

AWA

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

v.

Case:2:15-cr-20200
Judge: Michelson, Laurie J.
MJ: Grand, David R.
Filed: 04-01-2015 At 12:31 PM
INDI USA V CHAKA LECHAR CASTRO, ET
AL (LG0)

- D-1 CHAKA LeCHAR CASTRO,
a/k/a "Chaquita," "Chacarita," "Mina,"
"Chsca,"
- D-2 JUAN OLAYA a/k/a "Fernando,"
"Johnathan,"
- D-3 OCTAVIUS SCOTT,
a/k/a "Tae,"
- D-4 RODNEY GRANGER,
- D-5 JOHNISHA WILLIAMS,
a/k/a "Mimi," "Nisha,"
- D-6 JAKEYRA AUGUSTUS,
a/k/a "Kera"

- 18 U.S.C. § 1962(d)
- 18 U.S.C. § 1959(a)(3)
- 18 U.S.C. § 924(c)
- 18 U.S.C. § 2

INDICTMENT

THE GRAND JURY CHARGES:

PART I – THE RACKETEERING CONSPIRACY

COUNT ONE

18 U.S.C. §1962(d) – RICO CONSPIRACY

- D-1 CHAKA CASTRO
- D-2 JUAN OLAYA
- D-3 OCTAVIUS SCOTT
- D-4 RODNEY GRANGER
- D-5 JOHNISHA WILLIAMS
- D-6 JAKEYRA AUGUSTUS

Background

At all times relevant to the Indictment:

1. The defendants CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, RODNEY GRANGER, JOHNISHA WILLIAMS, JAKEYRA AUGUSTUS, and others known and unknown to the Grand Jury, were members and associates of the "Castro enterprise," a criminal organization, which was engaged in, among other things, acts of violence, robbery, money laundering, and interstate transportation of stolen property, and which operated in the states of Michigan, Texas, and elsewhere.

2. The "Castro enterprise" was organized and led by CHAKA CASTRO, who resides in Texas. CASTRO identified numerous robbery targets throughout the United States and then recruited and assigned enterprise members to specific identified robbery targets. These enterprise members were organized into crews to carry out the robberies. These robbery crews usually consisted of three to four enterprise members.

3. The "Castro enterprise" almost exclusively targeted families of Asian or Indian ancestry for robbery.

4. The "Castro enterprise" utilized a specific modus operandi for the robberies. Once the enterprise members made entry into the home of their intended victims, they immediately corralled the victims, including

children, into one location in the home. The members would then restrain the victims with duct tape and threats of violence.

5. The "Castro enterprise" members openly carried and brandished firearms in each of the robberies. Some enterprise members also disguised their appearance with clothing and bandanas so robbery victims would have difficulty identifying them. They wore gloves to protect against leaving trace evidence and fingerprints. During some of the robberies, enterprise members took the additional step of attempting to disguise their voices.

6. The "Castro enterprise" members stole money, jewelry, and electronics in the robberies. A portion of the stolen money, or money obtained from the sale of stolen property, was sent via Western Union or pre-paid money cards directly to CASTRO. The group would then travel over state lines with the rest of the proceeds, a certain percentage of which the group provided to CASTRO.

7. It was part of the conspiracy that CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, RODNEY GRANGER, JOHNISHA WILLIAMS, JAKEYRA AUGUSTUS, and others known and unknown to the Grand Jury, agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

The Enterprise

8. At all times relevant to this Count of the Indictment, there existed in the Eastern District of Michigan, and elsewhere, a criminal organization, namely the "Castro enterprise." This organization, including its leadership, members 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 activities of which affected interstate and foreign commerce, consisting of defendants, CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, RODNEY GRANGER, JOHNISHA WILLIAMS, JAKEYRA AUGUSTUS, and others known and unknown to the Grand Jury. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

