

KITCHEN

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	<u>FILED UNDER SEAL</u>
)	
Plaintiff,)	Cr. No. <u>2:15-cr-20141-SHM</u>
)	
vs.)	18 U.S.C. § 1959(a)(5)
)	18 U.S.C. § 924(c)(1)(A) (iii)
ROBERT MALLORY,)	18 U.S.C. § 922(g)(1)
a/k/a "Rambo,")	18 U.S.C. § 3
RANITO ALLEN,)	18 U.S.C. § 2
a/k/a "Nito,")	
a/k/a "Rambo,")	
FLORENCE ANTHONY,)	
a/k/a "Nikki,")	
EDWIN CARVIN,)	
a/k/a "Ren,")	
BRANDON MILTON,)	
a/k/a "Lil Folk,")	
ERIK REESE,)	
a/k/a "E," and)	
CANDIES WESLEY,)	
)	
Defendants.)	

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

THE RACKETEERING ENTERPRISE: THE GANGSTER DISCIPLES

1. At all times relevant to this Superseding Indictment, the defendants, **ROBERT MALLORY, a/k/a "Rambo," RANITO ALLEN, a/k/a "Nito," FLORENCE ANTHONY, a/k/a "Nikki," EDWIN CARVIN, a/k/a "Ren," BRANDON MILTON, a/k/a "Lil Folk," ERIK REESE, a/k/a "E," CANDIES WESLEY,** and others known and unknown to the Grand Jury, were members of the Gangster Disciples, a criminal organization whose members and associates engaged in narcotics distribution, firearms trafficking, and acts

of violence involving murder, attempted murder, and assault. At all relevant times, the Gangster Disciples operated in the Western District of Tennessee and elsewhere.

The Racketeering Enterprise

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

Structure and Operation of the Enterprise

3. The structure of the Gangster Disciples included, but was not limited to, the following:

a. The Gangster Disciples was a violent criminal gang which began in the Chicago, Illinois area. In the 1970’s, the leaders of two different Chicago-based gangs, the Black Disciples and the Supreme Gangsters, aligned their respective groups and created the Gangster Disciples.

b. Once united, the Gangster Disciples began recruiting heavily in Chicago, within Illinois jails and prisons, and throughout the United States. By the mid-1980’s, the group had spread throughout the Midwestern and Eastern United States. The Gangster Disciples were active in approximately 35 states as of the date of this Superseding Indictment.

c. The Gangster Disciples were composed of both male and female members. Male members often referred to themselves as "Brothers of the Struggle" while female members referred to themselves as "Sisters of the Struggle." Male and female members shared the same gang identity and identical organizational structure, but generally operated separately and parallel to each other.

d. The Gangster Disciples had a detailed and uniform organizational structure, which is outlined - along with various rules, procedures, and code of conduct - in a written "constitution" widely distributed to members throughout Tennessee and elsewhere.

e. The Gangster Disciples employed a highly-structured organization that bestowed upon its members certain titles indicative of the member's role or function within the gang. The Gangster Disciples used specific gang-developed terminology to describe meetings, subgroups and members. For example, meetings were called "deuces," a subgroup under the leadership of a ranking Gangster Disciples member was called a "count," "zone," "region," or a "deck." A member who was in good standing was considered to be "on count." The leadership of an individual "count" was referred to as the "first Coordinator" or "First C." "Count" meetings were often called "rounds" or "nines," and it was during these meetings that dues were collected, gang membership and business was discussed, gang literature was disseminated and criminal activity was discussed and/or planned.

f. The Gangster Disciples had a defined militaristic structure. Gangster Disciples members referred to the gang as the "Family." The title "Chairman"

was reserved for the leader of the Gangster Disciples who is currently incarcerated and where he is believed to still communicate with and direct members of the gang. In addition to the rank of Chairman, Gangster Disciples used a corporate board style group that collectively made decisions at the national level for the gang. "Board Members" at one time were primarily located in Chicago. In recent years as the Gangster Disciples increased their presence throughout the country, Board Members moved to, or had been appointed in, various regions. There were a number of active Gangster Disciples Board Members and each of those Board Members was responsible for Gangster Disciples' activities in various states or regions. Board Members maintained regular telephone contact with the various "Governors" and "Assistant Governors" in the states for which they were responsible. Board Members represented the upper level leadership of the Gangster Disciples and were responsible to the organization for the collection of dues, distribution of funds and general direction of the organization.

