a. **murder**, chargeable under Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2502, of the laws of the Commonwealth of Pennsylvania, and Title 18 Code of Virginia, Section 18.2 - 33, of the laws of the Commonwealth of Virginia, and
- b. **kidnaping**, chargeable under Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2901 and Title 42, Pennsylvania Consolidated Statutes Annotated, Section 5322, of the laws of the Commonwealth of Pennsylvania, Title 18 Code of Virginia, Section 18.2 - 47, of the laws of the Commonwealth of Virginia, Title 5 Texas Penal Code, Section 20.03, of the laws of the State of Texas, Title XLVI Florida Statutes, Section

787.01, of the laws of the State of Florida,

and acts indictable under the following provisions of federal law:

- c. Title 18, United States Code, Section 1584, for holding persons in involuntary servitude;
- d. Title 18, United States Code, Section 1589, for forced labor;
- e. Title 18, United States Code, Section 1591, for sex trafficking;
- f. Title 18, United States Code, Section 1341, relating to mail fraud violations;
- g. Title 18, United States Code, Section 1343, relating to wire fraud violations;

THE AGREEMENT

35. It was part of the conspiracy that each defendant agreed that at least two acts of racketeering activity would be committed by a conspirator in the conduct of the affairs of the enterprise.

MANNER AND MEANS

36. The manner and means used by the defendants to further goals of the WF and achieve its purposes included the following:

a. Defendant LINDA WESTON targeted and lured mentally disabled adults, often estranged from their families, to come to live with her family. She promised these individuals romantic relationships and a nice place to stay.

b. Defendants LINDA WESTON, JEAN MCINTOSH, and GREGORY THOMAS, SR. treated these mentally disabled adults well until defendant LINDA WESTON was

able to convince them to allow her to become their representative payee with the SSA. This enabled defendant WESTON to control their social security benefits. Her name was added to the checks issued for their benefits. Once the benefits began to be transmitted electronically, she was permitted to establish joint bank accounts which she controlled. This allowed the WF to have access to all of the benefits the mentally disabled people were entitled to receive.

c. Defendants LINDA WESTON and NICKLAUS WOODARD forcefully removed all of the social security and identification documents of the mentally disabled captives who refused to voluntarily surrender them to defendant WESTON.

d. Defendants LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, SR., EDDIE WRIGHT and NICKLAUS WOODARD housed the minors and mentally disabled captives in locked basements, attics, houses, and apartments.

e. Defendants LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, SR., EDDIE WRIGHT and NICKLAUS WOODARD used isolation, intimidation, food restriction, drugs, threats of force, violence and rape to create a climate of fear and maintain control of the mentally disabled captives.

f. Defendants LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, SR., EDDIE WRIGHT transported the mentally disabled captives interstate in order to elude detection by social service and law enforcement agencies.

g. Defendants LINDA WESTON and JEAN MCINTOSH obtained the social security benefits and state benefits of these mentally disabled adults by becoming their representative payee or by forcefully taking possession of their identification and social security payment cards.

h. Defendants LINDA WESTON and GREGORY THOMAS, SR. forced several of the female captives to submit to the sexual advances of one of its male members.

i. Defendant LINDA WESTON prostituted some of its female captives and ordered one of its male captives to break into locations and steal copper piping in order to acquire additional funds to support its lifestyle.

j. Defendant LINDA WESTON encouraged the WF's minor children to engage in sexual relations with other minor children and its male and female captives in order to increase its membership.

OVERT ACTS

In furtherance of the conspiracy, and to effect the object thereof, the defendants and their co-conspirators committed and caused to be committed the following overt acts, among others, in the Eastern District of Pennsylvania, Virginia, Texas, Florida, and elsewhere:

Overt Acts Directed at T.B. and E.S.

From in or around fall 2001, to in or around March, 2002:

(1) In or around fall 2001, when defendant LINDA WESTON met T.B. at the home of WESTON'S sister, with whom T.B. was living, WESTON offered to allow T.B. to stay with her, and caused T.B. to move in with defendants WESTON and GREGORY THOMAS, SR. and the remainder of the WF at 1749 Foulkrod Street in Philadelphia, Pennsylvania.

(2) Defendant LINDA WESTON caused E.S. to move with T.B. into the home of defendants WESTON and GREGORY THOMAS, SR. and the remainder of the WF at 1749 Foulkrod Street in Philadelphia, Pennsylvania.

(3) On January 7, 2002, defendant LINDA WESTON took T.B. to a Social

Security office in Philadelphia and made an application to become T.B.'s representative payee for social security benefits which T.B. was receiving for a mental disability. Defendant WESTON began collecting T.B.'s disability benefit payments after SSA approved WESTON's application to be the representative payee for T.B.

(4) On January 9, 2002, defendant LINDA WESTON took E.S. to a Social Security office in Philadelphia and made an application to become E.S.'s representative payee for social security benefits which E.S. was receiving for a physical and mental disability. Defendant WESTON began collecting E.S.'s disability payments after SSA approved WESTON's application to be the representative payee for E.S.

(5) In or around February, 2002, defendant LINDA WESTON received her first social security disability check on behalf of T.B. and diverted that payment for her own use and the use of the WF.

(6) In or around February, 2002, defendant LINDA WESTON received her first social security disability check on behalf of E.S. and diverted that payment for her own use and the use of the WF.

(7) Within weeks of collecting T.B.'s and E.S.'s disability benefits, defendants LINDA WESTON and GREGORY THOMAS, SR. installed locks on the doors and began to confine T.B. and E.S. to the basement. Defendant THOMAS, SR. installed a lock on the basement door and defendant WESTON kept the key. WESTON prohibited T.B. and E.S. from using the bathroom to relieve herself or himself or bathe. WESTON provided T.B. and E.S. with a bucket or other container. WESTON did not feed T.B. and E.S. the same food WESTON fed her family. Instead, WESTON fed T.B. and E.S. a combination of rice and beans, Ramen noodles, and stew.

WESTON regularly drugged T.B.'s and E.S.'s food. WESTON denied T.B.'s and E.S.'s requests to leave the basement.

From in or around March, 2002 to in or around March, 2008:

(8) Defendants LINDA WESTON and GREGORY THOMAS, SR. moved their family and T.B. and E.S. to different residences in Philadelphia and its surrounding suburbs. During these moves, defendants WESTON and THOMAS, SR. locked T.B. and E.S. in basements, attics, and closets. WESTON banished T.B. and E.S. from living in any area of the residences occupied by WESTON, THOMAS, SR., or their children. WESTON continued to feed T.B. and E.S. a variation of Ramen noodles, stew, and rice and beans. Moreover, WESTON continued to place drugs in T.B.'s and E.S.'s food and prohibit them from using the bathrooms.

(9) When E.S. ran away from defendants LINDA WESTON and GREGORY THOMAS, SR., defendant WESTON lied and convinced E.S. to return by telling him that the police were looking for him in reference to an earlier incident.

(10) Defendant LINDA WESTON ordered E.S. to beat T.B., M.L., and B.W. because they allegedly either stole food or did something to anger defendant WESTON.

(11) Defendants LINDA WESTON and JEAN MCINTOSH regularly beat T.B. with their fists, sticks, belts, bats, and hammers. WESTON also directed her minor children (and E.S.) to beat T.B.

(12) Defendant LINDA WESTON told E.S. and T.B. that she wanted them to have children for defendant WESTON. Defendant WESTON directed T.B. and E.S. to have sexual relations, one of the results of which was a stillborn, full term, baby girl born on September 28, 2004.

(13) When T.B. gave birth to the stillborn baby girl on September 28, 2004, defendant LINDA WESTON accompanied T.B. to the hospital and instructed her to use WESTON's name.

(14) When T.B. subsequently gave birth to a baby girl on March 31, 2006, defendant LINDA WESTON accompanied T.B. to Pennsylvania Hospital. In an effort to have the hospital list the birth mother as "Linda Weston" on birth records, defendant WESTON instructed T.B. to identify herself as "Linda Weston." Upon learning that T.B. forgot to identify herself as "Linda Weston" to hospital personnel, WESTON chastised T.B. and identified herself to hospital personnel as T.B.'s mother.

(15) Defendant LINDA WESTON later told a series of lies to T.B., E.S. and others about the baby girl born to T.B. First, defendant WESTON lied to T.B. and E.S. when she told them that the baby girl had died in the hospital. Second, WESTON lied to T.B. and E.S. when she identified the newborn baby girl as defendant JEAN MCINTOSH's baby. WESTON lied a third time when she subsequently told T.B., E.S. and others that she (WESTON) was the real mother of the baby girl who she named L.A.M.W., subsequently named "Little L."

(16) Defendant GREGORY THOMAS, SR. forced T.B. to have sexual intercourse with him against her will while WESTON watched.

(17) On or about February 26, 2008, defendants LINDA WESTON and GREGORY THOMAS, SR. transported T.B., E.S. and several other mentally disabled captives, against their will, from Philadelphia, Pennsylvania to Killeen, Texas. Defendant JEAN MCINTOSH had already transported the other members of the WF, including one of the minor couples, to Killeen, Texas.

From in or around March, 2008 to in or around August/September, 2008:

(18) Defendant LINDA WESTON and other members of the WF held T.B. and E.S. against their will in apartments or the attics of various locations throughout Killeen, Texas. Defendant WESTON told T.B., E.S. and the other mentally disabled captives to be quiet when company came over and not to move around. Defendant WESTON and other members of the WF subjected T.B. and E.S. to abusive control and confinement techniques while in various residences in Killeen, Texas. As part of these techniques, defendant WESTON permitted the minor children to beat T.B. and continued to order E.S. to beat T.B. WESTON and defendant JEAN MCINTOSH also beat T.B.

(19) Defendant LINDA WESTON ordered E.S. to beat T.B., M.L. and B.W.

(20) On July 23, 2008, while holding T.B. in Killeen, Texas against her will, defendant LINDA WESTON applied to be T.B.'s representative payee for additional Social Security benefits T.B. was eligible to receive.

From in or around August/September, 2008 through on or about November 14, 2008:

(21) In or around August/September 2008, defendants LINDA WESTON and GREGORY THOMAS, SR. transported T.B., E.S. and several other mentally disabled captives, against their will, from Killeen Texas, to Norfolk, Virginia.

(22) Defendants LINDA WESTON, GREGORY THOMAS, SR. and other members of the WF held T.B, and E.S. against their will in an apartment in Norfolk, Virginia. They and other mentally disabled captives were locked in the apartment with THOMAS. WESTON assigned THOMAS the task of guarding them. Only WESTON and THOMAS possessed a key. WESTON and other members of the WF subjected T.B. and E.S. to abusive

control and confinement techniques. As part of these techniques, WESTON continued to regularly drug T.B.'s and E.S.'s food and ordered E.S. to beat T.B. because T.B. allegedly either stole food or did something to anger defendant LINDA WESTON.

(23) Defendant LINDA WESTON offered E.S. sexual intercourse as a means of controlling E.S.

(24) On November 10, 2008, defendant LINDA WESTON filed a fraudulent payee expenditure report with the SSA, falsely claiming that she had expended T.B.'s social security benefits on the health and welfare of T.B.

From on or about November 14, 2008 through in or around August, 2009:

(25) Defendants JEAN MCINTOSH, LINDA WESTON, and GREGORY THOMAS, SR. transported T.B., E.S. and several other mentally disabled captives from Virginia to Philadelphia after the death of M.L.

(26) On November 19, 2008, in Philadelphia, defendant LINDA WESTON filed a fraudulent payee expenditure report with the SSA, falsely claiming that she had expended E.S.'s social security benefits on the health and welfare of E.S.

(27) In or around February, 2009, defendant LINDA WESTON received T.B.'s first Title II benefit payment from Social Security and diverted those funds to the use of the WF.

(28) On March 25, 2009, defendants LINDA WESTON and JEAN MCINTOSH contrived a plan to trick the hospital staff at the University of Pennsylvania into listing defendant MCINTOSH as the mother of a baby boy born to T.B. In accordance with this plan, defendant WESTON instructed TB to use MCINTOSH's name when T.B. gave birth to a baby boy at the hospital on March 25, 2009. T.B. did as she was told and used the name Jean Nashay

MCINTOSH. To further the scheme, WESTON and MCINTOSH accompanied T.B. to the hospital and posed as T.B.'s mother and aunt, respectively.

(29) Defendant JEAN MCINTOSH, as Laronda Smith, and defendant LINDA WESTON made arrangements for the baby to be discharged to MCINTOSH's home, citing T.B.'s mental health status as a reason for doing so.

(30) Defendants LINDA WESTON and JEAN MCINTOSH caused T.B. to add them to the approved visitor's list for the baby and also caused her to sign an authorization for the baby to come home with WESTON.

(31) On March 31, 2009, defendants LINDA WESTON and JEAN MCINTOSH brought T.B.'s son home to defendant MCINTOSH's apartment on Busti Avenue in Philadelphia. They told T.B., E.S. and everyone else that the baby belonged to MCINTOSH.

(32) In or around 2009, defendant LINDA WESTON, acting as a caretaker for the baby, named "D.M.M.," submitted an application to Social Security to receive benefits as a result of complications from "D.M.M's" premature birth.

(33) On April 3, 2009, in Philadelphia, Pennsylvania, defendant LINDA WESTON filed a fraudulent payee expenditure report with the SSA, falsely claiming that she had expended E.S.'s social security benefits on the health and welfare of E.S.

From in or around August, 2009 through in or around July, 2010:

(34) In or around August, 2009, defendants LINDA WESTON, JEAN MCINTOSH and GREGORY THOMAS, SR., transported T.B., E.S. and several other mentally disabled captives, against their will, from Philadelphia, Pennsylvania to Killeen, Texas.

(35) Defendant LINDA WESTON forced to T.B. to have sex with men solicited

by WESTON in exchange for payment of money which was always given to WESTON.

(36) Defendants LINDA WESTON, JEAN MCINTOSH and other members and associates of the WF continued to subject T.B. and E.S. to abusive conditions of control and confinement. WESTON and MCINTOSH continued to beat T.B.

(37) After defendant EDDIE WRIGHT began a relationship with defendant LINDA WESTON, he joined in the physical abuse of T.B. by beating her with his fists. WRIGHT also helped the WF transport, control, confine, and discipline the mentally disabled captives.

(38) Defendant JEAN MCINTOSH hired an attorney to prepare a Special Power of Attorney granting all of her parental rights for "D.M.M" and corresponding rights to defendant LINDA WESTON, falsely asserting that D.M.M. was defendant MCINTOSH's child.

(39) On March 4, 2010, defendant LINDA WESTON filed a fraudulent payee expenditure report with the SSA, falsely claiming that she had expended T.B.'s social security benefits on the health and welfare of T.B.

(40) On March 8, 2010, defendant LINDA WESTON filed a fraudulent payee expenditure report with the SSA, falsely claiming that she had expended E.S.'s social security benefits on the health and welfare of E.S.

(41) Defendant LINDA WESTON ordered E.S. to assist defendant EDDIE WRIGHT in stealing copper and other materials for re-sell so that she could obtain additional funds.

From in or around July, 2010 through October, 2011:

(42) On or about July 6, 2010, defendants LINDA WESTON, EDDIE WRIGHT and GREGORY THOMAS, SR. transported T.B., E.S. and several other mentally disabled

captives from Killeen, Texas to West Palm Beach, Florida.

(43) While in West Palm Beach, Florida, defendant LINDA WESTON forced T.B. to have sex with men solicited by in WESTON in exchange for payment of money which was always given to WESTON.

(44) Defendants LINDA WESTON, EDDIE WRIGHT and other members and associates of the WF., subjected T.B. and E.S. to abusive, control and confinement techniques while in West Palm Beach, Florida. As part of these techniques, WESTON and WRIGHT beat T.B.

