

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Attachment A

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: See Attachment A

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

US v. MELVIN LANDRY JR

DISTRICT COURT NUMBER
13-cr-466-jsw

FILED
MAR 18 2014
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI Special Agents Lesline Wimbley and Paul Healy

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

13cr70765 KAW

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) AUSA KATHRYN R. HAUN

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges *
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction } Federal State
- 6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

TBA

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST Month/Day/Year
July 3, 2013

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: 0

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: Before Judge:

Comments:

ATTACHMENT A (LANDRY JR)

The Offenses Charged:

- 1: 18 U.S.C. § 1962(c) - Racketeering
- 2: 18 U.S.C. § 1962(d) – Racketeering Conspiracy
- 3: 18 U.S.C. § 1951(a) – Conspiracy to Commit Robbery Affecting Interstate Commerce
- 4: 18 U.S.C. § 1951(a) – Robbery Affecting Interstate Commerce (Five Counts)
- 5: 18 U.S.C. § 924(c)(1)(A) – Use/Possession of Firearm During and in Relation to Crime of Violence (Five Counts)
- 6: 18 U.S.C. § 1956(a)(1)(b)(i) – Money Laundering
- 7: 18 U.S.C. § 201(b) – Attempting to Bribe a Federal Official
- 8: 18 U.S.C. § 1512(c)(1) – Obstruction of Justice

The Maximum Penalties:

- Offenses 1 & 2: life imprisonment; 5 years supervised release; maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary gain loss inflicted on another; and a \$100 special assessment
- Offenses 3 & 4: 20 years imprisonment; 3 years of supervised release; maximum fine of \$250,000; and a \$100 special assessment
- Offense 5: life imprisonment with the following minimum consecutive penalties: 5 years consecutive mandatory minimum term of imprisonment, 7 years if firearm is brandished, or 10 years if firearm is discharged, 25 years mandatory minimum consecutive for each second or successive 924(c) conviction);

\$250,000 fine; 5 years supervised release; and a \$100 special assessment

Offense 6: 20 years imprisonment, \$500,000 fine, or twice the value of the property involved in the transactions; 3 years' supervised release; \$100 special assessment

Offense 7: 15 years imprisonment; \$250,000 maximum fine; 3 years supervised release; and a \$100 special assessment

Offense 8: 20 years imprisonment; 3 years of supervised release; maximum fine of \$250,000; and a \$100 special assessment

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Attachment A Petty
 Minor
 Misdemeanor
 Felony

PENALTY: See Attachment A

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DEFENDANT - U.S.
▶ **US v. DOMINIQUE MARQUIS MARTIN**
DISTRICT COURT NUMBER

FILED
MAR 18 2014
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
FBI Special Agents Lesline Wimbley and Paul Healy

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCP 20, 21, or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 U.S. ATTORNEY DEFENSE } **SHOW DOCKET NO.**

this prosecution relates to a pending case involving this same defendant } **MAGISTRATE CASE NO.**
13cr70765 KAW

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

DEFENDANT

IS NOT IN CUSTODY
Has not been arrested, pending outcome this proceeding.

1) If not detained give date any prior summons was served on above charges ▶ *

2) Is a Fugitive

3) Is on Bail or Release from (show District)

IS IN CUSTODY

4) On this charge

5) On another conviction } Federal State

6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution
TBA

Has detainer been filed? Yes } If "Yes" give date filed
 No

DATE OF ARREST ▶ Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶ Month/Day/Year

Name and Office of Person Furnishing Information on this form MELINDA HAAG
 U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA KATHRYN R. HAUN

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:
 SUMMONS NO PROCESS* WARRANT Bail Amount: 0

If Summons, complete following:
 Arraignment Initial Appearance
Defendant Address: _____
Date/Time: _____ Before Judge: _____

Comments: _____

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

ATTACHMENT A (MARTIN)

The Offenses Charged:

- 1: 18 U.S.C. § 1962(c) - Racketeering
- 2: 18 U.S.C. § 1962(d) – Racketeering Conspiracy
- 3: 18 U.S.C. § 1951(a) – Conspiracy to Commit Robbery Affecting Interstate Commerce
- 4: 18 U.S.C. § 1951(a) – Robbery Affecting Interstate Commerce (Four Counts)
- 5: 18 U.S.C. § 924(c)(1)(A) – Use/Possession of Firearm During and in Relation to Crime of Violence (Four Counts)
- 6: 18 U.S.C. § 1956(a)(1)(b)(i) – Money Laundering

The Maximum Penalties:

- Offenses 1 & 2: life imprisonment; 5 years supervised release; maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary gain loss inflicted on another; and a \$100 special assessment
- Offenses 3 & 4: 20 years imprisonment; 3 years of supervised release; maximum fine of \$250,000; and a \$100 special assessment
- Offense 5: life imprisonment with the following minimum consecutive penalties: 5 years consecutive mandatory minimum term of imprisonment, 7 years if firearm is brandished, or 10 years if firearm is discharged, 25 years consecutive mandatory minimum for each if second or successive 924(c) conviction); \$250,000 fine; 5 years supervised release; and a \$100 special assessment

Offense 6: 20 years imprisonment, \$500,000 fine, or twice the value of the property involved in the transactions; 3 years' supervised release; \$100 special assessment

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Attachment A

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: See Attachment A

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

▶ US v. RUDOLPHO ANTOINE JAMES

DISTRICT COURT NUMBER

13-cr-466-jsw

FILED

MAR 18 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges ▶ _____
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction } Federal State
- 6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

TBA

Has detainer Yes }
been filed? No } If "Yes" give date filed

DATE OF ARREST ▶

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶

Month/Day/Year

This report amends AO 257 previously submitted

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI Special Agents Lesline Wimbley and Paul Healy

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) AUSA KATHRYN R. HAUN

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: 0

If Summons, complete following:

Arraignment Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

ATTACHMENT A (JAMES)

The Offenses Charged:

- 1: 18 U.S.C. § 1962(c) - Racketeering
- 2: 18 U.S.C. § 1962(d) – Racketeering Conspiracy
- 3: 18 U.S.C. § 1951(a) – Conspiracy to Commit Robbery Affecting Interstate Commerce
- 4: 18 U.S.C. § 1951(a) – Robbery Affecting Interstate Commerce (Two Counts)
- 5: 18 U.S.C. § 924(c)(1)(A) – Use/Possession of Firearm During and in Relation to Crime of Violence (Two Counts)
- 6: 18 U.S.C. §§ 1029(a)(1) & 2 – Access Device Fraud (Two Counts)
- 7: 18 U.S.C. §§ 1029(a)(4) & 2 – Access Device Making Equipment

The Maximum Penalties:

- Offenses 1 & 2: life imprisonment; 5 years supervised release; maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary gain loss inflicted on another; and a \$100 special assessment
- Offenses 3 & 4: 20 years imprisonment; 3 years of supervised release; maximum fine of \$250,000; and a \$100 special assessment
- Offense 5: life imprisonment with the following minimum consecutive penalties: 5 years consecutive mandatory minimum term of imprisonment, 7 years if firearm is brandished, or 10 years if firearm is discharged, 25 years consecutive mandatory minimum for each if second or successive 924(c) conviction); \$250,000 fine; 5 years supervised release; and a \$100 special assessment

Offenses 6: 10 years imprisonment; 3 years of supervised release; maximum fine of \$250,000 or twice the gross pecuniary gain or loss from the offense; and a \$100 special assessment

Offense 7: 15 years imprisonment; 3 years of supervised release; maximum fine of \$250,000 or twice the gross pecuniary gain or loss from the offense; and a \$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

See Attachment A

- Petty
- Minor
- Misdemeanor
- Felony

PENALTY: See Attachment A

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

DEFENDANT - U.S.

