UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 14-403 (PJS/FLN)

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. LOUIS LEE FRASIER BANKS,
   a/k/a "G.I.,"
2. CORTEZ DAVON BLAKEMORE,
   a/k/a "Tez,"
3. TERREL VONSHAY ROBERSON,
   a/k/a "Get Right,"
   a/k/a "Can't Get Right,"
   a/k/a "Slim,"
4. LAQUEDRICK LEMEL AS-SADIQ,
   a/k/a "Quady,"
   a/k/a "C,"
5. CARNEL LAVEL HARRISON,
   a/k/a "Boo Man,"
6. DEJUAN PIERRE DARKYSE WASHINGTON,
   a/k/a "DJ," and
7. DONTE TRAMAYNE SMITH,
   a/k/a "Five,"

Defendants.

SECOND SUPERSEDING INDICTMENT

18 U.S.C. § 2
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 924(c)
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 846
21 U.S.C. § 853

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1
(Conspiracy to Distribute Cocaine Base ("Crack"))

Beginning in or about July 2013, and continuing through on or about the present, in the State and District of Minnesota and elsewhere, the defendants,

SCANNED
FEB 19 2015
U.S. DISTRICT COURT MPLS

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.,"
TERRELL VONSHAY ROBERSON,
a/k/a "Get Right,"
a/k/a "Can't Get Right,"
a/k/a "Slim,"
LAQUEDRICK LEMEL AS-SADIQ,
a/k/a "Quady,"
a/k/a "C,"
CARNEL LAVEL HARRISON,
a/k/a "Boo Man,"
DEJUAN PIERRE DARKYSE WASHINGTON,
a/k/a "DJ," and
DONTE TRAMAYNE SMITH,
a/k/a "Five,"

knowingly and intentionally conspired with each other and with other persons known and unknown to the Grand Jury to distribute more than 280 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

BACKGROUND AND PURPOSE OF THE CONSPIRACY

1. During the time frame of the conspiracy, the defendants organized and maintained two closely associated street gangs, the Taliban gang and the "Young N Thuggin" gang, also known as the Y.N.T. The gang has a loose hierarchical structure. All of the defendants listed in Count 1 are members of the Taliban/Y.N.T.

2. Members of the gang use handsigns, language and social media to commicate and convey membership and solidarity amongst each other.

3. The gang claims an area of north Minneapolis that includes 20th Avenue North to Lowry Avenue North and west to Fremont Avenue North. Members of the Taliban/Y.N.T are enemies of other rival gangs, including another north Minneapolis gang, the 19-Dipset/Stick Up Boys (S.U.B.s).

4. The purpose and benefit of gang membership is to make money for the gang members by committing criminal acts, including but not limited to trafficking in controlled substances in the Minneapolis area. In addition, members of the Taliban/Y.N.T. often travel to Fargo, North Dakota, St. Cloud, Minnesota and Duluth, Minnesota, to sell crack cocaine and heroin. This is done because the price of controlled substances in those areas is much higher than the price that can be obtained in Minneapolis. A user amount of crack cocaine, which is called a "pill" or a "rock," weighs around .2 to .3 grams, and sells for $20 in Minneapolis. In St. Cloud, Duluth, and Fargo the same amount of crack cocaine sells for $50.

5. Some of the members of the gang possess and use firearms during the drug trafficking activities of the gang to protect turf, profits and product. The gang members also use firearms to protect against assaults by rival gangs. If assaulted, members of the Taliban/Y.N.T. use firearms to retaliate against rival gangs in an effort to gain street supremacy thereby indirectly furthering the gang's ability to sell controlled substances.

COUNT 2
(Distribution of Cocaine Base ("Crack"))

On or about December 27, 2013, in the State and District of Minnesota, the defendant,

TERREL VONSHAY ROBERSON,
a/k/a "Get Right,"
a/k/a "Can't Get Right,"
a/k/a "Slim,"

aiding and abetting and being aided and abtted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 3
(Distribution of Cocaine Base ("Crack"))

On or about January 15, 2014, in the State and District of Minnesota, the defendants,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.," and
CARNEL LAVEL HARRISON,
a/k/a "Boo Man,"

aiding and abetting each other and others, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 4
(Distribution of Cocaine Base ("Crack"))

