

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
KHALIL SMITH, a/k/a "Lil,"	:	VIOLATIONS:
MARK WOODS, a/k/a "Bundles," a/k/a "Brian Bosket,"	:	18 U.S.C. § 1951 (conspiracy to commit robbery which interferes with interstate commerce – 1 count)
MARCUS BOWENS, a/k/a "Money," a/k/a "Little Money," a/k/a "Junior,"	:	18 U.S.C. § 1951 (robbery which interferes with interstate commerce - 2 counts)
MICHAEL QUEEN, a/k/a "Little Has," a/k/a "Has,"	:	18 U.S.C. § 1951 (attempted robbery which interferes with interstate commerce - 4 counts)
TERRANCE MUNDEN, a/k/a "Boob," a/k/a "Boo,"	:	18 U.S.C. § 2119 (carjacking – 2 counts)
ROBERT HARTLEY, a/k/a "Do," a/k/a "Doo," a/k/a "Dooman,"	:	21 U.S.C. § 846 (attempted possession with intent to distribute cocaine - 1 count)
HASAN CHANEY, a/k/a "Has," a/k/a "Big Has,"	:	18 U.S.C. § 924(c)(1)(A) (carrying and using a firearm during and in relation to a crime of violence and to a drug trafficking crime – 7 counts)
LEVERN JACKSON, a/k/a "Bucket," a/k/a "V,"	:	18 U.S.C. § 2 (aiding and abetting) Notice of forfeiture
BRAHEIM BALLARD, a/k/a "Big Fellow," a/k/a "Big Homie," a/k/a "Brian Moore,"	:	
WILLIAM JEFFERSON, a/k/a "Money," a/k/a "Big Money,"	:	
DANIEL HAYES, a/k/a "Geez,"	:	
JAMAL DOGGETT, a/k/a "Jersey,"	:	

JEFFREY BELLAMY, :
 a/k/a “Fats,”
ROMEL ANTHONY, :
 a/k/a “Dame,”
ERIC SCOTT, :
BRANDON SEGERS,
 a/k/a “B” :

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. The illegal sale, distribution, possession with intent to distribute, and trafficking of controlled substances are activities which affect interstate commerce as follows:

a. They have a substantial and detrimental effect on the health and general welfare of the American people;

b. A major portion of the traffic in illegal narcotics and controlled substances flows through interstate and foreign commerce. Incidents of the traffic which are not an integral part of the interstate or foreign flow, such as manufacture, local distribution, and possession, nonetheless have a substantial and direct effect upon interstate commerce because many illegal narcotics and controlled substances: (i) after manufacture, are transported in interstate commerce; (ii) that are distributed locally usually have been transported in interstate commerce immediately before their distribution; and (iii) immediately prior to the possession of such substances, commonly flow through interstate commerce.

c. Local distribution and possession of illegal narcotics and controlled substances contribute to swelling the interstate traffic in such substances.

d. Illegal narcotics and controlled substances manufactured and distributed intrastate cannot be differentiated from controlled substances manufactured and distributed interstate.

All as set forth in Title 21, United States Code, Section 801.

2. C.W., M.M., J.B., A.C., and L.T., (hereinafter “Victims”), persons known to the grand jury, were believed by defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, MICHAEL QUEEN, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, BRAHEIM BALLARD, WILLIAM JEFFERSON, DANIEL HAYES, JAMAL DOGGETT, JEFFREY BELLAMY, ROMEL ANTHONY, ERIC SCOTT, and BRANDON SEGERS, to be engaged in the illegal sale, distribution, and trafficking of cocaine, marijuana and other illegal controlled substances in the Eastern District of Pennsylvania.

3. Platinum Jewelers, (hereinafter “Victim Business”), located at 1136 Market Street, Philadelphia, PA was a business engaged in the sale of jewelry and watches which were manufactured outside the Commonwealth of Pennsylvania.

4. From at least in or around September 2012, through on or about April 29, 2014, in Philadelphia, Ambler, Hatfield, and elsewhere in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a “Lil,”
MARK WOODS,
a/k/a “Bundles,”
a/k/a “Brian Bosket,”
MARCUS BOWENS,
a/k/a “Money,”
a/k/a “Little Money,”
a/k/a “Junior,”
MICHAEL QUEEN,
a/k/a “Little Has,”**