US v. ERIC CARLISLE

DISTRICT COURT NUMBER
13-cr-466-JSW

FILED

MAR 18 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI Special Agent Lesline Wimbley

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCP 20, 21, or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

14-70187-MAG

Name and Office of Person Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA KATHRYN R. HAUN

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction } Federal State
- 6) Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution TBA

Has detainer been filed? Yes No

If "Yes" give date filed

DATE OF ARREST Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: 0

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: Before Judge:

Comments:

ATTACHMENT A (CARLISLE)

The Offenses Charged:

- 1: 18 U.S.C. § 1962(c) - Racketeering
- 2: 18 U.S.C. § 1962(d) – Racketeering Conspiracy
- 3: 18 U.S.C. § 1951(a) – Conspiracy to Commit Robbery Affecting Interstate Commerce
- 4: 18 U.S.C. § 1951(a) – Robbery Affecting Interstate Commerce (One Count)
- 5: 18 U.S.C. § 924(c)(1)(A) – Use/Possession of Firearm During and in Relation to Crime of Violence (One Count)

The Maximum Penalties:

- Offenses 1 & 2: life imprisonment; 5 years supervised release; maximum fine of the greatest of either: (a) \$250,000; (b) twice the gross pecuniary gain to the defendant; or (c) twice the gross pecuniary gain loss inflicted on another; and a \$100 special assessment
- Offenses 3 & 4: 20 years imprisonment; 3 years of supervised release; maximum fine of \$250,000; and a \$100 special assessment
- Offense 5: life imprisonment with the following minimum consecutive penalties: 5 years consecutive mandatory minimum term of imprisonment, 7 years if firearm is brandished, or 10 years if firearm is discharged, 25 years if second 924(c) conviction); \$250,000 fine; 5 years supervised release; and a \$100 special assessment

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

18 U.S.C. Section 1512(c)(1) - Obstruction of Justice Petty
 Minor
 Misdemeanor
 Felony
PENALTY: Maximum: 20 years imprisonment; 3 years of supervised release; maximum fine of \$250,000; and a \$100 special assessment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DEFENDANT - U.S.

▶ US v. VEANTE WILLIAMS

DISTRICT COURT NUMBER
13-cr-466-jsw

FILED

MAR 18 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges _____ *
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District) _____

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction } Federal State
- 6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution _____

Has detainer been filed? Yes } If "Yes" give date filed _____
 No

DATE OF ARREST ▶ _____
Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶ _____
Month/Day/Year

This report amends AO 257 previously submitted

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI Special Agents Lesline Wimbley and Paul Healy

person is awaiting trial in another Federal or State Court, give name of court _____

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District _____

this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 U.S. ATTORNEY DEFENSE } SHOW DOCKET NO. _____

this prosecution relates to a pending case involving this same defendant } MAGISTRATE CASE NO. _____

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under } _____

Name and Office of Person Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA KATHRYN R. HAUN

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: 0 _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address: _____

Date/Time: _____ Before Judge: _____

Comments: _____

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

18 U.S.C. Section 1029(a)(1) & 2 - Access Device Fraud Petty
 Minor
 Misdemeanor
 Felony

PENALTY: Maximum: 10 years imprisonment; 3 years of supervised release; maximum fine of \$250,000 or twice the gross pecuniary gain or loss from offense; and a \$100 special assessment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DEFENDANT - U.S.

US v. DESIER WILLIAMS

DISTRICT COURT NUMBER
13-cr-466-jsw

FILED
MAR 18 2014

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT

IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

- 1) If not detained give date any prior summons was served on above charges _____ *
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District) _____

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction } Federal State
- 6) Awaiting trial on other charges
If answer to (6) is "Yes", show name of institution _____

Has detainer been filed? Yes } If "Yes" give date filed _____
 No

DATE OF ARREST _____
Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY _____
Month/Day/Year

This report amends AO 257 previously submitted

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI Special Agents Lesline Wimbley and Paul Healy

person is awaiting trial in another Federal or State Court, give name of court _____

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District _____

this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 U.S. ATTORNEY DEFENSE } SHOW DOCKET NO. _____

this prosecution relates to a pending case involving this same defendant } MAGISTRATE CASE NO. _____

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under } _____

Name and Office of Person Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA KATHRYN R. HAUN

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: 0 _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address: _____

Date/Time: April 24, 2014 at 9:30am Before Judge: Kandis Westmore

Comments:

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

18 U.S.C. Section 1029(a)(1) & 2 - Access Device Fraud Petty
18 U.S.C. Section 1029(a)(4) & 2 - Access Device Making Equipment Minor
 Misdemeanor
 Felony

PENALTY: Maximum: 10 years imprisonment; 3 years of supervised release; \$250,000 or twice the gross pecuniary gain or loss from offense; and a \$100 special assessment
Maximum: 15 years imprisonment; 3 years of supervised release; \$250,000 or twice the gross pecuniary gain or loss from offense; and a \$100 special assessment

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

DEFENDANT - U.S.

US v. REINA RODRIGUEZ

DISTRICT COURT NUMBER
13-cr-466-jsw

FILED
MAR 18 2014
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI Special Agents Lesline Wimbley and Paul Healy

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form MELINDA HAAG

U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) AUSA KATHRYN R. HAUN

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: 0

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address:

Date/Time: April 24, 2014 at 9:30am Before Judge: Kandis Westmore

Comments:

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: OAKLAND

UNITED STATES OF AMERICA,

v.

CR 13-466 JSW

MELVIN LANDRY JR,
DOMINIQUE MARQUIS MARTIN,
RUDOLPHO ANTOINE JAMES, ERIC
CARLISLE, VEANTE WILLIAMS, DESIER
WILLIAMS and
REINA RODRIGUEZ

FILED
2014 MAR 18 A 10:00
RECEIVED
CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
AK

DEFENDANT(S).

SECOND SUPERSEDING INDICTMENT

VIOLATIONS: Title 18, United States Code, Section 1962(c) – Racketeering; Title 18, United States Code, Section 1962(d) – Racketeering Conspiracy; Title 18 U.S.C. Section 1951(a) - Conspiracy to Commit Hobbs Act Robbery; Title 18 U.S.C. Section 1951(a) - Hobbs Act Robbery; Title 18 U.S.C. Section 924(c) - Using/Carrying Firearm in Furtherance of Crime of Violence; Title 18 U.S.C. Section 201(b)(1) - Bribery of a Federal Official; Title 18 U.S.C. Section 1512(c)(1) - Obstruction of Justice; Title 18 U.S.C. Section 1029 – Access Device Fraud; Title 18 U.S.C. Section 1956 – Money Laundering; Title 18, United States Code, Section 2 – Aiding & Abetting; Two Forfeiture Allegations

A true bill.