g. The Tennessee chapters of the Gangster Disciples were governed by a "Governor of Governors" who maintained a staff of subordinate gang members with the following rank structure: "Assistant Governor," "Regions," "Chief Enforcer," "Chief of Security," "Coordinators," "Treasurers" and "Secretaries." The gang in Memphis, Tennessee employed a similar hierarchy and structure. The Regions covered a certain geographic region and would disseminate information to the gang's governing bodies. Because of its size and large number of gang members, the gang's chapter in the city of Memphis had its own Governor, Assistant Governor and staff structure similar to that found at the state level.

h. The Gangster Disciples appointed a Governor to manage gang activities in Tennessee. The Governor maintained regular telephone contact with his counterparts throughout the United States. The responsibilities of the Governor ranged from membership recruitment, communication with national leadership, enforcement of gang codes and rules, collection and disbursement of dues or funds and approval of certain forms of criminal activity to be carried out by members of the gang or others who would be hired by or recruited by the gang to carry out its criminal activity. Because the Governor was the highest ranking Gangster Disciple within a state, he was responsible for coordinating much of the criminal activity that occurred within that state. In addition, Gangster Disciples Governors received updates from members regarding numbers of members per "count," members' participation in certain forms of criminal activity, and ongoing recruitment efforts being carried out by subordinate members.

i. An "Assistant Governor" reported directly to the Governor. He was responsible for collecting dues from the various "counts," ensuring that those who claimed membership were actually recognized by a "count," and recruited new members into the gang.

j. The "Literature Coordinator" was responsible to the Governor for maintaining literature such as contact lists, meeting minutes, membership applications and other documents. Literature Coordinators also conducted literature classes with members in order to teach members about the gang, its codes, rules, regulations and language that each member was required to learn and use.

k. The "Chief Enforcer" was responsible for enforcing the gang's codes, rules and regulations. Chief Enforcers were also responsible for the administration of punishment of members who violated gang rules and for ensuring that people who claim to be members of the Gangster Disciples were in fact members in good standing. Chief Enforcers often maintained close physical and verbal communication with the Governor and traveled with the Governor around the Governor's zone of responsibility.

l. The "Chief of Security" or "COS" was responsible for ensuring the security of fellow gang members, providing protection to the Governor, and for responding to requests from the Governor and others to provide security and protection during times when law enforcement or rival gangs were exerting pressure on the gang.

m. The "Treasurer" was responsible for assisting Gangster Disciples State Governors in collecting dues and funds from the "counts" and transporting or transmitting the funds to the Treasurer at the national level. A National Level Treasurer was responsible for assisting Board Members in collecting dues and funds from the states and managing the Gangster Disciples bank accounts.

n. The state of Tennessee was divided into specific area codes that defined the separate divisions or "sets" of the Gangster Disciples. The Knoxville, Tennessee set was known by its area code "865." The Chattanooga, Tennessee set was known by its area code "423." The Nashville, Tennessee set was known by its area code "615." The Columbia, Tennessee set was known by its area code "931." The Jackson, Tennessee set was known by its area code "731." Finally, the Memphis,

Tennessee set was known by its area code "901," and was known as the location of the "second board" of the Gangster Disciples because of the sizable number of Gangster Disciples gang members whom resided in the Memphis area.

o. The Gangster Disciples further divided the above area codes into different zones and sections. The Memphis area or "901" was divided into four zones of control. The city of Memphis was called "Zone One." Chapel Hill and the rest of Shelby County, Tennessee was called "Zone Two." Fayette County was called "Zone Three," and Tipton County was called "Zone Four." Within each zone was a further division of command and control, called "Sections."

p. Memphis was commonly broken up geographically into North Memphis, South Memphis and East Memphis. The Gangster Disciples also created different section or sets based on individual neighborhoods.

