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DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

December 2012 Grand Jury

**13CR4510 JAH**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

- AARON DWAYNE PITTMAN (1),  
aka "Q-Tip", aka "Lil' Q-Tip",
- ALVIN BERNARD MITCHELL (2),  
aka "A.J.", aka "Juice",
- ROBERT BANKS III (3),  
aka "Pimpsey",
- HAKEEM TAYARI DUNN (4),  
aka "Hook",
- MARCUS ANTHONY STEVENSON (5),  
aka "OT", aka "Lil' OT",
- LABARRON CARNELL COKER (6),  
aka "L.B.",
- MALIK HASSAN KELLY (7)  
aka "Double D",
- HAROLD RANDOLPH MARTIN (8),  
aka "Dump", aka "Magic",  
aka "Goldie",
- ANTHONY DWAYNE EDMOND (9),  
aka "TY",
- TONY BROWN (10),  
aka "Lil' Play Doh",
- JAKARI DEANDREZ BLAKE (11),  
aka "Kari",
- DANTE LEVELL GRANT (12),  
aka "Stick Up",
- RONALD LEDON JACKSON (13),  
aka "Smac", aka "Hunnit",

Case No. \_\_\_\_\_

I N D I C T M E N T

Title 18, U.S.C., Sec. 1962(d) -  
Conspiracy to Conduct Enterprise  
Affairs Through A Pattern of  
Racketeering Activity; Title 18,  
U.S.C., Sec. 1963 - Criminal  
Forfeiture

1 JONATHAN DEVON PRICE (14),  
aka "Lil' TY",  
2 BRADLEY WEST REYNOLDS (15),  
aka "Lil' Goldie",  
3 AKILI LYNN COBB (16),  
aka "Cobb",  
4 ANTWON RUASON HOLLINGSWORTH (17),  
aka "Mack Twon",  
5 CHRISTOPHER MICHAEL WALL (18),  
aka "Mac Wall",  
6 EVERETT BURDETTE WILLIAMS (19),  
aka "Polo Flo", aka "Florida",  
7 MARCUS JOHN ANTHONY GRIFFIN (20),  
aka "Money Bagz",  
8 aka "Tiny Shoob",  
9 EDWARD REYNOLDS (21),  
aka "Mobbin' Ed",  
10 NICOLE LEE RICE (22),  
aka "Nikki",  
11 YASENIA ARMENTARO (23),  
NADINE DAVIS (24),  
12

13 Defendants.  
14

15 The grand jury charges:

16 Count 1

17 THE ENTERPRISE

18 1. At various times material to this Indictment:

19 a. Defendants AARON DWAYNE PITTMAN (1), aka "Q-Tip",  
20 aka "Lil' Q-Tip"; ALVIN BERNARD MITCHELL (2), aka "A.J.", aka "Juice";  
21 ROBERT BANKS III (3), aka "Pimpsy"; HAKEEM TAYARI DUNN (4),  
22 aka "Hook"; MARCUS ANTHONY STEVENSON (5), aka "OT", aka "Lil' OT";  
23 LABARRON CARNELL COKER (6), aka "L.B."; MALIK HASSAN KELLY (7),  
24 aka "Double D"; HAROLD RANDOLPH MARTIN (8), aka "Dump", aka "Magic",  
25 "Goldie"; ANTHONY DWAYNE EDMOND (9), aka "TY"; TONY BROWN (10),  
26 aka "Lil' Play Doh"; JAKARI DEANDREZ BLAKE (11), aka "Kari"; DANTE  
27 LEVELL GRANT (12), aka "Stick Up"; RONALD LEDON JACKSON (13),  
28 aka "Smac", aka "Hunnit"; JONATHAN DEVON PRICE (14), aka "Lil' TY";

1 BRADLEY WEST REYNOLDS (15), aka "Lil' Goldie"; AKILI LYNN COBB (16),  
2 aka "Cobb"; ANTWON RUASON HOLLINGSWORTH (17), aka "Mack Twon";  
3 CHRISTOPHER MICHAEL WALL (18), aka "Mac Wall"; EVERETT BURDETTE  
4 WILLIAMS (19), aka "Polo Flo", aka "Florida"; MARCUS JOHN ANTHONY  
5 GRIFFIN (20), aka "Money Bagz", aka "Tiny Shoob"; EDWARD REYNOLDS  
6 (21), aka "Mobbin' Ed"; NICOLE LEE RICE (22), aka "Nikki"; YASENIA  
7 ARMENTARO (23); and NADINE DAVIS (24) (collectively "Defendants"), and  
8 others known and unknown to the grand jury, were members, associates  
9 and facilitators of an organization known as the "Black MOB/Skanless"  
10 ("BMS").

11 The BMS organization was engaged in a variety of illegal  
12 activities, including but not limited to the prostitution of minor and  
13 adult females, murder, attempted murder, robbery, and narcotics  
14 trafficking. At all relevant times, the BMS operated in the Southern  
15 District of California and elsewhere. The organization and the  
16 individuals who associate with it for criminal purposes constituted an  
17 "enterprise," as defined by Title 18, United States Code,  
18 Section 1961(4) (hereinafter the "Enterprise"), that is, a group of  
19 individuals associated in fact. The Enterprise constituted an ongoing  
20 organization whose members functioned as a continuing unit for the  
21 common purpose of achieving the objectives of the Enterprise. The  
22 Enterprise was engaged in, and its activities affected, interstate and  
23 foreign commerce.

24 THE PURPOSE OF THE ENTERPRISE

25 2. The purposes of the Enterprise included, but are not limited  
26 to, the following:

27 a. Enriching the members and associates of the Enterprise  
28 through, among other things, recruiting and maintaining juvenile and

1 adult females to work as prostitutes; the illegal distribution of  
2 narcotics; committing robberies; and conducting other profit-driven  
3 illegal activities in San Diego County and elsewhere;

4           b. Maintaining control over illegal activities occurring  
5 in BMS "territory" within San Diego County, California, including  
6 keeping the public-at-large in fear of the Enterprise, and in fear of  
7 its members and associates through threats of violence and violence;

8           c. Preserving, protecting and expanding the power of the  
9 Enterprise through the use of intimidation, violence, threats of  
10 violence, assaults, and other violent crimes as well through rap music  
11 and social media.

12           BACKGROUND ON THE BMS AND THE ROLE OF THE DEFENDANTS WITHIN THE

13                           ENTERPRISE

14           3. The BMS is primarily comprised of African American gang  
15 members from two San Diego gang sets. Primary membership of the BMS  
16 comes from members of the "Black MOB" criminal street gang. Unlike  
17 traditional street gangs, this group does not claim "Crip" or "Blood"  
18 associations and tends to get along with members of both factions.  
19 Members of Black MOB make references to the term "the Blackness" and  
20 address one another as "Black."

21           4. Secondary membership of BMS comes from the "Skanless"  
22 criminal street gang. Members of Skanless tend to be older members or  
23 "big homies" within the Enterprise. Like Black MOB, Skanless does not  
24 claim "Crip" or "Blood" associations and tends to get along with  
25 members of both factions.

26           5. Many of the members and associates of the BMS are allied  
27 with members and associates of several other criminal street gangs  
28 including but not limited to the Neighborhood Crips (NHC), 5/9 Brims,

1 Lincoln Park, East San Diego (E.S.D.), West Coast Crips (W.C.C.) and  
2 Garden Boy Crips (G.B.C.). The BMS is comprised of several groups or  
3 cliques such as the "Nuttty Boys," "No FAB," and "Young Pimpin' Fuck a  
4 Bitch" aka "YP FAB." Members of the BMS, including its groups, come  
5 together for one common goal, which is to make money through criminal  
6 acts and to raise their status within the Enterprise.

7 6. There are several generations within the BMS, which provides  
8 a form of hierarchy where older generations teach and advise the  
9 younger generations. In all, BMS acts as a "family" where all members  
10 work together committing various criminal acts to make money and  
11 further support the Enterprise, which is sometimes referred to as  
12 "mobbin." Members of the BMS confer with each other on how best to  
13 conduct their criminal activities and assist each other with their  
14 criminal activity.

15 7. Black MOB activities began in San Diego in or about the  
16 early 1990s, which led to the gang's number being "190." In 1995,  
17 several members of Black MOB perpetrated the homicide of a pizza  
18 delivery man, which noted one of the first major offenses perpetrated  
19 by members of Black MOB.

20 8. Skanless also formed in or about the early 1990s.  
21 Skanless's gang number is "75."