J. Schen

Foreman

Filed in open court this 18 day of

March 2014

[Signature]

Clerk

Bail, \$ - No bail arrest warrant as to Veante Williams.

[Signature]
Nathanael Cousins
United States Magistrate Judge

- Summons as to Reina Rodriguez and Deser Williams

FILED
2014 MAR 18 A 10:01
U.S. DISTRICT COURT
OAKLAND, CALIFORNIA
JK

1 MELINDA HAAG (CABN 132612)
2 United States Attorney

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 OAKLAND DIVISION

11	UNITED STATES OF AMERICA)	No. 13-cr-466 JSW
12	v.)	VIOLATIONS: Title 18, United States Code, Section
13	(1) MELVIN LANDRY JR,)	1962(c) – Racketeering; Title 18, United States Code,
	a/k/a “New Hefner,”)	Section 1962(d) – Racketeering Conspiracy; Title 18
14	(2) DOMINIQUE MARQUIS MARTIN,)	U.S.C. Section 1951(a) - Conspiracy to Commit
	a/k/a “Domo,”)	Hobbs Act Robbery; Title 18 U.S.C. Section 1951(a)
15	(3) RUDOLPHO ANTOINE JAMES,)	- Hobbs Act Robbery; Title 18 U.S.C.
	a/k/a “Youngnrichdolpho,”)	Section 924(c) - Using/Carrying Firearm in
16	(4) ERIC CARLISLE,)	Furtherance of Crime of Violence; Title 18 U.S.C.
	a/k/a “Pimpinassero,”)	Section 201(b)(1) - Bribery of a Federal Official;
17	(5) VEANTE WILLIAMS,)	Title 18 U.S.C. Section 1512(c)(1) - Obstruction of
	a/k/a “V,”)	Justice; Title 18 U.S.C. Section 1029 – Access
18	(6) DESIER WILLIAMS, and)	Device Fraud; Title 18 U.S.C. Section 1956 – Money
	(7) REINA RODRIGUEZ,)	Laundering; Title 18, United States Code, Section 2 –
19	Defendants.)	Aiding & Abetting; Two Forfeiture Allegations
20)	OAKLAND VENUE

21 **SECOND SUPERSEDING INDICTMENT**

22 The Grand Jury charges:

23 **COUNT ONE:** (18 U.S.C. § 1962(c) – Racketeering)

24 **Introductory Allegations**

25 At all times relevant to this Second Superseding Indictment:

26 1. The Landry Crew is an enterprise based in Oakland, California, and beyond. It is
27 affiliated with the larger Money Team gang that also operates in and around Oakland, California, and
28 beyond, as well as with other groups. The Landry Crew’s members operate in the greater Bay Area

1 including among other places, Richmond, Antioch, Vallejo, Fairfield, the North Bay, the East Bay, the
2 Peninsula, and outside the Northern District of California in Sacramento and elsewhere.

3 2. The Landry Crew's members engage in, among other crimes, armed robberies of
4 commercial enterprises and businesses, during which they brandish firearms and steal cash, checks, and
5 merchandise while the store is full of customers. The enterprise also engages in armed home invasion-
6 style robberies, credit card fraud, and identity theft, as well as obstruction of justice. The Landry Crew's
7 members possess and use a variety of firearms in their illegal activities and sell much of their stolen
8 merchandise to third parties, or "fences."

9 3. The Landry Crew is notable for its use of female accomplices, not only to carry out its
10 criminal objectives, but also to facilitate its crimes. Landry Crew members use female accomplices to
11 transport them to the scene of crimes; hold and conceal evidence to include money and proceeds; steal
12 credit cards and identities from third parties; obtain cellular phones in the female accomplices' names to
13 deflect law enforcement scrutiny; and rent or steal vehicles in which to commit crimes.

14 4. Landry Crew members often document their criminal activities, which they broadcast and
15 about which they boast on various social media outlets, including Facebook, Twitter, Instagram, and
16 YouTube. Members also photograph themselves in the aftermath of their crimes, literally rolling around
17 in large amounts of cash. Such "trophy" photographs are featured on members' social media accounts,
18 and also on their cellular telephones and mobile devices. In addition to these trophy photographs, the
19 members document themselves on spending sprees with the proceeds from their robberies in the Bay
20 Area and beyond, including at luxury retailers. Members also photograph themselves brandishing
21 firearms and wearing personal items that have been robbed, including at gun point, from victims.

22 5. Landry Crew members also steal and engage in the unauthorized use of identities, credit
23 cards, and checkbooks. Landry Crew members obtain these access devices through a variety of sources.
24 For example, they purchase card numbers from online websites that traffic in stolen credit cards and
25 then create fraudulent credit cards using a combination of credit card readers and embossing machines.
26 They also steal credit cards and checkbooks during the course of home invasion robberies and make
27 charges on, or draw funds from, these access devices directly. Furthermore, they possess fraudulent
28 credit cards known as "sliders" which they obtain from third-party sources of supply.

1 LANDRY JR who participated with LANDRY JR and others in the criminal enterprise.

2 11. RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," is a friend and associate of
3 LANDRY JR who also participated with LANDRY JR and others in the criminal enterprise. At times,
4 he acted as a lookout for the enterprise and facilitated the enterprise's additional crimes.

5 12. ERIC CARLISLE, a/k/a "Pimpinassero," is another friend and associate of LANDRY JR
6 who participated with LANDRY JR and others in the criminal enterprise.

7 13. CO-CONSPIRATORS 1 through 8, and others known and unknown, are friends and
8 associates of LANDRY JR who also participated with LANDRY JR and others in the criminal
9 enterprise and the Racketeering Conspiracy charged in Count Two. CO-CONSPIRATOR 1's
10 participation also includes, but is not limited to, Racketeering Act Four. CO-CONSPIRATOR 2's
11 participation also includes, but is not limited to, Racketeering Act Six. CO-CONSPIRATOR 3's
12 participation also includes, but is not limited to, Racketeering Act Ten. CO-CONSPIRATOR 4's
13 participation also includes, but is not limited to, Racketeering Act Two. CO-CONSPIRATOR 7's
14 participation also includes, but is not limited to, Racketeering Act Nine.

15 The Racketeering Violation

16 14. From at least in or about February 2012, up through and including the present, in the
17 Northern District of California and elsewhere, the defendants,

18 MELVIN LANDRY JR, a/k/a "New Hefner,"

19 DOMINIQUE MARQUIS MARTIN, a/k/a "Domo,"

20 RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," and

21 ERIC CARLISLE, a/k/a "Pimpinassero,"

22 and others known and unknown, being persons employed by and associated with the enterprise
23 described above, namely, the Landry Crew, which enterprise was engaged in, and the activities of which
24 affected, interstate and foreign commerce, unlawfully, intentionally, and knowingly conducted and
25 participated, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of
26 racketeering activity, that is, through the commission of the acts of racketeering set forth in Paragraphs
27 ¹⁵ ~~X~~ through ²⁶ ~~X~~ of this Second Superseding Indictment as Racketeering Acts One through Eleven.