q. In Tennessee, Gangster Disciples members were generally recruited from the local neighborhood. In order to be considered for membership, a person had to be sponsored by another Gangster Disciples member. Once sponsored, a prospective member had to serve a probationary period of at least 30-days and had to be at least 16 years old. During this period, the prospect studied and learned the Gangster Disciples Constitution and other rules that governed the gang. While a prospect, the individual was considered part of the Gangster Disciples and entitled to the full protection of the enterprise. The prospect was called an "Outstanding Member." The prospect was also subject to the rules and orders of the enterprise and his or her background would be checked for criminal arrests and convictions, other gang

membership, loyalty to the Gangster Disciples and willingness to follow rules and orders from superior gang members. Many prospects joined the gang by going through an initiation called a "beat in," during which they were subjected to a beating by other gang members for a predetermined period. Other Outstanding Members were instructed to assault an innocent, unsuspecting citizen in order to prove their toughness, dedication and willingness to follow orders. If the prospect's conduct during the probationary period was deemed satisfactory, he or she was admitted into the gang.

r. Symbolism played a large role in the Gangster Disciples' culture. The primary symbol with which the gang associated was a six-pointed figure, which was also meant to resemble the Star of David. Graffiti that contained a heart with wings, an inverted shepherd's case, an inverted pyramid, or an inverted cross were also known as gang identifiers. Blue and black were the colors with which the gang identified.

Purposes of the Enterprise

4. The purposes of the enterprise included, but were not limited to, the following:

a. Enriching the leaders, members, and associates of the enterprise through among other things, the illegal trafficking of controlled substances and firearms.

b. Preserving and protecting the power, territory, operations, and proceeds of the enterprise through the use of threats, intimidation, violence, and destruction, including, but not limited to, acts of murder, attempted murder, assault with a dangerous weapon, obstruction of justice, and other acts of violence.

c. Promoting and enhancing the enterprise and its members' and

associates' activities.

d. Keeping victims in fear of the enterprise and in fear of its leaders, members, and associates through threats of violence and actual violence. The leaders, members, and associates of the enterprise undertook all steps necessary to prevent the detection of their criminal activities and sought to prevent and resolve the imposition of any criminal liabilities upon their leaders, members, and associates, by the use of murder, violence, and intimidation directed against witnesses, victims, and others.

e. Providing support to gang members who were charged with or incarcerated for gang-related activities.

f. Preserving and protecting the financial proceeds of the enterprise by money laundering funds through prepaid bank, debit and credit cards.

Means and Methods of the Enterprise

5. The means and methods by which the members and associates conducted and participated in the affairs of the Gangster Disciples criminal enterprise included the following:

a. The members and associates of the enterprise attended regular meetings where criminal activity was discussed, financial proceeds from criminal activity were collected including, but not limited to, collection of drug proceeds from subordinate gang members for senior Gangster Disciples gang leaders, and disciplinary beatings of fellow Gangster Disciples gang members were administered.

b. To enforce discipline and the rules of the enterprise, members and associates of the enterprise engaged in a system of "violations," in which the

defendants and others committed murder, attempted murder, conspired to murder, physically assaulted, and threatened those members and associates of the enterprise who violated rules, questioned authority, or posed a threat to the leaders, members, or purposes of the enterprise.

c. To generate income, Gangster Disciples gang members engaged in illegal activities under the protection of the enterprise, including narcotics trafficking and other illegal activities.

d. For protection, attacks, and armed combat, Gangster Disciples gang members acquired, carried and used firearms.

e. Members and associates of the enterprise employed and used gang-related terminology, symbols, phrases, and gestures to demonstrate affiliation with the gang.

f. To perpetuate the enterprise and to maintain and extend their power, members and associates of the enterprise committed and conspired to commit acts including murder, attempted murder, intimidation, and assault against individuals who posed a threat to the enterprise or jeopardized its operations, including rival gang members, Gangster Disciples gang members, and witnesses to illegal activities of the enterprise.

g. Members and associates of the enterprise hid, misrepresented, concealed, and caused to be hidden, misrepresented, and concealed, the objectives of acts done in furtherance of the "enterprise," and used coded language and other means of communication to avoid detection and apprehension by law enforcement authorities.