(45) After defendant NICKLAUS WOODARD began a relationship with defendant LINDA WESTON, he joined in the physical abuse of T.B. by repeatedly beating her with his fists and pistol whipping her.

(46) While in West Palm Beach, Florida, defendant LINDA WESTON ordered E.S. to assist defendant EDDIE WRIGHT in stealing copper and other items to sell in order to provide LINDA WESTON and the WF with additional funds.

(47) On or about May 23, 2011, defendant LINDA WESTON filed a fraudulent payee expenditure report with the SSA, falsely claiming that she had expended T.B.'s social security benefits on the health and welfare of T.B.

(48) On or about May 23, 2011, defendant LINDA WESTON filed a fraudulent payee expenditure report with the SSA, falsely claiming that she had expended E.S.'s social security benefits on the health and welfare of E.S.

Overt Acts Directed At M.L.

From in or around 2002 through in or around March, 2008:

(49) In or around 2002, defendant LINDA WESTON met M.L. on a party line, established a romantic relationship with her, and convinced M.L. to move in with her and defendant GREGORY THOMAS, SR. and the rest of the Weston family at 1749 Foulkrod Street in Philadelphia, Pennsylvania.

(50) Initially defendant LINDA WESTON treated M.L. as her girlfriend and the two slept together in the same bedroom. However, after a few months or so, defendant WESTON confined M.L. in the basement with T.B. and E.S. Like them, defendant WESTON submitted M.L. to abusive control conditions: WESTON did not allow M.L. to use the bathroom to relieve herself or bathe and M.L. was forced to share a bucket or other container with the others confined to the basement; WESTON no longer allowed M.L. to eat with the “WF,” but instead fed her a combination of rice and beans, Ramen noodles, and stew; and WESTON regularly placed drugs in M.L.’s food. WESTON denied M.L.’s requests to leave WESTON’s home and punished her with violence or threats of violence.

(51) Defendant LINDA WESTON permitted M.L. out of the basement to babysit the younger children of WESTON and defendant GREGORY THOMAS, SR. as well as perform other household chores as directed by WESTON. WESTON never paid M.L. for performing these duties.

(52) Defendants LINDA WESTON and GREGORY THOMAS, SR. and the WF resided in numerous homes in Philadelphia and its surrounding suburbs, and WESTON subjected M.L. to abusive conditions of confinement and control at every one of these residences.

(53) When defendant LINDA WESTON suspected that M.L. may be pregnant by defendant GREGORY THOMAS, SR., she and defendant JEAN MCINTOSH attacked M.L. after

making her strip and get into the bathtub. They hit her with a bat and stick and punched and kicked her all over her body.

(54) Defendants LINDA WESTON and JEAN MCINTOSH beat M.L. regularly. They used a combination of bats, sticks, hammers and open fists; striking her in the face, head, and all over the rest of her body. Defendants WESTON and MCINTOSH never treated M.L.'s wounds from these beatings and never sought medical treatment for M.L.

(55) Defendant LINDA WESTON ordered E.S. to beat M.L. when M.L. did not follow WESTON's instructions.

(56) In or around April, 2005, when D.S. came to live with defendants LINDA WESTON and GREGORY THOMAS, SR., defendant WESTON ordered M.L. to take care of D.S. who needed help dressing, eating, and washing herself.

(57) Defendant LINDA WESTON ordered M.L. and E.S. to move D.S.' body after D.S. died in the basement on Glenview Street in Philadelphia.

(58) In or around March, 2006, when defendant LINDA WESTON brought L.A.M.W. home from the hospital, WESTON instructed M.L. to take care of her newborn baby, which M.L. did without receiving payment. WESTON, defendant JEAN MCINTOSH, and E.S., at defendant LINDA WESTON's direction, beat M.L. if she did not take care of L.A.M.W. in the manner directed by WESTON.

(59) On August 21, 2007, defendant LINDA WESTON took M.L. to a Social Security office in Philadelphia and made M.L. file an application for social security disability benefits. Defendant WESTON told M.L. to act as if she had a mental disability. After the SSA approved the application based on M.L.'s mental condition and began to issue disability benefit

payments to M.L., WESTON took the disability benefit payments.

(60) On December 31, 2007, defendant LINDA WESTON took M.L. to a Social Security office in Philadelphia where she applied to become M.L.'s representative payee. In applying to become the representative payee, WESTON lied on the application by falsely stating that she had never been convicted of a felony or served more than a year in prison. WESTON collected M.L.'s disability payments after the SSA approved her application to become M.L.'s representative payee.

(61) Defendant LINDA WESTON directed M.L. to write a favorable letter about WESTON to the Philadelphia Department of Human Services so that WESTON could take custody of four minor children who were in the custody of WESTON's sister, including N.S. and E.Sa.

(62) In or around February, 2008, when M.L. attempted to escape from the WF's apartment on Lieper Street in Philadelphia, defendant LINDA WESTON caught her and dragged her back into the apartment where WESTON beat M.L. all over her body. WESTON then beat M.L. on her feet with an object that caused them to bleed and swell up.

(63) To ensure that M.L. could not run away again, defendant GREGORY THOMAS, SR. locked M.L. in the bathroom of an apartment of the W.F., where M.L. remained until the WF moved to Killeen, Texas.

(64) On or about February 26, 2008, defendants LINDA WESTON and GREGORY THOMAS, SR. transported M.L., T.B., E.S. and B.W., against their will, from Philadelphia, Pennsylvania to Killeen, Texas.

(65) From in or around March, 2008 to in or around August/September, 2008,

defendants LINDA WESTON, JEAN MCINTOSH and GREGORY THOMAS, SR. held M.L. against her will in apartments or the attics of various locations in Killeen, Texas. While being held in these apartments or attics, defendants WESTON, MCINTOSH and THOMAS, SR., subjected M.L. to abusive, control and confinement techniques. WESTON directed M.L. and other captives to be quiet when company came over and not to move around. While WESTON and MCINTOSH continued to beat M.L. as part of the abusive conditions of control and confinement, WESTON also permitted the minor children to beat M.L. and continued to order E.S. to beat M.L.

(66) Defendant LINDA WESTON at times ordered M.L. to watch L.A.M.W., a task for which WESTON never paid her.

(67) On one occasion while the WF lived in a house on Paintrock Street in Killeen, Texas, defendant LINDA WESTON and others acting on her behalf severely beat M.L. after M.L. moved around in the attic where she had been confined and fell through the ceiling.

From in or around August/September, 2008 through in or around November, 2008:

(68) In or around August/September 2008, defendants LINDA WESTON, and GREGORY THOMAS, SR. transported M.L. and several other mentally disabled captives, against their will, from Killeen, Texas to Norfolk, Virginia.

(69) Upon arrival in Virginia, defendant LINDA WESTON ordered M.L. to stay inside of the kitchen cabinet under the sink of a residence occupied by the WF.

(70) Defendant LINDA WESTON gave M.L. little or no food while she was confined to the kitchen cabinet.

(71) Defendant LINDA WESTON beat M.L. when M.L. broke the kitchen cabinet door. WESTON ordered M.L. to strip off all of her clothes and go up into the attic.

(72) Defendant LINDA WESTON forced M.L. to sit and sleep on top of the exposed insulation in the unfinished attic. WESTON rarely provided food to M.L. WESTON prohibited members of the WF from providing M.L. with food or drink without WESTON's permission, even when M.L. asked for food or drink through an opening in the attic floor.

(73) On November 13, 2008, after M.L. repeatedly complained that she was not feeling well, defendant LINDA WESTON relented and directed others in the home to help remove M.L. from the attic. As M.L.'s physical condition continued to deteriorate, WESTON directed B.W. to force-feed M.L. a can of kidney beans. WESTON also instructed others to wash M.L. and provide her with clean clothes.

(74) As M.L.'s condition further deteriorated, as evidenced by her eyes rolling back and her inability to speak, defendant LINDA WESTON directed others to place M.L. in the living room of the residence, where she died on November 13, 2008.

(75) Defendant LINDA WESTON instructed the minor children to place M.L.'s body on a chair with wheels and then move her body to the bedroom shared by minors So. T., N.S. and their young son. WESTON then ordered the children to clean the room, move the television inside of the bedroom, and place blankets over M.L.'s body so it looked like M.L. died while watching television.

(76) Defendant LINDA WESTON directed all of the children to walk with her to the apartment where defendant GREGORY THOMAS, SR. was holding the other mentally disabled captives. At the apartment, defendant WESTON called defendant JEAN MCINTOSH in Philadelphia and asked her to come get them since she was afraid of what would happen as a result of M.L.'s death.

(77) Defendant LINDA WESTON took her son GTJr. and T.B. back with her to the house where M.L. lay dead and called the police.

(78) Defendant LINDA WESTON lied to the police about the circumstances surrounding M.L. being in Virginia and about the circumstances of her captivity and ultimate death.

(79) Defendant LINDA WESTON caused the death of M.L., which the medical examiner attributed to acute bacterial meningitis and cachexia (starvation).

(80) On or about November, 14, 2008, the day after M.L. died, defendants JEAN MCINTOSH, LINDA WESTON, and GREGORY THOMAS, SR. transported the other mentally disabled captives from Virginia to Philadelphia, Pennsylvania in an effort to thwart further inquiry by authorities in Virginia into the cause of M.L.'s death.

(81) Defendant LINDA WESTON continued to collect social security benefits on behalf of M.L. after her death. Defendant LINDA WESTON kept these benefits even after Social Security ordered her to refund the benefits upon learning of M.L.'s death from officials in Virginia.

Overt Acts directed at B.W.

From in or around August 2002, to in or around March, 2008:

(82) On August 16, 2002 defendant LINDA WESTON obtained temporary custody of her niece, B.W., after it was determined that B.W.'s mother was unable to care for her and her siblings at that time. Defendant WESTON moved B.W., who was approximately 10 years old, in with her family where she was afforded the same food, clothing, and privileges as defendant WESTON'S minor children.

(83) After April 9, 2003, when defendant LINDA WESTON was granted full

custody of B.W., defendant WESTON began to gradually treat B.W. in the same manner that she treated T.B., E.S. and M.L. WESTON subjected B.W. to the same abusive, control and confinement techniques, including, occasionally locking her in the basement, feeding her a diet primarily of rice and beans, and was no longer affording her any of the privileges her cousins enjoyed.

(84) Defendant LINDA WESTON tasked B.W. with taking the food downstairs to the mentally disabled captives after WESTON prepared it. WESTON placed drugs in the drinks and/or food she prepared for these people which caused them to fall asleep shortly after their meal.

(85) Defendant LINDA WESTON instructed E.S. to guard B.W. and to beat her if she did not follow WESTON'S instructions. WESTON also permitted her minor children to beat B.W. Defendant JEAN MCINTOSH also beat B.W. There were also occasions when WESTON and MCINTOSH joined together in beating B.W. with bats, stick, pipes, and their fists. WESTON and MCINTOSH provided no medical treatment for the bleeding and bruising that resulted from these beatings.

(86) On occasion, defendant GREGORY THOMAS, SR. restrained B.W. while she was being beaten.

(87) Eventually, defendant LINDA WESTON forbade B.W. from attending school, forcing B.W. to help M.L. with household chores such as cooking, cleaning, and washing clothes.

(88) Defendant LINDA WESTON often confined B.W. to a bathroom and hall closets.

(89) On or about February 26, 2008, defendants LINDA WESTON and

GREGORY THOMAS, SR. transported B.W. and several mentally disabled captives, against their will, from Philadelphia, Pennsylvania to Killeen, Texas after defendant JEAN MCINTOSH had already transported the other members of the WF, including one of the minor couples, to Killeen, Texas.

From in or around March, 2008 to in or around August/September, 2008:

(90) Defendant LINDA WESTON held B.W. against her will in a home in Killeen, Texas, where WESTON and the WF subjected B.W. to abusive, confinement and control techniques. WESTON, defendant JEAN MCINTOSH, and other members of the WF continued to beat B.W.

(91) Defendant LINDA WESTON confined B.W. to closets, rooms and attics when she was not performing household chores.

(92) Defendant LINDA WESTON also continued to permit the minor children to beat B.W. and continued to order E.S. to beat B.W. for failing to do as she was told by defendant WESTON and other WF members.

(93) Defendant LINDA WESTON occasionally ordered B.W. to watch L.A.M.W.

From in or around August/September, 2008 through in or around November, 2008:

(94) Defendants LINDA WESTON and GREGORY THOMAS, SR. transported B.W. and the mentally disabled captives, against their will, from Killeen, Texas to Norfolk, Virginia.

(95) Upon arrival in Virginia, defendant LINDA WESTON ordered B.W. to stay inside of locked rooms.

(96) Defendant LINDA WESTON held B.W. against her will in a home and subjected her to abusive, control and confinement techniques. As part of these techniques, defendant WESTON and other members of the WF continued to beat B.W.

(97) Defendant LINDA WESTON and other members of the WF often confined B.W. to closets, rooms and attics when she was not performing services on behalf of WESTON. WESTON directed B.W. to take on the primary role of performing household chores and watching and caring for L.A.M.W. when she was not confined.

(98) Defendant LINDA WESTON also continued to permit the minor children to beat B.W. and continued to order E.S. to beat B.W. for failing to do as she was told by WESTON and other WF members.

(99) Defendant LINDA WESTON, on occasion, sent B.W. to the unfinished attic where she forced B.W. and M.L. to sit and sleep on top of exposed asbestos insulation. WESTON fed B.W. sporadically, though more often than M.L.

(100) On November 13, 2008, defendant LINDA WESTON ordered B.W. to help her stage the scene after M.L. died to hide from authorities the fact that WESTON's abuse and neglect of M.L. had caused M.L.'s death.

From in or around November, 2008 through in or around August, 2009:

(101) Defendants JEAN MCINTOSH, LINDA WESTON, and GREGORY THOMAS, SR. transported B.W. and the mentally disabled captives from Norfolk, Virginia to Philadelphia, Pennsylvania after the death of M.L.

(102) Defendant GREGORY THOMAS, SR. sexually assaulted B.W.

(103) Defendant LINDA WESTON continued to hold B.W., at the time a teenager

between the ages of 16 and 17, against her will in various homes occupied by the WF. Defendant WESTON and other members of the WF continued to subject B.W. to abusive, control and confinement techniques in whatever home they occupied. As part of these techniques, WESTON, defendant JEAN MCINTOSH, and other members of the WF continued to beat B.W.

(104) Defendant LINDA WESTON made B.W. solely responsible for performing household chores and watching and caring for L.A.M.W. As in other locations the WF occupied, WESTON confined B.W. to closets, rooms and attics when B.W. was not performing services for WESTON and the WF.

(105) Defendant LINDA WESTON continued to permit the minor children to beat B.W. and continued to order E.S. to beat B.W. for failing to do as she was told by defendant WESTON and other WF members.

From in or around August, 2009 through in or around July, 2010:

(106) In or around August, 2009, defendants LINDA WESTON, GREGORY THOMAS, SR. , and JEAN MCINTOSH transported B.W. and the mentally disabled captives, against their will, from Philadelphia, Pennsylvania to Killeen, Texas.

(107) In Killeen, Texas, defendant LINDA WESTON forced B.W., who had turned 18 in December, 2009, to have sex with men solicited by defendant WESTON in exchange for payment of money which was provided to WESTON.

(108) Defendant LINDA WESTON continued to subject B.W. to abusive, control and confinement techniques while in residences in Killeen. As part of these techniques, defendants WESTON, JEAN MCINTOSH, EDDIE WRIGHT and other members of the WF beat B.W.

From in or around July, 2010 through October, 2011:

(109) Defendants LINDA WESTON, EDDIE WRIGHT and GREGORY THOMAS, SR. transported B.W. and the mentally disabled captives, against their will, from Killeen, Texas to West Palm Beach, Florida.