22 9. The BMS claims the area of "North Park" San Diego. The  
23 boundaries of this area include approximately Interstate 8 to the  
24 North, Interstate 805 to the East, Highway 163 to the West, and Upas  
25 Street to the South. The BMS claims the North Park water tower  
26 located at 4200 Idaho Street as a symbol of their gang territory. The  
27 BMS primarily congregates at the North Park Recreation Center located  
28

1 at 4100 Idaho Street but is also known to congregate at Morley Field  
2 and Montclair Park in San Diego.

3 10. Members of the BMS use tattoos to identify themselves as  
4 members of Enterprise. These symbols include the North Park Water  
5 Tower, "MOB," "75" or the initials "NP" for "North Park." However,  
6 many members distinguish themselves by generation with tattoos such as  
7 the "Nutty Boy," which is a picture of a Planters' "Mr. Peanut"  
8 character. Other generations use "FAB" ("Fuck a Bitch") and  
9 "Skainless." Members of the BMS also identify themselves by displaying  
10 hand signs representing their membership. Some of these hand signs  
11 include displaying an "MOB," "SK," or "YP." Enterprise members  
12 generally wear the color black for "Black MOB" or brown for  
13 "Skainless."

14 11. Many members of the BMS claim to be "rappers" and produce  
15 rap music and rap videos. This music raises the Enterprise's status  
16 making it a symbol of success and power within the community, thus  
17 assisting in recruitment of other members of the Enterprise and  
18 victims of prostitution. Members of the BMS have created various rap  
19 groups and support each other in the promotion of their music. The  
20 lyrics of the Enterprise's music primarily focus on pimping activity  
21 and narcotics related activity in San Diego County and across the  
22 country. The lyrics also frequently contain mentions of the gang  
23 lifestyle and their respective gang sets.

24 12. BMS has no set procedure to join the Enterprise. Some  
25 members have joined due to their family connection or geographical  
26 location. Some members have been "jumped in" which requires a new  
27 member to be physically beaten by senior, established members of the  
28 gang and demonstrate resilience during the beating. Other members

1 have been able to join due to their contribution to the Enterprise,  
2 such as selling drugs, obtaining guns, selling and receiving stolen  
3 property, or "putting in work," which includes other illegal  
4 activities.

5 13. The BMS puts much of its profit-driven Enterprise focus on  
6 prostituting adult and juvenile females throughout San Diego County  
7 and the United States:

8 a. Members and associates of the Enterprise acted as  
9 "pimps" (a person who befriends, recruits, trains and/or panders a  
10 person for prostitution) and "bottoms" (a pimp's most trusted/senior  
11 prostitute) to promote and manage prostitution activities in San Diego  
12 County, California, and elsewhere. Other coconspirators facilitated  
13 the Enterprise's prostitution activities, assisting Enterprise members  
14 and associates in "pimping out" the adult and juvenile prostitutes.  
15 Gang-controlled prostitution spawned a "pimping" subculture, known as  
16 "The Game," with its own set of rules.

17 b. The BMS Enterprise adheres to the rules of "The Game,"  
18 which a pimp would teach to any female he was about to "turn out" or  
19 begin prostituting. Prostitutes were expected to maintain absolute  
20 loyalty to their pimp, and in fact are often considered the property  
21 of the pimp. Prostitutes were not permitted to speak with or even  
22 look at other pimps, and may be traded or sold among the pimps. Other  
23 pimps were permitted to encourage a prostitute to work for him, and  
24 she was allowed to select, or "choose up," to a new pimp, though  
25 generally she must pay a "choose up fee" to her new pimp for the  
26 privilege. The new pimp then informed the old pimp that the  
27 prostitute had decided to leave. Long-term prostitutes frequently  
28 obtained tattoos, or other branding, featuring the gang moniker of

1 their pimps. The rules of "The Game" also included instructions  
2 related to interactions with other prostitutes ("wifey's" or "wifey's-  
3 in-law"), and interactions with prostitution clients ("johns" or  
4 "tricks").

5 c. A prostitute was expected to provide her pimp with the  
6 money earned through her prostitution activities. In exchange, the  
7 prostitute received protection, clothing, housing, cars, and food from  
8 her pimp. Prostitutes who attempted to carry out their business  
9 without a pimp, known as "renegading," or prostitutes who were  
10 suspected of cooperating with law enforcement investigations may be  
11 subject to punishment by the Enterprise and were labeled as "snitches"  
12 by the Enterprise. This labeling was to encourage physical punishment  
13 to these females. Enterprise members jointly enforced the rules of  
14 "The Game" on prostitutes who were ignoring the rules, or "out-of-  
15 pocket." This would typically be done through violence or threats of  
16 violence. Pimps known for controlling their prostitutes through force  
17 were considered "gorilla pimps," while those who convinced their  
18 prostitutes to abide by the rules without violence are "finesse  
19 pimps." "Finesse Pimps" usually use fraud, coercion, and emotional  
20 manipulation to get their prostitutes to follow their rules.

21 d. Enterprise members and associates cooperated to promote  
22 the prostitution activities of the Enterprise, primarily in and around  
23 low-cost motels in Rancho Bernardo, North County and Mission Valley,  
24 California.

25 e. Members frequently pooled resources to further the  
26 prostitution activities of the Enterprise by, for instance, sharing  
27 vehicles used to transport prostitutes, computers used to post  
28 advertisements, and motel rooms in which the "dates" occur.

1 Enterprise members also worked together to monitor law enforcement and  
2 monitor other pimps' girls. Enterprise members and associates  
3 traveled together to prostitute females in other states.

4 f. Enterprise members and associates also worked together  
5 to recruit new prostitutes. Recruitment efforts generally focused on  
6 vulnerable females, particularly those from a broken home or runaways.  
7 Both pimps and their "bottoms" recruited new prostitutes. To "turn  
8 out" or initiate a new prostitute, pimps and bottoms utilized various  
9 methods to manipulate the woman, including false promises of a  
10 luxurious lifestyle, intimidation, and actual or threatened violence.  
11 Pimps regularly furnished drugs and alcohol to lower the recruited  
12 prostitute's inhibitions and increase her productivity.

13 14. At various times material to this Indictment, the defendants  
14 had the following roles in the Enterprise.

15 a. BMS Enterprise Members: Defendants AARON DWAYNE PITTMAN  
16 (1), aka "Q-Tip", aka "Lil' Q-Tip"; ALVIN BERNARD MITCHELL (2),  
17 aka "A.J.", aka "Juice"; ROBERT BANKS III (3), aka "Pimpsy"; HAKEEM  
18 TAYARI DUNN (4), aka "Hook"; MARCUS ANTHONY STEVENSON (5), aka "OT",  
19 aka "Lil' OT"; LABARRON CARNELL COKER (6), aka "L.B."; MALIK HASSAN  
20 KELLY (7), aka "Double D"; HAROLD RANDOLPH MARTIN (8), aka "Dump",  
21 aka "Magic", aka "Goldie"; ANTHONY DWAYNE EDMOND (9), aka "TY"; TONY  
22 BROWN (10), aka "Lil' Play Doh"; JAKARI DEANDREZ BLAKE (11),  
23 aka "Kari"; DANTE LEVELL GRANT (12), aka "Stick Up"; RONALD LEDON  
24 JACKSON (13), aka "Smac", aka "Hunnit"; JONATHAN DEVON PRICE (14),  
25 aka "Lil' TY"; BRADLEY WEST REYNOLDS (15), aka "Lil' Goldie"; AKILI  
26 LYNN COBB (16), aka "Cobb"; ANTWON RUASON HOLLINGSWORTH (17),  
27 aka "Mack Twon"; CHRISTOPHER MICHAEL WALL (18), aka "Mac Wall";  
28 EVERETT BURDETTE WILLIAMS (19), aka "Polo Flo", aka "Florida"; MARCUS

1 JOHN ANTHONY GRIFFIN (20), aka "Money Bagz", aka "Tiny Shoob"; EDWARD  
2 REYNOLDS (21), aka "Mobbin' Ed" were members of BMS Enterprise. Each  
3 BMS member may be a "Big Homie" or "Lil' Homie" within the Enterprise.  
4 Members were expected to "hustle" on behalf of the Enterprise, with  
5 their efforts focused upon a variety of profit-making illegal  
6 activity, including drug trafficking, robberies, extortion and, in  
7 recent years, the prostitution of juvenile and adult females. To  
8 protect and expand these illegal ventures, members defend Enterprise  
9 territory against competing gangs, cooperate to detect and avoid law  
10 enforcement, and intimidate members of the community.