6. The above-described enterprise, through its members, prospects and associates, engaged in racketeering activity as defined in Sections 1959(b) (1) and 1961 (1), of Title 18, United States Code, that is, multiple acts involving murder, in violation of Tennessee Code Annotated, Section 39-13-201, and multiple acts involving narcotics trafficking, in violation of Sections 841(a)(1) (distribution and possession with the intent to distribute a controlled substance) and 846 (conspiracy to distribute and possession with the intent to distribute a controlled substance) of Title 21, United States Code.

COUNT ONE

Attempted Murder of D.S.
[18 U.S.C. §§ 1959 (a) (5) and (2)]

7. Paragraphs ONE through SIX of the General Allegations of this Superseding Indictment are re-alleged and incorporated by reference as though fully set forth herein.

8. On or about June 21, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants, **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito," **FLORENCE ANTHONY**, a/k/a "Nikki," **EDWIN CARVIN**, a/k/a "Ren," **BRANDON MILTON**, a/k/a "Lil Folk," **ERIK REESE**, a/k/a "E," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder D.S. in violation of Tennessee Code Annotated, Section 39-13-210.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and 2.

COUNT TWO

Using and Carrying a Firearm During and in Relation to a Crime of Violence:

Aiding and Abetting

[18 U.S.C. §§924(c) (1) (A) (iii)]

9. On or about June 21, 2014, in the Western District of Tennessee, the defendants **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito," **FLORENCE ANTHONY**, a/k/a "Nikki," **EDWIN CARVIN**, a/k/a "Ren," **BRANDON MILTON**, a/k/a "Lil Folk," **ERIK REESE**, a/k/a "E," along with others known and unknown to the Grand Jury, aiding each other, did knowingly use and carry a firearm during and in relation to a crime of violence, for which the defendants may be prosecuted in the United States, as alleged in Count ONE of the Superseding Indictment, which is incorporated by reference here, and did in the course of such offense discharge a firearm.

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

COUNT THREE

Attempted Murder of K.M.

[18 U.S.C. §§ 1959 (a) (5) and (2)]

10. Paragraph SEVEN of this Superseding Indictment is re-alleged and incorporated by reference as though set forth fully herein.

11. On or about June 21, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants, **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito," **FLORENCE ANTHONY**, a/k/a "Nikki," **EDWIN CARVIN**, a/k/a "Ren," **BRANDON MILTON**, a/k/a "Lil Folk," **ERIK**

REESE, a/k/a "E," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder K.M. in violation of Tennessee Code Annotated, Section 39-13-210.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and Section 2.

COUNT FOUR

Using and Carrying a Firearm During and in Relation to a Crime of Violence:
Aiding and Abetting
[18 U.S.C. §§924(c) (1) (A) (iii)]

12. On or about June 21, 2014, in the Western District of Tennessee, the defendants **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito," **FLORENCE ANTHONY**, a/k/a "Nikki," **EDWIN CARVIN**, a/k/a "Ren," **BRANDON MILTON**, a/k/a "Lil Folk," **ERIK REESE**, a/k/a "E," along with others known and unknown to the Grand Jury, aiding each other, did knowingly use and carry a firearm during and in relation to a crime of violence, for which the defendants may be prosecuted in the United States, as alleged in Count THREE of the Superseding Indictment, which is incorporated by reference here, and did in the course of such offense discharge a firearm.

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

COUNT FIVE

Attempted Murder of T.J.

18 U.S.C. §§ 1959 (a) (5) and (2)]

13. Paragraph SEVEN of this Superseding Indictment is re-alleged and incorporated by reference as though set forth fully herein.

14. On or about June 21, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants, **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito," **FLORENCE ANTHONY**, a/k/a "Nikki," **EDWIN CARVIN**, a/k/a "Ren," **BRANDON MILTON**, a/k/a "Lil Folk," **ERIK REESE**, a/k/a "E," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder T.J. in violation of Tennessee Code Annotated, Section 39-13-210.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and Section 2.

