**YMM SUMMARY OF CHARGES/PENALTIES**

**Count 1:** 18 U.S.C. § 1962(d) – Racketeering Influenced and Corrupt Organizations Conspiracy

**Date(s):** Beginning on a date unknown, but prior to January 1, 2007, and continuing to on or about the date of this Second Superseding indictment

 **Penalty:** 0 to 20 years, $250,000 fine, 3 years supervised release (“S/R”) (Wilson 0-20); those charged with murder - life(Allen, Fortia and Keelen – life)

 **Defendants:** Wilson, Allen, Fortia and Keelen

**Count 2:** 21 U.S.C. § 841, § 846 – Conspiracy to Distribute 280 grams or more of crack cocaine and quantities of cocaine base and marijuana

**Date(s):** Beginning on a date unknown, but prior to January 1, 2008, and continuing to on or about the date of this indictment.

**Penalties:** Crack cocaine – 10 years to life, $10,000,000 fine, at least 5 years S/R

Marijuana – not more than 5 years, $250,000 fine, at least 2 years S/R

**Defendants:** Wilson, Fortia, Keelen, McLaren and Scott (not Lionel Allen)

**Count 3:** 18 U.S.C. § 924(o) – Conspiracy to use or carry or possess firearms during and in relation and in furtherance of a drug trafficking crime (count 1).

**Date(s):** Beginning on a date unknown, but prior to January 1, 2008, and continuing to on or about the date of this indictment.

**Penalties:** 0 to 20 years, $250,000 fine, 3 years S/R

**Defendants:** All (except Jeffery Wilson)

**Count 4:** 18 U.S.C. § 1959(a)(3) and 2 – Assault with a Dangerous Weapon in Aid of Racketeering (See Overt Act 8)

**Date(s):** October 18, 2011

**Penalties:** 0 to 20 years, $250,000 fine, 3 years S/R

**Defendants:** Lionel Allen

**Count 5:** 18 U.S.C. § 924(c)(1)(A) and 2 – Use, Carry, and Discharge of a Firearm during and in Relation to a Crime of Violence and Drug Trafficking Crime (See Overt Act 8)

**Date(s):** October 18, 2011

**Penalties:** Not less than10 yrs. (consecutive); $250,000 fine; 3 years S/R

**Defendants:** Lionel Allen

**Count 6:** 18 U.S.C. § 1959(a)(3) and 2 – Assault with a Dangerous Weapon in Aid of Racketeering (See Overt Act 10)

**Date(s):** December 4, 2011

**Penalties:** 0 to 20 years, $250,000 fine, 3 years S/R

**Defendants:** Lionel Allen

**Count 7:** 18 U.S.C. § 924(c)(1)(A) – Use, Carry and Discharge of a Firearm during and in Relation to a Crime of Violence and Drug Trafficking Crime (See Overt Act 10)

**Date(s):** December 4, 2011

**Penalties:** Not less than10 yrs. (consecutive); $250,000 fine; 3 years S/R **Defendants:** Lionel Allen

**Count 8:** 18 U.S.C. § 1959 (a)(1) and 2 — Murder in Aid of Racketeering (See Overt Act 14)

**Date(s):** April 22, 2012

**Penalties:** Life or Death

**Defendants:** Lionel Allen and Jawan Fortia

**Count 9:** 18 U.S.C. § 924(j) and 2 — Causing Death Through the Use of a Firearm (See Overt Act 14)

**Date(s):** April 22, 2012

**Penalties:** 0-Life or Death; $250,000 fine; 5 years S/R

**Defendants:** Lionel Allen and Jawan Fortia

**Count 10:** 18 U.S.C. § 1959 (a)(1) and 2 — Murder in Aid of Racketeering (See Overt Act 16)

**Date(s):** June 3, 2012

**Penalties:** Life or Death

**Defendants:** Lionel Allen

**Count 11:** 18 U.S.C. § 924(j) and 2 — Causing Death Through the Use of a Firearm (See Overt Act 16)

**Date(s):** June 3, 2012

**Penalties:** 0-Life or Death; $250,000 fine; 5 years S/R

**Defendants:** Lionel Allen

**Count 12:** 18 U.S.C. § 1959(a)(3) and 2 – Assault with a Dangerous Weapon in Aid of Racketeering (See Overt Act 16)

**Date(s):** June 3, 2012

**Penalties:** 0 to 20 years, $250,000 fine, 3 years S/R

**Defendant:** Lionel Allen

**Count 13:** 18 U.S.C. § 924(c)(1)(A) – Use, Carry, and Discharge of a Firearm during and in Relation to a Crime of Violence and Drug Trafficking Crime (See Overt Act 16)

**Date(s):** June 3, 2012

**Penalties:** Not less than10 yrs. (consecutive); $250,000 fine; 3 years S/R

**Defendant:** Lionel Allen

**Count 14:** 18 U.S.C. § 924(c)(1)(A) – Use, Carry, and Discharge of a Firearm during and in Relation to a Crime of Violence and Drug Trafficking Crime (no overt act listed)

**Date(s):** September 24, 2012

**Penalties:** Not less than10 yrs. (consecutive); $250,000 fine; 3 years S/R

**Defendant:** Lionel Allen

**Count 15:** 18 U.S.C. § 1959(a)(3) — Assault with a Dangerous Weapon in Aid of Racketeering (See Overt Act 19)

**Date(s):** November 26, 2012 at approximately 7:00 pm

**Penalties:** 0 to 20 years, $250,000 fine, 3 years S/R

**Defendants:** Lionel Allen

**Count 16:**  18 U.S.C. § 924(c)(1)(A) – Use, Carry, and Discharge of a Firearm during and in Relation to a Crime of Violence and Drug Trafficking Crime (See Overt Act 19)