11 b. BMS Enterprise Associates: Defendants NICOLE LEE RICE  
12 (22), aka "Nikki"; YASENIA ARMENTARO (23); and NADINE DAVIS (24) were  
13 associates of the BMS Enterprise. Associates - all of whom are  
14 "bottoms" or "bottom bitches" for a pimp member of the Enterprise -  
15 assisted the pimp - members in recruiting and training other females  
16 to work as prostitutes, and provide logistical support like computers,  
17 online accounts and pre-paid credit cards for the new prostitutes and  
18 other pimps.

19 **THE MEANS AND METHODS OF THE ENTERPRISE**

20 15. Defendants and their coconspirators and associates used the  
21 following methods and means, among others, to conduct and participate  
22 in the conduct of the affairs of the Enterprise:

23 a. Defendants used the Enterprise to promote and expand  
24 their prostitution of juvenile and adult females. BMS Enterprise  
25 members used their status and reputation as gang members to further  
26 the Enterprise's illegal prostitution activities.

27 b. Members and associates of the Enterprise, acting as  
28 pimps, bottoms, and other coconspirators, solicited, enticed, coerced

1 and persuaded adult and juvenile females from various locations where  
2 minors congregate, to work for them as prostitutes. Members of the  
3 Enterprise also conducted online recruitment through social networking  
4 websites like Instagram, Facebook, and Twitter, as well as through  
5 other previously recruited prostitutes.

6 c. Members of the enterprise, acting as pimps and bottoms,  
7 instructed prostitutes on the "rules of the game," which are rules  
8 that prostitutes are expected to obey without question.

9 d. Members of the Enterprise, acting as pimps, controlled  
10 their females, and punished them if they broke the rules set by the  
11 pimp. Punishment included physical beatings, verbal lashings and  
12 other humiliating acts towards the prostitute.

13 e. Members of the Enterprise, acting as pimps, sold,  
14 traded or "gifted" prostitutes to other pimps, and such gifted  
15 prostitutes were forced to work for the receiving pimp.

16 f. Members of the Enterprise, acting as pimps, transported  
17 female prostitutes to various locations in San Diego County and  
18 elsewhere in the United States, including known areas of prostitution  
19 (called "tracks" or "blades"), private residences, hotels and motels  
20 that would facilitate such activity and places and events with large  
21 customer base such as professional sporting events.

22 g. Members of the Enterprise, acting as pimps, transported  
23 their female prostitutes across state lines, to states including, but  
24 not limited to: Alaska, Nevada, Arizona, Hawaii, Colorado, Texas, New  
25 Jersey, New York, Washington D.C., Idaho, Illinois, Pennsylvania,  
26 Colorado, Utah, Washington, Florida, Virginia, and Kansas.

27 h. Members of the Enterprise, acting as pimps, bottoms and  
28 coconspirators, provided logistical support for each other, including

1 but not limited to renting motel rooms for one another, transporting  
2 prostitutes for each other, sharing computers, data, mobile internet  
3 connections, online accounts (like Backpage.com) and prepaid credit  
4 cards to post prostitution ads.

5 i. Members of the Enterprise also shared prostitution  
6 intelligence such as what areas to work and what websites will  
7 generate the most business.

8 j. Members of the Enterprise, acting as pimps, directed  
9 adult and juvenile prostitutes working for them to rent hotel and  
10 motel rooms to use as temporary residences for the pimps and  
11 prostitutes as well as to commit acts of prostitution.

12 k. Members of the Enterprise, acting as pimps, provided  
13 to, and directed others to provide for, their prostitutes specific  
14 items to further their prostitution activity, including cellular  
15 telephones, laptop computers, wireless internet connections, prepaid  
16 credit cards and condoms.

17 l. Members of the Enterprise, acting as pimps, directed  
18 adult and juvenile females working for them to have sex with clients  
19 for money, and then required the females to provide the money earned  
20 to the pimp.

21 m. Members of the Enterprise, acting as pimps, threatened  
22 and used force to coerce the females working as prostitutes into being  
23 compliant, to protect the monies they received from prostitutes, and  
24 to protect and to expand their territory to work prostitution.

25 n. Members of the Enterprise, acting as pimps, provided  
26 controlled substances, as well as alcohol, to the females working as  
27 prostitutes, to manipulate their loyalty and increase productivity.

1 o. Members and associates of the Enterprise committed  
2 robberies to generate income.

3 p. Members and associates of the Enterprise engaged in the  
4 trafficking of controlled substances to generate income.

5 q. Members of the Enterprise committed, attempted to  
6 commit, and threatened to commit acts of violence to protect and  
7 expand the Enterprise's criminal operation, and to intimidate the  
8 general public. These acts included murder, attempted murder,  
9 assaults, intimidation, and threats of violence directed against rival  
10 gang members, members of law enforcement, and witnesses in criminal  
11 cases.

12 THE RACKETEERING CONSPIRACY

13 16. Beginning in or about 1995, and continuing up to and  
14 including the present, within the Southern District of California and  
15 elsewhere, defendants AARON DWAYNE PITTMAN (1), aka "Q-Tip", aka "Lil'  
16 Q-Tip"; ALVIN BERNARD MITCHELL (2), aka "A.J.", aka "Juice"; ROBERT  
17 BANKS III (3), aka "Pimpsy"; HAKEEM TAYARI DUNN (4), aka "Hook";  
18 MARCUS ANTHONY STEVENSON (5), aka "OT", aka "Lil' OT"; LABARRON  
19 CARNELL COKER (6), aka "L.B."; MALIK HASSAN KELLY (7), aka "Double D";  
20 HAROLD RANDOLPH MARTIN (8), aka "Dump", aka "Magic", aka "Goldie";  
21 ANTHONY DWAYNE EDMOND (9), aka "TY"; TONY BROWN (10), aka "Lil' Play  
22 Doh"; JAKARI DEANDREZ BLAKE (11), aka "Kari"; DANTE LEVELL GRANT (12),  
23 aka "Stick Up"; RONALD LEDON JACKSON (13), aka "Smac", aka "Hunnit";  
24 JONATHAN DEVON PRICE (14), aka "Lil' TY"; BRADLEY WEST REYNOLDS (15),  
25 aka "Lil' Goldie"; AKILI LYNN COBB (16), aka "Cobb"; ANTWON RUASON  
26 HOLLINGSWORTH (17), aka "Mack Twon"; CHRISTOPHER MICHAEL WALL (18),  
27 aka "Mac Wall"; EVERETT BURDETTE WILLIAMS (19), aka "Polo Flo",  
28 aka "Florida"; MARCUS JOHN ANTHONY GRIFFIN (20), aka "Money Bagz",

1 aka "Tiny Shoob"; EDWARD REYNOLDS (21), aka "Mobbin' Ed"; NICOLE LEE  
2 RICE (22), aka "Nikki"; YASENIA ARMENTARO (23); and NADINE DAVIS (24)  
3 and others known and unknown to the grand jury, being persons employed  
4 and associated with the Enterprise (as defined above), which  
5 Enterprise was engaged in, and the activities of which affected,  
6 interstate and foreign commerce, did knowingly and intentionally  
7 conspire with each other, and with other persons, to violate Title 18,  
8 United States Code, Section 1962(c), that is, to conduct and  
9 participate, directly and indirectly, in the conduct of the  
10 Enterprise's affairs through a pattern of racketeering activity  
11 involving multiple acts chargeable under the following provisions  
12 under State law and punishable by imprisonment for more than one year:

13 a. Acts and threats involving murder in violation of  
14 California Penal Code, Sections 182, 187, 422 and 664;

15 b. Acts involving kidnapping in violation of California  
16 Penal Code Sections 182, 207(a), 664;

17 c. Acts involving robbery in violation of California Penal  
18 Code, Sections 182, 211, 212.5, 664;

19 d. Acts involving drug trafficking in violation of  
20 California Health and Safety Code, Sections 11351.5, 11352, 11359,  
21 11360, 11378, 11379;

22 and multiple acts indictable under the following provisions of federal  
23 law:

24 e. Title 18, United States Code, Section 1591 (sex  
25 trafficking of children or by force, fraud, and  
26 coercion);  
27  
28

1 f. Title 18, United States Code, Section 1952 (interstate  
2 and foreign travel or transportation in aid of  
3 racketeering);

4 g. Title 18, United States Code, Section 1956 (money  
5 laundering);

6 h. Title 18, United States Code, 2421 (Mann Act)

7 i. Title 18, United States Code, Section 2423  
8 (transportation of minors);

9 and multiple acts involving distribution of narcotics in violation of:

10 j. Title 21, United States Code, Sections 841(a) and 846  
11 (Possession of controlled substance for distribution)

12 17. It was a further part of the conspiracy that each defendant  
13 agreed that a conspirator would commit at least two acts of  
14 racketeering activity in the conduct of the affairs of the Enterprise.