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1 Racketeering Act Two

2 (February 22, 2012 Robbery of a Safeway Store in Oakland)

3 17. MELVIN LANDRY JR, a/k/a "New Hefner," the defendant, committed the following act
4 of racketeering, which constitutes the commission of Racketeering Act Two:

5 a. Robbery

6 On or about February 22, 2012, in the Northern District of California, MELVIN
7 LANDRY JR, a/k/a "New Hefner," and others known and unknown, unlawfully and knowingly took
8 property in the possession of another, from that person and that person's immediate presence, against
9 that person's will, accomplished by means of force and fear, to wit, LANDRY JR and his co-
10 conspirators robbed an employee of a Safeway store in Oakland of money and property belonging to the
11 store, in violation of California Penal Code, Sections 211 and 31.

12 Racketeering Act Three

13 (May 2012 Money Laundering in Oakland)

14 18. MELVIN LANDRY JR, a/k/a "New Hefner," the defendant, committed the following act
15 of racketeering, which constitutes the commission of Racketeering Act Three:

16 a. Money Laundering

17 In or about May 2012, in the Northern District of California, MELVIN LANDRY JR,
18 a/k/a "New Hefner," unlawfully and knowingly conducted a financial transaction affecting interstate
19 commerce, to wit, the cash purchase of a Jaguar and registering the vehicle in a third party's name,
20 which involved the proceeds of a specified unlawful activity, that is, Robbery Affecting Interstate
21 Commerce, in violation of Title 18, United States Code, Sections 1951(a) & 2, knowing that the
22 transaction was designed in whole and in part to conceal and disguise the nature, the location, the
23 source, the ownership, and the control of the proceeds of that specified unlawful activity, in violation of
24 Title 18, United States Code, Section 1956(a)(1)(B)(i).

25 Racketeering Act Four

26 (July 25, 2012 Conspiracy to Commit Robbery and Home Invasion Robbery in Oakland)

27 19. MELVIN LANDRY JR, a/k/a "New Hefner," the defendant, committed the following
28 acts of racketeering, either one of which constitutes the commission of Racketeering Act Four:

1 a. Conspiracy to Commit Robbery

2 On or about July 25, 2012, in the Northern District of California and elsewhere,
3 MELVIN LANDRY JR, a/k/a "New Hefner," and others known and unknown, unlawfully,
4 intentionally, and knowingly combined, conspired, confederated, and agreed together and with each
5 other to rob a victim in the victim's home in Oakland, California, and a conspirator committed an overt
6 act in furtherance of the conspiracy, in violation of California Penal Code, Sections 182 and 211.

7 Overt Acts

8 i. On or about July 25, 2012, in the Northern District of California,
9 MELVIN LANDRY JR, a/k/a "New Hefner," entered a home.

10 b. Robbery

11 On or about July 25, 2012, in the Northern District of California, MELVIN LANDRY
12 JR, a/k/a "New Hefner," and others known and unknown, unlawfully and knowingly took property in
13 the possession of another, from that person and that person's immediate presence, against that person's
14 will, accomplished by means of force and fear, to wit, LANDRY JR and his co-conspirators robbed a
15 victim at gunpoint in the victim's home, in violation of California Penal Code, Sections 211 and 31.

16 Racketeering Act Five

17 (October 19, 2012 Conspiracy to Commit Robbery and Robbery of a Walmart store in San Leandro)

18 20. MELVIN LANDRY JR, a/k/a "New Hefner," DOMINIQUE MARQUIS MARTIN, a/k/a
19 "Domo," RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," and ERIC CARLISLE, a/k/a
20 "Pimpinassero," committed the following acts of racketeering, either one of which constitutes the
21 commission of Racketeering Act Five:

22 a. Conspiracy to Commit Robbery

23 On or about October 19, 2012, in the Northern District of California and elsewhere,
24 MELVIN LANDRY JR, a/k/a "New Hefner," DOMINIQUE MARQUIS MARTIN, a/k/a "Domo,"
25 RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," and ERIC CARLISLE, a/k/a
26 "Pimpinassero," and others known and unknown, unlawfully, intentionally, and knowingly combined,
27 conspired, confederated, and agreed together and with each other to rob a Walmart store in San Leandro,
28 California, and a conspirator committed an overt act in furtherance of the conspiracy, in violation of

1 California Penal Code, Sections 182 and 211.

2 Overt Acts

- 3 i. On or about October 19, 2012, in the Northern District of California,
4 RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," conducted
5 surveillance outside and inside a Walmart store.
- 6 ii. On or about October 19, 2012, in the Northern District of California,
7 MELVIN LANDRY JR, a/k/a "New Hefner," physically restrained a
8 Walmart employee.
- 9 iii. On or about October 19, 2012, in the Northern District of California,
10 DOMINIQUE MARQUIS MARTIN, a/k/a "Domo," and ERIC
11 CARLISLE, a/k/a "Pimpinassero," took cash drawers from a Walmart
12 store.

13 b. Robbery

14 On or about October 19, 2012, in the Northern District of California, MELVIN
15 LANDRY JR, a/k/a "New Hefner," DOMINIQUE MARQUIS MARTIN, a/k/a "Domo," RUDOLPHO
16 ANTOINE JAMES, a/k/a "Youngnrichdolpho," and ERIC CARLISLE, a/k/a "Pimpinassero," and
17 others known and unknown, unlawfully and knowingly took property in the possession of another, from
18 that person and that person's immediate presence, against that person's will, accomplished by means of
19 force and fear, to wit, LANDRY JR, MARTIN, JAMES, and CARLISLE robbed an employee of a
20 Walmart store in San Leandro of money and property belonging to the store, in violation of California
21 Penal Code, Sections 211 and 31.

22 Racketeering Act Six

23 (October 31, 2012 Conspiracy to Commit Robbery and Robbery of a Walmart store in Sacramento)

24 21. MELVIN LANDRY JR, a/k/a "New Hefner," DOMINIQUE MARQUIS MARTIN, a/k/a
25 "Domo," and ERIC CARLISLE a/k/a "Pimpinassero," committed the following acts of racketeering,
26 either one of which constitutes the commission of Racketeering Act Six:

27 a. Conspiracy to Commit Robbery

28 On or about October 31, 2012, in the Northern District of California, the Eastern District

1 of California, and elsewhere, MELVIN LANDRY JR, a/k/a "New Hefner," DOMINIQUE MARQUIS
2 MARTIN, a/k/a "Domo," and ERIC CARLISLE, a/k/a "Pimpinassero," and others known and
3 unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed
4 together and with each other to rob a Walmart store in Sacramento, California, and a conspirator
5 committed an overt act in furtherance of the conspiracy, in violation of California Penal Code, Sections
6 182 and 211.

