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UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

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FILED-USDC-CT-HARTFORD

Grand Jury H-24-1

3:25CR5 (VDO)(MEG)

UNITED STATES OF AMERICA)	Criminal No. 3:24CR_____ () ()
)	
)	18 U.S.C. § 1962(d) (Racketeering Conspiracy)
)	18 U.S.C. § 1959(a)(1) (VCAR Murder)
v.)	18 U.S.C. § 924(c) (Carrying and Using a
)	Firearm During and in Relation to a Crime of
ANGEL RIVERA,)	Violence/Possession of a Firearm in Furtherance
a.k.a. "Rico," "Slatt,")	of a Drug Trafficking Offense)
RAQUAN KNIGHT,)	18 U.S.C. § 924(j)(1) (Causing Death Through
a.k.a. "RQ,")	the Use of a Firearm in Relation to a Crime of
PAUL DOWNER,)	Violence)
a.k.a. "Luap Benji,")	18 U.S.C. § 922(o) (Illegal Possession of a
MEKHI THOMPSON,)	Machine Gun)
a.k.a. "Midnight,")	18 U.S.C. § 2 (Aiding and Abetting)
PAUL CLARKE,)	21 U.S.C. § 846 (Narcotics Conspiracy)
a.k.a. "Tommy Bunz,")	
TYSHON WALKER,)	
a.k.a. "Pone Gwapoo," and)	
JOSHUA CRUZ,)	
a.k.a. "Hop-out Curly,")	
Defendants.)	

The Grand Jury charges:

COUNT ONE
(Racketeer Influenced Corrupt Organizations (RICO) Conspiracy)

Introduction

At all times relevant to this Indictment:

1. The defendants ANGEL RIVERA, a.k.a. "Rico," a.k.a. "Slatt," RAQUAN KNIGHT, a.k.a. "RQ," PAUL DOWNER, a.k.a. "Luap Benji," MEKHI THOMPSON, a.k.a. "Midnight," PAUL CLARKE, a.k.a. "Tommy Bunz," TYSHON WALKER, a.k.a. "Pone Gwapoo," and JOSHUA CRUZ, a.k.a. "Hop-out Curly," and others known and unknown to the Grand Jury, were members and associates of the Hoodstar Gzz street gang, a criminal organization whose members

and associates engaged in, among other activities, narcotics trafficking, acts of violence, including murder and assault, firearms trafficking, robberies, extortion, obstruction of justice, witness tampering, arson, and auto theft.

2. Throughout the gang's existence it has referred to itself by a variety of names, including but not limited to the "Hoodstars," "Hoodstarz," "Hoodstar Gzz," or "Gz."

3. The Hoodstar Gzz is a street gang that began in or about early 2010. Originally, the gang engaged primarily in large-scale drug trafficking and violence in and around Hartford, Connecticut. In the decade since its founding, the gang has grown its membership, extended its territory, and expanded the scope of its criminal activities.

4. The Hoodstar Gzz was originally established as the result of a merger of several narcotics traffickers from the same neighborhood in the North End of Hartford, Connecticut. These individuals initially organized to support their street-level drug distribution efforts in their neighborhood.

5. The Hoodstar Gzz originated at 91 Barbour Street and 1994 Main Street in Hartford, Connecticut and today generally operates between Capen Street, Westland Street, Enfield Street, and Main Street. Within this area, members originally distributed cocaine, crack cocaine, heroin, and marijuana. Members participated in robberies and conducted acts of violence such as shootings and homicides of competitors and rival gang members. These individuals operated in concert to protect each other from gangs from rival neighborhoods as well as from competing narcotics distributors.

6. Following the murder of the Hoodstarz leader in 2011, the gang started to evolve into a more violent gang that was controlled by younger members. The younger, more violent gang members began to refer to themselves as the Hoodstar Gzz or Gz instead of simply the Hoodstarz.

7. Members and associates of the Hoodstar Gzz committed and threatened to commit acts of violence, to protect the gang and its members and associates. These acts of violence have included murder, attempted murder, and assault intended to protect Hoodstar Gzz from rival gangs and to retaliate for acts of violence carried out by rival gang members.

8. Members and associates of the Hoodstar Gzz have utilized stolen vehicles in furtherance of the gang's affairs.

9. Members and associates of the Hoodstar Gzz have burned vehicles that were used in the commission of crimes.

10. Prospective members wishing to join the Hoodstar Gzz were required to participate in criminal activity to show their potential value to the gang.

11. The Hoodstar Gzz do not have a specific organizational hierarchy, instead the members that have participated in episodes of violent crime or make the most profit from their involvement in narcotics sales become the most revered within the gang.

12. Hoodstar Gzz members met on a regular basis to, among other things, report on acts of violence committed by their members with the goal of furthering the gang's influence and power.

13. Hoodstar Gzz members have signified their membership with tattoos. Hoodstar Gzz members refer to other members by their monikers, or nicknames, and often did not know fellow gang members' legal names. Hoodstar Gzz members signify their membership to each other and to rival gang members by using hand signs.

14. The Hoodstar Gzz wear common clothing to identify themselves as members of the gang. Hoodstar Gzz members commonly wear "Full Profit" clothing, a brand of clothing that was founded and distributed by a member of the gang.

15. Hoodstar Gzz members have regularly engaged in acts of violence against innocent citizens and rival gang members. Participation in criminal activity by a Hoodstar Gzz member, particularly violent acts directed at rival gangs, increases the respect accorded to that member, resulting in that member maintaining or increasing his status in the gang.

16. The Hoodstar Gzz members have routinely engaged in violent conduct against rival gangs, or “opps,” specifically the Ave gang. The Ave is a criminal street gang operating in the Albany Avenue area in the North End of Hartford, Connecticut. Hoodstar Gzz members have committed violent acts to enhance the gang’s overall reputation for violence in the community, resulting in the intimidation of citizens and witnesses in Hoodstar Gzz’s territory.