15 OVERT ACTS

16 18. In furtherance of the conspiracy and to accomplish the  
17 objects of the conspiracy, the defendants and their co-conspirators  
18 committed the following overt acts, among others, in San Diego County,  
19 within the Southern District of California, unless otherwise  
20 specified, on or about the dates set forth below:

21 (1) On or about January 21, 1995, three unindicted  
22 coconspirators and defendant HAKEEM TAYARI DUNN, killed T.K.  
23 in the North Park area of San Diego, California.

24 (2) On or about March 10, 2000, defendants TONY BROWN, MALIK  
25 HASSAN KELLY, and an unindicted conspirator sold cocaine  
26 base to an undercover detective in San Diego, California.

27 (3) On or about August 12, 2000, defendants TONY BROWN and  
28 ROBERT BANKS III transported 16 year old minor female

1 ("MF" 1) from San Diego, California to Las Vegas, Nevada for  
2 the purpose of prostitution.

3 (4) On March 31, 2001, defendants ROBERT BANKS III and TONY  
4 BROWN transported three minor females (MF9, MF10, MF11) from  
5 San Diego to Los Angeles, California for prostitution.

6 (5) On or about October 16, 2002, defendants ALVIN BERNARD  
7 MITCHELL and HAROLD RANDOLPH MARTIN transported by vehicle,  
8 a 15 year old girl, MF8, and an adult female ("AF" #42),  
9 from California to Las Vegas, Nevada for the purpose of  
10 prostituting the females.

11 (6) On, about and between June 2004-January 22, 2007, defendant  
12 HAKEEM TAYARI DUNN recruited and maintained MF5 for  
13 prostitution in San Diego, California.

14 (7) On or about September 28, 2004, defendant LABARRON CARNELL  
15 COKER transported 700 grams of marijuana in San Diego,  
16 California.

17 (8) On or about December 8, 2004, defendant BRADLEY WEST  
18 REYNOLDS and an unindicted coconspirator attempted to rob  
19 property belonging to an adult male near 3900 Idaho Street,  
20 near the North Park Recreation Center, San Diego.

21 (9) On or about March 4, 2005, defendants MALIK HASSAN KELLY,  
22 LABARRON CARNELL COKER, TONY BROWN and an unindicted  
23 conspirator were associating which one another on El Cajon  
24 Boulevard, San Diego, California.

25 (10) On or about June 2, 2005, defendant EDWARD REYNOLDS  
26 possessed approximately 53.9 grams of marijuana for the  
27 purpose of distribution.  
28

- 1 (11) On or about July 17, 2005, defendant LABARRON CARNELL COKER  
2 possessed with intent to sell marijuana in San Diego,  
3 California.
- 4 (12) On or about October 31, 2005, defendants ANTHONY DWAYNE  
5 EDMOND and EDWARD REYNOLDS were in a vehicle together in  
6 San Diego, California where EDWARD REYNOLDS possessed  
7 approximately 39.8 grams of marijuana for the purpose of  
8 distribution.
- 9 (13) On or about November 22, 2006, defendant RONALD LEDON  
10 JACKSON kidnapped AF22 at the El Pollo Loco Restaurant  
11 located at 5415 El Cajon Boulevard in San Diego, California.
- 12 (14) On or about December 1, 2006, defendant TONY BROWN attempted  
13 to entice AF11 to get into his vehicle by offering her  
14 marijuana and money near 3700 El Cajon Boulevard, San Diego,  
15 California.
- 16 (15) On or about March 31, 2007, defendant BRADLEY WEST REYNOLDS  
17 used a firearm to rob a cell phone from R.C. on 34th Avenue  
18 in San Diego, California.
- 19 (16) On or about May 24, 2007, defendant EVERETT BURDETE  
20 WILLIAMS took by force a purse from A.L. in San Diego,  
21 California.
- 22 (17) On or about June 10, 2007, defendant AKILI LYNN COBB  
23 possessed and transported 911 grams of marijuana in a  
24 vehicle in San Diego, California.
- 25 (18) On or about June 18, 2007, defendant EDWARD REYNOLDS and an  
26 unindicted coconspirator robbed W.R. of his cell phone using  
27 force and fear in San Diego, California.
- 28

- 1 (19) On or about June 21, 2007, defendant HAROLD RANDOLPH MARTIN  
2 possessed with intent to distribute 96 tablets of ecstasy  
3 near 4400 Texas Street, San Diego, California.
- 4 (20) On or about October 26, 2007, defendant EDWARD REYNOLDS  
5 kidnapped AF41, and transported her in a vehicle while  
6 physically beating her in San Diego, California.
- 7 (21) On or about October 27, 2007, defendant LABARRON CARNELL  
8 COKER possessed 5 pills, which later tested positive for  
9 MDMA and Methamphetamine.
- 10 (22) On or about November 27, 2007, defendant RONALD LEDON  
11 JACKSON assaulted AF4 in La Mesa, California.
- 12 (23) On or about December 31, 2007, defendant ALVIN BERNARD  
13 MITCHELL transported an adult female, AF30, from Nevada to  
14 Scottsdale, Arizona for the purpose of prostitution.
- 15 (24) In or about January 2008, defendant ALVIN BERNARD MITCHELL  
16 transported an adult female, AF37, from in Las Vegas,  
17 Nevada, to California, for the purpose of prostitution.
- 18 (25) On or about February 27, 2008, defendant AARON DWAYNE  
19 PITTMAN took AF43's purse by force and fear at 3328 Daley  
20 Center Drive, San Diego.
- 21 (26) On or about April 2, 2008, defendant ALVIN BERNARD MITCHELL  
22 transported an adult female, AF30, from Nevada to Santa  
23 Barbara, California for the purpose of prostitution.
- 24 (27) In or about May 2008, defendant ALVIN BERNARD MITCHELL  
25 recruited an adult female, AF26, in Las Vegas, Nevada, to  
26 engage in prostitution and taught her the rules of the  
27 "game."  
28

- 1 (28) On or about May 25, 2008, defendants ANTWON RUASON  
2 HOLLINGSWORTH and BRADLEY WEST REYNOLDS were together at the  
3 North Park Recreation Center where REYNOLDS told an officer  
4 that it was "his park."
- 5 (29) On or about July 12, 2008, defendant EVERETT BURDETTE  
6 WILLIAMS possessed a flare gun as a concealed weapon.
- 7 (30) On or about September 26, 2008, defendants MARCUS JOHN  
8 ANTHONY GRIFFIN, ANTHONY DWAYNE EDMOND, and MARCUS ANTHONY  
9 STEVENSON were contacted in the North Park area of San  
10 Diego, California and referred to each other as "black."
- 11 (31) On, in, or about October 2008, defendant MALIK HASSAN KELLY  
12 transported an adult female, AF33, to El Cajon Boulevard and  
13 had her work as a prostitute for him under fear of force and  
14 violence.
- 15 (32) On or about October 7, 2008, defendant JAKARI DEANDREZ BLAKE  
16 provided a cell phone to an adult female, AF34, for the  
17 purpose of promoting prostitution while she was in Kansas,  
18 having traveled from San Diego, California.
- 19 (33) On or about April 1, 2009, defendant MALIK HASSAN KELLY  
20 physically assaulted an adult female, AF2, to cause her to  
21 engage in prostitution.
- 22 (34) On or about June 17, 2009, defendant HAROLD RANDOLPH MARTIN  
23 took by force and fear \$180.00 from M.R. in Vista,  
24 California.
- 25 (35) On or about and between July 2009 and October 19, 2009,  
26 defendant HAROLD RANDOLPH MARTIN caused an adult female,  
27 AF1, to work as a prostitute by force and fear.  
28