7 Overt Acts

8 i. On or about October 31, 2012, in the Eastern District of California,
9 MELVIN LANDRY JR, a/k/a "New Hefner," brandished a firearm at a
10 Walmart employee.

11 ii. On or about October 31, 2012, in the Eastern District of California,
12 DOMINIQUE MARQUIS MARTIN, a/k/a "Domo," and ERIC
13 CARLISLE, a/k/a "Pimpinassero," took cash drawers from a Walmart
14 store.

15 b. Robbery

16 On or about October 31, 2012, in the Northern District of California and the Eastern
17 District of California, MELVIN LANDRY JR, a/k/a "New Hefner," DOMINIQUE MARQUIS
18 MARTIN, a/k/a "Domo," and ERIC CARLISLE, a/k/a "Pimpinassero," and others known and
19 unknown, unlawfully and knowingly took property in the possession of another, from that person and
20 that person's immediate presence, against that person's will, accomplished by means of force and fear,
21 to wit, LANDRY JR, MARTIN, and CARLISLE robbed an employee of a Walmart store in Sacramento
22 of money and property belonging to the store, in violation of California Penal Code, Sections 211 and
23 31.

24 Racketeering Act Seven

25 (December 17, 2012 Conspiracy to Commit Robbery and Robbery of a Walmart store in San Leandro)

26 22. MELVIN LANDRY JR, a/k/a "New Hefner," and DOMINIQUE MARQUIS MARTIN,
27 a/k/a "Domo," committed the following acts of racketeering, either one of which constitutes the
28 commission of Racketeering Act Seven:

1 a. Conspiracy to Commit Robbery

2 On or about December 17, 2012, in the Northern District of California and elsewhere,
3 MELVIN LANDRY JR, a/k/a "New Hefner," and DOMINIQUE MARQUIS MARTIN, "Domo," and
4 others known and unknown, unlawfully, intentionally, and knowingly combined, conspired,
5 confederated, and agreed together and with each other to rob a Walmart store in San Leandro,
6 California, and a conspirator committed an overt act in furtherance of the conspiracy, in violation of
7 California Penal Code, Sections 182 and 211.

8 Overt Acts

9 i. On or about December 17, 2012, in the Northern District of California,
10 MELVIN LANDRY JR, a/k/a "New Hefner," brandished a firearm at a
11 Walmart employee.

12 ii. On or about December 17, 2012, in the Northern District of California,
13 DOMINIQUE MARQUIS MARTIN, a/k/a "Domo," took cash drawers
14 from a Walmart store.

15 b. Robbery

16 On or about December 17, 2012, in the Northern District of California, MELVIN
17 LANDRY JR, a/k/a "New Hefner," and DOMINIQUE MARQUIS MARTIN, a/k/a "Domo," and others
18 known and unknown, unlawfully and knowingly took property in the possession of another, from that
19 person and that person's immediate presence, against that person's will, accomplished by means of force
20 and fear, to wit, LANDRY JR and MARTIN robbed an employee of a Walmart store in San Leandro of
21 money and property belonging to the store, in violation of California Penal Code, Sections 211 and 31.

22 Racketeering Act Eight

23 (December 17, 2012 Money Laundering in Oakland)

24 23. DOMINIQUE MARQUIS MARTIN, a/k/a "Domo," committed the following act of
25 racketeering, which constitutes the commission of Racketeering Act Eight:

26 a. Money Laundering

27 On or about December 17, 2012, in the Northern District of California, DOMINIQUE
28 MARQUIS MARTIN, a/k/a "Domo," the defendant, unlawfully and knowingly conducted a financial

1 transaction affecting interstate commerce, to wit, the cash purchase of a BMW and registering the
2 vehicle in a third party's name, which involved the proceeds of a specified unlawful activity, that is,
3 Robbery Affecting Interstate Commerce, in violation of Title 18, United States Code, Sections 1951(a)
4 & 2, knowing that the transaction was designed in whole and in part to conceal and disguise the nature,
5 the location, the source, the ownership, and the control of the proceeds of that specified unlawful
6 activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

7 Racketeering Act Nine

8 (January 3, 2013 Conspiracy to Commit Robbery and Robbery of a Walmart store in Fremont)

9 24. MELVIN LANDRY JR, a/k/a "New Hefner," DOMINIQUE MARQUIS MARTIN, a/k/a
10 "Domo," and RUDOLPHO ANTOINE JAMES, a/k/a "Youngrichdolpho," committed the following acts
11 of racketeering, either one of which constitutes the commission of Racketeering Act Nine:

12 a. Conspiracy to Commit Robbery

13 On or about January 3, 2013, in the Northern District of California and elsewhere,
14 MELVIN LANDRY JR, a/k/a "New Hefner," DOMINIQUE MARQUIS MARTIN, a/k/a "Domo," and
15 RUDOLPHO ANTOINE JAMES, a/k/a "Youngrichdolpho," and others known and unknown,
16 unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and
17 with each other to rob a Walmart store in Fremont, California, and a conspirator committed an overt act
18 in furtherance of the conspiracy, in violation of California Penal Code, Sections 182 and 211.

19 Overt Acts

- 20 i. On or about January 3, 2013, in the Northern District of California,
21 RUDOLPHO ANTOINE JAMES, a/k/a "Youngrichdolpho," conducted
22 surveillance outside and inside a Walmart store.
- 23 ii. On or about January 3, 2013, in the Northern District of California,
24 MELVIN LANDRY JR, a/k/a "New Hefner," brandished a firearm at a
25 Walmart employee.
- 26 iii. On or about January 3, 2013, in the Northern District of California,
27 DOMINIQUE MARQUIS MARTIN, a/k/a "Domo," took cash from a
28 Walmart store.

1 b. Robbery

2 On or about January 3, 2013, in the Northern District of California, MELVIN LANDRY
3 JR, a/k/a "New Hefner," DOMINIQUE MARQUIS MARTIN, a/k/a "Domo," and RUDOLPHO
4 ANTOINE JAMES, a/k/a "Youngnrichdolpho," and others known and unknown, unlawfully and
5 knowingly took property in the possession of another, from that person and that person's immediate
6 presence, against that person's will, accomplished by means of force and fear, to wit, LANDRY JR,
7 MARTIN, and JAMES robbed an employee of a Walmart store in Fremont of money and property
8 belonging to the store, in violation of California Penal Code, Sections 211 and 31.

9 Racketeering Act Ten

10 (July 2013 Obstruction of Justice/Witness Tampering)

11 25. MELVIN LANDRY JR, a/k/a "New Hefner," committed the following act of
12 racketeering, which constitutes the commission of Racketeering Act Ten:

13 a. From at least on or about July 3, 2013, up through and including on or about July
14 4, 2013, in the Northern District of California, MELVIN LANDRY JR, a/k/a "New Hefner," together
15 with others known and unknown, unlawfully, knowingly, and corruptly obstructed, influenced, and
16 impeded an official proceeding, and attempted to do so, to wit, following his arrest, LANDRY JR sought
17 to hide evidence of his crimes, in violation of Title 18, United States Code, Sections 1512(c) and 2.