COUNT SIX

Using and Carrying a Firearm During and in Relation to a Crime of Violence:

Aiding and Abetting

[18 U.S.C. §§924 (c) (1) (A) (iii)]

15. On or about June 21, 2014, in the Western District of Tennessee, the defendants **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito," **FLORENCE ANTHONY**, a/k/a "Nikki," **EDWIN CARVIN**, a/k/a "Ren," **BRANDON MILTON**, a/k/a "Lil Folk," **ERIK REESE**, a/k/a "E," along with others known and unknown to the Grand Jury, aiding each other, did knowingly use and carry a firearm

during and in relation to a crime of violence, for which the defendants may be prosecuted in the United States, as alleged in Count FIVE of the Superseding Indictment, which is incorporated by reference here, and did in the course of such offense discharge a firearm.

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

COUNT SEVEN
Attempted Murder of A.C.
[18 U.S.C. §§ 1959 (a) (5) and (2)]

16. Paragraph SEVEN of this Superseding Indictment is re-alleged and incorporated by reference as though set forth fully herein.

17. On or about June 21, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants, **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito," **FLORENCE ANTHONY**, a/k/a "Nikki," **EDWIN CARVIN**, a/k/a "Ren," **BRANDON MILTON**, a/k/a "Lil Folk," **ERIK REESE**, a/k/a "E," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder A.C. in violation of Tennessee Code Annotated, Section 39-13-210.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and Section 2.

COUNT EIGHT

Using and Carrying a Firearm During and in Relation to a Crime of Violence:

Aiding and Abetting

[18 U.S.C. §§924(c) (1) (A) (iii)]

18. On or about June 21, 2014, in the Western District of Tennessee, the defendants **ROBERT MALLORY**, a/k/a “Rambo,” **RANITO ALLEN**, a/k/a “Nito,” **FLORENCE ANTHONY**, a/k/a “Nikki,” **EDWIN CARVIN**, a/k/a “Ren,” **BRANDON MILTON**, a/k/a “Lil Folk,” **ERIK REESE**, a/k/a “E,” along with others known and unknown to the Grand Jury, aiding each other, did knowingly use and carry a firearm during and in relation to a crime of violence, for which the defendants may be prosecuted in the United States, as alleged in Count SEVEN of the Superseding Indictment, which is incorporated by reference here, and did in the course of such offense discharge a firearm.

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

COUNT NINE

Attempted Murder of F.J.

[18 U.S.C. §§ 1959 (a) (5) and (2)]

19. Paragraph SEVEN of this Superseding Indictment is re-alleged and incorporated by reference as though set forth fully herein.

20. On or about June 21, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants, **ROBERT MALLORY**, a/k/a “Rambo,” **RANITO ALLEN**, a/k/a “Nito,” **FLORENCE ANTHONY**, a/k/a “Nikki,” **EDWIN CARVIN**, a/k/a “Ren,” **BRANDON MILTON**, a/k/a “Lil Folk,” **ERIK**

REESE, a/k/a "E," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder F.J. in violation of Tennessee Code Annotated, Section and 39-13-210.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and Section 2.

COUNT TEN

Using and Carrying a Firearm During and in Relation to a Crime of Violence:
Aiding and Abetting
[18 U.S.C. §§924(c) (1) (A) (iii)]

21. On or about June 21, 2014, in the Western District of Tennessee, the defendants **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito," **FLORENCE ANTHONY**, a/k/a "Nikki," **EDWIN CARVIN**, a/k/a "Ren," **BRANDON MILTON**, a/k/a "Lil Folk," **ERIK REESE**, a/k/a "E," along with others known and unknown to the Grand Jury, aiding each other, did knowingly use and carry a firearm during and in relation to a crime of violence, for which the defendants may be prosecuted in the United States, as alleged in Count NINE of the Superseding Indictment, which is incorporated by reference here, and did in the course of such offense discharge a firearm.

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

COUNT ELEVEN

Accessory After the Fact in the Attempted Murder of D.S., K.M., T.J, A.C. and F.J.
[18 U.S.C. § 3]

22. Paragraph SEVEN of this Superseding Indictment is re-alleged and incorporated by reference as though set forth fully herein.