- 1 (36) On or about September 16, 2009, defendant NICOLE LEE RICE  
2 advertised for prostitution on Craigslist in San Diego.
- 3 (37) On or about December 4, 2009, defendant DANTE LEVELL GRANT  
4 along with two un-indicted coconspirators took property from  
5 E.S.M. in San Diego, California.
- 6 (38) On or about December 26, 2009, defendant MARCUS ANTHONY  
7 STEVENSON attempted to murder AF28 after he forced entry  
8 into her apartment, prohibited her from leaving the  
9 apartment, and choked her until she lost consciousness.
- 10 (39) In or about March 2010, defendant MARCUS JOHN ANTHONY  
11 GRIFFIN "turned out" AF16 in San Diego, California.
- 12 (40) On or about March 7, 2010, defendants ANTHONY DWAYNE EDMOND  
13 and CHRISTOPHER MICHAEL WALL were contacted together at  
14 North Park Recreation Center wearing "F.A.B." on clothing.
- 15 (41) On or about July 29, 2010, defendant JAKARI DEANDREZ BLAKE  
16 received approximately \$1,100 of prostitution proceeds from  
17 AF34 via Western Union from San Antonio, Texas, to San  
18 Diego, California.
- 19 (42) On or about August 24, 2010, defendant HAKEEM TAYARI DUNN  
20 threatened to physically harm and shoot K.O. and E.F. for  
21 their security company's cooperation with police in the  
22 arrest of unindicted coconspirator.
- 23 (43) On or about August 28, 2010, defendants LABARRON CARNELL  
24 COKER and ANTHONY DWAYNE EDMOND supervised and maintained  
25 AF3 to work as a prostitute in Santa Ana, California.
- 26 (44) On or about October 30, 2010, defendants CHRISTOPHER MICHAEL  
27 WALL and ANTHONY DWAYNE EDMOND were with AF29 and AF31 at  
28 the Premier Inn, 2484 Hotel Circle Place, San Diego,

1 California where WALL furnished AF29 with Ecstasy, a  
2 controlled substance.

3 (45) On or about November 6, 2010, defendant ANTWON RUASON  
4 HOLLINGSWORTH transported AF46 and AF47 to conduct  
5 prostitution acts in Oceanside, California.

6 (46) On or about December 22 and 30, 2010, AF25 sent two wire  
7 transfers to defendant ANTWON RUASON HOLLINGSWORTH via  
8 Western Union totaling \$1,000.00 from prostitution proceeds.

9 (47) Sometime in 2011, in San Diego, California, defendant RONALD  
10 LEDON JACKSON sold seven (7) Vicodin pills, a controlled  
11 substance, to AF40.

12 (48) On or about January 23, 2011, a picture was posted to  
13 defendant EVERETT BURDETTE WILLIAMS' Facebook account  
14 depicting him and defendant CHRISTOPHER MICHAEL WALL  
15 displaying the Black MOB gang hand sign, and WILLIAMS is  
16 shown wearing a "North Park" sweatshirt.

17 (49) On or about January 28, 2011, defendant EVERETT BURDETTE  
18 WILLIAMS posted a picture to his Facebook account showing  
19 him with defendants CHRISTOPHER MICHAEL WALL and EDWARD  
20 REYNOLDS congregating with each other at a park he refers to  
21 as "YP Park."

22 (50) On or about February 9, 2011, defendant EVERETT BURDETTE  
23 WILLIAMS stated he was part of the Black MOB criminal street  
24 gang while on Idaho and El Cajon Boulevard.

25 (51) On or about February 11, 2011, defendants EVERETT BURDETTE  
26 WILLIAMS and EDWARD REYNOLDS were together in an area known  
27 for street prostitution, located at 4200 Wilson Avenue, San  
28 Diego, California.

1 (52) On or about February 28, 2011, defendant EVERETT BURDETTE  
2 WILLIAMS posted a picture to his Facebook account of him and  
3 defendant EDWARD REYNOLDS while REYNOLDS is displaying a  
4 Black MOB gang hand sign.

5 (53) On or about April 20, 2011, defendant DANTE LEVELL GRANT  
6 posted a comment on Facebook offering marijuana to others.

7 (54) On or about May 5, 2011, defendants CHRISTOPHER MICHAEL WALL  
8 and EVERETT BURDETTE WILLIAMS were interviewed in a recorded  
9 video about pimping in North Park, San Diego, California.

10 (55) On or about May 11, 2011, defendants RONALD LEDON JACKSON,  
11 CHRISTOPHER MICHAEL WALL and EVERETT BURDETTE WILLIAMS  
12 appeared in a You Tube video uploaded to the internet called  
13 "Have to Sho" where JACKSON and WALL rap about pimping and  
14 gang activity.

15 (56) On or about June 3, 2011, defendants RONALD LEDON JACKSON  
16 and MARCUS JOHN ANTHONY GRIFFIN appeared in a You Tube video  
17 uploaded to the internet called "Shot a Movie" where JACKSON  
18 and GRIFFIN rap about pimping and show several females who  
19 they claimed were their "bitches."

20 (57) On or about October 10, 2011, defendant EVERETT BURDETTE  
21 WILLIAMS posted a picture to his Facebook account of a large  
22 amount of cash on a laptop computer with comments including  
23 "Band Clan", "#FAB" and "Bitch you ain't payin me so fuck  
24 you don't talk to me."

25 (58) On or about December 6, 2011, defendant RONALD LEDON JACKSON  
26 used force and fear towards AF40 to have her engage in  
27 prostitution.  
28

- 1 (59) On or about December 30, 2011, defendant EVERETT BURDETTE  
2 WILLIAMS provided and maintained a 16 year old female, MF2,  
3 as a prostitute in San Diego, California.
- 4 (60) On or about February 4, 2012, defendant JONATHAN DEVON PRICE  
5 traveled from San Diego, California to El Paso, Texas and  
6 rented a room for AF6 and AF10 for the purpose of  
7 prostitution.
- 8 (61) On or about February 8, 2012, defendant AARON DWAYNE PITTMAN  
9 arranged for defendant NICOLE LEE RICE to fly from Phoenix,  
10 Arizona to Orlando, Florida for the purpose of committing  
11 prostitution.
- 12 (62) On or about February 14-15, 2012, defendant CHRISTOPHER  
13 MICHAEL WALL transported AF35 from San Diego to Denver,  
14 Colorado for the purpose of prostitution.
- 15 (63) On or about February 28, 2012, defendant JONATHAN DEVON  
16 PRICE arranged for AF10 to travel to El Paso, Texas from San  
17 Diego, California for the purpose of prostitution.
- 18 (64) On or about February 28, 2012, defendant RONALD LEDON  
19 JACKSON appeared in a You Tube video uploaded to the  
20 internet called, "This Way" where JACKSON raps about pimping  
21 and states he is a "pimp too."
- 22 (65) In or about and between March 2012 to September 2012,  
23 defendant BRADLEY WEST REYNOLDS maintained AF20 for the  
24 purpose of prostitution.
- 25 (66) On or about March 23, 2012, defendant AARON DWAYNE PITTMAN  
26 supervised AF15 to engage in prostitution in Old Town San  
27 Diego, California.
- 28

1 (67) On or about March 29, 2012, defendant JONATHAN DEVON PRICE  
2 transported AF6 to the Marriott Hotel in San Diego,  
3 California for the purpose of prostitution.

4 (68) On or about April 6, 2012, defendant AARON DWAYNE PITTMAN  
5 supervised AF15 in prostitution while she was working as a  
6 prostitute at the La Quinta Inn and Suites in San Diego,  
7 California.

8 (69) On or about April 8, 2012, defendant AARON DWAYNE PITTMAN  
9 posted a photograph to his Facebook page depicting defendant  
10 NICOLE LEE RICE and AF15 with the caption of "Team Tip."

11 (70) On or about April 24, 2012, defendant LABARRON CARNELL COKER  
12 took pictures of AF39, posted her an advertisement on  
13 Backpage.com and directed her to rent a hotel room at the  
14 Premiere Inn in San Diego, California to engage in  
15 prostitution acts.

16 (71) On or about April 28, 2012, defendant RONALD LEDON JACKSON  
17 and AF4 were staying in Room 253 at the Atrium Hotel in  
18 Irvine, California for the purposes of prostitution, where  
19 JACKSON assaulted AF4 and jumped off of the second floor  
20 balcony when police arrived to the hotel room.

21 (72) In or about May 2012, defendants ANTHONY DWAYNE EDMOND and  
22 ANTWON RUASON HOLLINGSWORTH texted one another about  
23 locating areas in Jacksonville, Florida profitable for  
24 prostitution.

25 (73) Sometime between May 2012 and November 2012, defendant AKILI  
26 LYNN COBB directed AF39 to travel to Las Vegas, Nevada from  
27 San Diego, California for the purpose of prostitution.  
28

1 (74) On or about June 12, 2012, defendants EVERETT BURDETTE  
2 WILLIAMS and NADINE DAVIS traveled from San Diego to Denver,  
3 Colorado via Phoenix, Arizona for the purpose of  
4 prostitution.

5 (75) On or about June 15, 2012, defendant TONY BROWN had a  
6 picture of the North Park water tower posted to his Facebook  
7 profile with a comment stating, "#OGTOWERBOY," a nickname  
8 for an "Original Gangster" North Park gang member.

9 (76) On or about and between June 27-July 8, 2012, defendant  
10 ANTHONY DWAYNE EDMOND received approximately \$3,000 from  
11 AF23 via Money Gram money transfers from New York and New  
12 Jersey to San Diego while AF23 was traveling across the  
13 country for prostitution purposes.