(110) In West Palm Beach, Florida, defendant LINDA WESTON forced B.W. to have sex with men solicited by WESTON in exchange for payment of money, which was provided to WESTON.

(111) Defendant LINDA WESTON and other members of the WF subjected B.W. to abusive, control and confinement techniques. As part of these techniques, defendant WESTON sometimes did not feed B.W. everyday. Defendants WESTON, EDDIE WRIGHT and other members of the WF continued to beat B.W.

(112) After defendant NICKLAUS WOODARD began a relationship with defendant LINDA WESTON, he joined in the physical abuse of B.W. by repeatedly beating her with his fists and pistol whipping her, causing a significant injury to her ear.

(113) Defendant LINDA WESTON continued to force B.W. to perform household chores and watch and care for L.A.M.W.

Overt Acts Directed at D.S.

From in or around April, 2005 through June 26, 2005:

(114) In or about April 2005, defendants LINDA WESTON and GREGORY THOMAS, SR. picked D.S. up on a corner in the Frankford section of Philadelphia, PA after D.S. had recently been released from a mental health treatment facility. Defendant LINDA WESTON persuaded D.S. to stay with her, defendant THOMAS, SR, and the rest of the Weston family at 2211 Glenview Avenue in Philadelphia, Pennsylvania. Defendant LINDA WESTON portrayed

D.S. to her children as WESTON's girlfriend.

(115) Defendant LINDA WESTON ordered D.S. down into the laundry room area of the basement where T.B., E.S., M.L. and B.W. were already being confined in front portion of the basement. Defendants WESTON and GREGORY THOMAS, SR. had already installed locks on the doors and began to confine D.S. to the basement in the same manner as T.B., E.S., M.L. and B.W. THOMAS, SR. also installed a lock on the door leading to the laundry room area of the basement, separating D.S. from the others. WESTON allowed no one to go into or come up from the basement without WESTON'S permission. She prohibited D.S. from using the bathroom to relieve herself or bathe and provided D.S. with a bucket or other container. WESTON no longer fed D.S. the same food WESTON fed her family. Instead she gave D.S. a combination of rice and beans, Ramen noodles, and stew. WESTON denied D.S.'s requests to leave WESTON's home. WESTON regularly placed drugs in D.S.' food, causing D.S. to sleep many hours after mealtime. Defendant LINDA WESTON did not permit anyone else to give D.S. her medication.

(116) On June 3, 2005, defendant LINDA WESTON took D.S., who had been collecting social security benefits for a mental disability since 1985, to a Social Security office in Philadelphia and submitted an application to become D.S.'s representative payee. WESTON began collecting D.S.'s disability benefit payments after the SSA approved WESTON's application and diverted the funds to the WF.

(117) On June 26, 2005, when defendant LINDA WESTON and other Weston family members discovered that D.S. had died in the laundry room, defendants LINDA WESTON, GREGORY THOMAS, SR., and JEAN MCINTOSH moved the minor children to MCINTOSH' home.

(118) Later, on June 26, 2005, defendant LINDA WESTON and GREGORY THOMAS, SR. returned to the home and began to cover up the circumstances in which D.S. had been confined. WESTON and THOMAS moved D.S.' body from the laundry room area of the basement to the front room of the basement and placed her body in the bed belonging to E.S. and T.B. They also placed a table with nine bottles of pills on top of it, next to the bed. WESTON and THOMAS then caused D.S.'s bed and other items to be removed from the basement before the Philadelphia police responded and removed any evidence that D.S. had been forced to live in the basement. Defendant Weston then called the police.

(119) WESTON gave police false information about the circumstances surrounding D.S.' living conditions and her death.

(120) Defendant LINDA WESTON staged a false death scene in an effort to conceal her abuse of D.S.

(121) In early July 2005, less than two weeks after the death of D.S., defendant LINDA WESTON collected her first disability check on behalf of D.S. from Social Security. WESTON cashed this check and used the funds for the benefit of herself and members and associates of the W.F. Despite an order from Social Security that WESTON repay the benefits to Social Security, WESTON kept them.

Overt Acts Directed at N.S. and E.Sa.

From in or around July 2007 to in or around February 2008:

(122) In or around July 2007, defendant LINDA WESTON, GREGORY THOMAS, SR., and others known and unknown to the grand jury, interfered with the Philadelphia Department of Human Services' (DHS) lawful custody of minors N.S., a 14 year old boy, and

E.Sa., the 13 year old sister of N.S..

(123) Without the authorization of DHS, defendant LINDA WESTON took custody of N.S. and E.Sa after N.S., E.Sa and their other siblings ran away from a foster parent who had been taking care of the children under the authority and supervision of DHS.

(124) Defendant LINDA WESTON moved N.S. and E.Sa. to defendant WESTON's home on A Street in Philadelphia, Pennsylvania.

(125) Defendant LINDA WESTON promoted a romantic relationship between her 13 year old daughter, So.T., and N.S. by permitting So.T. and N.S. to occupy the same bedroom and to engage in sexual relations.

(126) Defendant LINDA WESTON promoted a romantic relationship between her 14 year old son, G.T., Jr., and E.Sa. by permitting G.T., Jr. and E.Sa. to occupy the same bedroom and engage in sexual relations.

(127) Defendant LINDA WESTON encouraged N.S. and E.Sa. to tell DHS that they did not want to live with the foster parent authorized by DHS to care for N.S. and E.Sa., and instead wanted to live with defendant WESTON and her family, including G.T., Jr. and So.T.

(128) After DHS denied these requests, defendant LINDA WESTON nevertheless took unauthorized custody of N.S. and E.Sa., hid them from DHS investigators and the Philadelphia Police by moving them around in various locations in Philadelphia, and lied about their whereabouts when questioned by investigators.

From in or around February 2008 to in or around October 2011:

(129) On or about February 26, 2008, defendants LINDA WESTON and GREGORY THOMAS, Sr., without the authority and permission of DHS, transported N.S. from

Philadelphia, Pennsylvania to Killeen, Texas where N.S. continued to live with defendants WESTON, THOMAS, Sr. and other members of the WF.

(130) In Killeen, Texas, defendant WESTON continued to promote a romantic and sexual relationship between her 13 year old daughter, So.T., and N.S., which eventually resulted in the birth of X.T., the child of So.T., and N.S..

(131) In or about February 2008, without the authority and permission of DHS, defendant JEAN McINTOSH transported E.Sa. from Philadelphia to Killeen, Texas where E.Sa. lived with defendants LINDA WESTON, GREGORY THOMAS, Sr. and other members of the WF.

(132) In Killeen, Texas, defendant WESTON continued to promote a romantic and sexual relationship between her 14 year old son, G.T., Jr., and E.Sa.

(133) In or around August or September 2008, defendants LINDA WESTON and GREGORY THOMAS, Sr., without the authority or permission of DHS, transported N.S. and E.Sa. from Killeen, Texas to Norfolk, Virginia where N.S. and E.Sa. continued to reside with defendants WESTON, THOMAS, Sr., and other members of the WF.

(134) In or around November 2008, defendants LINDA WESTON and GREGORY THOMAS, Sr., without the authority or permission of DHS, transported N.S. and E.Sa. from Norfolk, Virginia to Philadelphia where N.S. and E.Sa. continued to reside with defendants WESTON, THOMAS, Sr., and other members of the WF at various locations in Philadelphia, until N.S. ended his romantic and sexual relationship with WESTON's daughter, So.T. WESTON continued to interfere with DHS' legal custody of E.Sa. by permitting E.Sa. to live with WESTON and the WT.

(135) In or around August 2009, defendants LINDA WESTON and GREGORY THOMAS, Sr., without the authority or permission of DHS, transported E.Sa. from Philadelphia, Pennsylvania to Killeen, Texas where E.Sa. continued to reside with defendants WESTON, THOMAS, Sr., and other members of the WF.

(136) In or around July 2010, defendants LINDA WESTON, JEAN MCINTOSH and GREGORY THOMAS, Sr., without the authority or permission of DHS, transported E.Sa. from Killeen, Texas to West Palm Beach, Florida where E.Sa. continued to reside with defendants WESTON, THOMAS, Sr., and other members of the WF.

(137) In or around August 2011, when E.Sa. ended her romantic and sexual relationship with G.T., Jr. and left the WF residence in West Palm Beach, Florida, defendants LINDA WESTON and NICKLAUS WOODARD approached E.Sa. and, at gun point, threatened to kill E.Sa. if she told law enforcement about WESTON's and the WF's treatment of the mentally disabled adults.

Overt Acts Directed at H.K.

(138) In or around October, 2008, while residing in Norfolk, Virginia, defendant LINDA WESTON observed H.K. in a store and instructed T.B. to approach H.K. WESTON further instructed T.B. to tell H.K. that she wanted to be his girlfriend in order to get his telephone number. WESTON, with T.B.'s assistance, persuaded H.K. to give them his number.

(139) T.B. and defendant LINDA WESTON began to converse with H.K. over the telephone in an effort to persuade him to come live with them.

(140) In or around early to mid October, 2008, defendant LINDA WESTON persuaded H.K. to move into an apartment with T.B., E.S. and defendant GREGORY THOMAS,

SR., whom WESTON assigned the task of guarding them. After H.K. moved in, WESTON subjected H.K. to the same abusive, control and confinement techniques that she subjected T.B., E.S., M.L. and B.W. to, except WESTON initially permitted H.K. to leave the apartment to go to work. As part of these abusive, control and confinement techniques, WESTON and THOMAS, SR. regularly beat H.K. with their fists.

(141) On or about November 4, 2008, defendants LINDA WESTON and GREGORY THOMAS, SR. informed H.K. that he would no longer be allowed to go to work and thereafter prohibited him from leaving the apartment.

(142) On November 7, 2008, defendant LINDA WESTON took H.K. to the Social Security Office in Norfolk, Virginia and applied to be H.K.'s representative payee for benefits which he had been receiving.

(143) In or around August 2009, defendants JEAN MCINTOSH, LINDA WESTON, and GREGORY THOMAS, Sr. transported H.K., and several other mentally disabled captives, against their will, from Virginia to Philadelphia, Pennsylvania, after the death of M.L.

(144) Defendants LINDA WESTON, JEAN MCINTOSH and GREGORY THOMAS, Sr. held H.K. against his will in homes, apartments, and basements with the other mentally disabled captives. During the time that defendants held H.K. in Philadelphia, he was subjected to the same abusive, control and confinement techniques and conditions that were imposed on him in Virginia. Defendants WESTON and THOMAS, SR. continued to regularly beat H.K.

(145) In or around August, 2009, defendants LINDA WESTON, JEAN MCINTOSH and GREGORY THOMAS, SR. , transported H.K. and several other mentally

disabled captives, against their will, from Philadelphia, Pennsylvania to Killeen, Texas.

(146) On December 26, 2009, defendant LINDA WESTON filed a fraudulent payee expenditure report with the SSA which falsely stated that she had expended H.K.'s social security benefits on the health and welfare of H.K., when, as defendant WESTON well knew, she had spent H.K.'s benefits on herself and the W.F.

(147) In Killeen, Texas, defendants LINDA WESTON, JEAN MCINTOSH and GREGORY THOMAS, SR. continued to subject H.K. to the same abusive, control and confinement techniques that were imposed on him in Virginia and Philadelphia, Pennsylvania. As part of these techniques, defendants LINDA WESTON and GREGORY THOMAS, SR. continued to beat H.K.

(148) In July 2010, defendants LINDA WESTON, EDDIE WRIGHT and GREGORY THOMAS, SR. transported H.K. and several other mentally disabled captives, against their will, from Killeen, Texas to West Palm Beach, Florida.

(149) In West Palm Beach, Florida, defendants LINDA WESTON, JEAN MCINTOSH, EDDIE WRIGHT and GREGORY THOMAS, SR. continued to subject H.K. to the same abusive, control and confinement techniques that were imposed on him in Virginia, Philadelphia, Pennsylvania, and Killeen, Texas. As part of these techniques, defendants LINDA WESTON and GREGORY THOMAS, SR. continued to beat H.K.

(150) On January 7, 2011, defendant LINDA WESTON filed a fraudulent payee expenditure report with the SSA by falsely claiming that she had expended H.K.'s social security benefits on the health and welfare of H.K. when, as defendant WESTON knew, she had spent H.K.'s benefits on herself and the W.F.

Overt Acts Directed Towards D.M.

From in or around July, 2010 through October, 2011:

(151) On or around October, 2010, defendant LINDA WESTON met D.M. while chatting on a “party line” and frequently spoke with him over the course of several weeks.

(152) On or around the end of October, 2010, defendant LINDA WESTON convinced D.M. to move in with her by promising him that they would be together and enjoy a romantic relationship.

(153) On or about November 3, 2010, defendant Linda WESTON caused D.M., who had just received his latest disability payment, to move from Pompano, Florida into a home at 702 52nd Street, West Palm Beach, Florida with WESTON and defendant GREGORY THOMAS, SR. Defendant GREGORY THOMAS, SR. gave D.M. directions to the West Palm Beach home over the telephone.

(154) Upon his arrival, defendant LINDA WESTON informed D.M. that his rent of \$450.00 was due immediately. After collecting the rent, defendant WESTON persuaded D.M. to take her shopping. Defendant EDDIE WRIGHT drove them to a store where D.M. purchased personal items for WESTON. When they returned home, defendant WESTON persuaded D.M. to give her his food stamp card to help buy food for everyone. That evening, WESTON instructed D.M. to sleep in the room with defendant WESTON’s youngest son.

(155) The very next day, defendant LINDA WESTON moved D.M. to an apartment with T.B., E.S. and defendant EDDIE WRIGHT. Defendant WESTON assigned defendant WRIGHT the task of guarding them. WESTON subjected D.M. to the same treatment she gave to T.B. and E.S. and fed him a variation of Ramen noodles, stew, and rice and beans.

(156) Defendants LINDA WESTON and NICKLAUS WOODARD forced D.M. to give them all of his identification documents and social security card, at point of gun.

(157) Defendant LINDA WESTON ignored and refused D.M.'s requests to leave WESTON and the WF. Defendant NICKLAUS WOODARD caught D.M. when he attempted to run away. Defendant WOODARD forced D.M. to return to the home by placing a gun at his waist and threatening to shoot him. Defendants WESTON and WOODARD threatened to shoot D.M. if he ever tried to run away again. Defendant WOODARD also beat D.M. with his gun.

(158) Defendant LINDA WESTON directed members and associates of the WF to have a pit bull attack D.M. The pit bull bit D.M. several times on his arms and ear, resulting in the loss of the entire bottom of his right ear.

(159) Following D.M.'s escape attempt, defendants LINDA WESTON, GREGORY THOMAS, SR. and NICKLAUS WOODARD moved D.M. to a 52nd Street house where they locked him in a closet under the stairs in order to prevent him from running away again. Defendant WESTON subjected him to further inhumane conditions: he was fed on average once a day but not every day; he was provided a bottle to urinate in but nothing to place his waste in; he was beaten by WESTON when he defecated on himself and then forced to clean it up before being returned to the closet. On occasion, WESTON forced him to drink his own urine. WESTON confined D.M. in the closet until defendant WESTON moved the mentally disabled captives to another apartment.

(160) When they moved to the new apartment, defendant LINDA WESTON chained D.M. in a locked closet.