9. In addition to being members of the enterprise, the defendants served in various roles within the enterprise, including the following:

a. CHAKA CASTRO was the leader and organizer of the enterprise. She recruited new members, researched potential victims, and directed the robbery crews to the specific home addresses of these targeted victims of Asian or Indian ancestry.

b. JUAN OLAYA was the leader of the robbery crews who coordinated with CASTRO to identify potential victims and organized other enterprise members with specific tasks before, during, and after the robberies, and coordinated the movement of stolen property and laundering of robbery proceeds.

c. OCTAVIUS SCOTT was an active participant in the enterprise's activities, including the renting of cars, surveillance, robberies, and movement of stolen property.

d. RODNEY GRANGER was an active participant in the enterprise's activities, including robberies.

e. JOHNISHA WILLIAMS was an active participant in the enterprise's activities, including acting as a decoy and look out during robberies.

f. JAKEKYRA AUGUSTUS was an active participant in the enterprise's activities, including acting as a decoy and look out during robberies.

Purposes of the Enterprise

10. The purposes of the "Castro enterprise" included, but were not limited to, the following:

- a. Enriching the leaders, members, and associates of the enterprise through among other things, acts of violence, robbery, money laundering, and the interstate transportation of stolen goods;
- b. Keeping victims in fear of the enterprise through threats of violence and actual violence; and
- c. Disguising and protecting the financial proceeds of the enterprise's racketeering activity by laundering the stolen funds and moneys received from the sale of stolen goods via wire transfer or pre-paid money cards.

Manner and Means of the Enterprise

11. The manner and means used by the enterprise to further the goals of the enterprise and achieve its purposes included, but were not limited to, the following:

- a. Enterprise members and their associates identified families of Asian and Indian ancestry in cities and states throughout the United States;
- b. Once the victims were identified, enterprise members organized plans to rob the victims of jewelry, cash, and other goods in their homes;

c. Enterprise members and their associates conducted surveillance on the residences of identified victims to ensure that their targets resided at that address;

d. Enterprise members and their associates stole firearms, jewelry, money, and other goods from the homes of individuals by armed robbery;

e. Enterprise members and their associates used bandanas, masks and gloves to conceal their identity and limit the trace evidence left behind during the robberies;

f. Enterprise members and their associates used a driver as both a lookout during the robbery and means of escape after the robbery;

g. Enterprise members and their associates used violence, threats of violence, and weapons, including firearms, to rob the families;

h. Enterprise members and their associates often used mobile phones to communicate with one another;

i. Enterprise members and their associates traveled and transported stolen jewelry, money, and other goods across state lines and made phone calls in interstate commerce to further the goals of the enterprise;

j. Enterprise members and their associates sold the stolen goods to individuals and commercial establishments in New York, Texas, and elsewhere and then split the proceeds of their unlawful activities;

k. Enterprise members and their associates laundered the proceeds to promote their unlawful activities by, among other means, using proceeds from their robberies to pay for travel expenses, such as hotel rooms, meals, and gas, during the course of their surveillance and robbery of families as well as using Western Union and pre-paid money cards to move the proceeds among enterprise members; and

l. Enterprise members and their associates used rental vehicles and personal vehicles during the course of the robberies and surveillance operations. Enterprise members and their associates also changed vehicles during the course of the robberies and surveillance operations to avoid detection.

The Racketeering Conspiracy

12. From a date unknown, but at least from in or about April 2014 and continuing to on or about December 11, 2014, both dates being approximate and inclusive, within the Eastern District of Michigan and elsewhere, defendants,

CHAKA CASTRO

JUAN OLAYA
OCTAVIUS SCOTT
RODNEY GRANGER
JOHNISHA WILLIAMS
JAKERYA AUGUSTUS

and others known and unknown to the grand jury, being persons employed by and associated with the "Castro enterprise," which enterprise is described more fully above, which was 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, being persons associated with the enterprise, as more fully described hereinafter, the defendants did agree 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, Section 1961(1) and (5), consisting of:

a. Multiple threats and acts involving:

(1) Robbery, in violation of Michigan Compiled Laws, Sections 750.529, 750.530, 750.88, 750.89, 750.157a(a), 750.92, and 767.39 and Texas Penal Code, Sections 29.02, 29.03, 15.01, 15.02, 7.01; and

b. Multiple acts indictable under the following provisions of federal law:

(1) 18 U.S.C. § 1956(a)(1)(A)(i) (laundering of monetary instruments);

(2) 18 U.S.C. § 2314 (transportation of stolen goods or other property); and

(3) 18 U.S.C. § 2315 (sale or receipt of stolen goods or other property).

Overt Acts

In furtherance of the conspiracy, and to affect the object and purposes thereof, the defendants, and others known and unknown to the grand jury, committed various overt acts, including but not limited to the following:

(1) In or about April 2014, CHAKA CASTRO obtained a subscription to Publicdata.com.

(2) In or about July 2014, CHAKA CASTRO had a discussion with OCTAVIUS SCOTT in order to interview him for entry into the "Castro enterprise."

(3) On or about November 24, 2014, OCTAVIUS SCOTT and JAKERYA AUGUSTUS rented a vehicle from Enterprise Rental Company in Ypsilanti, Michigan.

(4) On or about November 23, 2014 through November 26, 2014, JUAN OLAYA, OCTAVIUS SCOTT, and JAKERYA AUGUSTUS conducted surveillance on potential robbery targets.

(5) On or about November 24, 2014, CHAKA CASTRO provided JUAN OLAYA with a list of addresses for the crew to select from for their robbery targets.

(6) On or about November 24, 2014, JUAN OLAYA and OCTAVIUS SCOTT broke a glass window and forcibly entered the residence of Family A located on Trillium Woods Drive in Ann Arbor, Michigan.

(7) On or about November 24, 2014, JUAN OLAYA and OCTAVIUS SCOTT forced victims A-1 and A-2 at gunpoint into their bathroom where they bound victims A-1 and A-2 with duct tape.

(8) On or about November 24, 2014, JUAN OLAYA, OCTAVIUS SCOTT and JAKERYA AUGUSTUS took money, electronics, and jewelry away from Family A's residence located on Trillium Woods Drive in Ann Arbor, Michigan.

(9) On or about November 24, 2014, JAKEYRA AUGUSTUS acted as a lookout for JUAN OLAYA and OCTAVIUS SCOTT outside of Family A's residence on Trillium Woods Drive in Ann Arbor, Michigan.

(10) On or about November 25, 2014, JAKEYRA AUGUSTUS knocked on the front door of Family B's residence on Plainview Street in Ypsilanti, Michigan.

(11) On or about November 25, 2014, JUAN OLAYA, JAKEYRA AUGUSTUS, and OCTAVIUS SCOTT entered Family B's residence located on Plainview Street in Ypsilanti, Michigan.

(12) On or about November 25, 2014, JUAN OLAYA and OCTAVIUS SCOTT held victim B-1 at gunpoint and assaulted victim B-2 before binding both men with duct tape.

(13) On or about November 25, 2014, JUAN OLAYA, OCTAVIUS SCOTT, and JAKERYA AUGUSTUS took money, firearms, electronics, and other items away from Family B's residence located at Plainview Street in Ypsilanti, Michigan.

(14) On or about November 26, 2014, JAKEYRA AUGUSTUS knocked on the front door of Family C's residence on Lothrop Road in Canton, Michigan.

(15) On or about November 26, 2014, JUAN OLAYA and OCTAVIUS SCOTT entered Family C's residence on Lothrop Road in Canton, Michigan.

(16) JUAN OLAYA and OCTAVIUS SCOTT assaulted victim C-1 and held victims C-1 and C-2 at gunpoint in the laundry room where victims C-1 and C-2 were bound with duct tape.