14 (77) On or about July 8, 2012, defendant EVERETT BURDETTE  
15 WILLIAMS posted a picture to his Facebook account of him,  
16 defendant NADINE DAVIS, and AF12 in a vehicle together where  
17 WILLIAMS is displaying the "YP FAB" hand sign and comments  
18 "The driver bitch mine too bro. Yeah Flo got the bitch bro."

19 (78) On or about July 12, 2012, defendant CHRISTOPHER MICHAEL  
20 WALL and AF35 travelled from Long Beach, California to  
21 Anchorage, Alaska for the purpose of prostitution.

22 (79) On or about July 15, 2012, defendants HAKEEM TAYARI DUNN and  
23 DANTE LEVELL GRANT and an unindicted coconspirator assaulted  
24 a 15 year old girl, MF3, who was working as a prostitute for  
25 GRANT in San Diego, California.

26 (80) On, in, or about August and September of 2012, defendant  
27 ANTWON RUASON HOLLINGSWORTH received Promethazine Codeine on  
28

1 at least five occasions and offered to sell the controlled  
2 substance to several customers via text messages.

3 (81) On, in, or about September 2012 to December 2012, defendant  
4 BRADLEY WEST REYNOLDS maintained AF7 for the purpose of  
5 prostitution.

6 (82) On or about September 8, 2012, defendant ANTWON RUASON  
7 HOLLINGSWORTH sold marijuana in San Diego, California.

8 (83) On or about September 8, 2012, defendant ANTWON RUASON  
9 HOLLINGSWORTH had tattoos of the YP FAB gang sign, FAB and  
10 MOB.

11 (84) On or about September 12, 2012, defendant NADINE DAVIS  
12 rented a hotel room in Los Angeles for the purpose of the  
13 prostitution of AF12.

14 (85) On or about and between September 21-24, 2012, defendants  
15 AARON DWAYNE PITTMAN, NICOLE LEE RICE, and YASENIA ARMENTERO  
16 traveled from San Diego, California to Honolulu, Hawaii via  
17 LAX for the purposes of prostitution.

18 (86) On or about September 29, 2012, defendants AARON DWAYNE  
19 PITTMAN, NICOLE LEE RICE, and YASENIA ARMENTERO were  
20 associating with one another at the La Quinta Inn and  
21 Suites, San Diego, California.

22 (87) On or about October 23, 2012, defendant AARON DWAYNE PITTMAN  
23 traveled with defendant YASENIA ARMENTERO from San Diego to  
24 Tempe, Arizona for the purpose of her to engage in  
25 prostitution.

26 (88) On or about October 23, 2012, defendants EVERETT BURDETTE  
27 WILLIAMS and NADINE DAVIS traveled from San Diego,  
28

1 California to Honolulu, Hawaii for the purpose of  
2 prostitution.

3 (89) From in or about and between November 2012 to February 2013,  
4 defendant AKILI LYNN COBB while in custody at a San Diego  
5 jail directed and encouraged AF39's prostitution.

6 (90) On or about November 2, 2012, defendant EVERETT BURDETTE  
7 WILLIAMS posted a picture to his Facebook account of himself  
8 under a "North Park" sign while he displayed the "YP FAB"  
9 gang hand sign.

10 (91) On or about November 7, 2012, defendant BRADLEY WEST  
11 REYNOLDS claimed to be a member Black MOB.

12 (92) In or about December 2012, defendant EDWARD REYNOLDS picked  
13 up approximately \$1800 in prostitution proceeds from a  
14 residence and gave it to defendant NADINE DAVIS for a  
15 prostitution trip and a lawyer for defendant EVERETT  
16 BURDETTE WILLIAMS.

17 (93) In or about December 2012, defendant EVERETT BURDETTE  
18 WILLIAMS purchased plane tickets for defendant NADINE DAVIS  
19 and AF9 to travel from San Diego, California to New Jersey  
20 for the purpose of prostitution.

21 (94) On or about and between December 16-18, 2012, defendant  
22 LABARRON CARNELL COKER sent several instant messages to AF8  
23 using his Facebook profile offering to sell her \$130 worth  
24 of marijuana.

25 (95) On or about and between December 17-18, 2012, defendant  
26 NADINE DAVIS posted prostitution advertisements to  
27 Backpage.com for herself and AF9 in Orange County,  
28 California and Riverside County, California.

1 (96) On or about December 18, 2012, defendant LABARRON CARNELL  
2 COKER offered to send two ounces of marijuana to an  
3 unindicted coconspirator by setting up the transaction using  
4 Facebook instant messaging.

5 (97) On or about December 26, 2012, defendant EVERETT BURDETTE  
6 WILLIAMS instructed defendant NADINE DAVIS to contact  
7 defendant BRADLEY WEST REYNOLDS to maintain AF9 as a  
8 prostitute while WILLIAMS was in custody.

9 (98) In or about January 2013, defendant BRADLEY WEST REYNOLDS  
10 gave \$500.00 to defendant NADINE DAVIS then took her to the  
11 airport to travel to New Jersey to work as a prostitute at  
12 defendant EVERETT BURDETTE WILLIAMS' direction.

13 (99) In or about January 2013, defendant BRADLEY WEST REYNOLDS  
14 took AF20 to Las Vegas, Nevada from San Diego, California  
15 for the purpose of prostitution.

16 (100) On or about January 8, 2013, defendant BRADLEY WEST REYNOLDS  
17 had "MOB" and "NP" tattoos.

18 (101) On or about January 8, 2013, defendant EVERETT BURDETTE  
19 WILLIAMS is featured in a You Tube video named "Money and  
20 Bitches" where WILLIAMS raps about pimping and features  
21 defendants NADINE DAVIS, EDWARD REYNOLDS, BRADLEY WEST  
22 REYNOLDS with another adult female who worked as a  
23 prostitute.

24 (102) On or about January 14, 2013, defendant CHRISTOPHER MICHAEL  
25 WALL arranged for AF17 to travel from Las Vegas, Nevada to  
26 San Diego, California for the purpose of prostitution.  
27  
28

1 (103) On or about January 17, 2013, defendant CHRISTOPHER MICHAEL  
2 WALL harbored and maintained MF4 at La Quinta Inn in  
3 Carlsbad, California.

4 (104) On or about January 28, 2013, a digital album called  
5 "Smoothest in my Section" was uploaded to Datpiff.com  
6 featuring several rap songs about pimping and gang activity  
7 by defendant EVERETT BURDETTE WILLIAMS.

8 (105) On or about January 30, 2013, defendant MARCUS ANTHONY  
9 STEVENSON assaulted AF44 after she refused to continue to  
10 work as a prostitute for him.

11 (106) On or about January 31, 2013, in San Diego, defendants AARON  
12 DWAYNE PITTMAN and YASENIA ARMENTERO managed, supervised,  
13 and maintained AF12 for prostitution.

14 (107) On or about February 9, 2013, defendant EVERETT BURDETTE  
15 WILLIAMS called defendant NADINE DAVIS from jail custody and  
16 directed her to deposit \$5,000 of her prostitution proceeds  
17 in his Navy Federal Credit Union Bank account.

18 (108) On, about and between February 10-13, 2013, defendant  
19 YASENIA ARMENTERO posted four online prostitution  
20 advertisements for AF21 in San Diego, California, collected  
21 prostitution proceeds from AF21, and used those proceeds to  
22 bail defendant AARON DWYANE PITTMAN out of jail.

23 (109) On or about February 11, 2013, defendant RONALD LEDON  
24 JACKSON assaulted AF4 in La Mesa, California.

25 (110) On or about and between February 21-26, 2013, defendant  
26 NICOLE LEE RICE and AF21 drove from San Diego, California to  
27 Arizona for the purpose of prostitution while working for  
28 defendant AARON DWAYNE PITTMAN.

1 (111) On or about February 23, 2013, defendant ANTWON RUASON  
2 HOLLINGSWORTH used a cell phone to post an online  
3 prostitution advertisement to Backpage.com for AF9 while she  
4 was working as a prostitute in Arizona.

5 (112) On, about and in March 2013, defendant EDWARD REYNOLDS sold  
6 Promethazine Codeine to an unindicted conspirator.

7 (113) On or about March 3, 2013, defendant ANTWON RUASON  
8 HOLLINGSWORTH posted a video to his Twitter feed entitled  
9 "Cross Country", which contains Hollingsworth rapping about  
10 out of state prostitution.