17. Hoodstar Gzz members and associates have communicated through various forms of electronic communication, including phone calls, text messages, Facebook, Instagram, music videos posted on YouTube, and other social media sites.

The Enterprise

18. At all times relevant to this Indictment there existed, in the District of Connecticut and elsewhere, an organization, namely, referring to itself as the “Hoodstar Gzz,” “Hoodstars,” “Hoodstarz,” or “Gz,” a street gang operating in and around Hartford, Connecticut. The Hoodstar Gzz, including its leaders, members, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section 1961(4), namely, a group of individuals associated in fact, although not a legal entity, that was engaged in, and the activities of which affected, interstate and foreign commerce. This enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

19. At all times relevant to this Indictment, the purposes of the enterprise included, but were not limited to, the following:

- a. Enriching members and associates of the enterprise through criminal activities, including, but not limited to, drug trafficking, robbery, and trafficking in firearms;
- b. Increasing the enterprise's control and authority over its territory through threats, intimidation, and acts of violence committed against rival gangs, including but not limited to the Ave gang;
- c. Promoting and enhancing the enterprise and its members' and associates' activities through meetings, and other gatherings that allowed members to, among other things, find other members willing to engage in criminal activity and plan that criminal activity, devise ways to hide criminal activity from law enforcement, and discuss ways in which members could enrich themselves and the enterprise through various criminal schemes;
- d. Keeping victims and witnesses in fear of the enterprise and in fear of its leaders, members, and associates through threats of violence and actual violence; and
- e. Providing assistance to gang members who committed crimes for and on behalf of the gang in order to hinder, obstruct, and prevent law enforcement officers from identifying the offenders of those crimes, apprehending the offenders, and successfully prosecuting and punishing the offenders.

Manner and Means of the Enterprise

20. Among the manner and means whereby members and associates of the enterprise, including defendants ANGEL RIVERA, RAQUAN KNIGHT, PAUL DOWNER, MEKHI THOMPSON, PAUL CLARKE, TYSHON WALKER, JOSHUA CRUZ, and their co-conspirators conducted and participated in the conduct of the affairs of the enterprise were the following:

- a. To protect and expand the enterprise's power and territory, members and associates of the enterprise conspired to commit, attempted, and committed, acts of violence, including murder, assault with dangerous weapons, robbery, extortion, and directed attacks against rival gang members and/or civilians not involved in gang activities;
- b. In the course of carrying out the criminal activities of the enterprise, members and associates of the enterprise carried, and used dangerous weapons, including firearms;

- c. To increase the enterprise's control and authority over its territory, members and associates of the enterprise promoted a climate of fear in the community through violence and threats of violence;
- d. To promote the enterprise, members and associates of the enterprise frequently engaged in the aforementioned criminal activity in the presence of other gang members in order to enhance the status of those conducting criminal acts;
- e. To ensure the success of the enterprise's criminal activities, members and associates of the enterprise coordinated criminal ventures, including trafficking narcotics in Connecticut and Vermont, obtained supplies of controlled substances, pooled and shared monetary funds to promote gang activities, and moved firearms from Vermont to Connecticut;
- f. To perpetuate the enterprise, members and associates of the enterprise used various techniques to avoid law enforcement detection, such as hiding firearms and other weapons, swapping firearms, destroying or hiding evidence of murders, changing phones, and burning vehicles;
- g. To promote the enterprise, members and associates of the enterprise frequently engaged in recording and distributing rap music to promote the criminal activities the gang members committed on behalf of the enterprise, namely narcotics distribution, acts involving violence and murder, and the possession and use of firearms; and
- h. The members and associates of the enterprise used the enterprise's reputation for violence to further the members' and associates' drug trafficking activity.

The Racketeering Conspiracy

21. Beginning on or about a date unknown, but starting no later than 2010, and continuing at least until the date of this Indictment, in the District of Connecticut and elsewhere, the defendants,

- (1) ANGEL RIVERA, a.k.a. "Rico," a.k.a. "Slatt"
- (2) RAQUAN KNIGHT, a.k.a. "RQ"
- (3) PAUL DOWNER, a.k.a. "Luap Benji"
- (4) MEKHI THOMPSON, a.k.a. "Midnight"
- (5) PAUL CLARKE, a.k.a. "Tommy Bunz"
- (6) TYSHON WALKER, a.k.a. "Pone Gwapoo"
- (7) JOSHUA CRUZ, a.k.a. "Hop-out Curly"

and others known and unknown to the Grand Jury, each being a person employed by and associated with the Hoodstar Gzz, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with one another to violate Title 18, United States Code, Section 1962(c); that is, to conduct and participate directly and indirectly in the conduct of the affairs of said enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), consisting of multiple:

- a. Acts indictable under Title 18, United States Code, Section 1512 (relating to tampering with a witness, victim, or an informant);
- b. Acts indictable under Title 18, United States Code, Section 1513 (relating to retaliating against a witness, victim, or an informant);
- c. Acts indictable under Title 18, United States Code, Section 933 (relating to gun trafficking);
- d. Offenses involving trafficking in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846;
- e. Acts involving murder, chargeable under Connecticut General Statutes Sections 53a-54a (murder), 53-8(a) (aiding and abetting), 53a-48 (conspiracy), and 53a-49 (attempt);
- f. Acts involving arson, chargeable under Connecticut General Statutes Sections 53a-112 and 53a-100;
- g. Acts involving murder, chargeable under Title 13, Vermont Statutes Annotated, Sections 2301 (murder), 3 (aiding and abetting), 9(a) (attempt), and 1404 (conspiracy);
- h. Acts involving arson, chargeable under Title 13, Vermont Statutes Annotated, Section 502; and
- i. Acts involving extortion, chargeable under Title 13, Vermont Statutes Annotated, Section 1701.