(17) On or about November 26, 2014, JUAN OLAYA, OCTAVIUS SCOTT, and JAKERYA AUGUSTUS took money, jewelry, and electronics away from Family C's residence located on Lothrop Road in Canton, Michigan.

(18) On or about November 26, 2014, JAKERYA AUGUSTUS knocked on the front door of Family D's residence located on Arlington Boulevard in Ann Arbor, Michigan.

(19) On or about November 26, 2014, JUAN OLAYA, OCTAVIUS SCOTT, and JAKERYA AUGUSTUS entered Family D's residence on Arlington Boulevard in Ann Arbor, Michigan.

(20) On or about November 26, 2014, JUAN OLAYA and OCTAVIUS SCOTT forced Family D at gunpoint into the basement where they bound the entire family, including the children, with duct tape.

(21) On or about November 26, 2014, JUAN OLAYA, OCTAVIUS SCOTT and JAKERYA AUGUSTUS took money, including foreign currency, jewelry, electronics, and a young boy's piggybank away from Family D's residence on Arlington Boulevard in Ann Arbor, Michigan.

(22) On or about November 28, 2014, CHAKA CASTRO discussed with JUAN OLAYA the stolen items and jewelry from a robbery the crew had committed within the Eastern District of Michigan.

(23) On or about December 3, 2014, OCTAVIUS SCOTT returned a rental vehicle to an Enterprise location in Houston, Texas.

(24) On or about December 5, 2014, CHAKA CASTRO sent JUAN OLAYA a list of addresses in Texas.

(25) On or about December 5, 2014, CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, and JOHNISHA WILLIAMS drove from Houston, Texas to the Dallas/Ft. Worth area for the purpose of conducting robberies.

(26) On or about December 5, 2014, JUAN OLAYA, OCTAVIUS SCOTT, and JOHNISHA WILLIAMS entered Family E's residence on Abbey Court in Coppell, Texas.

(27) On or about December 5, 2014, JUAN OLAYA and OCTAVIUS SCOTT held Family E at gun point and bound them with duct tape.

(28) On or about December 5, 2014, JUAN OLAYA, OCTAVIUS SCOTT, and JOHNISHA WILLIAMS took money, purses, jewelry, electronics, and other items away from Family E's residence located on Abbey Court, Coppell, Texas.

(29) On or about December 5, 2014, JUAN OLAYA, OCTAVIUS SCOTT and JOHNISHA WILLIAMS gave proceeds from the robbery to CHAKA CASTRO.

(30) On or about December 5, 2014 through December 7, 2014, CHAKA CASTRO sent addresses in the Dallas/Ft. Worth, Texas area to JUAN OLAYA.

(31) On or about December 6, 2014, JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT entered the garage of Family F's residence on Rio Grande Drive in Allen, Texas.

(32) On or about December 6, 2014, victim F-1 was dragged into his home at gunpoint, thrown to the floor, and bound with duct tape. Two other family members were also dragged next to victim F-1 and bound with duct tape.

(33) On or about December 6, 2014, JUAN OLAYA, OCTAVIUS SCOTT, RODNEY GRANGER, and JOHNISHA WILLIAMS took money,

jewelry, and electronics from Family F's residence located on Rio Grande Drive, Allen, Texas.

(34) On or about December 6, 2014, JOHNISHA WILLIAMS acted as the lookout for JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT while they robbed Family F's residence located on Rio Grande Drive in Allen, Texas.

(35) On or about December 6, 2014, JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT entered Family G's residence on Phillip Drive in Allen, Texas through a door they broke to gain access.

(36) On or about December 6, 2014, JUAN OLAYA, OCTAVIUS SCOTT, RODNEY GRANGER, and JOHNISHA WILLIAMS took money, jewelry, and electronics away from Family G's residence on Phillip Drive, Allen, Texas.

(37) On or about December 6, 2014, JOHNISHA WILLIAMS acted as a look out and getaway driver for JUAN OLAYA, RODNEY GRANGER and OCTAVIUS SCOTT as they robbed Family G's residence on Phillip Drive in Allen, Texas.