Overt Acts Arising out of Transport to Philadelphia

In or around October, 2011:

(161) Defendants LINDA WESTON, EDDIE WRIGHT and GREGORY THOMAS, SR. transported T.B., E.S., B.W., H.K., and D.M., against their will, from West Palm Beach, Florida to Philadelphia, Pennsylvania. The defendants confined T.B., E.S., B.W., H.K. and D.M., along with two dogs, in the cargo area of a sports utility vehicle. The defendants chained D.M. to B.W. and E.S. to make sure he did not escape

(162) Defendants LINDA WESTON, GREGORY THOMAS, SR., JEAN MCINTOSH, and EDDIE WRIGHT locked T.B., E.S. and D.M. inside of the sub basement of an apartment building located at 4724 Longshore Avenue in Philadelphia.

(163) Defendant LINDA WESTON directed that D.M. be chained to a boiler located in the sub-basement during the entire period of time he was locked in the sub-basement.

(164) Defendants LINDA WESTON, GREGORY THOMAS, SR., and EDDIE WRIGHT initially placed H.K. in the kitchen of defendant JEAN MCINTOSH's apartment, also located at 4724 Longshore Avenue in Philadelphia. Defendant WESTON and MCINTOSH then directed defendant WRIGHT to take him to the sub-basement where he was locked in the sub-basement with T.B., E.S., and D.M.

(165) Defendants LINDA WESTON and JEAN MCINTOSH confined B.W. in a bathroom closet inside defendant MCINTOSH'S apartment.

(166) Defendant GREGORY THOMAS, SR. installed a lock on the closet door so the B.W. could not escape.

(167) Defendant EDDIE WRIGHT slept in the sub-basement at night to guard T.B., E.S., H.K. and D.M. and make sure they did not make loud noises or try to escape.

(168) Defendant GREGORY THOMAS, SR. held the key to the lock for the chain wrapped around D.M.'s leg.

(169) Defendants LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, SR. and EDDIE WRIGHT forced T.B., E.S., H.K. and D.M. to live in squalid conditions. They fed them an inadequate diet of Ramen noodles, stew, rice and beans. They prohibited them from using a toilet and instead provided them with a bucket to relieve themselves. The defendants removed the lights from the basement and forced the captives to sleep on the dirt floor on makeshift beds made out of padding and wood. The defendants would not permit them to bathe, wash up, or change their clothing.

(170) Defendants LINDA WESTON, GREGORY THOMAS, SR., JEAN MCINTOSH and EDDIE WRIGHT kept T.B., E.S., H.K. and D.M. captive in the sub-basement until October 15, 2011, when Philadelphia Police, alerted to their presence, freed them from the sub-basement at 4724 Longshore Avenue.

(171) While the police were investigating the captivity of T.B., E.S., H.K. and D.M. in the sub-basement, defendant JEAN MCINTOSH kept B.W. concealed inside her apartment. Later that day, defendant MCINTOSH directed other persons to remove B.W. from the closet and take her to another location. MCINTOSH ordered B.W. to put on Muslim clothing to cover the injuries to her face and head caused by the defendants and other members of the WF.

Overt Acts Directed at B.R.

From in or around July, 2010 through October, 2011:

(172) In or around July, 2011, defendants LINDA WESTON and JEAN MCINTOSH, interfered with the lawful custody of B.R., a 13 year old female, who was estranged

from her family. Defendant WESTON and MCINTOSH, who knew that B.R.'s parents were looking for her, nevertheless concealed B.R. by helping her run away and hide with defendant MCINTOSH and G.T., Jr.

(173) In or about July 2011, defendant JEAN MCINTOSH arranged for her boyfriend, M.C., to pick up defendant MCINTOSH, B.R. and GTJr and drive them to Killeen, Texas.

(174) Subsequently defendant JEAN MCINTOSH arranged for her boyfriend, M.C., to take MCINTOSH, B.R. and GTJr to Philadelphia, Pennsylvania, where B.R. remained until October 16, 2011 when Philadelphia Police discovered her in the custody of a relative of defendants MCINTOSH and WESTON.

NOTICE OF SPECIAL SENTENCING FACTORS

THE GRAND JURY FURTHER FINDS THAT:

The allegations and facts set forth in this Notice of Special Sentencing Factors relate to Count One:

1. From in or around 2002 through in or around September, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, during the commission of a kidnaping, defendants LINDA WESTON, GREGORY THOMAS, SR., and JEAN MCINTOSH knowingly and willfully held and aided and abetted the holding of M.L., in involuntary service for a term, [through use of physical restraint, force, threats of force, and legal coercion], in violation of Title 18, United States Code, Section 1584(a).

2. On or about June 26, 2005, at Philadelphia, in the Eastern District of Pennsylvania, defendant LINDA WESTON caused the death of D.S., during the commission of a kidnaping, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2502.

3. On or about November 13, 2008, at Norfolk, Virginia, defendant LINDA WESTON caused the death of M.L., a person known to the grand jury, during the commission of a kidnaping, in violation of the laws of the Commonwealth of Virginia, that is, Title 18 Code of Virginia, Section 18.2 - 33.

4. From in or around August, 2009 through in or around October, 2011, at Killeen, Texas and West Palm Beach, Florida, defendant LINDA WESTON in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained B.W., and benefitted financially from participation in a venture which engaged such

acts, knowing and in reckless disregard of the fact that B.W. had not attained the age of 18 years, and knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and combinations of such means would be used to cause B.W. to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591.

5. From in or around August, 2009 through in or around October, 2011, at Killeen, Texas and West Palm Beach, Florida, during the commission of a kidnaping, defendant LINDA WESTON in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained T.B., and benefitted financially from participation in a venture which engaged such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and combinations of such means would be used to cause T.B. to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591.

6. From in or around December, 2009 through in or around October, 2011, at Killeen, Texas and West Palm Beach Florida, during the commission of a kidnaping, defendants LINDA WESTON, GREGORY THOMAS, SR., EDDIE WRIGHT, JEAN MCINTOSH, and NICKLAUS WOODARD, aiding and abetting one another and others, knowingly provided and obtained the labor and services of B.W., by means of force, threats of force, physical restraint, threats of physical restraint, serious harm, threats of serious harm, and a scheme, plan, and pattern intended to cause B.W. to believe that, if B.W. did not perform such labor or services, B.W. would suffer serious harm or physical restraint, in violation of Title 18, United States Code, Section 1589(a)(1) and (a)(2) and 2.

COUNT TWO

CONSPIRACY TO COMMIT HATE CRIME

18 U.S.C. § 371

THE GRAND JURY FURTHER CHARGES THAT:

1. T.B. was a female who was born with mental retardation and other developmental disabilities that substantially limited her ability to care for her daily needs. As a result of this condition, T.B. received disability and SSI benefits administered by the SSA.

2. E.S. was a male who was born with mental retardation and other mental developmental disabilities and physical disabilities that substantially limited his ability to care for his daily needs. As a result of this condition, E.S. received SSI benefits administered by the SSA.

3. H.K. was a male who was born with spastic diplegia, cerebral palsy, mental retardation and development disabilities that substantially limited his ability to care for his daily needs. As a result of his condition, H.K. received SSI benefits administered by the SSA.

4. D.M was a male who was born with mental retardation and other developmental disabilities that substantially limited his ability to care for his daily needs . As a result of this condition, D.M. received SSI and disability benefits administered by the SSA.

5. From on or about October 28, 2009 through on or about October 15, 2011, in the Eastern District of Pennsylvania and elsewhere, defendants

**LINDA WESTON,
a/k/a "Mom,"
a/k/a "Brenda Williams,"
GREGORY THOMAS, SR.,
a/k/a "Big Greg,"
JEAN MCINTOSH
a/k/a "Shay,"
a/k/a "Jean Pierce,"**

**a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD
a/k/a “Nick,”**

and others known and unknown to the Grand jury, knowingly and voluntarily conspired, combined, confederated and agreed with each other to willfully cause bodily injury to T.B., E.S., H.K., and D.M. because of the actual and perceived disability of T.B., E.S., H.K., and D.M. resulting from defendants employing a dangerous weapon that traveled in interstate commerce, that is, a handgun, and traveling across state lines, that is, kidnaping victims T.B., E.S., H.K., and D.M. and transporting them across state lines, that is, from Florida to Pennsylvania, in violation of Title 18, United States Code, Section 249(a)(2).

MANNER AND MEANS

6. Defendant LINDA WESTON employed various deceptive devices in order to convince mentally disabled individuals who were collecting or were otherwise eligible to receive Social Security disability benefits to move in with her and her family. Once the individuals moved in with her, defendant WESTON persuaded the individuals to allow her to act as the representative payee for their disability benefits. WESTON then positioned herself to become the representative payee for the individuals – thereby collecting direct access to their monthly disability payments – by making material misrepresentations to the SSA about her relationship to the individuals, their living arrangements, and her criminal record.

7. Defendant LINDA WESTON stole the disability benefits intended for the use of the disabled individuals by spending the money she received as representative payee for her

own benefit or for the benefit of the WF.

8. In order to ensure the continuous flow of these monthly disability benefits to her and her family, defendant LINDA WESTON employed techniques designed to control the disabled individuals and to prevent them or others from reporting her fraudulent scheme to law enforcement or the SSA. Among other things, defendants WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT and NICHOLAS WOODARD:

- a. confined the disabled individuals to locked basements, rooms, closets, attics, and apartments;
- b. sedated the disabled individuals by putting drugs in the food and drink served to them by WESTON and the other defendants;
- c. subdued the disabled individuals by serving them a low calorie, high starch diet consisting exclusively of Ramen noodles, beans and stew and generally limited them to one meal a day;
- d. punished the disabled individuals by slapping, punching, kicking, stabbing, burning and hitting them with bats or other objects, including the butt of a pistol, when the individuals tried to escape, stole food, or otherwise acted out to protest their confinement and treatment.

9. Defendants LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT and NICHOLAS WOODARD transported the disabled individuals from state to state in order to flee from, or otherwise avoid detection by, social services and law enforcement agencies.

OVERT ACTS

Killeen Texas

1. From in or about October 28, 2009 through July 2010, defendants LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, SR., and EDDIE WRIGHT confined disabled individuals T.B., E.S., and H.K. to locked closets, rooms and attics inside residences located in Killeen, Texas. Defendant WESTON continued to exert other measures of control and punishment over T.B., E.S., and H.K., that caused bodily harm to these individuals. Among other things, defendant WESTON sedated the disabled individuals by putting drugs in the food and drink served to them by WESTON and deprived them of adequate nutrition by serving them a low calorie, high starch diet consisting exclusively of Ramen noodles, beans and stew and generally limited them to one meal a day.

2. Defendants LINDA WESTON, JEAN MCINTOSH, EDDIE WRIGHT, and others known and unknown to the Grand jury physically abused T.B. by beating her with their hands and feet and by using other objects.

3. Defendant LINDA WESTON ordered E.S. to beat T.B. in order to punish her for taking food from a refrigerator without receiving permission from defendant WESTON.

4. During the nine month period of time that T.B., E.S., and H.K. were locked in closets, rooms and attics inside residences located in Killeen, Texas, LINDA WESTON collected the monthly disability payments intended for the use of T.B., E.S., and H.K. and instead used the money for her own purposes.

5. In or about July 2010, defendants LINDA WESTON, EDDIE WRIGHT and GREGORY THOMAS, Sr., transported T.B., E.S., H.K. and others from Killeen, Texas to West Palm Beach, Florida.

West Palm Beach, Florida

6. From in or about July 2010 through in or about October 2011, defendants LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT, and NICHOLAS WOODARD confined disabled individuals T.B., E.S., and H.K. to locked closets, apartments, rooms and attics inside residences located in Killeen, Texas. Defendant WESTON continued to exert other means of control and punishment over T.B., E.S., and H.K. that caused bodily harm to these individuals. Among other things, defendant WESTON sedated the disabled individuals by putting drugs in the food and drink served to them by WESTON and deprived them of adequate nutrition by serving them a low calorie, high starch diet consisting exclusively of Ramen noodles, beans and stew and generally limited them to one meal a day.

7. After defendant NICHOLAS WOODARD began to date defendant LINDA WESTON, defendant WOODARD participated in her efforts to control the disabled individuals.

8. During this time, defendants LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT, and NICHOLAS WOODARD beat T.B., E.S., and H.K.

9. On or about November 3, 2010, defendant LINDA WESTON persuaded D.M. to move into her home by promising him a romantic relationship. Defendant WESTON then confined D.M. to an apartment with T.B. and E.S. Defendant WESTON deprived D.M. of adequate nutrition by serving him a low calorie, high starch diet consisting exclusively of Ramen noodles, beans and stew and generally limited him to one meal a day.

10. Defendants LINDA WESTON and NICHOLAS WOODARD forced D.M. to give them his Social Security card and other identification documents by pointing a gun at him.

11. When D.M. escaped from the apartment, defendant NICHOLAS WOODARD recaptured D.M. and forced him to return to the apartment at point of gun. Once back at the apartment, defendant WOODARD beat D.M. with the gun, causing serious bodily injury.

12. Defendant LINDA WESTON chained and locked D.M. in a closet in an apartment where D.M. suffered further bodily injury due to inadequate nutrition, unsanitary living conditions and beatings inflicted by WESTON.

13. During the period of time that T.B., E.S., and H.K. were locked in closets, rooms and attics inside residences located in West Palm Beach, Florida, defendant WESTON collected the monthly disability payments intended for the use of T.B., E.S., and H.K. and instead used the money for her own and the WF's purposes.

14. In or about October 2011, defendants LINDA WESTON, EDDIE WRIGHT and GREGORY THOMAS, Sr., transported T.B., E.S., H.K., and D.M. and others from West Palm Beach, Florida to Philadelphia, Pennsylvania. Defendant WESTON forced these disabled individuals to ride in the storage compartment of a SUV. During the long drive from Florida to Philadelphia, defendant WESTON prohibited the disabled individuals from leaving the storage area, forcing them to urinate and defecate on themselves. Defendant WESTON required D.M. to travel the entire distance with a chain wrapped around his ankle, causing bodily injury.

Philadelphia, Pennsylvania

15. Upon arrival in Philadelphia, defendant LINDA WESTON forced T.B., E.S., H.K. and D.M. to the damp sub-basement of an apartment building at 4724 Longshore Avenue, where they were locked behind a heavy metal door. Defendant WESTON chained D.M. to a large

boiler located in the sub-basement.

16. Defendant EDDIE WRIGHT guarded the disabled individuals while they remained confined in the sub-basement.

17. Defendant LINDA WESTON forced the disabled individuals to live in the squalid conditions of the sub-basement for approximately one week until they were rescued by Philadelphia Police officers who freed them and transported them to the hospital for treatment of their injuries.

All in violation of Title 18, United States Code, Section 371.

NOTICE OF SPECIAL SENTENCING FACTORS

THE GRAND JURY FURTHER FINDS THAT:

The allegations and facts set forth in this Notice of Special Sentencing Factors relate to Count Two:

1. From on or about October 28, 2009 through on or about October 15, 2011, in the Eastern District of Pennsylvania and elsewhere, defendants LINDA WESTON, GREGORY THOMAS, SR., NICK WOODARD, and JEAN MCINTOSH and others known and unknown to the Grand jury, knowingly and voluntarily conspired, combined, confederated and agreed with each other to willfully cause bodily injury to T.B., E.S., H.K., and D.M. because of the actual and perceived disability of T.B., E.S., H.K., and D.M. resulting from defendants employing a dangerous weapon that traveled in interstate commerce, that is, a handgun, and traveling across state lines, that is, kidnaping victims T.B., E.S., H.K., and D.M. and transporting them across state lines, that is, from Florida to Pennsylvania, in violation of Title 18, United States Code, Section 249(a)(2).

COUNT THREE
HATE CRIME
18 U.S.C. § 249(a)(2)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4, 6 through 9 and Overt Acts 1 through 17 of Count Two of this indictment are incorporated by reference.