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

Overt Acts

23. In furtherance of the conspiracy, and to accomplish the objects and purposes thereof, the defendants and others committed and caused others to commit various overt acts in the District of Connecticut and elsewhere, including but not limited to the following:

- (1) On or about April 16, 2019, THOMPSON shot and wounded T.J., G.C., and J.H. in Hartford, Connecticut.
- (2) On or about March 20, 2020, Hoodstar Gzz members and associates uploaded a music video on the social media platform YouTube entitled, "Tommy Bunz x Pone Gwap- Loony." The video depicts RIVERA, CLARKE, WALKER, and CRUZ and other Hoodstar Gzz displaying large sums of cash. The lyrics include references to the Hoodstar Gzz gang and members shooting rivals and selling narcotics.
- (3) On or about October 6, 2020, Hoodstar Gzz members and associates posted a music video on the social media platform YouTube entitled, "GBG Quese x Hopout Curlyy- Full Profit." The video depicts Hoodstar Gzz wearing Full Profit clothing and displaying narcotics and cash. Multiple gang members display firearms, including RIVERA, CLARKE, and CRUZ. The lyrics of the song describe shooting the gang's rivals and selling narcotics.
- (4) Beginning in or about January 2021 and extending to September of 2024, RIVERA, KNIGHT, DOWNER, THOMPSON, CLARKE, WALKER, and CRUZ sold marijuana, cocaine, heroin, and fentanyl in Connecticut and Vermont. The Hoodstar Gzz sold marijuana with the brand name "Gumbo" on the packaging.
- (5) On or about January 22, 2021, DOWNER shot R.F. in the femoral artery for failure to pay a drug debt in St. Johnsbury, Vermont.
- (6) On or about January 22, 2021, DOWNER threatened R.F. and K.C. after shooting R.F. in the leg. DOWNER sent a text message demanding payment stating, "I want my money."
- (7) On or about February 22, 2021, a Hoodstar Gzz member or associate uploaded a music video on the social media platform YouTube entitled, "2 Hawdd x Hopout Curlyy – 2 Bodies." The video depicts RIVERA, CLARKE, WALKER, and CRUZ displaying firearms. The Hoodstar Gzz members rap about manufacturing drugs and shooting rival gang members.
- (8) On or about February 25, 2021, DOWNER possessed at least 120.8 grams of cocaine, at least 24.25 grams of fentanyl, \$917 in cash, and eleven firearms at a residence in St. Johnsbury, Vermont.

- (9) On or about March 11, 2021, a Hoodstar Gzz member or associate uploaded a music video on the social media platform YouTube entitled, "RQ ft Jhaze- Don't try us." The lyrics of the song mention catching "lil Mari," which is a reference to rival gang member Jamari Preston.
- (10) On or about April 10, 2021, RIVERA was involved in an incident with Ave gang members that resulted in the shooting death of 3-year-old R.J. Jr., a.k.a. "Jun Jun."
- (11) On or about April 10, 2021, RIVERA, KNIGHT, CRUZ and other Hoodstar Gzz members and associates shot and killed Jamari Preston, a member of the rival Ave gang and wounded J.O. in Hartford, Connecticut.
- (12) On or about April 10, 2021, Hoodstar Gzz members and associates burned a stolen grey Acura TL sedan in South Windsor, Connecticut. The stolen grey Acura TL sedan was used in the homicide of Jamari Preston.
- (13) On or about April 11, 2021, Hoodstar Gzz members and associates burned a stolen silver Audi SQ 5 SUV vehicle in Hartford, Connecticut. The stolen silver Audi SQ 5 SUV was used in the homicide of Jamari Preston.
- (14) On or about December 30, 2021, a Hoodstar Gzz member or associate uploaded a music video on the social media platform YouTube entitled "Tommy Bunz Feat. Band Gang Lonnie Bands - Yea." The video depicts CLARKE, WALKER, CRUZ and other Hoodstar Gzz members and associates with the Gumbo brand of marijuana, Full Profit clothing and displaying firearms. CLARKE raps about being a shooter and using a Glock switch.
- (15) On or about January 12, 2022, KNIGHT sent Facebook messages to the mother of homicide victim Jamari Preston. KNIGHT's messages included telling Preston's mother, "LMAO, he so cold" and "word to mari that case so cold."
- (16) On or about January 12, 2022, KNIGHT and RIVERA exchanged Facebook messages. KNIGHT sent RIVERA a screen shot of the messages he sent to Jamari Preston's mother and RIVERA responded, ". . . delete all of that the fuck is you doing. Fuckin duck."
- (17) On or about January 18, 2022, RIVERA, WALKER, CRUZ and other Hoodstar Gzz members and associates shot from a white Infiniti M37 at A.J., a.k.a. "Watts," and shot and injured J.O. in Hartford, Connecticut.
- (18) On or about January 18, 2022, RIVERA, WALKER, CRUZ and other Hoodstar Gzz members and associates shot and killed Kendall Fair, a.k.a. "Swerve," and shot and injured J.W. in Hartford, Connecticut.