23. On or about June 21, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, defendants **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito," **FLORENCE ANTHONY**, a/k/a "Nikki," **EDWIN CARVIN**, a/k/a "Ren," **BRANDON MILTON**, a/k/a "Lil Folk," **ERIK REESE**, a/k/a "E," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder D.S., K.M., J.J., A.C. and F.J, in violation of Tennessee Code Annotated, Section 39-13-210, and in violation of 18 U.S.C. §§ 1959 (a) (5) and 2.

24. **CANDIES WESLEY**, and others known and unknown to the Grand Jury, knowing that the commission of the above-described offense against the United States had been committed, received, relieved, comforted and assisted **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito," **FLORENCE ANTHONY**, a/k/a "Nikki," **EDWIN CARVIN**, a/k/a "Ren," **BRANDON MILTON**, a/k/a "Lil Folk," **ERIK REESE**, a/k/a "E," and others known and unknown to the Grand Jury, in order to hinder and prevent the apprehension, trial, and punishment of defendants **ROBERT MALLORY**, a/k/a "Rambo," **RANITO ALLEN**, a/k/a "Nito,"

FLORENCE ANTHONY, a/k/a “Nikki,” **EDWIN CARVIN**, a/k/a “Ren,” **BRANDON MILTON**, a/k/a “Lil Folk,” **ERIK REESE**, a/k/a “E,” and others known and unknown to the Grand Jury.

In violation of 18 U.S.C. §3.

COUNT TWELVE
Felon in Possession of a Firearm
[18 U.S.C. §§922(g) (1) and 2]

25. On or about June 21, 2014, in the Western District of Tennessee, the defendant **ROBERT MALLORY**, a/k/a “Rambo,” having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce firearms, to wit: (a) a Norinco MAC 9- sporter assault rifle bearing serial number 44766 and (b) a Rossi, model 971, 357 Magnum handgun, bearing serial number F229734.

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

COUNT THIRTEEN
Felon in Possession of a Firearm
[18 U.S.C. §§922(g) (1) and 2]

26. On or about June 21, 2014, in the Western District of Tennessee, the defendant **RANITO ALLEN**, a/k/a “Nito,” having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, to wit: a Rossi, model 971, .357 Magnum handgun, bearing serial number F229734.

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

COUNT FOURTEEN
Felon in Possession of a Firearm
[18 U.S.C. §§922(g) (1) and 2]

27. On or about June 21, 2014, in the Western District of Tennessee, the defendant **EDWIN CARVIN**, a/k/a “Ren,” having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, to wit: a Llama .45 caliber pistol, bearing serial number C37975.

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

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE
Pursuant to 18 U.S.C. §§924(d) (1), 3665 and 28 U.S.C. § 2461

28. As a result of committing the offenses described in Counts TWELVE, THIRTEEN and FOURTEEN, each a violation of 18 U.S.C. § 922 (as specified in 18 U.S.C. § 922 (d) (1)), as alleged in this Superseding Indictment, defendants **ROBERT MALLORY**, a/k/a “Rambo,” **RANITO ALLEN**, a/k/a “Nito” and **EDWIN CARVIN**, a/k/a “Ren” shall forfeit to the United States of America pursuant to 18 U.S.C. §§ 924 (d) (1), 3665 and 28 U.S.C. § 2461, all firearms and ammunition subject to forfeiture based upon the aforementioned statutes, including but not limited to (a) a Norinco MAC 9-sporter assault rifle bearing serial number 44766, (b) a Rossi, model 971, .357 Magnum handgun, bearing serial number F229734 and (c) a Llama .45 caliber pistol, bearing serial number C37975.

By virtue of the commission of the offenses alleged in this Superseding Indictment, any and all interest the defendants **ROBERT MALLORY**, a/k/a “Rambo,”

RANITO ALLEN, a/k/a "Nito" and **EDWIN CARVIN**, a/k/a "Ren" have in the above-described property is vested in the United States of America and hereby forfeited to the United States of America pursuant to 18 U.S.C §§ 924 (d) (1), 3665 and 28 U.S.C. § 2461.

A TRUE BILL:

FOREPERSON

DATE: _____

DATE: _____

UNITED STATES ATTORNEY

**CHIEF, ORGANIZED CRIME & GANG
SECTION, U.S. DEPARTMENT OF JUSTICE**