18 Racketeering Act Eleven

19 (January 10, 2014 Access Device Fraud)

20 26. RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," committed the following
21 acts of racketeering, any one of which constitutes the commission of Racketeering Act Eleven:

22 a. At the latest in or about January 2013 and continuing until at least on or about
23 January 10, 2014, in the Northern District of California, RUDOLPHO ANTOINE JAMES, a/k/a
24 "Youngnrichdolpho," and others known and unknown, unlawfully and knowingly, and with intent to
25 defraud, produced, used, and trafficked in one or more counterfeit access devices, in and affecting
26 interstate commerce, in violation of 18 U.S.C. § 1029(a)(1).

27 b. On or about January 10, 2014, in the Northern District of California,
28 RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," and others known and unknown,

1 unlawfully and knowingly, and with intent to defraud, possessed 15 and more access devices which
2 were counterfeit and unauthorized, in and affecting interstate commerce, in violation of 18 U.S.C.
3 § 1029(a)(3).

4 c. On or about January 10, 2014, in the Northern District of California,
5 RUDOLPHO ANTOINE JAMES, a/k/a “Youngnrichdolpho,” and others known and unknown,
6 unlawfully and knowingly, and with intent to defraud, produced, trafficked in, had control or custody of,
7 and possessed device-making equipment, in and affecting interstate commerce, in violation of 18 U.S.C.
8 § 1029(a)(4).

9 All in violation of Title 18, United States Code, Sections 1962(c) and 2.

10 COUNT TWO: (18 U.S.C. § 1962(d) – Racketeering Conspiracy)

11 27. Paragraphs 1 through 26 of this Second Superseding Indictment are realleged, repeated,
12 and incorporated by reference as though fully set forth herein.

13 28. From at least in or about February 2012, up through and including the present, in the
14 Northern District of California and elsewhere, the defendants,

15 MELVIN LANDRY JR, a/k/a “New Hefner,”

16 DOMINIQUE MARQUIS MARTIN, a/k/a “Domo,”

17 RUDOLPHO ANTOINE JAMES, a/k/a “Youngnrichdolpho,” and

18 ERIC CARLISLE, a/k/a “Pimpinassero,”

19 and others known and unknown, being persons employed by and associated with the enterprise
20 described above, namely, the Landry Crew, which enterprise is engaged in, and the activities of which
21 affect, interstate and foreign commerce, unlawfully, intentionally, and knowingly combined, conspired,
22 confederated, and agreed together and with each other to conduct and participate, directly and indirectly,
23 in the conduct of the affairs of the enterprise through a pattern of racketeering activity, which pattern of
24 racketeering consists of:

25 a. multiple acts and threats involving robbery, in violation of California Penal Code
26 Sections 211, 182, 31; and

27 b. multiple acts indictable under Title 18, United States Code, Sections 1951
28 (interference with commerce, robbery, or extortion), 1512 (tampering with a

1 witness/obstruction of justice), 1956 (laundering of monetary instruments) and
2 1029 (fraud and related activity in connection with access devices).

3 29. It is part of the conspiracy that each defendant agreed that a conspirator would commit at
4 least two acts of racketeering activity in the conduct of the affairs of the enterprise.

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

6 COUNT THREE: (18 U.S.C. § 1951(a) – Conspiracy to Commit Robbery Affecting Interstate
7 Commerce)

8 30. Between at the latest in or about early 2012, and continuing through at least until on or
9 about January 3, 2013, in the Northern District of California, the defendants,

10 MELVIN LANDRY JR, a/k/a “New Hefner,”

11 DOMINIQUE MARQUIS MARTIN, a/k/a “Domo,”

12 RUDOLPHO ANTOINE JAMES, a/k/a “Youngnrichdolpho,” and

13 ERIC CARLISLE, a/k/a “Pimpinassero,”

14 and others known and unknown to the grand jury, unlawfully, willfully, and intentionally did combine,
15 conspire, confederate, and agree together and with each other to commit robbery, as that term is defined
16 in Title 18, United States Code, Section 1951(b)(1), and thereby would obstruct, delay, and affect
17 commerce and the movement of articles and commodities in commerce.

18 All in violation of Title 18, United States Code, Section 1951(a).

19 COUNT FOUR: (18 U.S.C. §§ 1951(a) & 2 – Robbery Affecting Interstate Commerce)

20 31. On or about February 17, 2012, in the Northern District of California, the defendants,

21 MELVIN LANDRY JR, a/k/a “New Hefner,”

22 DOMINIQUE MARQUIS MARTIN, a/k/a “Domo,”

23 unlawfully and knowingly did obstruct, delay, and affect commerce and the movement of articles and
24 commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section
25 1951(b)(1), to wit: the defendants robbed a Rite Aid Pharmacy located on MacArthur Boulevard in San
26 Leandro, California.

27 All in violation of Title 18, United States Code, Sections 1951(a) and 2.

1 COUNT FIVE: (18 U.S.C. §§ 924(c) & 2 – Using/Possessing a Firearm in Crime of Violence)

2 32. On or about February 17, 2012, in the Northern District of California, the defendants,
3 MELVIN LANDRY JR, a/k/a “New Hefner,” and
4 DOMINIQUE MARQUIS MARTIN, a/k/a “Domo,”
5 unlawfully and knowingly did use, carry, and brandish a firearm during and in relation to a crime of
6 violence for which they may be prosecuted in a court of the United States, namely, the robbery affecting
7 commerce charged in Count Four of this Second Superseding Indictment, and did possess and brandish a
8 firearm in furtherance of that offense.

9 All in violation of Title 18, United States Code, Sections 924(c) and 2.

10 COUNT SIX: (18 U.S.C. §§ 1951(a) & 2 – Robbery Affecting Interstate Commerce)

11 33. On or about February 22, 2012, in the Northern District of California, the defendant,
12 MELVIN LANDRY JR a/k/a “New Hefner,”
13 and others known and unknown to the grand jury, unlawfully and knowingly did obstruct, delay, and
14 affect commerce and the movement of articles and commodities in commerce by robbery, as that term is
15 defined in Title 18, United States Code, Section 1951(b)(1), to wit: the defendant robbed a Safeway
16 located on Grand Avenue in Oakland, California.

17 All in violation of Title 18, United States Code, Sections 1951(a) and 2.

18 COUNT SEVEN: (18 U.S.C. §§ 924(c) & 2 – Using/Possessing a Firearm in Crime of Violence)

19 34. On or about February 22, 2012, in the Northern District of California, the defendant,
20 MELVIN LANDRY JR a/k/a “New Hefner,”
21 unlawfully and knowingly did use, carry, and brandish a firearm during and in relation to a crime of
22 violence for which he may be prosecuted in a court of the United States, namely, the robbery affecting
23 commerce charged in Count Six of this Second Superseding Indictment, and did possess and brandish a
24 firearm in furtherance of that offense.