- (19) On or about January 18, 2022, Hoodstar Gzz members and associates burned a stolen white Infiniti M37 vehicle in Windsor, Connecticut. The stolen white Infiniti M37 was used in the Kendall Fair homicide.
- (20) On or about February 11, 2022, a Hoodstar Gzz member or associate uploaded a music video on the social media platform YouTube entitled, "RQ Gzz- free tungi." The video depicts KNIGHT rapping about the "Gzz" and "young Gzz," the title of the song refers to a Hoodstar Gzz member that was in custody after his cellular telephone was found at the scene of the murder of Jamari Preston.
- (21) On or about March 21, 2022, a Hoodstar Gzz member or associate uploaded a music video on the social media platform YouTube entitled "RQ ft JHaze- Dont try us part 2." The video depicts KNIGHT wearing a Full Profit backpack and displaying a large stack of cash. KNIGHT raps about being a Hoodstar Gzz member, he taunts the Ave gang and references Glock switches.
- (22) On or about March 24, 2022, RIVERA received a text message from a Hoodstar Gzz associate with suggested rap lyrics about Jamari Preston's murder. RIVERA responded that the suggested lyrics would "have me in jail."
- (23) On or about March 28, 2022, a Hoodstar Gzz member or associate uploaded a music video on the social media platform YouTube entitled, "Esco Crack- Outside Official Music Video." The video depicts RIVERA, KNIGHT, CRUZ and other Hoodstar Gzz members displaying the Gumbo brand of marijuana and wearing Full Profit clothing. The song begins with a gang member rapping about "Gzz shit" and then Hoodstar Gzz members rap about distributing Gumbo marijuana and fentanyl, wearing Full Profit clothing, and shooting rivals.
- (24) On or about April 10, 2022, RIVERA and other Hoodstar Gzz members and associates recorded a video where they brag about rival gang members that the Hoodstar Gzz have killed. RIVERA states, "on Mari grave, on Buck grave, on Eight grave, all dead-ass..." RIVERA is waving a handgun while another Hoodstar Gzz member states, "then we gonna finish you off with a forty and leave you stiff as all fuck."
- (25) On or about April 10, 2022, Hoodstar Gzz members and associates recorded a rap music video entitled, "Mr. Slatt x RQ- 3X." The video depicts RIVERA, KNIGHT, and THOMPSON and other Hoodstar Gzz members displaying firearms. RIVERA and KNIGHT rap about shooting Jamari Preston on the one-year anniversary of his murder. RIVERA states, "they took my nephew life, told Curly take that right, they goin' die tonight, they ain't playin' right, Capin in this shit, they're tryin to lose their life. Send RQ on that mission, he goin do it right." KNIGHT states, "40 clip with extension, walk em down we ain't missin... everytime my brother on that mission he ain't never missin... all my Gzz we winnin'."

- (26) In April of 2022, DOWNER possessed a Glock Model 19 firearm that he directed another person to purchase in St. Johnsbury, Vermont.
- (27) On or about April 16, 2022, DOWNER possessed a Glock Model 29 Generation 4 firearm that he directed another person to purchase in Harwick, Vermont.
- (28) On or about April 18, 2022, RIVERA, DOWNER and other Hoodstar Gzz gang members and associates gathered at an event facility located at 2566 Main Street, Hartford, Connecticut, for a memorial for a deceased gang member who was killed in a car accident. The event facility is known as the "Party House."
- (29) On or about April 18, 2022, at the Party House, Hoodstar Gzz members and associates engaged in a shootout with rival gang members from the Ave gang. Several members and associates of the Hoodstar Gzz fired at Ave gang members during the shootout. Hoodstar Gzz believed that Ave gang member Brian Evans was responsible for starting the shooting.
- (30) On or about April 18, 2022, a Hoodstar Gzz member or associate uploaded a music video on the social media platform YouTube entitled "Mr. Slatt x RQ 3X" boasting about the murder of Jamari Preston.
- (31) On or about May 5, 2022, RIVERA drove through Ave gang territory to taunt the Hoodstar Gzz rivals. RIVERA was shot during the incident.
- (32) On or about May 14, 2022, RIVERA posted on social media, "I got shot playing around with the opps never thought I will but was Tauntin em on they own block."
- (33) On or about May 15, 2022, Hoodstar Gzz members Jaime Holmes and B.F. possessed approximately 5.8 pounds of fentanyl, 7.5 pounds of marijuana, and Gumbo packaging materials at a residence in Hartford, Connecticut.
- (34) On or about May 15, 2022, Hoodstar Gzz member B.F. unloaded Full Profit clothing into a residence in Hartford, Connecticut.
- (35) On or about May 15, 2022, Hoodstar Gzz member Jaime Holmes was shot and killed and Hoodstar Gzz member B.F. was shot by rival Ave gang members as part of an ongoing feud between the Hoodstar Gzz and the Ave gang. Hoodstar Gzz believed that Ave gang member Brian Evans was one of the perpetrators of this incident.
- (36) On or about June 19, 2022, KNIGHT shot E.A. with a Glock Model 19 firearm in Hartford, Connecticut.
- (37) On or about July 13, 2022, KNIGHT fled from a Vermont State Trooper in a Dodge Charger at a high rate of speed in Newport, Vermont. KNIGHT eventually crashed the car and fled on foot. KNIGHT discarded a clear plastic bag containing a rock-

like substance, 161 bags of fentanyl, 8.3 grams of cocaine, \$1,619 in cash, and a Full Profit sweatshirt. KNIGHT's backpack contained \$8,000 in cash and 3.88 ounces of marijuana. The Dodge Charger contained two empty safes and a digital scale with a white powdery substance.

- (38) On or about July 15, 2022, RIVERA sent a message to a Hoodstar Gzz associate to purchase blackout ammunition for RIVERA.
- (39) On or about August 1, 2022, RIVERA and other members and associates of the Hoodstar Gzz gang shot and killed Brian Evans and shot and injured D.G. and J.M. in Hartford, Connecticut. Hoodstar Gzz used blackout ammunition and a Glock switch during this shooting.
- (40) On or about August 1, 2022, Hoodstar Gzz members and associates burned a stolen silver Jeep Grand Cherokee vehicle in Windsor, Connecticut. The stolen silver Jeep Grand Cherokee was used in the homicide of Brian Evans.
- (41) On or about September 6, 2022, DOWNER purchased a firearm in Vermont using a straw purchaser.
- (42) On or about September 14, 2022, THOMPSON and RIVERA got into a confrontation with Devante Gardner over a rental car THOMPSON failed to return. THOMPSON informed RIVERA of the location of a firearm stating, "Ayo Ric, go grab that other banger, it's in my book bag." THOMPSON then shot and killed Gardner.
- (43) On or about September 23, 2022, RIVERA sent a text message with an MP3 audio file with lyrics about murdered rival Ave members Brian Evans, Kendall Fair, a.k.a. "Swerve," and Jamari Preston. The lyrics state "Big B (Brian Evans) took his last sip. And if you keep dissin my gang we gon keep sliding through your strip. But now lets talk about it ... Mari (referencing Jamari Preston) tried to run he couldn't breathe. Brian (referencing Brian Evans) got left by some steps left that dumb deceased, Swerve (Kendall Fair) was lackin on that block and put him on the T... Mari (referencing Jamari Preston) got hit in his head and then his mom talkin bout Jun Jun?— MARI, SWERVE, you got all these dead...dead."
- (44) On or about September 23, 2022, a Hoodstar Gzz member or associate uploaded a rap music video on the social media platform YouTube entitled "RQ Gzz- just cause y'all hate it." The video depicts a memorial photo of Jaime Holmes, a Hoodstar Gzz gang member who was shot and killed by a member of the Ave gang. KNIGHT and other Hoodstar Gzz members are seen holding firearms and taunting the Ave gang by holding four fingers upside down.
- (45) On or about October 4, 2022, DOWNER possessed four firearms, including a Glock Model 19, inside of a silver Nissan Maxima in Hartford, Connecticut. DOWNER

