UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CR 13 175

UNITED STATES OF AMERICA	:	
	:	CR. No. 13-
	:	In violation of
	:	18 U.S.C. § 371
V.	:	18 U.S.C. § 844(i)
	:	
NAKELE FREEMAN	:	

INFORMATION

The United States Attorney charges that:

COUNT ONE

18 U.S.C. § 371

From beginning at least as early as November 1, 2013 through on or about November 2, 2013, in the District of Rhode Island and elsewhere, defendant NAKELE FREEMAN, along with others known and unknown, did unlawfully, willfully and knowingly combine, conspire, confederate and agree with each other to:

maliciously damage and destroy by means of fire and explosive materials, the building at 31-33 Ida Street, Providence, Rhode Island, which building was used in and affecting interstate commerce, in violation of 18 U.S.C. § 844(i);

Overt Acts

In furtherance of the conspiracy and in order to accomplish its objectives and purposes, at least one of the following overt acts, among others, was committed by one or more of the co-conspirators in the District of Rhode Island and elsewhere:

1) On November 1, 2013 the defendant, Nakele FREEMAN, received instructions from another individual, known to FREEMAN, about the location of the keys to both the exterior door of 31-33 Ida Street and the third floor interior apartment door of that address. Thereafter, the defendant, Nakele FREEMAN travelled to a location in the City of Providence where he located and took possession of the keys to 31-33 Ida Street Providence, Rhode Island.
2) On November 1, 2013 the defendant, Nakele FREEMAN, travelled to the Family Dollar Store on Dexter Street in Pawtucket, Rhode Island, where, using his Santander Bank Debit card, he purchased two pairs of cloth gloves, a flashlight and a plastic bottle, all to use to carry out the contemplated destruction by fire of 31-33 Ida Street Providence, Rhode Island.
3) Later on November 1, 2013 the defendant, Nakele FREEMAN, travelled to the Benny's store on Branch Avenue in Providence, Rhode Island, where, using his Santander Bank Debit card, he purchased a red five gallon gas can to use

to carry gasoline to commit the contemplated destruction by fire of 31-33 Ida Street Providence, Rhode Island.

4) Later on November 1, 2013 the defendant, Nakele FREEMAN, travelled to the Stop & Shop Supermarket gas station located at 333 West River Street Providence, Rhode Island where, using his Santander Bank Debit card, he purchased gasoline, to commit the contemplated destruction by fire of 31-33 Ida Street Providence, Rhode Island.

5) During the early morning hours of November 2, 2013, the defendant, Nakele FREEMAN, entered the three story rental property located at 31-33 Ida Street, Providence, Rhode Island carrying among other items a five gallon plastic jug containing gasoline. After entering the third floor apartment at that address the defendant, Nakele FREEMAN, began to systematically splash the gasoline throughout the apartment, resulting in the gasoline igniting within the third floor apartment.

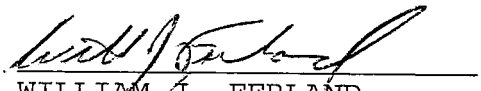
All in violation of 18 U.S.C. § 371.

COUNT 2

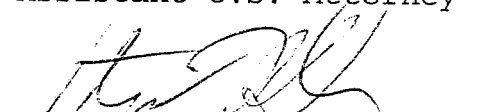
On or about the 2nd day of November 2013, in the District of Rhode Island, the defendant, NAKELE FREEMAN, maliciously damaged and destroyed and attempted to maliciously damage and destroy by means of fire and explosive materials, the building

at 31-33 Ida Street, Cranston, Rhode Island, which building was used in and affecting interstate commerce, in violation of 18 U.S.C. § 844(i).

PETER F. NERONHA
UNITED STATES ATTORNEY



WILLIAM J. FERLAND
Assistant U.S. Attorney



STEPHEN G. DAMBRUCH
Assistant U.S. Attorney
Criminal Chief