25 All in violation of Title 18, United States Code, Sections 924(c) and 2.

26 COUNT EIGHT: (18 U.S.C. § 1956(a)(1)(b)(i) – Money Laundering)

27 35. On or about June 7, 2012, in the Northern District of California, the defendant,
28 MELVIN LANDRY JR. a/k/a “New Hefner,”

1 unlawfully and knowingly did conduct a financial transaction affecting interstate commerce, to wit, the
2 cash purchase of a Jaguar and registering the vehicle in a third party's name, which involved the
3 proceeds of a specified unlawful activity, that is, Robbery Affecting Interstate Commerce, in violation of
4 Title 18, United States Code, Section 1951(a) & 2, knowing that the transaction was designed in whole
5 and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of
6 the proceeds of that specified unlawful activity.

7 All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

8 COUNT NINE: (18 U.S.C. §§ 1951(a) & 2 – Robbery Affecting Interstate Commerce)

9 36. On or about October 19, 2012, in the Northern District of California, the defendants,

10 MELVIN LANDRY JR, a/k/a "New Hefner,"

11 DOMINIQUE MARQUIS MARTIN, a/k/a "Domo,"

12 RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," and

13 ERIC CARLISLE, a/k/a "Pimpinassero,"

14 unlawfully and knowingly did obstruct, delay, and affect commerce and the movement of articles and
15 commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section
16 1951(b)(1), to wit: the defendants robbed a Walmart located on Hesperian Boulevard in San Leandro,
17 California.

18 All in violation of Title 18, United States Code, Sections 1951(a) and 2.

19 COUNT TEN: (18 U.S.C. §§ 924(c) & 2 – Using/Possessing a Firearm in Crime of Violence)

20 37. On or about October 19, 2012, in the Northern District of California, the defendants,

21 MELVIN LANDRY JR, a/k/a "New Hefner,"

22 DOMINIQUE MARQUIS MARTIN, a/k/a "Domo,"

23 RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," and

24 ERIC CARLISLE, a/k/a "Pimpinassero,"

25 unlawfully and knowingly did use, carry, and brandish a firearm during and in relation to a crime of
26 violence for which he may be prosecuted in a court of the United States, namely, the robbery affecting
27 commerce charged in Count Nine of this Second Superseding Indictment, and did possess and brandish
28 a firearm in furtherance of that offense.

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

2 COUNT ELEVEN: (18 U.S.C. §§ 1951(a) & 2 – Robbery Affecting Interstate Commerce)

3 38. On or about December 17, 2012, in the Northern District of California, the defendants,
4 MELVIN LANDRY JR, a/k/a “New Hefner,” and
5 DOMINIQUE MARQUIS MARTIN, a/k/a “Domo,”
6 unlawfully and knowingly did obstruct, delay, and affect commerce and the movement of articles and
7 commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section
8 1951(b)(1), to wit: they conducted an armed robbery of a Walmart located on Davis Street in San
9 Leandro, California.

10 All in violation of Title 18, United States Code, Sections 1951(a) and 2.

11 COUNT TWELVE: (18 U.S.C. §§ 924(c) & 2 – Using/Possessing a Firearm in Crime of Violence)

12 39. On or about December 17, 2012, in the Northern District of California, the defendants,
13 MELVIN LANDRY JR, a/k/a “New Hefner,” and
14 DOMINIQUE MARQUIS MARTIN, a/k/a “Domo,”
15 unlawfully and knowingly did use, carry, and brandish a firearm during and in relation to a crime of
16 violence for which they may be prosecuted in a court of the United States, namely, the robbery affecting
17 commerce charged in Count Eleven of this Second Superseding Indictment, and did possess and
18 brandish a firearm in furtherance of that offense.

19 All in violation of Title 18, United States Code, Sections 924(c) and 2.

20 COUNT THIRTEEN: (18 U.S.C. § 1956(a)(1)(b)(i) – Money Laundering)

21 40. On or about December 17, 2012, in the Northern District of California, the defendant,
22 DOMINIQUE MARQUIS MARTIN, a/k/a “Domo,”
23 unlawfully and knowingly did conduct a financial transaction affecting interstate commerce, to wit, the
24 cash purchase of a BMW and registering that vehicle in a third party’s name, which involved the
25 proceeds of a specified unlawful activity, that is, Robbery Affecting Interstate Commerce, in violation of
26 Title 18, United States Code, Section 1951(a) & 2, knowing that the transaction was designed in whole
27 and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of
28 the proceeds of that specified unlawful activity.

1 All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

2 COUNT FOURTEEN: (18 U.S.C. §§ 1951(a) & 2 – Robbery Affecting Interstate Commerce)

3 41. On or about January 3, 2013, in the Northern District of California, the defendants,

4 MELVIN LANDRY JR, a/k/a “New Hefner,”

5 DOMINIQUE MARQUIS MARTIN, a/k/a “Domo,” and

6 RUDOLPHO ANTOINE JAMES, a/k/a “Youngnrichdolpho,”

7 unlawfully and knowingly did obstruct, delay, and affect commerce and the movement of articles and
8 commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section
9 1951(b)(1), to wit: they conducted an armed robbery of a Walmart located on Albrae in Fremont,
10 California.

11 All in violation of Title 18, United States Code, Sections 1951(a) and 2.

12 COUNT FIFTEEN: (18 U.S.C. §§ 924(c) & 2 – Using/Possessing a Firearm in Crime of Violence)

13 42. On or about January 3, 2013, in the Northern District of California, the defendants,

14 MELVIN LANDRY JR, a/k/a “New Hefner,” and

15 DOMINIQUE MARQUIS MARTIN, a/k/a “Domo,”

16 unlawfully and knowingly did use, carry, and brandish a firearm during and in relation to a crime of
17 violence for which they may be prosecuted in a court of the United States, namely, the robbery affecting
18 commerce charged in Count Fifteen of this Second Superseding Indictment, and did possess and
19 brandish a firearm in furtherance of that offense.

20 All in violation of Title 18, United States Code, Sections 924(c) and 2.

21 COUNT SIXTEEN: (18 U.S.C. § 201(b)(1) – Bribing a Federal Official)

22 43. On or about July 3, 2013, in the Northern District of California, the defendant,

23 MELVIN LANDRY, JR., a/k/a “New Hefner,”

24 unlawfully and knowingly did directly and indirectly corruptly give, offer, and promise a thing of value
25 to a public official with the intent to influence any official act and to induce such public official to do
26 and to omit to do any act in violation of that official’s lawful duty, to wit: the defendant offered to
27 provide a Federal Bureau of Investigation (FBI) Special Agent and an Alameda County Sheriff’s Deputy
28 cash and goods in exchange for facilitating the defendant’s release from custody.

SECOND SUPERSEDING INDICTMENT

1 All in violation of Title 18, United States Code, Section 201(b)(1).

2 COUNT SEVENTEEN: (18 U.S.C. §§ 1512(c)(1) & 2 – Obstruction of Justice)

3 44. From at least on or about July 3, 2013, up through and including on or about July 5, 2013,
4 in the Northern District of California, the defendants,

5 MELVIN LANDRY, JR., a/k/a “New Hefner,” and

6 VEANTE WILLIAMS, a/k/a “V,”

7 unlawfully and knowingly did corruptly attempt to alter, destroy, mutilate, and conceal an object with
8 the intent to impair the object’s integrity and availability for use in an official proceeding, to wit: they
9 attempted to conceal evidence of robberies LANDRY JR and others committed.