directed another person to purchase the Glock Model 19 in St. Johnsbury, Vermont in April of 2022.

- (46) In or about October 2022, THOMPSON obtained a rental vehicle, a gray Hyundai Elantra, in exchange for narcotics.
- (47) On or about October 8, 2022, RIVERA received an MP3 audio file via text message with rap lyrics about Hoodstar Gzz members shooting rival Ave members Kendall Fair, a.k.a. "Swerve," and Brian Evans. CRUZ and a Hoodstar Gzz associate state, "Swerve died, Brian died they said they want they lick back... and I'm a big slatt hopin out on 50 with a switch he can't take that. Talkin crazy bout my brother got his wig clapped. Straw face (Brian Evans), I know y'all sad, I know y'all really feel that. Damn and that's some big facts, you betta go check the stats."
- (48) On or about October 11, 2022, RIVERA received an MP3 audio file via text message with rap lyrics about Hoodstar Gzz members shooting rivals and witnesses. DOWNER states, "Opp hate that I'm winnin. All I know is get the money and kill the witness."
- (49) On or about October 27, 2022, THOMPSON and RIVERA were driving in a rented gray Hyundai Elantra and were involved in a car accident with a black Nissan sedan. THOMPSON and RIVERA fled the scene. The Nissan followed them for approximately 1.6 miles. THOMPSON then exited the vehicle and shot and killed the driver of the Nissan, Manuel Rodriguez.
- (50) On or about December 24, 2022, RIVERA sent an MP3 audio file via text message with rap lyrics about the murder of rival Ave gang members Jamari Preston and Brian Evans. RIVERA states, "Bro got a glizzy with a switch I got a mack. Black ass hoppin out and he getting on your ass. Fuck Mari, Fuck B leave them in the past... ran up a bag then we slid through the Ave. Told Pone hop out do that bad... We heard the Ave's diss all them dead. RIP I aint never miss. RQ got my right and I got his fuckin left. We love jumpin out makin our mess, hit you with that uh uh then we leave you stretched."
- (51) On or about December 30, 2022, RIVERA sent a text message with an MP3 audio file with lyrics about murdered rival Ave members Brian Evans, Kendall Fair, a.k.a. "Swerve," and Jamari Preston. The lyrics state, "this my 4th time puttin Mari (Jamari Preston) in the track. Goddamn and I still aint get clapped (shot/killed). Swerve (Kendall Fair), 40, Dre, got packed... Fuck the opps, leave em dead up in a pound. You can't run when you hear the switchy sound."
- (52) On or about January 11, 2023, RIVERA possessed a Glock 29 Generation 4 with an extended 33-round magazine and a machine gun conversion device, otherwise known as a Glock switch, at an apartment in East Hartford, Connecticut. DOWNER directed another person to purchase the Glock Model 29 Generation 4 in Hardwick, Vermont on April 16, 2022.

- (53) On or about January 11, 2023, RIVERA possessed a Glock 10mm magazine with a 10-round capacity, Blazer 9mm rounds, and 5.7x 29 rounds ammunition, Full Profit clothing, a "RIP Jun Jun" t-shirt, a Hoodstar Gzz memorial card, gun oil, a digital scale, a safe, and counterfeit money at a residence in East Hartford, Connecticut.
- (54) In March of 2023, CLARKE sent Facebook messages attempting to establish a residence to sell narcotics from in Vermont.
- (55) On or about March 21, 2023, CLARKE provided narcotics to a resident of an apartment in St. Johnsbury, Vermont.
- (56) On or about March 21, 2023, CLARKE sold narcotics from an apartment in St. Johnsbury, Vermont.
- (57) On or about March 21, 2023, CLARKE started a fire inside a bedroom in an apartment in St. Johnsbury, Vermont.
- (58) On or about May 3, 2023, CLARKE filmed a video on his cellular telephone of a clear plastic bag of powder cocaine.
- (59) On or about May 4, 2023, CLARKE offered to sell an eight ball of cocaine for \$225.
- (60) On or about May 4, 2023, CLARKE fled from the police after they attempted to initiate a traffic stop. During the police pursuit, CLARKE threw a black Glock 22 Generation 4 .40 caliber firearm out of the vehicle. After law enforcement recovered the firearm, CLARKE told officers, "That's okay, I'll get another one."
- (61) On or about May 4, 2023, CLARKE possessed a clear plastic bag containing approximately 26 grams of cocaine.
- (62) On or about June 14, 2023, Hoodstar Gzz members and associates posted a rap music video on the social media platform YouTube entitled, "Luap Benji- 10 Hour Drive." The video depicts Hoodstar Gzz members and associates wearing Full Profit clothing and displaying firearms and large sums of cash. DOWNER raps about having the ability to make a call to facilitate a shooting and about Glock switches.
- (63) On or about June 29, 2023, Hoodstar Gzz members and associates posted a rap music video on the social media platform YouTube entitled, "Munna x Hopout Curly x Spliff x Gbg Quese x Pone Gwapo - Button Boyz." The video depicts CRUZ and other Hoodstar Gzz members and associates displaying the Gumbo brand of marijuana that is sold by gang members. The lyrics of the song include WALKER, CRUZ, and other gang members rapping about shooting a rival in the face and shooting rival gang members with Glock switches. The Glock switches

are referred to as “switches” and “buttons.” CRUZ states, “Must be dumb as fuck tryna duck a switch, ever since I’ve bought a button (switch) I don’t think I missed.”