a/k/a "Has,"
TERRANCE MUNDEN,
a/k/a "Boob,"
a/k/a "Boo,"
ROBERT HARTLEY,
a/k/a "Do,"
a/k/a "Doo,"
a/k/a "Dooman,"
HASAN CHANEY,
a/k/a "Has,"
a/k/a "Big Has,"
LEVERN JACKSON,
a/k/a "Bucket,"
a/k/a "V,"
BRAHEIM BALLARD,
a/k/a "Big Fellow,"
a/k/a "Big Homie,"
a/k/a "Brian Moore,"
WILLIAM JEFFERSON,
a/k/a "Money,"
a/k/a "Big Money,"
DANIEL HAYES,
a/k/a "Geez,"
JAMAL DOGGETT,
a/k/a "Jersey,"
JEFFREY BELLAMY,
a/k/a "Fats,"
ROMEL ANTHONY,
a/k/a "Dame,"
ERIC SCOTT, and
BRANDON SEGERS,
a/k/a "B,"

and A.M., a/k/a "Ant," a/k/a "Wax," a person known to the grand jury to be deceased, conspired and agreed, together and with other persons unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, in that defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, MICHAEL QUEEN, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, BRAHEIM BALLARD, WILLIAM JEFFERSON, DANIEL

HAYES, JAMAL DOGGETT, JEFFREY BELLAMY, ROMEL ANTHONY, ERIC SCOTT, and BRANDON SEGERS, and A.M. conspired to unlawfully take and obtain illegal controlled substances, that is, cocaine, marijuana, and other controlled substances, the proceeds from the sale of controlled substances, and jewelry and money, from the person and in the presence of other persons against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in their possession, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

MANNER AND MEANS

It was part of the conspiracy that defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, MICHAEL QUEEN, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, BRAHEIM BALLARD, WILLIAM JEFFERSON, DANIEL HAYES, JAMAL DOGGETT, JEFFREY BELLAMY, ROMEL ANTHONY, ERIC SCOTT, and BRANDON SEGERS, and A.M. and others unknown to the grand jury:

5. Planned to commit armed robberies of the Victims and Victim Business identified in paragraphs 2 and 3, and targeted them for that purpose;

6. Conducted surveillance of the Victims and Victim Business and tracked them using GPS devices;

7. Used cellular telephones and walkie talkies to communicate with each other before, during and after the planned armed robberies;

8. Used police scanners to monitor police radio during the commission of the armed robberies to avoid detection and apprehension by law enforcement;

9. Used tools, including but not limited to, ladders, pry bars and screw drivers to enter the Target Locations;

10. Wore disguises during the commission of the armed robberies, including but not limited to, police uniforms, police badges, bullet proof vests marked with the word “Police,” wigs, glasses, masks, gloves, and facial makeup;
11. Used semiautomatic pistols and a shotgun to facilitate the commission of the robberies, specifically to threaten, intimidate, and subdue the Victims;
12. Entered the homes of the Victims identified in paragraph 2, and the Victim Business identified in paragraph 3 and pointed their firearms at the Victims and others who were present;
13. Physically assaulted, threatened, abused and intimidated the Victims and others who were present;
14. Shot and threatened to shoot the Victims and others present;
15. Physically restrained the Victims and others present with handcuffs, zipties and shoelaces;
16. Stole and attempted to steal the Victims’ personal belongings, illegal narcotics, money, jewelry, and vehicles;
17. Fled from the residences of the Victims and the Victim Business in vehicles and met to divide the stolen items among themselves; and
18. Sold the illegal narcotics and other items stolen during the armed robberies.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, MICHAEL QUEEN, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, BRAHEIM BALLARD, WILLIAM JEFFERSON, DANIEL HAYES, JAMAL DOGGETT, JEFFREY BELLAMY,

ROMEL ANTHONY, ERIC SCOTT, and BRANDON SEGERS, committed the following overt acts, among others, in the Eastern District of Pennsylvania:

September 3, 2012
392 Railroad Avenue, Ambler, PA
Armed Home Invasion Robbery

1. In or about August 2012, through on or about September 3, 2012, defendants KHALIL SMITH, WILLIAM JEFFERSON, and ERIC SCOTT met to discuss their plan to commit an armed home invasion robbery at 392 Railroad Avenue, Ambler, PA, a residence.

2. On or about September 2, 2012, defendant ERIC SCOTT went to the residence and remained there as a guest of A.G., a person known to the grand jury.

3. On or about September 3, 2012:

a. Defendant ERIC SCOTT contacted defendants KHALIL SMITH and WILLIAM JEFFERSON and notified them that they should enter the residence and commit the planned robbery.

b. Defendants KHALIL SMITH and WILLIAM JEFFERSON entered the residence along with two other persons, unknown to the grand jury, wearing masks and gloves, and armed with firearms.

c. Once inside, defendants KHALIL SMITH and WILLIAM JEFFERSON and the other persons, unknown to the grand jury, pointed their guns at C.W., A.G., D.W., T.H., and defendant ERIC SCOTT, directing them at gunpoint to lay on the floor and/or remain still.

d. Defendants KHALIL SMITH and WILLIAM JEFFERSON restrained C.W., A.G., and defendant ERIC SCOTT by tying their hands and wrists with

shoelaces.

e. Defendants KHALIL SMITH and WILLIAM JEFFERSON and two others threatened C.W. to do as instructed or risk injury to others.

f. Defendants KHALIL SMITH, WILLIAM JEFFERSON, ERIC SCOTT and the other persons, unknown to the grand jury stole jewelry, approximately \$1,980 in U.S. currency, approximately a quarter ounce of cocaine, and an unknown number of Percocet pills.

g. Defendants KHALIL SMITH, WILLIAM JEFFERSON and the other persons, unknown to the grand jury, fled the residence.