(38) On or about December 6, 2014, JOHNISHA WILLIAMS knocked on the front door Family H's residence on Wrotham Drive in Allen, Texas.

(39) On or about December 6, 2014, when victim H-1 answered the door, JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT entered Family H's residence on Wrotham Drive in Allen, Texas, held the Family H at gun point, and bound Family H with duct tape.

(40) On or about December 6, 2014, JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT took jewelry, electronics, and other items away from Family H's residence on Wrotham Drive in Allen, Texas.

(41) On or about December 6, 2014, JUAN OLAYA, OCTAVIUS SCOTT, RODNEY GRANGER and JOHNISHA WILLIAMS returned proceeds from the robberies to CHAKA CASTRO.

(42) On or about December 7, 2014, CHAKA CASTRO provided JUAN OLAYA with additional addresses in the Dallas/Ft. Worth area of Texas.

(43) On or about December 7, 2014, JOHNISHA WILLIAMS acted as a lookout for JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT at Family I's residence located on Loch Meadow Court, Southlake, Texas.

(44) On or about December 7, 2014, JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT took jewelry, electronics, and other

items away from Family I's residence on Loch Meadow Court in Southlake, Texas.

(45) On or about December 7, 2014, JOHNISHA WILLIAMS knocked on the front door of Family J's residence on Suncrest Drive in Flower Mound, Texas.

(46) On or about December 7, 2014, JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT entered Family J's residence on Suncrest Drive in Flower Mound, Texas.

(47) On or about December 7, 2014, JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT assaulted victim J-1, held the family at gunpoint, and bound them with duct tape.

(48) On or about December 7, 2014, JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT took jewelry away from Family J's residence on Suncrest Drive in Flower Mound, Texas.

(49) On or about December 7, 2014, JOHNISHA WILLIAMS, while acting as a lookout, communicated to JUAN OLAYA, OCTAVIUS SCOTT, and RODNEY GRANGER that law enforcement was responding to Family J's residence on Suncrest Drive in Flower Mound, Texas.

(50) On or about December 7, 2014, JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT assaulted J.V. and forced him out of his vehicle at a residence on Sunswept Terrace in Flower Mound, Texas.

(51) On or about December 7, 2014, JUAN OLAYA, RODNEY GRANGER, and OCTAVIUS SCOTT stole a Nissan Versa from J.V.

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

Notice of Acts with Enhanced Sentencing

Between in or about April 2014 through on or about December 11, 2014, in the Eastern District of Michigan, and elsewhere, enterprise members CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, RODNEY GRANGER, JOHNISHA WILLIAMS and JAKERYA AUGUSTUS, aided and abetted by each other and by others known and unknown to the grand jury, engaged in conduct as proscribed in Michigan Compiled Law Section 750.529, that is, in the course of committing a larceny of any money or property that may be the subject of larceny did, in the course of engaging in that conduct possessed a dangerous weapon, or an article used or fashioned in a manner to lead any person present to reasonably believe the article was a dangerous weapon, or represented orally or otherwise that he or she was in possession of a dangerous weapon, all in violation of Michigan Compiled Laws, Sections 750.529 and 750.530 and engaged in

conduct as proscribed in Michigan Compiled Law Section 750.89, that is, being armed with a dangerous weapon, or any article used or fashioned in a manner to lead a person so assaulted reasonably to believe it to be a dangerous weapon, did assault another with intent to rob and steal, all in violation of Michigan Compiled Laws, Section 750.89.