11 (114) On or about March 3, 2013, defendant AARON DWAYNE PITTMAN  
12 and an unindicted coconspirator attempted to murder M.M.  
13 outside the F-6 Club, 800 6<sup>th</sup> Avenue, San Diego.

14 (115) On or about March 14, 2013, while working for defendant  
15 AARON DWAYNE PITTMAN, defendant NICOLE LEE RICE posted an ad  
16 on backpage.com for prostitution, and rented a hotel room at  
17 the Rodeway Inn in San Diego for purposes of prostitution.

18 (116) On or about March 28, 2013, defendant AARON DWAYNE PITTMAN  
19 supervised, managed and maintained defendant YASENIA  
20 ARMENTERO for prostitution at the Ramada Inn.

21 (117) Sometime in or about April 2013, defendant MARCUS JOHN  
22 ANTHONY GRIFFIN met AF32 in Las Vegas, Nevada, traveled with  
23 her to Phoenix, Arizona to engage in prostitution.

24 (118) In or about and between April 2013 to July 2013, defendant  
25 ALVIN BERNARD MITCHELL transported AF36 from Las Vegas,  
26 Nevada to Santa Barbara, California for the purpose of  
27 prostitution.  
28

1 (119) On or about April 6, 2013, defendant MARCUS JOHN ANTHONY  
2 STEVENSON attempted to murder A.A. in San Diego, California.

3 (120) On or about April 16, 2013, defendant LABARRON CARNELL COKER  
4 offered to sell \$575 worth of marijuana to another male  
5 using COKER's Facebook profile instant messaging.

6 (121) On or about April 16, 2013, defendant JAKARI DEANDREZ BLAKE  
7 and AF34 traveled from San Diego to Scottsdale, Arizona for  
8 purposes of prostitution.

9 (122) On or about May 17, 2013, defendant MARCUS JOHN ANTHONY  
10 GRIFFIN purchased a bus ticket for AF38 from San Diego to  
11 Phoenix, Arizona for the purpose of prostitution.

12 (123) On or about May 26, 2013, defendant ANTWON RUASON  
13 HOLLINGSWORTH posted a video link on his Twitter account of  
14 him firing an assault weapon at a firing range with a  
15 comment "What you think we playin?"

16 (124) On, about and between May 28, 2013 to June 13, 2013,  
17 defendant MARCUS JOHN ANTHONY GRIFFIN transported AF32 and  
18 AF38 from California to Idaho for the purpose of  
19 prostitution.

20 (125) On or about June 2013, defendant NICOLE LEE RICE recruited  
21 AF45 to work with her doing prostitution, claiming she could  
22 make a large amount of money in San Diego, California and in  
23 Arizona.

24 (126) On or about June 2, 2013, defendant ROBERT BANKS III  
25 received approximately \$500.00 from AF48 in prostitution  
26 proceeds via Money Gram from Phoenix, Arizona to San Diego,  
27 California.  
28

1 (127) On or about June 25, 2013, defendant MALIK HASSAN KELLY  
2 received approximately \$450.00 in prostitution proceeds from  
3 AF49 via Western Union from San Diego, California to  
4 Westminster, California.

5 (128) On or about June 26, 2013, defendant CHRISTOPHER MICHAEL  
6 WALL supervised AF13 (formerly MF4) engaging in prostitution  
7 at the Motel 6 in Carlsbad, California.

8 (129) On or about and between June 2013 and July 16, 2013,  
9 defendants AARON DWAYNE PITTMAN and NICOLE LEE RICE  
10 recruited and maintained a minor female, MF6, for the  
11 purpose of prostitution in the County of San Diego,  
12 California.

13 (130) On or about July 10, 2013, defendant AARON DWAYNE PITTMAN  
14 pushed defendant YASENIA ARMENTERO, took her purse, and ran  
15 from the police.

16 (131) On, about and between August 2013 and September 2013,  
17 defendants AARON DWAYNE PITTMAN and TONY BROWN communicated  
18 with each other via telephone and email concerning how  
19 PITTMAN's property would be handled while PITTMAN was in  
20 custody, how BROWN "beat" his prior pimping case with MF1,  
21 and how PITTMAN should handle his current pimping case.

22 (132) On or about August 1, 2013, defendant NICOLE LEE RICE went  
23 with AF27 (formerly MF6) and AF24 to R.N.'s house in  
24 Carlsbad, California where after the "date" was completed,  
25 approximately \$2,000 was stolen from his residence.

26 (133) On or about August 2, 2013, defendant YASENIA ARMENTERO  
27 arranged a prostitution "date" with an adult male for  
28 herself and AF27 to give a massage and a "hand job" for

1 money and thereafter, defendant AARON DWAYNE PITTMAN picked  
2 the girls up from the "date."

3 (134) On, about and between September 14-15, 2013, defendant  
4 LABARRON CARNELL COKER did transport MF7 to Las Vegas,  
5 Nevada from California for purposes of prostitution.

6 (135) On, about and between September 28, 2013 to October 5, 2013,  
7 defendant LABARRON CARNELL COKER transported MF7 from  
8 California to Arizona for purposes of prostitution.

9 (136) On or about October 11, 2013, defendant ANTHONY DWAYNE  
10 EDMOND sold 60 pills of a controlled substance (Schedule  
11 III) to CW8, a cooperating witness.

12 (137) On, about and between November 28, 2013 and December 4,  
13 2013, defendant AKILI LYNN COBB offered marijuana for sale  
14 on his Facebook page.

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

16 **FORFEITURE ALLEGATION**

17 19. All of the allegations contained in Count 1 of this  
18 Indictment are hereby realleged and incorporated by reference herein  
19 as though fully set forth for the purpose of alleging forfeiture  
20 pursuant to the provisions of Title 18, United States Code, Section  
21 1963. Pursuant to Federal Rules of Criminal Procedure, Rule 32.2,  
22 notice is hereby given to the above-named defendants that the United  
23 States will seek forfeiture as part of any sentence in accordance with  
24 Title 18, United States Code, Section 1963, in the event of any  
25 defendant's conviction under Count One of this Indictment.

26 a. Defendants AARON DWAYNE PITTMAN (1), aka "Q-Tip",  
27 aka "Lil' Q-Tip"; ALVIN BERNARD MITCHELL (2), aka "A.J.", aka "Juice";  
28 ROBERT BANKS III (3), aka "Pimpsy"; HAKEEM TAYARI DUNN (4),

1 aka "Hook"; MARCUS ANTHONY STEVENSON (5), aka "OT", aka "Lil' OT";  
2 LABARRON CARNELL COKER (6), aka "L.B."; MALIK HASSAN KELLY (7),  
3 aka "Double D"; HAROLD RANDOLPH MARTIN (8), aka "Dump", aka "Magic",  
4 aka "Goldie"; ANTHONY DWAYNE EDMOND (9), aka "TY"; TONY BROWN (10),  
5 aka "Lil' Play Doh"; JAKARI DEANDREZ BLAKE (11), aka "Kari"; DANTE  
6 LEVELL GRANT (12), aka "Stick Up"; RONALD LEDON JACKSON (13),  
7 aka "Smac", aka "Hunnit"; JONATHAN DEVON PRICE (14), aka "Lil' TY";  
8 BRADLEY WEST REYNOLDS (15), aka "Lil' Goldie"; AKILI LYNN COBB (16),  
9 aka "Cobb"; ANTWON RUASON HOLLINGSWORTH (17), aka "Mack Twon";  
10 CHRISTOPHER MICHAEL WALL (18), aka "Mac Wall"; EVERETT BURDETTE  
11 WILLIAMS (19), aka "Polo Flo", aka "Florida"; MARCUS JOHN ANTHONY  
12 GRIFFIN (20), aka "Money Bagz", aka "Tiny Shoob"; EDWARD REYNOLDS  
13 (21), aka "Mobbin' Ed"; NICOLE LEE RICE (22), aka "Nikki"; YASENIA  
14 ARMENTARO (23); and NADINE DAVIS (24) have acquired and maintained  
15 interests in violation of Title 18, United States Code, Section 1962,  
16 which interests are subject to forfeiture to the United States  
17 pursuant to Title 18, United States Code, Section 1963(a)(1); and