2. From in or about early October, 2011 through on or about October 15, 2011 in the Eastern District of Pennsylvania and elsewhere, defendants

LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD
a/k/a “Nick,”

and others known and unknown to the grand jury, willfully caused bodily injury to T.B. because of the actual and perceived disability of T.B.

3. Specifically, defendants LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT, and NICHOLAS WOODARD, and others known and unknown to the grand jury, assaulted T.B. by forcing her into the rear storage compartment of an SUV where T.B. was restrained while the SUV drove from Florida to Philadelphia, Pennsylvania, causing T.B. bodily injury. Further, defendants WESTON, JEAN MCINTOSH,

GREGORY THOMAS, Sr., and EDDIE WRIGHT locked T.B. in the squalid conditions of the damp sub-basement of an apartment building where she was deprived of light, adequate air, food and proper hygiene. This offense included kidnaping; that is, the defendants restrained and confined T.B. by force, intimidation and deception with intent to cause bodily injury to T.B.

4. The conduct described herein involved LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT, and NICHOLAS WOODARD and others known and unknown to the grand jury, beating, kidnaping T.B. and transporting her across state lines.

In violation of Title 18, United States Code, Sections 249(a)(2) and 2.

COUNT FOUR
HATE CRIME
18 U.S.C. § 249(a)(2)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4, 6 through 9 and Overt Acts 1 through 17 of Count Two of this indictment are incorporated by reference.

2. From in or about early October, 2011 through on or about October 15, 2012, in the Eastern District of Pennsylvania and elsewhere, defendants

LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD
a/k/a “Nick,”

and others known and unknown to the grand jury, willfully caused bodily injury to E.S. because of the actual and perceived disability of E.S.

3. Specifically, LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT, and NICHOLAS WOODARD, and others known and unknown to the Grand jury, assaulted E.S. by forcing him into the rear storage compartment of an SUV where he was restrained while the SUV drove from Florida to Philadelphia, Pennsylvania, causing him bodily injury. Further, defendants LINDA WESTON, JEAN MCINTOSH, GREGORY

THOMAS, Sr., and EDDIE WRIGHT locked him in the squalid conditions of the damp sub-basement of an apartment building where he was deprived of light, adequate air, food and proper hygiene. This offense included kidnaping; that is, the defendants restrained and confined E.S. by force, intimidation and deception with intent to cause bodily injury to E.S.

4. The conduct described herein involved LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT, and NICHOLAS WOODARD and others known and unknown to the grand jury, beating, kidnaping E.S. and transporting him across state lines.

In violation of Title 18, United States Code, Sections 249(a)(2) and 2.

COUNT FIVE
HATE CRIME
18 U.S.C. § 249(a)(2)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4, 6 through 9 and Overt Acts 1 through 17 of Count Two of this indictment are incorporated by reference.

2. From in or about early October, 2011 through on or about October 15, 2011, in the Eastern District of Pennsylvania and elsewhere, defendants

LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD
a/k/a “Nick,”

and others known and unknown to the grand jury, willfully caused bodily injury to H.K. because of the actual and perceived disability of H.K.

3. Specifically, LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT, and NICHOLAS WOODARD, and others known and unknown to the Grand jury, assaulted H.K. by forcing him into the rear storage compartment of an SUV where he was restrained while the SUV drove from Florida to Philadelphia, Pennsylvania, causing him bodily injury. Further, defendants LINDA WESTON, JEAN MCINTOSH, GREGORY

THOMAS, Sr., and EDDIE WRIGHT locked him in the squalid conditions of the damp sub-basement of an apartment building where he was deprived of light, adequate air, food and proper hygiene. This offense included kidnaping; that is, the defendants restrained and confined H.K. by force, intimidation and deception with intent to cause bodily injury to H.K.

4. The conduct described herein involved LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT, and NICHOLAS WOODARD and others known and unknown to the grand jury, beating, kidnaping H.K. and transporting him across state lines.

In violation of Title 18, United States Code, Sections 249(a)(2) and 2.

COUNT SIX
HATE CRIME
18 U.S.C. § 249(a)(2)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4, 6 through 9 and Overt Acts 1 through 17 of Count Two of this indictment are incorporated by reference.

2. From in or about early October, 2011 through on or about October 15, 2011, in the Eastern District of Pennsylvania and elsewhere, defendants

LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD
a/k/a “Nick,”

and others known and unknown to the grand jury, willfully caused bodily injury to D.M. because of the actual and perceived disability of D.M.

3. Specifically, LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT, and NICHOLAS WOODARD, and others known and unknown to the Grand jury, assaulted D.M. by forcing him into the rear storage compartment of an SUV where he was restrained while the SUV drove from Florida to Philadelphia, Pennsylvania, causing him bodily injury. Further, defendants LINDA WESTON, JEAN MCINTOSH, GREGORY

THOMAS, Sr., and EDDIE WRIGHT locked him in the squalid conditions of the damp sub-basement of an apartment building where he was deprived of light, adequate air, food and proper hygiene. This offense included kidnaping; that is, the defendants restrained and confined D.M. by force, intimidation and deception with intent to cause bodily injury to D.M.

4. The conduct described herein involved LINDA WESTON, JEAN MCINTOSH, GREGORY THOMAS, Sr., EDDIE WRIGHT, and NICHOLAS WOODARD and others known and unknown to the grand jury, beating, kidnaping D.M. and transporting him across state lines.

In violation of Title 18, United States Code, Sections 249(a)(2) and 2.

COUNT SEVEN

**KIDNAPING
18 U.S.C. § 1201(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From in or around the fall of 2001 through on or about October 15, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD
a/k/a “Nick,”**

knowingly and unlawfully seized, confined, kidnaped, abducted, carried away, and held T.B., and aided and abetted such, for ransom, reward, and otherwise, that is, for the purpose of gaining a personal benefit from that seizure, and willfully transported T.B. in interstate commerce from Philadelphia, Pennsylvania to Killeen, Texas; from Killeen, Texas to Norfolk, Virginia; from Norfolk, Virginia to Philadelphia, Pennsylvania; from Philadelphia, Pennsylvania to Killeen, Texas; from Killeen, Texas to West Palm Beach, Florida; and from West Palm Beach, Florida back to Philadelphia, Pennsylvania, in committing and in furtherance of the offense, and used means, facilities, and instrumentalities of interstate commerce, that is, the United States mail and the transmission of wire communications, in committing and in furtherance of the commission of the

offense.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT EIGHT

**KIDNAPING
18 U.S.C. § 1201(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From in or around the fall of 2001 through on or about October 15, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD
a/k/a, “Nick,”**

knowingly and unlawfully seized, confined, kidnaped, abducted, carried away, and held E.S., and aided and abetted such, for ransom, reward, and otherwise, that is, for the purpose of gaining a personal benefit from that seizure, and willfully transported E.S. in interstate commerce from Philadelphia, Pennsylvania to Killeen, Texas; from Killeen, Texas to Norfolk, Virginia; from Norfolk, Virginia to Philadelphia, Pennsylvania; from Philadelphia, Pennsylvania to Killeen, Texas; from Killeen, Texas to West Palm Beach, Florida; from West Palm Beach, Florida back to Philadelphia, Pennsylvania in committing and in furtherance of the offense, and used means, facilities, and instrumentalities of interstate commerce, that is, the United States mail and the transmission of wire communications, in committing and in furtherance of the commission of the

offense.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT NINE
KIDNAPING
18 U.S.C. § 1201(a)(1)

THE GRAND JURY FURTHER CHARGES THAT:

From in or around 2002 through on or about November 13, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,” and
JEAN MCINTOSH
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”

knowingly and unlawfully seized, confined, kidnaped, abducted, carried away, and held M.L., and aided and abetted such, for ransom, reward, and otherwise, that is, for the purpose of gaining a personal benefit from that seizure, and willfully transported M.L. in interstate commerce from Philadelphia, Pennsylvania to Killeen, Texas and from Killeen, Texas to Norfolk, Virginia in committing and in furtherance of the offense, and used means, facilities, and instrumentalities of interstate commerce, that is, the United States mail and the transmission of wire communications, in committing and in furtherance of the commission of the offense.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

NOTICE OF SPECIAL SENTENCING FACTORS

THE GRAND JURY FURTHER FINDS THAT:

The allegations and facts set forth in this Notice of Special Sentencing Factors relate to
Count Nine:

1. From in or around 2002 through on or about November 13, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants LINDA WESTON, GREGORY THOMAS, SR., and JEAN MCINTOSH knowingly and unlawfully seized, confined, kidnaped, abducted, carried away, and held M.L., and aided and abetted such, for ransom, reward, or otherwise, that is, for the purpose of gaining a personal benefit from that seizure, and willfully transported M.L. in interstate commerce from Philadelphia, Pennsylvania to Killeen, Texas, and from Killeen, Texas to Norfolk, Virginia, and M.L. died during the course of the kidnaping.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT TEN

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this Indictment, the WF, as more fully described in Paragraphs 1 through 33 of Count One of this Indictment, which paragraphs are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise, as defined in Title 18, United States Code, Section 1959(b)(2), namely the “Weston Family,” that is, a group of individuals associated in fact which was engaged in, and the activities of which affected, interstate commerce.

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), namely, acts involving murder, in violation of the laws of the Commonwealth of Pennsylvania and the Commonwealth of Virginia, and kidnaping, in violation of the laws of the Commonwealth of Pennsylvania, and Commonwealth of Virginia, and the States of Texas and Florida, and acts indictable under Title 18, United States Code, Section 1341, that is, Mail Fraud; Title 18, United States Code, Section 1343, that is Wire Fraud; Title 18, United States Code, Section 1584, that is Involuntary Servitude; Title 18, United States Code, Section 1589, that is Forced Labor, and Title 18, United States Code, Section 1591, that is Sex Trafficking.

3. From in or around the fall of 2001, through in or around October, 2011 in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendants

LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD,
a/k/a “Nick,”

knowingly and intentionally kidnaped, and aided and abetted the kidnaping of, T.B. and E.S., in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2901, and Title 42, Pennsylvania Consolidated Statutes Annotated, Section 5322; the laws of the State of Texas, that is, Title 5, Texas Penal Code, Section 20.03; the laws of the Commonwealth of Virginia, that is, Title 18, Code of Virginia, Section 18.2 - 47; and the laws of the State of Florida, that is, Title XLVI, Florida Statutes, Section 787.01.

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

COUNT ELEVEN

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.

2. From in or around 2002, through in or around October, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,” and
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”**

knowingly and intentionally kidnaped, and aided and abetted the kidnaping of, M.L., in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2901 and Title 42, Pennsylvania Consolidated Statutes Annotated, Section 5322; the laws of the State of Texas, that is, Title 5, Texas Penal Code, Section 20.03; and the laws of the Commonwealth of Virginia, that is, Title 18, Code of Virginia, Section 18.2 - 47.

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

COUNT TWELVE

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(6)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.

2. From in or around March, 2002 through in or around October, 2011, at Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD,
a/k/a “Nick,”**

knowingly and intentionally conspired to assault T.B., with a dangerous weapon, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2702(a)(4); in violation of the laws of the State of Texas, that is, Title 5, Texas Penal Code, Sections 15.02 and 22.02; and in violation of the laws of the State of Florida, that is, Title XLVI, Florida Statutes, Sections 777.04 and 784.021.

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

COUNT THIRTEEN

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(6)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.
2. From in or around 2002 through in or around November, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,” and
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”**

knowingly and intentionally conspired to assault M.L., with a dangerous weapon, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2702(a)(4) and in violation of the laws of the State of Texas, that is, Title 5, Texas Penal Code, Sections 15.02 and 22.02.

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

COUNT FOURTEEN

INVOLUNTARY SERVITUDE

18 U.S.C. § 1584(a)

THE GRAND JURY FURTHER CHARGES THAT:

From in or around 2002 through in or around September, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”and
JEAN MCINTOSH,
a/k/a/ “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”**

knowingly and willfully held, and aided and abetted the holding of, M.L., in involuntary servitude for a term, through use of physical restraint, force, threats of force, and legal coercion.

In violation of Title 18, United States Code, Sections 1584(a) and 2.

COUNT FIFTEEN

**MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.
2. On or about June 26, 2005, in Philadelphia, in the Eastern District of Pennsylvania, for the purpose of maintaining and increasing position in the enterprise, defendant

**LINDA WESTON,
a/k/a "Mom,"
a/k/a "Brenda Williams,"**

murdered D.S. in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2502 (b).

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

COUNT SIXTEEN

**KIDNAPING
18 U.S.C. § 1201(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From or around October, 2007 through in or around August, 2009, in Philadelphia,
in

the Eastern District of Pennsylvania, and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,” and
JEAN MCINTOSH
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”**

knowingly and unlawfully seized, confined, kidnaped, abducted, carried away, and held N.S., a minor, and aided and abetted such, for ransom, reward, and otherwise, that is, for the purpose of gaining a personal benefit from that seizure, and willfully transported N.S. in interstate commerce from Philadelphia, Pennsylvania to Killeen, Texas; from Killeen, Texas to Norfolk, Virginia; and from Norfolk, Virginia back to Philadelphia, Pennsylvania, in committing and in furtherance of the offense.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT SEVENTEEN

**KIDNAPING
18 U.S.C. § 1201(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From or around October, 2007 through in or around 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD
a/k/a “Nick,”**

knowingly and unlawfully seized, confined, kidnaped, abducted, carried away, and held E.Sa., a minor, and aided and abetted such, for ransom, reward, and otherwise, that is, for the purpose of gaining a personal benefit from that seizure, and willfully transported E.Sa. in interstate commerce from Philadelphia, Pennsylvania to Killeen, Texas; from Killeen, Texas to Norfolk, Virginia; and from Norfolk, Virginia to Philadelphia, Pennsylvania; from Philadelphia, Pennsylvania to Killeen, Texas and from Killeen, Texas to West Palm Beach, Florida in committing and in furtherance of the offense.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT EIGHTEEN

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.
2. From in or around October, 2007, through in or around late 2009, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,” and
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”**

knowingly and intentionally kidnaped, and aided and abetted the kidnaping of, N.S., in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2901 and Title 42, Pennsylvania Consolidated Statutes Annotated, Section 5322; the laws of the State of Texas, that is, Title 5, Texas Penal Code, Section 20.03; and the laws of the Commonwealth of Virginia, that is, Title 18, Code of Virginia, Section 18.2 - 47.

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

COUNT NINETEEN

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.
2. From in or around October, 2007, through in or around July, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,” and
EDDIE WRIGHT,
a/k/a “Pastor Wright,”**

knowingly and intentionally kidnaped, and aided and abetted, the kidnaping of E.Sa., in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2901 and Title 42, Pennsylvania Consolidated Statutes Annotated, Section 5322; the laws of the State of Texas, that is, Title 5, Texas Penal Code, Section 20.03; and the laws of the Commonwealth of Virginia, that is, Title 18 Code of Virginia, Section 18.2 - 47.

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

COUNT TWENTY

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(6)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.
2. From in or around September, 2008 through in or around October, 2011, at Norfolk, Virginia, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendant

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD
a/k/a “Nick,”**

knowingly and intentionally conspired to assault B.W., with a dangerous weapon, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2702(a)(4); in violation of the laws of the State of Texas, that is, Title 5, Texas Penal Code, Sections 15.02 and 22.02; and in violation of the laws of the State of Florida, that is, Title XLVI, Florida Statutes, Sections 777.04 and 784.021.