COUNT TWO

18 U.S.C. §§ 1959(a)(3); 2 - *Assault with a Dangerous Weapon in Aid of Racketeering*

D-1 CHAKA CASTRO
D-2 JUAN OLAYA
D-3 OCTAVIUS SCOTT
D-6 JAKEYRA AUGUSTUS

1. At all times relevant to this Indictment, there existed an enterprise, the "Castro enterprise," as more fully described in Paragraphs One through Seven and Nine through Eleven of this Indictment, which are re-alleged and incorporated by reference as though set forth fully herein. The leadership, members, and associates of the enterprise 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 commerce. The enterprise constituted an ongoing organization whose members functioned as a

continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Indictment, the above-described enterprise, the "Castro enterprise," through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Section 1959(b)(1) and 1961 (1), namely,

a. Multiple threats and acts involving:

- (1) Robbery, in violation of Michigan Compiled Laws, Sections 750.529, 750.530, 750.88, 750.89, 750.157a(a), 750.92, and 767.39 and Texas Penal Code, Sections 29.02, 29.03, 15.01, 15.02, 7.01; and

b. Multiple acts indictable under the following provisions of federal law:

- (1) 18 U.S.C. § 1956 (laundering of monetary instruments);
- (2) 18 U.S.C. § 2314 (transportation of stolen goods or other property); and
- (3) 18 U.S.C. § 2315 (sale or receipt of stolen goods or other property).

3. On or about November 24, 2014, in the Eastern District of Michigan, defendants, CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, and JAKEYRA AUGUSTUS, aided and abetted each other and others known and unknown to the Grand Jury, did, for the purpose of gaining entrance to and maintaining and increasing position within the “Castro enterprise,” an enterprise engaged in racketeering activity, knowingly and unlawfully assault victims A-1 and A-2, with a dangerous weapon, in violation of Michigan Compiled Laws, Section 750.82 and 767.39.

All in violation of 18 U.S.C. §§ 1959(a)(3) and 2.

COUNT THREE

18 U.S.C. § 924(c) – *Use and Carry of a Firearm During, and in Relation to, a Crime of Violence*

D-1 CHAKA CASTRO
D-2 JUAN OLAYA
D-3 OCTAVIUS SCOTT
D-6 JAKEYRA AUGUSTUS

On or about November 24, 2014, in the Eastern District of Michigan and elsewhere, defendants, CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, and JAKEYRA AUGUSTUS, did aid and abet each other in knowingly, intentionally, and unlawfully using and carrying a firearm during and in relation to a crime of violence for which they may be prosecuted in a

court of the United States, that is, assault with a dangerous weapon in aid of racketeering as alleged in Count Two of this Indictment, and said firearm was brandished, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT FOUR

18 U.S.C. §§ 1959(a)(3); 2 - *Assault with a Dangerous Weapon in Aid of Racketeering*

D-1 CHAKA CASTRO
D-2 JUAN OLAYA
D-3 OCTAVIUS SCOTT
D-6 JAKEYRA AUGUSTUS

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about November 25, 2014, in the Eastern District of Michigan, defendants, CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, and JAKEYRA AUGUSTUS, aided and abetted each other and others known and unknown to the Grand Jury, did, for the purpose of gaining entrance to and maintaining and increasing position within the "Castro enterprise," an enterprise engaged in racketeering activity, knowingly and unlawfully assault victims B-1 and B-2, with a dangerous weapon, in violation of Michigan Compiled Laws, Section 750.82 and 767.39.

All in violation of 18 U.S.C. §§ 1959(a)(3) and 2.

COUNT FIVE

18 U.S.C. § 924(c) – *Use and Carry of a Firearm During, and in Relation to, a Crime of Violence*

D-1 CHAKA CASTRO
D-2 JUAN OLAYA
D-3 OCTAVIUS SCOTT
D-6 JAKEYRA AUGUSTUS

On or about November 25, 2014, in the Eastern District of Michigan and elsewhere, defendants, CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, and JAKEYRA AUGUSTUS, did aid and abet each other in knowingly, intentionally, and unlawfully using and carrying firearms during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, assault with a dangerous weapon in aid of racketeering as alleged in Count Four of this Indictment, said firearm was brandished, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SIX