- (64) On or about October 9, 2023, WALKER possessed a Glock model 23 with an extended magazine, 290 wax packets of cocaine, a rock of cocaine weighing 22 grams, 14 wax packets of fentanyl, and a digital scale in East Hartford, Connecticut.
- (65) On or about May 30, 2024, CRUZ fled from the police and possessed marijuana, including marijuana packaged with the label Gumbo, in a vehicle in Windsor, Connecticut.
- (66) On or about July 10, 2024, CRUZ possessed a Glock 19 Generation 5 firearm with a Glock switch and an extended magazine and marijuana in a vehicle in Hartford, Connecticut.
- (67) On or about September 13, 2024, WALKER possessed a clear plastic bag containing 232 wax folds of fentanyl with xylazine, a clear plastic bag containing 56.691 grams of cocaine, an orange pill bottle containing 18 pills marked “K56” containing oxycodone, a blender with 3.234 grams of fentanyl, two clear plastic bags containing 30.743 grams of fentanyl with xylazine, a pink plate with 4.22 grams of fentanyl with xylazine, drug processing paraphernalia, and a Glock, Generation 4 45mm handgun with a Glock switch and an extended magazine containing 21 rounds of ammunition, \$6,775 in cash, and a Connecticut license plate bearing number BA00683 at an apartment in Vernon, Connecticut.

Notice of Special Sentencing Factors

24. On or about April 10, 2021, in the District of Connecticut, as part of their agreement to conduct and participate in the conduct of the affairs of the Hoodstar Gzz enterprise through a pattern of racketeering activity, ANGEL RIVERA, RAQUAN KNIGHT, JOSHUA CRUZ, and others known and unknown to the Grand Jury, did commit murder, that is with intent to cause the death of another person, RIVERA, KNIGHT, and CRUZ caused the death of Jamari Preston, and did aid and abet the same, in violation of Connecticut General Statutes Sections 53a-54a and 53-8(a).

25. On or about January 18, 2022, in the District of Connecticut, as part of their agreement to conduct and participate in the conduct of the affairs of the Hoodstar Gzz enterprise through a pattern of racketeering activity, ANGEL RIVERA, TYSHON WALKER, JOSHUA CRUZ, and others known and unknown to the Grand Jury, did commit murder, that is with intent to cause the death of another person, RIVERA, WALKER, and CRUZ caused the death of Kendall Fair, a.k.a. "Swerve," and did aid and abet the same, in violation of Connecticut General Statutes Sections 53a-54a and 53-8(a).

26. On or about April 18, 2022, in the District of Connecticut, as part of their agreement to conduct and participate in the conduct of the affairs of the Hoodstar Gzz enterprise through a pattern of racketeering activity, ANGEL RIVERA and others known and unknown to the Grand Jury, did commit murder, that is with intent to cause the death of another person, RIVERA caused the death of Brian Evans, and did aid and abet the same, in violation of Connecticut General Statutes Sections 53a-54a and 53-8(a).

27. On or about September 14, 2022, in the District of Connecticut, as part of their agreement to conduct and participate in the conduct of the affairs of the Hoodstar Gzz enterprise through a pattern of racketeering activity, MEKHI THOMPSON and others known and unknown to the Grand Jury, did commit murder, that is with intent to cause the death of another person,

THOMPSON caused the death of Devante Gardner, and did aid and abet the same, in violation of Connecticut General Statutes Sections 53a-54 and 53-8(a).

28. On or about October 27, 2022, in the District of Connecticut, as part of their agreement to conduct and participate in the conduct of the affairs of the Hoodstar Gzz enterprise through a pattern of racketeering activity, ANGEL RIVERA, MEKHI THOMPSON, and others known and unknown to the Grand Jury, did commit murder, that is with intent to cause the death of another person, RIVERA and THOMPSON caused the death of Manuel Rodriguez, and did aid and abet the same, in violation of Connecticut General Statutes Section 53a-54a.

29. From in or about January 2021 through in or about September 2024, the precise dates being unknown to the Grand Jury, in the District of Connecticut and elsewhere, as part of their agreement to conduct and participate in the conduct of the affairs of the Hoodstar Gzz enterprise through a pattern of racketeering activity, defendants ANGEL RIVERA, RAQUAN KNIGHT, PAUL DOWNER, MEKHI THOMPSON, PAUL CLARKE, TYSHON WALKER, and JOSHUA CRUZ and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to distribute and possess with intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of a Schedule II controlled substance, N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(vi), and 846.

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

COUNT TWO
(Murder in Aid of Racketeering)

30. At all times relevant to this Indictment, the Hoodstar Gzz, as more fully described in Paragraphs 1 through 20 of Count One of this Indictment, which are realleged and incorporated by reference herein, including its leaders, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), namely a group of individuals associated in fact, although not a legal entity, that was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

31. At all times relevant to this Indictment, the above-described enterprise, the Hoodstar Gzz, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Section 1959(b)(1) and Section 1961(1), that is, offenses involving trafficking in controlled substances in violation of Title 21, United States Code, Sections 841 and 846; acts involving murder in violation of the laws of Connecticut and Vermont; arson in violation of the laws of Connecticut; and extortion in violation of the laws of Vermont.