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

COUNT TWENTY-ONE

**KIDNAPING
18 U.S.C. § 1201(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From in or around October, 2008 through on or about October 15, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,”
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,” and
NICKLAUS WOODARD
a/k/a “Nick,”**

knowingly and unlawfully seized, confined, kidnaped, abducted, carried away, and held H.K., and aided and abetted such, for ransom, reward, and otherwise, that is, for the purpose of gaining a personal benefit from that seizure, and willfully transported H.K. in interstate commerce from Norfolk, Virginia to Philadelphia, Pennsylvania; from Philadelphia, Pennsylvania to Killeen, Texas; from Killeen, Texas to West Palm Beach, Florida; from West Palm Beach, Florida back to Philadelphia, Pennsylvania in committing and in furtherance of the offense, and used means, facilities, and instrumentalities of interstate commerce, that is, the United States mail and the

transmission of wire communications, in committing and in furtherance of the commission of the offense.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT TWENTY-TWO

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.
2. From in or around October, 2008, through in or around October, 2011, at Norfolk, Virginia, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,”
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,” and
NICKLAUS WOODARD
a/k/a “Nick,”**

knowingly and intentionally kidnaped, and aided and abetted the kidnaping of, H.K., a person known to the Grand jury, in violation of the laws of the Commonwealth of Virginia, that is, Title 18 Code of Virginia, Section 18.2 - 47; in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2901 and Title 42, Pennsylvania Consolidated Statutes Annotated, Section 5322; the laws of the State of

Texas, that is, Title 5, Texas Penal Code, Section 20.03; and the laws of the State of Florida, that is, Title XLVI, Florida Statutes, Section 787.01.

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

COUNT TWENTY-THREE

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(6)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.

2. From in or around November, 2008 through in or around October, 2011, at Philadelphia, in the eastern District of Pennsylvania, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendant

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD
a/k/a “Nick,”**

knowingly and intentionally conspired to assault H.K., with a dangerous weapon, in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Sections 903 and 2702(a)(4); in violation of the laws of the State of Texas, that is, Title 5, Texas Penal Code, Sections 15.02 and 22.02; and in violation of the laws of the State of Florida, that is, Title XLVI, Florida Statutes, Sections 777.04 and 784.021.

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

COUNT TWENTY-FOUR

**MURDER IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.

2. On or about November 13, 2008, at Norfolk, Virginia, for the purpose of maintaining and increasing position in the enterprise, defendant

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”**

murdered M.L., in violation of the laws of the Commonwealth of Virginia, that is, Title 18 Code of Virginia, Section 18.2 - 33 and in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2502(b), and Title 42, Pennsylvania Consolidated Statutes Annotated, Section 5322.

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

COUNT TWENTY-FIVE

COMMERCIAL SEX ACT

18 U.S.C. § 1591

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 17 of Count One are incorporated by reference.

2. From in or around August, 2009 through in or around October, 2011, at Killeen, Texas, and West Palm Beach, Florida, defendant

LINDA WESTON
a/k/a/ "Mom,"
a/k/a "Brenda Williams,"

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained T.B., and benefitted financially from participation in a venture which engaged such acts, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and combinations of such means would be used to cause T.B. to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591 and 1594(a) and (b).

COUNT TWENTY-SIX

COMMERCIAL SEX ACT

18 U.S.C. § 1591

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations of Paragraphs 1 through 17 of Count One are incorporated by reference.

2. From in or around August, 2009 through in or around October, 2011, at Killeen, Texas, and West Palm Beach, Florida, defendant

**LINDA WESTON
a/k/a/ "Mom,"
a/k/a "Brenda Williams,"**

in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained B.W., and benefitted financially from participation in a venture which engaged such acts, knowing and in reckless disregard of the fact that B.W. had not attained the age of 18 years, and knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and combinations of such means would be used to cause B.W. to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591 and 1594(a) and (b).

COUNT TWENTY-SEVEN

**FORCED HUMAN LABOR
18 U.S.C. § 1589(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From in or around December, 2009 through in or around October, 2011, at Killeen, Texas, and West Palm Beach, Florida, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH,
a/k/a/ “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,”and
NICKLAUS WOODARD,
a/k/a “Nick,”**

aiding and abetting one another and others, knowingly provided and obtained the labor and services of B.W., by means of force, threats of force, physical restraint, threats of physical restraint, serious harm, threats of serious harm, and a scheme, plan, and pattern intended to cause B.W. to believe that, if B.W. did not perform such labor or services, B.W. would suffer serious harm or physical restraint.

In violation of Title 18, United States Code, Sections 1589(a)(1) and (a)(2) and 2.

COUNT TWENTY-EIGHT

**KIDNAPING
18 U.S.C. § 1201(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From in or around December, 2009, through in or around October, 2011, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD,
a/k/a “Nick,”**

knowingly and unlawfully seized, confined, kidnaped, abducted, carried away, and held B.W., and aided and abetted such, for ransom, reward, and otherwise, that is, for the purpose of gaining a personal benefit from that seizure, and willfully transported B.W. in interstate commerce from Killeen, Texas to West Palm Beach, Florida; from West Palm Beach, Florida back to Philadelphia, Pennsylvania in committing and in furtherance of the offense, and used means, facilities, and instrumentalities of interstate commerce, that is, the United States mail and the transmission of wire communications, in committing and in furtherance of the commission of the offense.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT TWENTY-NINE

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(3)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.
2. In or around the fall of 2011, in West Palm Beach, Florida, for the purpose of maintaining and increasing position in the enterprise, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,” and
NICKLAUS WOODARD,
a/k/a “Nick,”**

knowingly and intentionally assaulted and aided and abetted the assault of E.Sa., with a dangerous weapon, in violation of the laws of the State of Florida, that is, Title XLVI Florida Statutes, Section 7784.021.

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

COUNT THIRTY

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.

2. From in or around December 2009, through in or around October, 2011, in Killeen, Texas, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD,
a/k/a “Nick,”**

knowingly and intentionally kidnaped and aided and abetted, the kidnaping of, B.W., in violation of the laws of the State of Texas, that is, Title 5, Texas Penal Code, Section 20.03; the laws of the State of Florida, that is, Title XLVI Florida Statutes, Section 787.01 and in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2901.

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

COUNT THIRTY-ONE

USE AND CARRYING FIREARM

18 U.S.C. § 924(c)(1)

THE GRAND JURY FURTHER CHARGES THAT:

From in or around November, 2010, through in or around October, 2011, in West Palm Beach Florida, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
and
NICKLAUS WOODARD,
a/k/a “Nick,”**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, kidnaping of T.B. as charged in Count 7 of this indictment, in violation of Title 18, United States Code, Section 1201(a)(1).

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

COUNT THIRTY-TWO

**USE AND CARRYING FIREARM
18 U.S.C. § 924(c)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From in or around November, 2010, through in or around October, 2011, in West Palm Beach Florida, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
and
NICKLAUS WOODARD,
a/k/a “Nick,”**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, conspiracy to assault B.W. with a dangerous weapon as charged in Count 20 of this indictment, in violation of Title 18, United States Code, Section 1959(a)(3).

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

COUNT THIRTY-THREE

**KIDNAPING
18 U.S.C. § 1201(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From on or about November 3, 2010, through on or about October 15, 2011, in West Palm Beach, Florida, and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD,
a/k/a/ “Nick,”**

knowingly and unlawfully seized, confined, kidnaped, abducted, carried away, and held D.M., and aided and abetted such, for ransom, reward, and otherwise, that is, for the purpose of gaining a personal benefit from that seizure, and willfully transported D.M. in interstate commerce from West Palm Beach, Florida to Philadelphia, Pennsylvania in committing and in furtherance of the offense, and used means, facilities, and instrumentalities of interstate commerce, that is, the United States mail and the transmission of wire communications, in committing and in furtherance of the commission of the offense.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

COUNT THIRTY-FOUR

**VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.

2. From in or around November, 2010, through in or around October, 2011, in West Palm Beach, Florida, and elsewhere, for the purpose of maintaining and increasing position in the enterprise, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.,
a/k/a “Big Greg,”
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD,
a/k/a “Nick,”**

knowingly and intentionally kidnaped and aided and abetted, the kidnaping of, D.M., in violation of the laws of the State of Florida, that is, Title XLVI Florida Statutes, Section 787.01 and in violation of the laws of the Commonwealth of Pennsylvania, that is, Title 18, Pennsylvania Consolidated Statutes Annotated, Section 2901.

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

COUNT THIRTY-FIVE
VIOLENT CRIME IN AID OF RACKETEERING
18 U.S.C. § 1959(a)(6)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 and 2 of Count Ten of this Indictment are realleged and incorporated by reference as though set forth fully herein.
2. From on or about November 3, 2010, through in or around October, 2011, in West Palm Beach, Florida, for the purpose of maintaining and increasing position in the enterprise, defendants

LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
GREGORY THOMAS, SR.
a/k/a “Big Greg,”
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”
EDDIE WRIGHT,
a/k/a “Pastor Wright,” and
NICKLAUS WOODARD,
a/k/a “Nick,”

knowingly and intentionally conspired to assault D.M., with a dangerous weapon, in violation of the laws of the State of Florida, that is, Title XLVI Florida Statutes, Sections 777.04 and 784.021.

In violation of Title 18, United States Code, Sections 1959(a)(6) and 2.

COUNT THIRTY-SIX

**USE AND CARRYING FIREARM
18 U.S.C. § 924(c)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From in or around November, 2010, through in or around October, 2011, in West Palm Beach Florida, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
and
NICKLAUS WOODARD,
a/k/a “Nick,”**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, kidnaping of D.M. as charged in Count 33 of this indictment, in violation of Title 18, United States Code, Section 1201(a)(1).

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

COUNT THIRTY-SEVEN

**USE AND CARRYING FIREARM
18 U.S.C. § 924(C)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From in or around November, 2010, through in or around October, 2011, in West Palm Beach Florida, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,”
and
NICKLAUS WOODARD,
a/k/a “Nick,”**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, 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 dangerous weapon of E.Sa. as charged in Count 29 of this indictment, in violation of Title 18, United States Code, Section 1959(a)(3).

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

COUNT THIRTY-EIGHT

**THEFT OF GOVERNMENT PROPERTY
18 U.S.C. § 641**

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in or around November 2010, and continuing without interruption through in or around October 2011, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

LINDA WESTON

knowingly embezzled, stole, and converted to her own use money of the SSA, an agency of the United States, namely, Social Security Supplemental Security Income Benefits and Social Security Disability payments paid to D.M. to which she knew that she was not entitled, having a value of approximately \$8,902.

In violation of Title 18, United States Code, Section 641.

COUNT THIRTY-NINE

**THEFT OF GOVERNMENT PROPERTY
18 U.S.C. § 641**

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in or around February 2003, and continuing without interruption through in or around October 2011, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

LINDA WESTON

knowingly embezzled, stole, and converted to her own use money of the SSA, an agency of the United States, namely, Social Security Supplemental Security Income Benefits paid to her as Representative Payee for E.S. to which she knew that she was not entitled, having a value of approximately \$68,962.

In violation of Title 18, United States Code, Section 641.

COUNT FORTY

**THEFT OF GOVERNMENT PROPERTY
18 U.S.C. § 641**

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in or around January 2008, and continuing without interruption through in or around January 2009, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

LINDA WESTON

knowingly embezzled, stole, and converted to her own use money of the SSA, an agency of the United States, namely, Social Security Disability payments paid to her as Representative Payee for M.L. to which she knew that she was not entitled, having a value of approximately \$20,533.

In violation of Title 18, United States Code, Section 641.

COUNT FORTY-ONE

**THEFT OF GOVERNMENT PROPERTY
18 U.S.C. § 641**

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in or around November 2008, and continuing without interruption through in or around October 2011, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

LINDA WESTON

knowingly embezzled, stole, and converted to her own use money of the SSA, an agency of the United States, namely, Social Security Supplemental Security Income Benefits and Social Security Disability payments paid to her as Representative Payee for H.K. to which she knew that she was not entitled, having a value of approximately \$30,034.

In violation of Title 18, United States Code, Section 641.

COUNT FORTY-TWO

**THEFT OF GOVERNMENT PROPERTY
18 U.S.C. § 641**

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in or around February 2002, and continuing without interruption through in or around October 2011, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendant

LINDA WESTON

knowingly embezzled, stole, and converted to her own use money of the SSA, an agency of the United States, namely, Social Security Supplemental Security Income Benefits and Social Security Disability payments paid to her as Representative Payee for T.B. to which she knew that she was not entitled, having a value of approximately \$74,936.

In violation of Title 18, United States Code, Section 641.

COUNT FORTY-THREE

**THEFT OF GOVERNMENT PROPERTY
18 U.S.C. § 641**

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in or around July 2010, and continuing without interruption through in or around October 2011, in Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**LINDA WESTON and
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”**

knowingly embezzled, stole, and converted to her own use money of the SSA, an agency of the United States, namely, Social Security Supplemental Security Income Benefits and Social Security Disability payments paid to her as Representative Payee for D.M.M. to which they knew that they were not entitled, having a value of approximately \$8,095.

In violation of Title 18, United States Code, Sections 641 and 2.

COUNT FORTY-FOUR

FALSE STATEMENTS

18 U.S.C. § 1001

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 10, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

LINDA WESTON,

in a matter within the jurisdiction of the SSA, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant WESTON stated that she had spent \$4,240 for food and housing for T.B, and had spent \$3,250 for clothing, medical and dental expenses, education, recreation or personal items for T.B. for the period February 1, 2007 through January 31, 2008, in a “Verification Form,” Form SSA-L732, and provided the document to the SSA, when, as the defendant knew, she had spent a significantly less amount of money for the needs of T.B. during the period February 1, 2007 through January 31, 2008.

In violation of Title 18, United States Code, Section 1001.

COUNT FORTY-FIVE

FALSE STATEMENTS

18 U.S.C. § 1001

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 11, 2007, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

LINDA WESTON,

in a matter within the jurisdiction of the SSA, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant WESTON stated that (1) she was the sister of M.L., (2) she had never been convicted of a felony and had never been imprisoned for more than one year, and (3) M.L. lived alone, in an application to the SSA to become a representative payee, and caused such misrepresentations to be placed in Form SSA-11, when, as the defendant knew that she was not the sister of M.L., she had been convicted of a felony and been imprisoned for more than one year and M.L. lived with other disabled persons.

In violation of Title 18, United States Code, Section 1001.

COUNT FORTY-SIX

FALSE STATEMENTS

18 U.S.C. § 1001

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 19, 2008, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

LINDA WESTON,

in a matter within the jurisdiction of the SSA, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant WESTON stated that she had spent \$3,250 for food and housing for E.S, and had spent \$4,240 for clothing, medical and dental expenses, education, recreation or personal items for E.S. for the period February 1, 2007 through January 31, 2008, in a “Representative Payee Report,” Form SSA-623, and provided the document to the SSA, when, as the defendant knew, she had spent a significantly less amount of money for the needs of E.S. during the period February 1, 2007 through January 31, 2008.

In violation of Title 18, United States Code, Section 1001.

COUNT FORTY-SEVEN

**FALSE STATEMENTS
18 U.S.C. § 1001**

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2009, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

LINDA WESTON,

in a matter within the jurisdiction of the SSA, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant WESTON stated that she had spent \$3,341 for food and housing for E.S, and had spent \$4,340 for clothing, medical and dental expenses, education, recreation or personal items for E.S. for the period February 1, 2008 through January 31, 2009, in a “Representative Payee Report,” Form SSA-623, and provided the document to the SSA, when, as the defendant knew, she had spent a significantly less amount of money for the needs of E.S. during the period February 1, 2008 through January 31, 2009.

In violation of Title 18, United States Code, Section 1001.