10 All in violation of Title 18, United States Code, Sections 1512(c) and 2.

11 COUNT EIGHTEEN: (18 U.S.C. §§ 1029(a)(1) & (2) – Access Device Fraud)

12 45. At the latest on or about January 26, 2013, in the Northern District of California, the
13 defendant,

14 DESIER WILLIAMS,

15 and others known and unknown, unlawfully and knowingly, and with intent to defraud, produced, used,
16 and trafficked in one or more counterfeit access devices, in and affecting interstate commerce.

17 All in violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

18 COUNT NINETEEN: (18 U.S.C. §§ 1029(a)(1) & 2 – Access Device Fraud)

19 46. In or about January 2014, in the Northern District of California, the defendants,

20 RUDOLPHO ANTOINE JAMES, a/k/a “Youngnrichdolpho,” and

21 REINA RODRIGUEZ,

22 and others known and unknown, unlawfully and knowingly, and with intent to defraud, produced, used,
23 and trafficked in one or more counterfeit access devices, in and affecting interstate commerce.

24 All in violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

25 COUNT TWENTY: (18 U.S.C. §§ 1029(a)(1) & 2 – Access Device Fraud)

26 47. On or about January 10, 2014, in the Northern District of California, the defendants,

27 RUDOLPHO ANTOINE JAMES, a/k/a “Youngnrichdolpho,” and

28 REINA RODRIGUEZ,

1 and others known and unknown, unlawfully and knowingly, and with intent to defraud, possessed 15
2 and more access devices which were counterfeit and unauthorized, in and affecting interstate commerce.

3 All in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.

4 COUNT TWENTY-ONE: (18 U.S.C. §§ 1029(a)(4) & 2 – Access Device Making Equipment)

5 48. On or about January 10, 2014, in the Northern District of California, the defendants,
6 RUDOLPHO ANTOINE JAMES, a/k/a “Youngnrichdolpho,” and

7 REINA RODRIGUEZ,

8 and others known and unknown, unlawfully and knowingly and with intent to defraud , produced,
9 trafficked in, had control or custody of, and possessed device-making equipment, in and affecting
10 interstate commerce.

11 All in violation of Title 18, United States Code, Sections 1029(a)(4) and 2.

12 FIRST FORFEITURE ALLEGATION: (18 U.S.C. § 1963 – Proceeds and Property Involved in RICO)

13 49. The allegations in Counts One through Twenty-One of this Second Superseding
14 Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging
15 forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963.

16 50. Pursuant to Title 18, United States Code, Section 1963, upon conviction of an offense in
17 violation of Title 18, United States Code, Section 1962, the defendants

18 MELVIN LANDRY JR, a/k/a “New Hefner,”

19 DOMINIQUE MARQUIS MARTIN, a/k/a “Domo,”

20 RUDOLPHO ANTOINE JAMES, a/k/a “Youngnrichdolpho,” and

21 ERIC CARLISLE, a/k/a “Pimpinassero,”

22 Shall forfeit to the United States of America:

23 a. Any interest acquired and maintained in violation of section 1962;

24 b. Any interest in, security of, claim against, and property and contractual right of any kind
25 affording a source of influence over, any enterprise which the defendants established, operated,
26 controlled, conducted, and participated in the conduct of, in violation of section 1962; and

27 c. Any property constituting, and derived from, any proceeds obtained, directly and
28 indirectly,

1 from racketeering activity and unlawful debt collection in violation of 1962.

2 51. If any of the property described above, as a result of any act or omission of the
3 defendants:

4 a. Cannot be located upon the exercise of due diligence;

5 b. Has been transferred or sold to, or deposited with, a third party;

6 c. Has been placed beyond the jurisdiction of the court;

7 d. Has been substantially diminished in value; or

8 e. Has been commingled with other property which cannot be divided without difficulty,

9 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18,
10 United States Code, Section 1963(m).

11 SECOND FORFEITURE ALLEGATION: (18 U.S.C. § 924(d), 981(a)(1)(C) and 28 U.S.C. § 2461(c))

12 52. The allegations in Counts One through Twenty-One of this Second Superseding
13 Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging
14 forfeiture pursuant to the provisions of Title 18, United States Code Sections, 924(d), 981(a)(1)(C), and
15 Title 28, United States Code, Section 2461(c).

16 53. Upon a conviction of any of the offenses alleged in Counts 1 through 4, 6, 9, 11 and 14,
17 above, defendants,

18 MELVIN LANDRY JR, a/k/a "New Hefner,"

19 DOMINIQUE MARQUIS MARTIN, a/k/a "Domo,"

20 RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," and

21 ERIC CARLISLE, a/k/a "Pimpinassero,"

22 shall, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code,
23 Section 2461, forfeit to the United States all property, real or personal, which constitutes or is derived
24 from proceeds traceable to a violation of Title 18, United States Code, Section 1951(a) as alleged in
25 Counts One through Four, Six, Nine, Eleven and Fourteen of this Second Superseding Indictment.

26 54. Upon a conviction of any of the offenses in Counts 5, 7, 10, and 12 above, defendants,

27 MELVIN LANDRY JR, a/k/a "New Hefner,"

28 DOMINIQUE MARQUIS MARTIN, a/k/a "Domo,"

SECOND SUPERSEDING INDICTMENT

1 RUDOLPHO ANTOINE JAMES, a/k/a "Youngnrichdolpho," and

2 ERIC CARLISLE, a/k/a "Pimpinassero,"

3 shall, pursuant to Title 18, United States Code, Section 924(d), forfeit to the United States any firearm
4 involve in or used in a violation of Title 18, United States Code, Section 924(c),as alleged in Counts
5 Five, Seven, Ten, and Twelve of this Second Superseding Indictment

6 55. If any of the forfeitable property, as a result of any act or omission of defendants,

7 a. cannot be located upon the exercise of due diligence;

8 b. has been transferred or sold to, or deposited with, a third party;

9 c. has been placed beyond the jurisdiction of the Court;

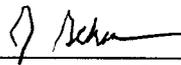
10 d. has been substantially diminished in value; or

11 e. has been commingled with other property which cannot be divided without difficulty;

12 any and all interests that defendants have in any other property (not to exceed the value of the above
13 described property) shall be forfeited to the United States.

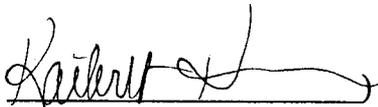
14
15 DATED: 3-18-14

A TRUE BILL.

16
17 
18 _____
FOREPERSON

19 MELINDA HAAG
United States Attorney

20 
21 _____
J. DOUGLAS WILSON
22 Chief, Criminal Division

23 (Approved as to form: 
24 _____
KATHRYN HAUN
25 KIMBERLY HOPKINS
Assistant U.S. Attorneys
26
27
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