32. On or about April 10, 2021, in the District of Connecticut, and elsewhere, defendant:

ANGEL RIVERA

aided and abetted by others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the Hoodstar Gzz, an enterprise engaged in racketeering activity, did knowingly and unlawfully murder Jamari Preston, in violation of Connecticut General Statutes Sections 53a-54a and 53-8(a).

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

COUNT THREE

(Use of a Firearm During and in Relation to a Crime of Violence)

33. On or about April 10, 2021, in the District of Connecticut, and elsewhere, defendant:

ANGEL RIVERA

aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the murder of Jamari Preston as alleged in Count Two of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii) and Section 2.

COUNT FOUR

(Use of a Firearm During and in Relation to a Crime of Violence Causing Death)

34. On or about April 10, 2021, in the District of Connecticut, and elsewhere, defendant:

ANGEL RIVERA

aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the murder of Jamari Preston as alleged in Count Two of this Indictment, and in the course of committing said offense did cause the death of Jamari Preston through the use of a firearm, with such killing being murder as defined in Title 18, United States Code, Section 1111.

All in violation of Title 18, United States Code, Section 924(j)(1) and Section 2.

COUNT FIVE

(Murder in Aid of Racketeering)

35. At all times relevant to this Indictment, the Hoodstar Gzz, as more fully described in Paragraphs 1 through 20 of Count One of this Indictment, which are realleged and incorporated by

reference herein, including its leaders, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

36. At all times relevant to this Indictment, the above-described enterprise, the Hoodstar Gzz, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Section 1959(b)(1) and Section 1961(1), that is, acts indictable under Title 18, United States Code, Section 1512; acts indictable under Title 18, United States Code, Section 1513; acts indictable under Title 18, United States Code, Section 933; offenses involving trafficking in controlled substances in violation of Title 21, United States Code, Sections 841 and 846; acts involving murder in violation of the laws of Connecticut and Vermont; arson in violation of the laws of Connecticut; and extortion in violation of the laws of Vermont.

37. On or about September 14, 2022, in the District of Connecticut, and elsewhere, defendant:

MEKHI THOMPSON

aided and abetted by others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the Hoodstar Gzz, an enterprise engaged in racketeering activity, did knowingly and unlawfully murder Devante Gardner, in violation of Connecticut General Statutes Sections 53a-54a and 53-8(a).

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

COUNT SIX

(Use of a Firearm During and in Relation to a Crime of Violence)

38. On or about September 14, 2022, in the District of Connecticut, and elsewhere, defendant:

MEKHI THOMPSON

aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the murder of Devante Gardner as alleged in Count Five of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii) and Section 2.

COUNT SEVEN

(Use of a Firearm During and in Relation to a Crime of Violence Causing Death)

39. On or about September 14, 2022, in the District of Connecticut, and elsewhere, defendant:

MEKHI THOMPSON

aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, the murder of Devante Gardner as alleged in Count Five of this Indictment, and in the course of committing said offense caused the death of Devante Gardner through the use of a firearm, with such killing being murder as defined in Title 18, United States Code, Section 1111.

All in violation of Title 18, United States Code, Section 924(j)(1) and Section 2.

COUNT EIGHT
(Murder in Aid of Racketeering)

40. At all times relevant to this Indictment, the Hoodstar Gzz, as more fully described in Paragraphs 1 through 20 of Count One of this Indictment, which are realleged and incorporated by reference herein, including its leaders, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

41. At all times relevant to this Indictment, the above-described enterprise, the Hoodstar Gzz, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Section 1959(b)(1) and Section 1961(1), that is, acts indictable under Title 18, United States Code, Section 1512; acts indictable under Title 18, United States Code, Section 1513; acts indictable under Title 18, United States Code, Section 933; offenses involving trafficking in controlled substances in violation of Title 21, United States Code, Sections 841 and 846; acts involving murder in violation of the laws of Connecticut and Vermont; arson in violation of the laws of Connecticut; and extortion in violation of the laws of Vermont.

42. On or about October 27, 2022, in the District of Connecticut, and elsewhere, defendants:

**ANGEL RIVERA AND
MEKHI THOMPSON,**

aided and abetted by one another and by others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the Hoodstar Gzz, an enterprise engaged in racketeering activity, did knowingly and unlawfully murder Manuel Rodriguez, in violation of Connecticut General Statutes Sections 53a-54a, and 53-8(a).

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

COUNT NINE

(Use of a Firearm During and in Relation to a Crime of Violence)

43. On or about October 27, 2022, in the District of Connecticut, and elsewhere, defendants:

**ANGEL RIVERA AND
MEKHI THOMPSON,**

aided and abetted by one another and by others known and unknown to the Grand Jury, did knowingly and intentionally use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, the murder of Manuel Rodriguez as alleged in Count Eight of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii) and Section 2.

COUNT TEN

(Use of a Firearm During and in Relation to a Crime of Violence Causing Death)

44. On or about October 27, 2022, in the District of Connecticut, and elsewhere, defendants:

**ANGEL RIVERA AND
MEKHI THOMPSON,**

aided and abetted by one another and by others known and unknown to the Grand Jury, did knowingly and intentionally use, carry, brandish, and discharge a firearm during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, the murder of Manuel Rodriguez as alleged in Count Eight of this Indictment, and in the course of committing said offense did cause the death of Manuel Rodriguez through the use of a firearm, with such killing being murder as defined in Title 18, United States Code, Section 1111.

All in violation of Title 18, United States Code, Section 924(j)(1) and Section 2.

COUNT ELEVEN

(Possession of a Firearm During and in Relation to a Drug Trafficking Crime)

45. On or about July 10, 2024, in the District of Connecticut and elsewhere, the defendant, JOSHUA CRUZ, during and in relation to a drug trafficking offense for which he may be prosecuted in a court of the United States, namely, the conspiracy to distribute and possess with intent to distribute controlled substances as charged in Count Fifteen of this Indictment, did knowingly and intentionally use and carry a machinegun, and in furtherance of such an offense, did possess a machinegun, and did aid and abet the use, carrying, and possession of the machinegun, as defined in Title 26, United States Code, Section 5845(b).