18           b. Defendants AARON DWAYNE PITTMAN (1), aka "Q-Tip",  
19 aka "Lil' Q-Tip"; ALVIN BERNARD MITCHELL (2), aka "A.J.", aka "Juice";  
20 ROBERT BANKS III (3), aka "Pimpsy"; HAKEEM TAYARI DUNN (4),  
21 aka "Hook"; MARCUS ANTHONY STEVENSON (5), aka "OT", aka "Lil' OT";  
22 LABARRON CARNELL COKER (6), aka "L.B."; MALIK HASSAN KELLY (7),  
23 aka "Double D"; HAROLD RANDOLPH MARTIN (8), aka "Dump", aka "Magic",  
24 aka "Goldie"; ANTHONY DWAYNE EDMOND (9), aka "TY"; TONY BROWN (10),  
25 aka "Lil' Play Doh"; JAKARI DEANDREZ BLAKE (11), aka "Kari"; DANTE  
26 LEVELL GRANT (12), aka "Stick Up"; RONALD LEDON JACKSON (13),  
27 aka "Smac", aka "Hunnit"; JONATHAN DEVON PRICE (14), aka "Lil' TY";  
28 BRADLEY WEST REYNOLDS (15), aka "Lil' Goldie"; AKILI LYNN COBB (16),

1 aka "Cobb"; ANTWON RUASON HOLLINGSWORTH (17), aka "Mack Twon";  
2 CHRISTOPHER MICHAEL WALL (18), aka "Mac Wall"; EVERETT BURDETTE  
3 WILLIAMS (19), aka "Polo Flo", aka "Florida"; MARCUS JOHN ANTHONY  
4 GRIFFIN (20), aka "Money Bagz", aka "Tiny Shoob"; EDWARD REYNOLDS  
5 (21), aka "Mobbin' Ed"; NICOLE LEE RICE (22), aka "Nikki"; YASENIA  
6 ARMENTARO (23); and NADINE DAVIS (24) have an interest in, security  
7 of, claims against, and property and contractual rights which afford a  
8 source of influence over, the enterprise described herein which the  
9 defendants established, operated, controlled, conducted, and  
10 participated in the conduct of, in violation of Title 18, United  
11 States Code, Section 1962, which interests, securities, claims, and  
12 rights are subject to forfeiture to the United States pursuant to  
13 Title 18, United States Code, Section 1963(a)(2); and

14 c. Defendants AARON DWAYNE PITTMAN (1), aka "Q-Tip",  
15 aka "Lil' Q-Tip"; ALVIN BERNARD MITCHELL (2), aka "A.J.", aka "Juice";  
16 ROBERT BANKS III (3), aka "Pimpsey"; HAKEEM TAYARI DUNN (4),  
17 aka "Hook"; MARCUS ANTHONY STEVENSON (5), aka "OT", aka "Lil' OT";  
18 LABARRON CARNELL COKER (6), aka "L.B."; MALIK HASSAN KELLY (7),  
19 aka "Double D"; HAROLD RANDOLPH MARTIN (8), aka "Dump", aka "Magic",  
20 aka "Goldie"; ANTHONY DWAYNE EDMOND (9), aka "TY"; TONY BROWN (10),  
21 aka "Lil' Play Doh"; JAKARI DEANDREZ BLAKE (11), aka "Kari"; DANTE  
22 LEVELL GRANT (12), aka "Stick Up"; RONALD LEDON JACKSON (13),  
23 aka "Smac", aka "Hunnit"; JONATHAN DEVON PRICE (14), aka "Lil' TY";  
24 BRADLEY WEST REYNOLDS (15), aka "Lil' Goldie"; AKILI LYNN COBB (16),  
25 aka "Cobb"; ANTWON RUASON HOLLINGSWORTH (17), aka "Mack Twon";  
26 CHRISTOPHER MICHAEL WALL (18), aka "Mac Wall"; EVERETT BURDETTE  
27 WILLIAMS (19), aka "Polo Flo", aka "Florida"; MARCUS JOHN ANTHONY  
28 GRIFFIN (20), aka "Money Bagz", aka "Tiny Shoob"; EDWARD REYNOLDS

1 (21), aka "Mobbin' Ed"; NICOLE LEE RICE (22), aka "Nikki"; YASENIA  
2 ARMENTARO (23); and NADINE DAVIS (24) have property constituting and  
3 derived from proceeds obtained, directly and indirectly, from the  
4 racketeering activity described in this Indictment, in violation of  
5 Title 18, United States Code, Section 1962, which property is subject  
6 to forfeiture to the United States pursuant to Title 18, United States  
7 Code, Section 1963(a)(3).

8 20. The interests of the defendants subject to forfeiture to the  
9 United States pursuant to Title 18, United States Code,  
10 Sections 1963(a)(1), (a)(2) and (a)(3), include but are not limited to  
11 any and all proceeds or property derived from proceeds traceable to  
12 the racketeering activities alleged in Count One during the relevant  
13 time period alleged in the indictment and all interests and proceeds  
14 traceable thereto, including but not limited to the following assets:

- 15 a. 2006 Mercedes Benz C4, California License Plate No.  
16 6WLW831, VIN :WDDDJ75X16A062724;
- 17 b. 1991 Chevrolet Caprice, California License Plate No.  
18 6H05018; VIN :1G1BL53E1MW258978;
- 19 c. 2002 Cadillac, California License Plate No. 6PRU541,  
20 VIN :1G6KDS4Y02U299370;
- 21 d. 2004 Mercedes Benz, California License Plate No.  
22 6TZL380, VIN :WDBRF40J04F544702;
- 23 e. Gold Chain with large gold cross pendant;
- 24 f. Removable "grill", also known as a cosmetic partial  
25 denture belonging to defendant Tony Brown;
- 26 g. Gold veneer affixed to the teeth of defendant Aaron  
27 Dwayne Pittman;
- 28

1 h. Gold veneer affixed to the teeth of defendant Alvin  
2 Bernard Mitchell;

3 i. Six (6) "pimp" cups seized from defendant Aaron Dwayne  
4 Pittman's apartment.

5 21. Each of the defendants is jointly and severally liable for  
6 the forfeiture obligations alleged above.

7 22. If any of the above-described forfeitable property, as a  
8 result of any act or omission of the defendants:

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

10 b. has been transferred or sold to, or deposited with, a  
11 third person;

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

13 d. has been substantially diminished in value; or

14 e. has been commingled with other property which cannot be  
15 subdivided without difficulty, it is the intent of the United States,  
16 pursuant to Title 18, United States Code, Section 1963(m), to seek  
17 forfeiture of any other property of said defendants up to the value of  
18 the above forfeitable property.

19 All pursuant to Title 18, United States Code, Section 1963.

20 **NOTICE OF SPECIAL SENTENCING FACTORS REGARDING COUNT ONE**

21 **1. Sex Trafficking of Children - 18 U.S.C. § 1591**

22 On or about the dates listed below, within the Southern District  
23 of California, and elsewhere, defendants (see below), in and affecting  
24 interstate commerce, knowingly did recruit, entice, harbor, transport,  
25 provide, obtain, and maintain by any means a person (see below),  
26 knowing and in reckless disregard of the fact that the minor would be  
27 caused to engage in a commercial sex act, having had a reasonable  
28 opportunity to observe the minor and knowing and in reckless disregard

1 of the fact that the minor had not attained the age of 18 years; in  
 2 violation of Title 18, United States Code, Section 1591(a) and (b).

<u>Dates</u>	<u>Defendant(s)</u>	<u>Minor(s)</u>
March 31, 2001	Tony Brown, Robert Banks III	MF9, MF10, MF11
June 2004 - January 22, 2007	Hakeem Tayari Dunn	MF5
December 30, 2011	Everett Burdette Williams	MF2
July 15, 2012	Hakeem Tayari Dunn, Dante Levell Grant	MF3
January 17, 2013	Christopher Michael Wall	MF4
June 2013 - July 16, 2013	Aaron Dwayne Pittman, Nicole Lee Rice	MF6

12 2. Sex Trafficking by Force, Fraud or Coercion - 18 U.S.C. § 1591

13 On or about the dates listed below, within the Southern District  
 14 of California, and elsewhere, defendants (see below), in and affecting  
 15 interstate commerce, knowingly did recruit, entice, harbor, transport,  
 16 provide, obtain, and maintain by any means a person (see below),  
 17 knowing and in reckless disregard of the fact that means of force,  
 18 threats of force, fraud, coercion, and any combination of such means  
 19 will be used to cause the person to engage in a commercial sex act; in  
 20 violation of Title 18, United States Code, Section 1591(a) and (b).

<u>Dates</u>	<u>Defendant(s)</u>	<u>Person</u>
October 2008	Malik Hassan Kelly	AF33
April 1, 2009	Malik Hassan Kelly	AF2
July 2009 - October 19, 2009	Harold Randolph Martin	AF1
December 6, 2011	Ronald Ledon Jackson	AF40
July 15, 2012	Hakeem Tayari Dunn, Dante Levell Grant	MF3
January 30, 2013	Marcus Anthony Stevenson	AF44