COUNTS FORTY-EIGHT THROUGH FIFTY-ONE

**FALSE STATEMENTS SSA
42 U.S.C. § 1383 a(a)(2)**

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 10 of Count One of this indictment are incorporated by reference.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

LINDA WESTON,

in a matter within the jurisdiction of SSA, knowingly and willfully made and caused to be made false statements and representations of material fact to the SSA, when completing questions on Representative Payee Reports (SSA Form 6230) used by SSA to determine continued rights to SSI payments for E.S. Specifically, when completing questions on SSA Form 6230, defendant WESTON falsely stated that she spent all SSI benefit funds designated for E.S. for his care and support:

COUNT	DATE	FALSE STATEMENT OR REPRESENTATION
48	11-19-08	WESTON stated that she spent \$3,250 for E.S.'s food and housing between 02/01/2007 and 1/31/2008.
49	11-19-08	WESTON stated that she spent \$4,240 for clothing, medical and dental expenses, personal items, recreation, and education between 02/01/2007 and 1/31/2008.
50	4-03-09	WESTON stated that she spent \$3,340 for E.S.'s food, and housing between 2/1/2008 and 1/31/2009.

COUNT	DATE	FALSE STATEMENT OR REPRESENTATION
51	4-03-09	WESTON stated that she spent \$4,340 for E.S.'s, clothing, medical and dental expenses, personal items, recreation, and education between 2/1/2008 and 1/31/2009.

All in violation of Title 42, United States Code, Section 1383a (a) (2).

COUNTS FIFTY-TWO THROUGH ONE HUNDRED SEVENTY-SIX

**WIRE FRAUD
18 U.S.C. § 1343**

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

Background

1. Paragraphs 1 through 14 of Count One of this indictment are incorporated by reference.

Defendants

2. Defendant LINDA WESTON began collecting Social Security payments in March 1989 while residing in Philadelphia, Pennsylvania, based on a reported disability. While collecting social security payments, defendant WESTON lived in various places including: Philadelphia, Pennsylvania; Killeen, Texas; Norfolk, Virginia; and West Palm Beach, Florida. WESTON was convicted of a felony offense in 1985 in the Philadelphia Court of Common Pleas and was sentenced to four to thirteen years imprisonment. WESTON is the mother of defendant JEAN MCINTOSH. WESTON applied for and became the representative payee for the following disabled people who were recipients of payments administered by the SSA: T.M.; E.S.; M.L.; D.S.; D.M.M. , a minor; and H.K. In her capacity as representative payee for these individuals, WESTON received monthly payments on behalf of each disabled person with the express understanding that such payments were to be used for the care of the individual.

3. Defendant JEAN MCINTOSH began collecting Social Security payments in 2005 while residing in Philadelphia, Pennsylvania based on a reported disability. While collecting

social security payments, defendant MCINTOSH lived in various places including, Philadelphia, Pennsylvania, Killeen, Texas, Norfolk, Virginia, and West Palm Beach, Florida. Defendant MCINTOSH is the daughter of defendant LINDA WESTON. MCINTOSH applied for and became the representative payee for D.M.M..

Beneficiaries

4. T.B. began collecting DIB payments in 2009. T.B. began collecting SSI payments in 1991. Based on her mental disability, SSA required the designation of a representative payee. T.B.'s mother acted as her representative payee until 2002. In or about January 8, 2002, defendant LINDA WESTON applied for and became the representative payee for T.B. As a result of this designation, defendant WESTON received monthly payments to be used exclusively for the benefit of T.B. On or about March 25, 2009, T.B. gave birth to D.M.M., and as such, is the biological mother of D.M.M..

5. E.S. began collecting SSI payments in 1990. Based on his mental and physical disability, SSA required the designation of a representative payee. E.S.'s father acted as his representative payee until 2002. In or about January, 2002, defendant LINDA WESTON applied for and became the representative payee for E.S. As a result of this designation, defendant WESTON received monthly payments to be used exclusively for the benefit of E.S. E.S. is the biological father of D.M.M..

6. M.L. began collecting DIB payments in 2008. In or about 2002, M.L. began living with defendant LINDA WESTON. In or about December 31, 2007, defendant LINDA WESTON applied for and became the representative payee for M.L. As a result of this designation, defendant WESTON received monthly payments to be used exclusively for the benefit

of M.L. On or about November 14, 2008, M.L. died in Norfolk, Virginia while in the care and under the control of defendant WESTON.

7. D.S. began collecting DIB payments in 1985. In or about 2005, D.S. began living with defendant LINDA WESTON. In or about June 2005, defendant LINDA WESTON applied for and became the representative payee for D.S. As a result of this designation, defendant WESTON received monthly payments to be used exclusively for the benefit of D.S. On or about June 26, 2005, D.S. died in Philadelphia, Pennsylvania while in the care and under the control of defendant WESTON.

8. D.M.M. was born in Philadelphia, Pennsylvania on or about March 25, 2009. T.B. and E.S. are the biological parents of D.M.M.. Despite this, defendants LINDA WESTON and JEAN MCINTOSH caused the hospital to incorrectly list defendant MCINTOSH as the birth mother of D.M.M.. On or about July 2010, defendant MCINTOSH applied to become the representative payee for D.M.M.. However, she did not pursue this designation, and in or about July 2010, defendant WESTON applied for and became the representative payee for D.M.M.. As a result of this designation, defendant WESTON received monthly payments to be used exclusively for the benefit of D.M.M.. On or about August 3, 2011, MCINTOSH again applied to become and became the representative payee for D.M.M..

9. H.K. began collecting SSI payments in 1975. On or about May 24, 2007, H.K. began collecting Social Security Disability payments, too. Based on his mental and physical disability, SSA required the designation of a representative payee. H.K.'s grandmother acted as her representative payee until 2006. Child and Family Services acted as his representative payee until approximately November of 2008. In or about 2008, H.K. began living with defendant

LINDA WESTON. Defendant WESTON subsequently applied for and became the representative payee for H.K. As a result of this designation, defendant WESTON received monthly payments to be used exclusively for the benefit of H.K.

10. D.M. began collecting SSI payments in 1994. Based on his mental disability, SSA required the designation of a representative payee and various persons acted as his representative payee. However, D.M. began collecting his own payments. In or about October or November 2010, D.M. began living with defendant LINDA WESTON.

THE SCHEME

11. From in or about 2002, and continuing to in our about October 15, 2011, in the Eastern District of Pennsylvania and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,” and
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”**

knowingly and willfully devised a scheme and artifice to defraud the SSA (SSA), and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

12. Defendants LINDA WESTON and JEAN MCINTOSH used the representative payee program administered by SSA to steal Social Security (DIB) and Supplemental Security Insurance (SSI) benefits.

13. Defendants LINDA WESTON and JEAN MCINTOSH targeted mentally or physically disabled individuals who they knew were collecting benefits or who may become eligible to receive benefits in the future.

14. Defendants LINDA WESTON and JEAN MCINTOSH approached disabled individuals and made misrepresentations in order to gain the trust and confidence of the individuals or their families. For example, defendant WESTON pretended to be romantically interested in the individuals and invited them to live with her as part of the relationship. Defendant WESTON also made other misrepresentations as part of a concerted effort to persuade individuals that she and members of her family would take care of their day-to-day needs by providing them with adequate food, housing and financial support. Defendant LINDA WESTON then persuaded the individuals to allow her to act as their representative payee under the benefit programs administered by SSA. Defendant LINDA WESTON further misrepresented that she would use the monthly payments to benefit the individuals.

15. Defendant LINDA WESTON then applied to SSA to become the representative payee for each disabled individual. In order to qualify as the representative payee, defendant WESTON falsely declared that she had never before been convicted of a felony offense. She also misrepresented that she had never imprisoned for more than one year. WESTON made further misrepresentations about herself and the living arrangements of the disabled individual in order to become the representative payee for that individual.

16. Defendants LINDA WESTON and JEAN MCINTOSH cause the establishment of bank accounts for each disabled individual for whom they were designated as the representative payee. Defendants WESTON and MCINTOSH set up these accounts so that each

month SSA direct-deposited the benefit payments for each disabled individual. Defendant WESTON and MCINTOSH set up the accounts so that they could immediately make cash withdraws of the benefit payments.

17. Defendants LINDA WESTON and JEAN MCINTOSH withdrew the money deposited into these bank accounts and used the money for their own purposes and not for the benefit of the disabled person – contrary to the intent and instructions of SSA.

18. In order to prevent the disabled individuals from reporting the theft of benefit payments, defendants LINDA WESTON and JEAN MCINTOSH placed strict controls on them, including confinement in locked closets, basements and attics, and beat them for trying to escape or otherwise disrupt the scheme. In doing so, defendants WESTON and MCINTOSH deprived these adults of even the most basic needs – adequate housing, food, clothing, medical care and life’s basic necessities.

19. Defendant LINDA WESTON made a series of false statements to SSA in order to maintain her status as a representative payee on behalf of the disabled adults. In periodic accounting forms she was required to submit to SSA, defendant WESTON falsely certified that the payments she received for the disabled adults were spent on the essential needs of that adult, that is food, clothing, housing.

20. In direct contacts with SSA officials regarding the use of the monthly benefit payments, defendant LINDA WESTON made misrepresentations about the conditions of the disabled individuals, their living arrangements, addresses and relationships.

Specific Misrepresentations Regarding Disabled Individuals

21. In applying to become the representative payee for T.B., defendant LINDA

WESTON failed to disclose that she had previously been convicted of a felony offense and that she had been imprisoned for more than one year, facts that would have immediately disqualified her from acting as a representative payee.

22. Defendant LINDA WESTON falsely reported on the annual Representative Payee reports filed on the following dates that all DIB and SSI benefits received on behalf of T.B. were used for her care and support:

- a. SSA Form-L732 dated 11/10/08
- b. SSA Form - 623 dated 03/04/2010
- c. SSA Form - 623 dated 05/23/2011

23. Based on defendant LINDA WESTON'S fraudulent representations to the SSA, the United States Department of the Treasury, at the direction of the SSA, issued \$74,936 in DIB and SSI benefits payments, from February 2002 through October 2011, to defendant WESTON on behalf of T.B.

24. In applying to become the representative payee for E.S., defendant LINDA WESTON failed to disclose that she had previously been convicted of a felony offense, a fact that would have immediately disqualified her from acting as a representative payee.

25. Defendant LINDA WESTON falsely reported on the annual Representative Payee reports filed on the following dates that all DIB and SSI benefits received on behalf of E.S. were used for his care and support:

- a. SSA Form - 623 report dated 11/19/08
- b. SSA Form - 623 report dated 04/03/09
- c. SSA Form - 623 report dated 03/08/10

d. SSA Form - 623 report dated of 05/23/11

26. Based on defendant LINDA WESTON'S fraudulent representations to the SSA, the United States Department of the Treasury, at the direction of the SSA, issued approximately \$68,962.84 in SSI benefits payments, from August 2002 through October 2011, to defendant WESTON on behalf of E.S.

27. In applying to become the representative payee for M.L., defendant LINDA WESTON failed to disclose that she had previously been convicted of a felony offense and that she had been imprisoned for more than one year, facts that would have immediately disqualified her from acting as a representative payee.

28. Based on defendant LINDA WESTON'S fraudulent representations to the SSA, the United States Department of the Treasury, at the direction of the SSA, issued approximately \$20,533 in DIB benefits payments and one SSI check, from January 2008 through January 2009, to defendant WESTON on behalf of M.L.

29. In applying to become the representative payee for D.S., defendant LINDA WESTON failed to disclose that she had previously been convicted of a felony offense and that she had been imprisoned for more than one year, facts that would have immediately disqualified her from acting as a representative payee.

30. Based on defendant LINDA WESTON'S fraudulent representations to the SSA, the United States Department of the Treasury, at the direction of the SSA, issued \$656.00 in DIB benefits payments in June 2005 and one check in the amount of \$656 in July 2005 to defendant WESTON on behalf of D.S.

31. Defendants LINDA WESTON and JEAN MCINTOSH falsely reported to

officials at Hospital #1, located in Philadelphia, Pennsylvania, that defendant MCINTOSH was the biological mother of D.M.M.. When D.M.M. was born to T.B. inside Hospital #1 on or about March 25, 2009, defendants WESTON and MCINTOSH instructed T.B., a mentally disabled adult, to tell hospital officials that her name was Jean MCINTOSH. As a result, hospital officials listed the name Jean MCINTOSH on the birth certificate as the biological mother of D.M.M..

32. On or about July 19, 2010, defendant LINDA WESTON applied to the SSA for SSI payments for D.M.M. based on the child's mental disability.

33. In applying to become the representative payee for D.M.M., defendant LINDA WESTON failed to disclose that she had previously been convicted of a felony offense and that she had been imprisoned for more than one year, facts that would have immediately disqualified her from acting as a representative payee.

34. Defendant LINDA WESTON falsely reported on the application that defendant JEAN MCINTOSH was the biological mother of D.M.M. when, as defendants WESTON and MCINTOSH well knew, T.B. was the biological mother of D.M.M..

35. Defendant JEAN MCINTOSH applied to become the representative payee for D.M.M. on or about July 20, 2010. In applying to become the representative payee for D.M.M., defendant MCINTOSH falsely reported on the application that she was the biological mother of D.M.M. when, as defendants WESTON and MCINTOSH well knew, T.B. was the biological mother of D.M.M.. MCINTOSH did not receive the appointment as a representative payee at that time. However, she again applied to become the representative payee for D.M.M. on or about August 3, 2011. She falsely reported on the application that she was the biological mother of D.M.M. when, as defendants WESTON and MCINTOSH well knew, T.B. was the biological

mother other D.M.M..

36. Based on defendants LINDA WESTON'S and JEAN MCINTOSH's fraudulent representations to the SSA, the United States Department of the Treasury, at the direction of the SSA, issued approximately \$8,095 in DIB and SSI benefits payments, from July 2010 through October 2011, to defendants WESTON and MCINTOSH on behalf of D.M.M..

37. In applying to become the representative payee for H.K., defendant LINDA WESTON failed to disclose that she had previously been convicted of a felony offense and that she had been imprisoned for more than one year, facts that would have immediately disqualified her from acting as a representative payee.

38. Defendant LINDA WESTON falsely reported on the annual Representative Payee reports filed on the following dates that all DIB and SSI benefits received on behalf of H.K. were used for his care and support:

- a. SSA Form - 623 report dated of 12/26/09
- b. SSA Form - 623 report dated of 01/07/11

39. Based on defendant LINDA WESTON'S fraudulent representations to the SSA, the United States Department of the Treasury, at the direction of the SSA, issued approximately \$30,034 in SSI benefits payments, from November 2008 through October 2011, to defendant WESTON on behalf of H.K.