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

COUNT TWELVE

(Illegal Possession of a Machine Gun)

46. On or about July 10, 2024, in the District of Connecticut, the defendant, JOSHUA CRUZ, did knowingly possess a machinegun, that is, a Glock 19 Generation 5 firearm, equipped with a conversion device.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT THIRTEEN

(Possession of a Firearm During and in Relation to a Drug Trafficking Crime)

47. On or about September 13, 2024, in the District of Connecticut and elsewhere, the defendant, TYSHON WALKER, during and in relation to a drug trafficking offense for which he may be prosecuted in a court of the United States, namely, the conspiracy to distribute and possess with intent to distribute controlled substances as charged in Count Fifteen of this Indictment, did knowingly and intentionally use and carry a machinegun, and in furtherance of such an offense,

did possess a machinegun, and did aid and abet the use, carrying, and possession of the machinegun, as defined in Title 26, United States Code, Section 5845(b).

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

COUNT FOURTEEN
(Illegal Possession of a Machine Gun)

48. On or about September 13, 2024, in the District of Connecticut, the defendant, TYSHON WALKER, did knowingly possess a machinegun, that is, a Glock pistol Model 21 Gen 4 Caliber .45, equipped with a conversion device.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT FIFTEEN
(Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances)

49. From in or about January 2021 through in or about September 2024, the precise dates being unknown to the Grand Jury, in the District of Connecticut and elsewhere, the defendants ANGEL RIVERA, RAQUAN KNIGHT, PAUL DOWNER, MEKHI THOMPSON, PAUL CLARKE, TYSHON WALKER, and JOSHUA CRUZ and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to violate the narcotics laws of the United States.

50. It was a part and an object of the conspiracy that the defendants RIVERA, KNIGHT, DOWNER, THOMPSON, CLARKE, WALKER, and CRUZ and others known and unknown to the Grand Jury, would distribute and possess with intent to distribute controlled substances, namely, fentanyl, a Schedule II controlled substance; cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance; and marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substances Involved in the Conspiracy

51. Defendants RIVERA, KNIGHT, DOWNER, THOMPSON, CLARKE, WALKER, and CRUZ knew and reasonably should have foreseen from their own conduct and that of other members of the controlled substances conspiracy charged in Count Fifteen that the conspiracy involved 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi).

52. Defendants RIVERA, KNIGHT, DOWNER, THOMPSON, CLARKE, WALKER, and CRUZ knew and reasonably should have foreseen from their own conduct and that of other members of the controlled substances conspiracy charged in Count Fifteen that the conspiracy involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(ii).

53. Defendants RIVERA and KNIGHT knew and reasonably should have foreseen from their own conduct and that of other members of the controlled substances conspiracy charged in Count Fifteen that the conspiracy involved a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(D).

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

FORFEITURE ALLEGATIONS

54. Upon conviction of the offense in violation of Title 18, United States Code, Section 1962, alleged in Count One of this Indictment, the defendants ANGEL RIVERA, RAQUAN KNIGHT, PAUL DOWNER, MEKHI THOMPSON, PAUL CLARKE, TYSHON WALKER, and

JOSHUA CRUZ shall forfeit to the United States pursuant to Title 18, United States Code, Section 1963:

- a. any interest acquired or maintained in violation of Section 1962;
- b. any interest in, security of, claim against, and property and contractual right of any kind affording a source of influence over, any enterprise which the defendants established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962; and
- c. any property consisting of, and derived from, any proceeds obtained, directly or indirectly, from racketeering activity in violation of Section 1962.

55. Upon the conviction of any of the offenses charged in this Indictment, the defendants ANGEL RIVERA, RAQUAN KNIGHT, PAUL DOWNER, MEKHI THOMPSON, PAUL CLARKE, TYSHON WALKER, and JOSHUA CRUZ shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition used in any knowing violation of Title 18, United States Code, Section 924 and of any other criminal law of the United States.

56. The property to be forfeited includes but is not limited to:

- a. A sum of money in United States currency representing the amount of proceeds obtained as a result of each offense for which the defendant is convicted.
- b. The following firearms and ammunition:
 - i. a loaded Glock 19 firearm, bearing serial number BTPL324;
 - ii. a loaded Glock 20 firearm, bearing serial number BURZ503;
 - iii. a loaded Keltec PF9 firearm, bearing serial number RFT51;
 - iv. a loaded Colt Short firearm, bearing serial number 74247D;
 - v. a loaded Glock 22 firearm, bearing serial number YCC653;


- vi. a loaded Glock 19 firearm, bearing serial number BPNA061;
- vii. a SCCY CPX-1 firearm, bearing serial number 882965;
- viii. a Ruger 57 firearm, bearing serial number 64202345;
- ix. a loaded Glock 21 firearm, bearing serial number BEKM479;
- x. a 9mm Glock style Ghost Gun with a Polymer 80 frame;
- xi. a 10mm Glock firearm, bearing serial number BUSV735;
- xii. a loaded 9mm Taurus G3 firearm, bearing serial number ABD528259;
- xiii. a Keltec .32 caliber P32 firearm, bearing serial number 28261;
- xiv. a Glock 21 firearm, bearing serial number AHNA205;
- xv. a Glock 23 firearm, bearing serial number NFL753; and
- xvi. all assorted ammunition and magazines.

57. If, as a result of any act or omission of the defendants, any property subject to forfeiture (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third person; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be subdivided without difficulty, the United States intends, pursuant to Title 18, United States Code, Section 1963(m) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property or seek a money judgment against said defendants for any amount that would constitute the proceeds of such violations.

A TRUE BILL

/s/

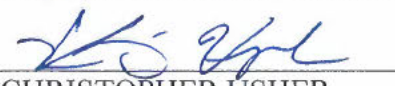
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