**Date(s):** November 26, 2012 at approximately 7:00 pm

**Penalties:** Not less than10 yrs. (consecutive); $250,000 fine; 3 years S/R **Defendants:** Lionel Allen

**Count 17:** 18 U.S.C. § 1959(a)(3) — Assault with a Dangerous Weapon in Aid of Racketeering (See Overt Act 20)

**Date(s):** November 26, 2012 at 8:12 pm

**Penalties:** 0 to 20 years, $250,000 fine, 3 years S/R

**Defendant:** Lionel Allen

(2nd of three shootings this day)

**Count 18:**  18 U.S.C. § 924(c)(1)(A) — Use, Carry, and Discharge of a Firearm during and in Relation to a Crime of Violence and Drug Trafficking Crime (See Overt Act 20)

**Date(s):** November 26, 2012 at 8:12 pm

**Penalties:** Not less than10 yrs. (consecutive); $250,000 fine; 3 years S/R

**Defendant:** Lionel Allen

(2nd of three shootings this day)

**Count 19:** 18 U.S.C. § 1959(a)(3) — Assault with a Dangerous Weapon in Aid of Racketeering (See Overt Act 21)

**Date(s):** November 26, 2012 at 8:20 pm

**Penalties:** 0 to 20 years, $250,000 fine, 3 years S/R

**Defendant:** Lionel Allen

(3rd of three shootings this day)

**Count 20:**  18 U.S.C. § 924(c)(1)(A) — Use, Carry, and Discharge of a Firearm during and in Relation to a Crime of Violence and Drug Trafficking Crime (See Overt Act 21)

**Date(s):** November 26, 2012 at 8:20 pm

**Penalties:** Not less than10 yrs. (consecutive); $250,000 fine; 3 years S/R

**Defendant:** Lionel Allen

(3rd of three shootings this day)

**Count 21:** 18 U.S.C. § 1959 (a)(1) and 2 — Murder in Aid of Racketeering (See Overt Act 22)

**Date(s):** December 16, 2012

**Penalties:** Life or Death

**Defendant:** Dedrick Keelen

**Count 22:** 18 U.S.C. § 1959 (a)(1) and 2 — Murder in Aid of Racketeering (See Overt Act 22)

**Date(s):** December 16, 2012

**Penalties:** Life or Death

**Defendant:** Dedrick Keelen

**Count 23:** 18 U.S.C. § 924(j) and 2 — Causing Death Through the Use of a Firearm (See Overt Act 22)

**Date(s):** December 16, 2012

**Penalties:** 0-Life or Death; $250,000.00; 5 years S/R

**Defendant:** Dedrick Keelen

**Count 24:** 18 U.S.C. § 1959(a)(3) — Assault with a Dangerous Weapon in Aid of Racketeering (See Overt Act 22)

**Date(s):** December 16, 2012

**Penalties:** 0 to 20 years, $250,000 fine, 3 years S/R

**Defendants:** Dedrick Keelen

**Count 25:** 18 U.S.C. § 924(c)(1)(A) — Use, Carry, and Discharge of a Firearm during and in Relation to a Crime of Violence and Drug Trafficking Crime (See Overt Act 22)

**Date(s):** December 16, 2012

**Penalties:** Not less than10 yrs. (consecutive); $250,000 fine; 3 years S/R

**Defendants:** Dedrick Keelen

**Count 26:** 18 U.S.C. § 1959 (a)(1) and 2 — Murder in Aid of Racketeering (See Overt Act 24)

**Date(s):** May 6, 2013

**Penalties:** Life or Death

**Defendants:** Lionel Allen

**Count 27:** 18 U.S.C. § 924(j) and 2 — Causing Death Through the Use of a Firearm (See Overt Act 24)

**Date(s):** May 6, 2013

**Penalties:** 0-Life or Death; $250,000.00; 5 years S/R

**Defendants:** Lionel Allen

**Count 28:** 18 U.S.C. § 1959(a)(3) — Assault with a Dangerous Weapon in Aid of Racketeering (See Overt Act 24)

**Date(s):** May 6, 2013

**Penalties:** 0 to 20 years, $250,000 fine, 3 years S/R

**Defendants:** Lionel Allen

**Count 29:** 18 U.S.C. § 924(c)(1)(A) — Use, Carry, and Discharge of a Firearm during and in Relation to a Crime of Violence and Drug Trafficking Crime (See Overt Act 24)

**Date(s):** May 6, 2013

**Penalties:** Not less than10 yrs. (consecutive); $250,000 fine; 3 years S/R

**Defendants:** Lionel Allen

**Count 30:** 21 U.S.C. § 841 – distribution of a quantity of cocaine hydrochloride

**Date(s):** May 13, 2014

**Penalties:** 0-20 years; $1,000,000.00; at least 3 years S/R

**Defendant:** Jeffery Wilson

**Count 31:** 21 U.S.C. § 841 – distribution of more than 28 grams of cocaine base

**Date(s):** May 30, 2014

**Penalties:** 5-40 years; $5,000,000.00; at least 4 years S/R

**Defendant:** Jeffery Wilson