40. On or about each of the dates set forth below, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendants

**LINDA WESTON,
a/k/a "Mom,"
a/k/a "Brenda Williams," and**

**JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”**

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds which resulted in the transfer of funds from the United States Treasury on behalf of the SSA for the DIB and/or (SSI) payments Supplemental Security Income designated for the disabled beneficiaries listed below, to accounts numbers at as described below, and the withdrawal of such funds, each transmission, and each withdrawal constituting a separate count:

SSA Benefits Deposited in Bank Account of LINDA WESTON, on behalf of T.B.			
COUNT	Date of Deposit	Description	Amount
52	2/12/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$1835.20
53	3/3/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
54	4/3/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
55	5/1/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
56	6/3/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
57	7/2/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
58	8/3/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
59	9/3/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00

SSA Benefits Deposited in Bank Account of LINDA WESTON, on behalf of T.B.			
COUNT	Date of Deposit	Description	Amount
60	10/2/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
61	11/3/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
62	12/3/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	165.00
63	12/31/2009	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
64	2/3/2010	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
65	3/3/2010	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
66	4/2/2010	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
67	5/3/2010	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00

SSA Benefits Deposited in Bank Account of LINDA WESTON, on behalf of T.B.			
COUNT	Date of Deposit	Description	Amount
68	6/3/2010	SSA Benefits Deposited Into Bank Of America Account ending XXXX4773	\$165.00
69	7/2/2010	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
70	8/3/2010	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
71	9/3/2010	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
72	10/1/2010	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
73	11/3/2010	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
74	12/3/2010	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
75	1/3/2011	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00

SSA Benefits Deposited in Bank Account of LINDA WESTON, on behalf of T.B.			
COUNT	Date of Deposit	Description	Amount
76	2/3/2011	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
77	3/3/2011	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
78	4/1/2011	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
79	5/3/2011	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
80	6/3/2011	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
81	7/1/2011	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
82	8/3/2011	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00
83	9/2/2011	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00

SSA Benefits Deposited in Bank Account of LINDA WESTON, on behalf of T.B.			
COUNT	Date of Deposit	Description	Amount
84	10/3/2011	SSA Benefits Deposited Into Comerica Account ending XXXX4001	\$165.00

Debits/Withdraws from Bank of America Account in name of Linda Weston on behalf of T.B.			
COUNT	Date of Deposit	Description	Amount
85	2/17/2009	Cash Withdraw Banking Center, Kensington Avenue, Phila. PA Bank of America Account ending 4773	\$1780.00
86	2/27/2009	CT Withdraw 7-11 5028 Frankford Avenue, Philadelphia, PA Bank of America Account ending 4773	\$301.50
87	2/27/2009	CT Withdraw 7-11 5028 Frankford Avenue, Philadelphia, PA Bank of America Account ending 4773	\$301.50
88	4/1/2009	Cash withdraw ATM Express, 2401 54 th St. Philadelphia, PA Bank of America Account ending 4773	\$161.50

Debits/Withdraws from Bank of America Account in name of Linda Weston on behalf of T.B.			
COUNT	Date of Deposit	Description	Amount
89	4/1/2009	Cash withdraw ATM Express, 2401 54 th St. Philadelphia, PA Bank of America Account ending 4773	\$201.50
90	5/1/2009	Cash withdraw, United Bank, 3750 Lancaster Avenue, Philadelphia, PA Bank of America Account ending 4773	\$602.50
91	5/18/2009	LR Food Market, 1201 N. 52 nd St., Philadelphia, PA Bank of America Account ending 4773	\$201.50
92	5/18/2009	LR Food Market, 1201 N. 52 nd St., Philadelphia, PA Bank of America Account ending 4773	\$201.50
93	7/1/2009	ATM withdraw, Bank America, Shoprite, Aramingo Avenue, Phila. PA Bank of America Account ending 4773	\$360
94	7/6/2009	EB Games, 2371 Cottman Avenue, Phila. PA Bank of America Account ending 4773	\$42.79

Debits/Withdraws from Bank of America Account C-xxxxxxx5828 in the name of Linda Weston on behalf of E.S.			
COUNT	Date of Debit/Withdraw	Description	Amount
95	12/31/2008	Tlr Cash Withdraw Banking Center, Aramingo Avenue, Phila. PA	\$ 701.73
96	1/30/2009	Cash Withdraw Banking Center, Kensington Avenue, Phila. PA	\$ 701
97	2/27/2009	Cash Withdraw Banking Center, Kensington Avenue, Phila. PA	\$ 700
98	4/1/2009	Tlr Cash Withdraw Banking Center, Aramingo Avenue, Phila. PA	\$ 703.20
99	5/1/2009	Tlr Cash Withdraw Banking Center, Aramingo Avenue, Phila. PA	\$ 701
100	6/1/2009	Tlr Cash Withdraw Banking Center, 69 th St. Phila. PA	\$ 701
101	7/1/2009	Cash Withdraw, Bank of America ATM, ShopRite, Aramingo Ave., Phila. PA	\$ 500
102	7/1/2009	Tlr Cash Withdraw Banking Center, 69 th St. Phila. PA	\$ 201

SSA Benefits Deposited in Bank Account of LINDA WESTON, on behalf of M.L.			
COUNT	Date of Deposit	Description	Amount
103	1/25/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 9970
104	2/1/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 739
105	3/3/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 739
106	4/3/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 739
107	5/2/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 739
108	6/3/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 739
109	7/3/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 739
110	8/1/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 643

SSA Benefits Deposited in Bank Account of LINDA WESTON, on behalf of M.L.			
COUNT	Date of Deposit	Description	Amount
111	9/3/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 643
112	10/3/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 643
113	11/3/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 643
114	12/3/2008	Direct Deposit into Bank America Account ending xxxx5945	\$ 643
115	1/2/2009	Direct Deposit into Bank America Account ending xxxx5945	\$685

**Debits/Withdraws from Bank of America Account in name of Linda Weston on behalf of
M.L., Bank America Account
ending xxxx5945**

COUNT	Date of Debit/Withdraw	Description	Amount
116	1/25/2008	Cash Withdraw Bank Center, Kensington Ave., Phila PA	\$ 4000
117	1/28/2008	Cash Withdraw Bank Center, Kensington Ave., Phila PA	\$ 2000
118	1/30/2008	Checkcard Purchase Southwest Airlines	\$ 159
119	1/30/2008	Checkcard Purchase Southwest Airlines	\$ 152
120	1/30/2008	Checkcard Purchase Southwest Airlines	\$ 152
121	1/30/2008	Checkcard Purchase Southwest Airlines	\$ 152
122	1/30/2008	Checkcard Purchase Southwest Airlines	\$ 152
123	1/30/2008	Checkcard Purchase Southwest Airlines	\$ 152
124	1/30/2008	Checkcard Purchase Southwest Airlines	\$ 152
125	1/30/2008	Checkcard Purchase Southwest Airlines	\$ 152
126	1/30/2008	Checkcard Purchase Southwest Airlines	\$ 152
127	1/30/2008	Checkcard Purchase Southwest Airlines	\$ 152

Debits/Withdraws from Bank of America Account in name of Linda Weston on behalf of M.L., Bank America Account ending xxxx5945			
COUNT	Date of Debit/Withdraw	Description	Amount
128	12/3/2008	Cash Withdraw United Bank, 3750 Lancaster Ave., Phila. PA	\$602.50
129	1/2/2009	ATM Withdraw, ATM Express, 3398 Aramingo Ave., Phila. PA	\$201.50
130	1/2/2009	ATM Withdraw, ATM Express, 3398 Aramingo Ave., Phila. PA	\$201.50
131	1/2/2009	ATM Withdraw, ATM Express, 3398 Aramingo Ave., Phila. PA	\$201.50

SSA Benefits Deposited in Comerica Bank Account of LINDA WESTON, on behalf of H.K			
COUNT	Date of Deposit	Description	Amount
132	2/11/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 494
133	3/3/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 254

SSA Benefits Deposited in Comerica Bank Account of LINDA WESTON, on behalf of H.K			
COUNT	Date of Deposit	Description	Amount
134	4/3/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 254
135	5/1/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 254
136	6/3/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 254
137	7/2/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 254
138	8/3/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 254
139	9/3/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 254
140	10/2/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 254
141	11/3/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 254

SSA Benefits Deposited in Comerica Bank Account of LINDA WESTON, on behalf of H.K			
COUNT	Date of Deposit	Description	Amount
142	12/3/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$ 397
143	12/31/2009	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
144	2/3/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
145	3/2/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
146	4/2/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
147	5/3/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
148	6/3/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
149	7/2/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267

SSA Benefits Deposited in Comerica Bank Account of LINDA WESTON, on behalf of H.K			
COUNT	Date of Deposit	Description	Amount
150	8/3/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
151	9/3/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
152	10/1/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
153	11/3/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
154	12/3/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
155	1/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
156	2/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
157	4/1/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267

SSA Benefits Deposited in Comerica Bank Account of LINDA WESTON, on behalf of H.K			
COUNT	Date of Deposit	Description	Amount
158	5/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
159	6/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
160	7/1/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
161	8/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
162	9/2/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267
163	10/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx226241	\$267

SSA Benefits Deposited in Comerica Bank Account of LINDA WESTON on behalf of D.M.M., a minor			
COUNT	Date of Deposit	Description	Amount
164	9/3/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39

SSA Benefits Deposited in Comerica Bank Account of LINDA WESTON on behalf of D.M.M., a minor			
COUNT	Date of Deposit	Description	Amount
165	10/1/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39
166	11/3/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39
167	12/3/2010	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39
168	1/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39
169	2/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39
170	3/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39
171	4/1/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39
172	5/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39

SSA Benefits Deposited in Comerica Bank Account of LINDA WESTON on behalf of D.M.M., a minor			
COUNT	Date of Deposit	Description	Amount
173	6/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39
174	7/1/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$ 39

SSA Benefits Deposited in Comerica Bank Account C-xxxxxxxxxxxx0861 of JEAN PIERCE, on behalf of D.M.M., a minor			
COUNT	Date of Deposit	Description	Amount
175	9/2/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$35.10
176	10/3/2011	Direct Deposit into Comerica Bank Account x- xxxxxxxxxxxx0861	\$35.10

COUNTS ONE HUNDRED SEVENTY-SEVEN THROUGH
ONE HUNDRED NINETY-FOUR

MAIL FRAUD
18 U.S.C. § 1341

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1 through 10, and 12 through 38 of Counts 52 through 176 which charge defendants LINDA WESTON and JEAN MCINTOSH with multiple counts of wire fraud, in violation of 18 U.S.C. § 1343, are realleged and incorporated herein.

THE SCHEME

2. From in or about January 2002 to on or about October 15, 2011, defendants

LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,” and
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”

knowingly and willfully devised a scheme and artifice to defraud the SSA (SSA), and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

It was part of the scheme that:

3. Paragraphs 17 through 47 of Counts 52 through 176 which charge defendants LINDA WESTON and JEAN MCINTOSH with multiple counts of wire fraud, in

violation of 18 U.S.C. § 1343, are realleged and incorporated herein.

4. On or about the dates listed in Column B, within the Eastern District of Pennsylvania and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,” and
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a/ “Laronda Smith,”**

for the purpose of executing the above-mentioned scheme and artifice to defraud, knowingly caused to be delivered by the United States Postal Service, according to the direction thereon, the below described mail, including United States Treasury checks issued in Philadelphia, Pennsylvania, by the Department of Treasury on behalf of the SSA, made payable to defendants WESTON and MCINTOSH for disabled beneficiaries listed below, in the amounts listed in Column C:

COLUMN A	COLUMN B	COLUMN C
COUNT	DATE ON CHECK OR OTHER MAIL	AMOUNT or DESCRIPTION
177	11/20/2008	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$1511.40
178	12/17/2008	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$417.00
179	12/18/2008	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$290.00
180	12/22/2008	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$3951.21

COLUMN A	COLUMN B	COLUMN C
COUNT	DATE ON CHECK OR OTHER MAIL	AMOUNT or DESCRIPTION
181	12/31/2008	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$193.00
182	1/2/2009	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$254.00
183	2/27/2009	Check on behalf of H.K. addressed to Linda Weston at 1528 Church St., 3 rd floor, Philadelphia, PA \$440.00
184	3/2/2009	Check on behalf of H.K. addressed to Linda Weston at 1528 Church St., 3 rd floor, Philadelphia, PA \$440.00
185	4/14/2009	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$440.00
186	5/1/2009	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$440.00
187	5/18/2009	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$250.00
188	6/1/2009	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$440.00
189	7/1/2009	Check on behalf of H.K. addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA \$440.00
190	11/2/2008	Letter from SSA addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA on behalf of T.B., requesting information about T.B.
191	1/11/2008	Letter from SSA addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA on behalf of M.L. regarding Weston's status as representative payee
192	7/03/2008	Letter from SSA addressed to Linda Weston at P.O. Box 23278, Philadelphia, PA on behalf of M.L. regarding Weston's status as representative payee
193	4/3/2009	SSA- Form 623 for E.S. mailed to Linda Weston at 7238 Rutland St., Phila. PA

COLUMN A	COLUMN B	COLUMN C
COUNT	DATE ON CHECK OR OTHER MAIL	AMOUNT or DESCRIPTION
194	11/19/2008	SSA- Form 623 for E.S. mailed to Linda Weston at P.O. Box 23278, Philadelphia, PA

All in violation of Title 18, United States Code, Sections 1341 and 2.

COUNT ONE HUNDRED NINETY-FIVE

**FALSE STATEMENTS
18 U.S.C. § 1001**

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about July 24, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**LINDA WESTON,
a/k/a “Mom”
a/k/a “Brenda Williams”**

in a matter within the jurisdiction of the executive branch of the Government of the United States, that is, the Social Security Administration, Office of the Inspector General (SSA-OIG), knowingly and willfully made a materially false statement.

2. On or about July 24, 2009, agents of the SSA-OIG were investigating defendant LINDA WESTON’s status as a representative payee for disabled adults H.K., T.B. and E.S. Because agents of the SSA-OIG were trying to determine why defendant WESTON had failed to respond to SSA inquiries about disability payments made to WESTON on behalf of H.K., T.B. and E.S., the details relating to the addresses and living arrangements of H.K., T.B. and E.S. were material to the investigation being conducted by SSA-OIG.

3. With respect to a material matter, defendant LINDA WESTON told SSA-OIG agents that E.S. and T.B. were living separate and apart from her at a specific address on Bridge Street in Philadelphia, Pennsylvania.

4. Defendant LINDA WESTON’s statement, as she then and there well knew and believed, was false in that WESTON knew that E.S. and T.B. were not living separate and

apart from WESTON, and were, in fact, being confined by WESTON and others at different address in Philadelphia.

In violation of Title 18, United States Code, Section 1001.

COUNT ONE HUNDRED NINETY SIX

**KIDNAPING
18 U.S.C. § 1201(a)(1)**

THE GRAND JURY FURTHER CHARGES THAT:

From in or around July, 2011 through in or around October, 2011, in West Palm Beach, Florida, and elsewhere, defendants

**LINDA WESTON,
a/k/a “Mom,”
a/k/a “Brenda Williams,” and
JEAN MCINTOSH,
a/k/a “Shay,”
a/k/a “Jean Pierce,”
a/k/a “Laronda Smith,”**

knowingly and unlawfully seized, confined, kidnaped, abducted, carried away, and held B.R., and aided and abetted such, for ransom, reward, and otherwise, that is, for the purpose of gaining a personal benefit from that seizure, and willfully transported B.R. in interstate commerce from West Palm Beach, Florida to Killeen Texas; from Killeen Texas to Philadelphia, Pennsylvania, from Philadelphia, Pennsylvania to Killeen Texas, from Killeen Texas back to Philadelphia, Pennsylvania in committing and in furtherance of the offense.

In violation of Title 18, United States Code, Section 1201(a)(1) and 2.

NOTICE OF SPECIAL FINDINGS

THE GRAND JURY FURTHER FINDS THAT:

A. As to Count 15, defendant LINDA WESTON:

1. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];

2. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and D.S. died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(D)].

3. Committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to D.S. [Title 18, United States Code, Section 3592(c)(6)].

4. Committed the offense against a victim, D.S., who was particularly vulnerable due to infirmity [Title 18, United States Code, Section 3592(c)(11)].

B. As to Count 24, defendant LINDA WESTON:

1. Was 18 years of age or older at the time of the offense [Title 18, United States Code, Section 3591(a)];

2. Intentionally inflicted serious bodily injury that resulted in the death of the M.L. [Title 18, United States Code, Section 3591(a)(2)(B)];

3. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such

that participation in the act constituted a reckless disregard for human life and M.L. died as a direct result of the act [Title 18, United States Code, Section 3591(a)(2)(D)].

4. Committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to M.L. [Title 18, United States Code, Section 3592(c)(6)].

5. Committed the offense against a victim, M.L., who was particularly vulnerable due to infirmity [Title 18, United States Code, Section 3592(c)(11)].

A TRUE BILL

FOREPERSON



Zane David Memeger
United States Attorney