18 U.S.C. §§ 1959(a)(3); 2 - *Assault with a Dangerous Weapon in Aid of Racketeering*

D-1 CHAKA CASTRO
D-2 JUAN OLAYA
D-3 OCTAVIUS SCOTT
D-6 JAKYRA AUGUSTUS

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about November 26, 2014, in the Eastern District of Michigan, defendants, CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, and JAKYRA AUGUSTUS, aided and abetted each other and others known and unknown to the Grand Jury, did, for the purpose of gaining entrance to and maintaining and increasing position within the "Castro enterprise," an enterprise engaged in racketeering activity, knowingly and unlawfully assault victims C-1 and C-2, with a dangerous weapon, in violation of Michigan Compiled Laws, Section 750.82 and 767.39.

All in violation of 18 U.S.C. §§ 1959(a)(3) and 2.

COUNT SEVEN

18 U.S.C. § 924(c) – *Use and Carry of a Firearm During, and in Relation to, a Crime of Violence*

D-1 CHAKA CASTRO
D-2 JUAN OLAYA
D-3 OCTAVIUS SCOTT
D-6 JAKEYRA AUGUSTUS

On or about November 26, 2014, in the Eastern District of Michigan and elsewhere, defendants, CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, and JAKEYRA AUGUSTUS, did aid and abet each other in knowingly, intentionally, and unlawfully using and carrying firearms during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, assault with a dangerous weapon in aid of racketeering as alleged in Count Six of this Indictment, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT EIGHT

18 U.S.C. §§ 1959(a)(3); 2 - *Assault with a Dangerous Weapon in Aid of Racketeering*

D-1 CHAKA CASTRO
D-2 JUAN OLAYA
D-3 OCTAVIUS SCOTT
D-6 JAKEYRA AUGUSTUS

1. Paragraphs One and Two of Count Two are re-alleged herein as if fully incorporated in this Count.

2. On or about November 26, 2014, in the Eastern District of Michigan, defendants, CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, and JAKEYRA AUGUSTUS, aided and abetted each other and others known and unknown to the Grand Jury, did, for the purpose of gaining entrance to and maintaining and increasing position within the "Castro enterprise," an enterprise engaged in racketeering activity, knowingly and unlawfully assault multiple members of Family D, with a dangerous weapon, in violation of Michigan Compiled Laws, Section 750.82 and 767.39.

All in violation of 18 U.S.C. §§ 1959(a)(3) and 2.

COUNT NINE

18 U.S.C. § 924(c) – *Use and Carry of a Firearm During, and in Relation to, a Crime of Violence*

D-1 CHAKA CASTRO
D-2 JUAN OLAYA
D-3 OCTAVIUS SCOTT
D-6 JAKEYRA AUGUSTUS

On or about November 26, 2014, in the Eastern District of Michigan and elsewhere, defendants, CHAKA CASTRO, JUAN OLAYA, OCTAVIUS SCOTT, and JAKEYRA AUGUSTUS, did aid and abet each other in knowingly, intentionally, and unlawfully using and carrying firearms during and in relation to a crime of violence for which they may be prosecuted in a

court of the United States, that is, assault with a dangerous weapon in aid of racketeering as alleged in Count Eight of this Indictment, in violation of Title 18, United States Code, Sections 924(c) and 2.

A TRUE BILL

/s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

BARBARA L. McQUADE
UNITED STATES ATTORNEY

/s/ Christopher Graveline
CHRISTOPHER GRAVELINE
Assistant U.S. Attorney

/s/ Douglas C. Salzenstein
DOUGLAS C. SALZENSTEIN
Assistant U.S. Attorney

/s/ James M. Trusty
JAMES M. TRUSTY
CHIEF, Organized Crime and Gang Section
U.S. Department of Justice

/s/ Kelly Pearson
KELLY PEARSON
Trial Attorney, Organized Crime and Gang Section
U.S. Department of Justice