On or about February 4, 2014, in the State and District of Minnesota, the defendants,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.," and
LAQUEDRICK LEMEL AS-SADIQ,
a/k/a "Quady,"
a/k/a "C,"

aiding and abetting each other and others, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 5
(Distribution of Cocaine Base ("Crack"))

On or about February 28, 2014, in the State and District of Minnesota, the defendant,

LAQUEDRICK LEMEL AS-SADIQ,
a/k/a "Quady,"
a/k/a "C,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 6
(Distribution of Cocaine Base ("Crack"))

On or about March 13, 2014, in the State and District of Minnesota, the defendants,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.," and
LAQUEDRICK LEMEL AS-SADIQ,
a/k/a "Quady,"

aiding and abetting each other and others, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 7
(Distribution of Cocaine Base ("Crack"))

On or about April 24, 2014, in the State and District of Minnesota, the defendant,

LAQUEDRICK LEMEL AS-SADIQ,
a/k/a "Quady,"
a/k/a "C,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 8
(Distribution of Cocaine Base ("Crack"))

On or about July 3, 2014, in the State and District of Minnesota, the defendant,

TERREL VONSHAY ROBERSON,
a/k/a "Get Right,"
a/k/a "Can't Get Right,"
a/k/a "Slim,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 9
(Distribution of Cocaine Base ("Crack"))

On or about July 22, 2014, in the State and District of Minnesota, the defendants,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.," and
DONTE TRAMAYNE SMITH,
a/k/a "Five,"

aiding and abetting and being aided and abetted by each other and others, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 10
(Distribution of Cocaine Base ("Crack"))

On or about August 7, 2014, in the State and District of Minnesota, the defendant,

DONTE TRAMAYNE SMITH,
a/k/a "Five,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 11
(Distribution of Cocaine Base ("Crack"))

On or about September 4, 2014, in the State and District of Minnesota, the defendant,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base

("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 12
(Distribution of Cocaine Base ("Crack"))

On or about September 15, 2014, in the State and District of Minnesota, the defendants,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.," and
LAQUEDRICK LEMEL AS-SADIQ,
a/k/a "Quady,"
a/k/a "C,"

aiding and abetting each other and others, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 13
(Distribution of Cocaine Base ("Crack"))

On or about September 18, 2014, in the State and District of Minnesota, the defendant,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base

("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 14
(Distribution of Cocaine Base ("Crack"))

On or about September 30, 2014, in the State and District of Minnesota, the defendant,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 15
(Distribution of Cocaine Base ("Crack"))

On or about October 8, 2014, in the State and District of Minnesota, the defendants,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.,"
DONTE TRAMAYNE SMITH,
a/k/a "Five," and
DEJUAN PIERRE DARKYSE WASHINGTON,
a/k/a "DJ,"

aiding and abetting and being aided and abetted by each other and others, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 16
(Distribution of Cocaine Base ("Crack"))

On or about October 9, 2014, in the State and District of Minnesota, the defendant,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 17
(Distribution of Cocaine Base ("Crack"))

On or about October 14, 2014, in the State and District of Minnesota, the defendants,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.," and
DONTE TRAMAYNE SMITH,
a/k/a "Five,"

aiding and abetting and being aided and abetted by each other and others, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 18
(Distribution of Cocaine Base ("Crack"))

On or about October 31, 2014, in the State and District of Minnesota, the defendant,

DONTE TRAMAYNE SMITH,
a/k/a "Five,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 19
(Distribution of Cocaine Base ("Crack"))

On or about November 3, 2014, in the State and District of Minnesota, the defendant,

TERREL VONSHAY ROBERSON,
a/k/a "Get Right,"
a/k/a "Can't Get Right,"
a/k/a "Slim,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 20
(Possession With Intent to Distribute Cocaine Base ("Crack"))

On or about November 11, 2014, in the State and District of Minnesota, the defendant,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally possessed with intent to distribute in excess of 28 grams of a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 21
(Possession of a Firearm During and in Relation to a Drug Trafficking Crime)

On or about November 11, 2014, in the State and District of Minnesota, the defendant,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.,"

aiding and abetting and being aided and abetted by another, during and in relation to a drug trafficking crime which may be prosecuted in the United States, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, aiding and abetting possession with intent to distribute a controlled substance and aiding and abetting distribution of a controlled substance, knowingly and intentionally possessed a firearm, to wit, a Smith and Wesson 9mm semi-automatic pistol, Model SD9VE, bearing serial number, HFC4906, in violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A)(i).

COUNT 22
(Felon in Possession of a Firearm)

On or about November 13, 2014, in the State and District of Minnesota, the defendants,

LOUIS LEE FRASIER BANKS,
a/k/a "G.I.," and
CORTEZ DAVON BLAKEMORE,
a/k/a "Tez,"

each a person who had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, regarding Louis Lee Frasier Banks:

Crime	Court of Conviction	Year of Conviction (in or about)
Controlled Substance Crime, Second Degree Possession	Hennepin County, MN District Court	2010

and namely, regarding Cortez Davon Blakemore:

Crime	Court of Conviction	Year of Conviction (in or about)
Assault in the First Degree	Hennepin County, MN District Court	2009

aiding and abetting and being aided and abetted by each other and others, did knowingly possess, in and affecting interstate and foreign commerce a firearm, namely a Smith and Wesson, .357 caliber revolver pistol, Model 686-2, bearing serial number A765276, in violation of Title 18, United States Code, Sections 2, 922(g)(1) and 924(a)(2).

COUNT 23
(Distribution of Heroin)

On or about November 13, 2014, in the State and District of Minnesota, the defendant,

CARNEL LAVEL HARRISON,
a/k/a "Boo Man,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 24
(Distribution of Heroin)

On or about November 14, 2014, in the State and District of Minnesota, the defendants,

CARNEL LAVEL HARRISON,
a/k/a "Boo Man," and
TERREL VONSHAY ROBERSON,
a/k/a "Get Right,"
a/k/a "Can't Get Right,"
a/k/a "Slim,"

aiding and abetting and being aided and abetted by each other, knowingly and intentionally distributed a mixture and substance containing a detectable amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 25
(Distribution of Cocaine Base ("Crack")

On or about November 15, 2014, in the State and District of Minnesota, the defendant,

TERREL VONSHAY ROBERSON,
a/k/a "Get Right,"
a/k/a "Can't Get Right,"
a/k/a "Slim,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base

("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 26
(Distribution of Cocaine Base ("Crack")

On or about December 8, 2014, in the State and District of Minnesota, the defendant,

CARNEL LAVEL HARRISON,
a/k/a "Boo Man,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 27
(Distribution of Cocaine Base ("Crack")

On or about December 13, 2014, in the State and District of Minnesota, the defendants,

CARNEL LAVEL HARRISON,
a/k/a "Boo Man," and
DEJUAN PIERRE DARKYSE WASHINGTON,
a/k/a "DJ,"

aiding and abetting and being aided and abetted by each other and others, knowingly and intentionally distributed a mixture and substance containing a detectable amount of

cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 28
(Possession With Intent to Distribute Cocaine Base ("Crack"))

On or about December 29, 2014, in the State and District of Minnesota, the defendants,

CARNEL LAVEL HARRISON,
a/k/a "Boo Man," and
DEJUAN PIERRE DARKYSE WASHINGTON,
a/k/a "DJ,"

aiding and abetting and being aided and abetted by each other and others, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 29
(Distribution of Cocaine Base ("Crack"))

On or about January 6, 2015, in the State and District of Minnesota, the defendant,

TERREL VONSHAY ROBERSON,
a/k/a "Get Right,"
a/k/a "Can't Get Right,"
a/k/a "Slim,"

aiding and abetting and being aided and abetted by another, knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base ("crack"), a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

The allegations in Counts 1 through 29 of this Indictment are realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

If convicted of any of Counts 1 through 20, 23 through 27, 28 or 29 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of each such violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of each such violation.

If convicted of any of Counts 21, or 22 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm with accessories or any

ammunition involved in or used in any knowing violation of Sections 922(g)(1), 924(a)(2) or 924(c)(1)(A)(i), including the following firearms and ammunition:

a. a Smith and Wesson 9mm semi-automatic pistol, Model SD9VE, bearing serial number, HFC4906;

b. a Smith and Wesson, .357 caliber revolver pistol, Model 686-2, bearing serial number A765276;

If any of the above-described property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY FOREPERSON