July 15, 2013
Platinum Jewelers
1136 Market Street, Philadelphia, PA
Attempted Armed Robbery

4. On or about July 15, 2013:

a. Defendants KHALIL SMITH, MARCUS BOWENS, MARK WOODS, DANIEL HAYES, JEFFREY BELLAMY, BRANDON SEGERS, and MICHAEL QUEEN, and A.M., a person known to the grand jury to be deceased, met to discuss their plan to commit an armed robbery at Platinum Jewelers, located at 1136 Market Street, Philadelphia, PA.

b. Defendants KHALIL SMITH, MARCUS BOWENS, MARK WOODS, DANIEL HAYES, JEFFREY BELLAMY, BRANDON SEGERS, and MICHAEL QUEEN, and A.M. went to Platinum Jewelers.

c. Defendants DANIEL HAYES and BRANDON SEGERS entered the store wearing disguises, including a wig and posing as customers.

d. Defendants KHALIL SMITH and MARCUS BOWENS entered the store posing as police officers, wearing bullet proof vests with the word “Police” on the front and carrying semiautomatic pistols in holsters on their legs, and wearing masks and gloves.

e. Defendant KHALIL SMITH drew his firearm, pointed it at the clerk and yelled “Police.”

f. Defendants MARK WOODS, JEFFREY BELLAMY, and MICHAEL QUEEN, and A.M. remained outside the store as lookouts, and/or getaway drivers.

g. Defendant JEFFREY BELLAMY utilized a police scanner provided to him by defendant KHALIL SMITH to monitor police radio.

h. Defendants KHALIL SMITH, MARCUS BOWENS, DANIEL HAYES, and BRANDON SEGERS fled the store after a clerk inside the store pushed an alarm button, notifying police of the robbery, and they along with defendants MARK WOODS, JEFFREY BELLAMY, and MICHAEL QUEEN, and A.M., left the area.

November 7, 2013
1471 Leas Way, Hatfield, PA
Armed Home Invasion Attempted Robbery

5. In or about early November 2013 to on or about November 7, 2013:
 - a. Defendants KHALIL SMITH and MICHAEL QUEEN placed GPS tracking devices on vehicles driven by M.M. to assist them in locating M.M.'s residence.
 - b. Defendants BRAHEIM BALLARD and JAMAL DOGGETT, using the GPS devices, tracked M.M. and learned the location of M.M.'s residence.
 - c. Defendants KHALIL SMITH, MARCUS BOWENS, MICHAEL QUEEN, BRAHEIM BALLARD and JAMAL DOGGETT met to discuss their plan to rob M.M. at his home located at 1471 Leas Way, Hatfield, PA.
 - d. Defendants KHALIL SMITH, MARCUS BOWENS, MICHAEL QUEEN, BRAHEIM BALLARD and JAMAL DOGGETT drove to an area approximately one block from M.M.'s home where they met again to discuss their plan to rob M.M..
 - e. Defendants KHALIL SMITH, MARCUS BOWENS, MICHAEL QUEEN, and BRAHEIM BALLARD hid in the rear yard of M.M.'s home and awaited M.M.'s arrival as defendant DOGGETT remained in a vehicle and acted as a lookout.
 - f. Defendants KHALIL SMITH, MARCUS BOWENS, MICHAEL QUEEN, and BRAHEIM BALLARD approached M.M., pointed their guns at M.M., threatened M.M., subdued M.M. and forced M.M. inside his home where he was restrained, threatened and assaulted.
 - g. Defendant BRAHEIM BALLARD stood guard over M.M. as defendants KHALIL SMITH, MARCUS BOWENS, MICHAEL QUEEN, and JAMAL DOGGETT searched M.M.'s home.

h. Defendants KHALIL SMITH, MARCUS BOWENS, MICHAEL QUEEN, BRAHEIM BALLARD and JAMAL DOGGETT stole TVs, firearms, and M.M.'s BMW, after forcibly removing the keys from M.M., and a backpack containing a laptop computer, cellphones and \$600.

i. Defendants KHALIL SMITH, MARCUS BOWENS, MICHAEL QUEEN, BRAHEIM BALLARD and JAMAL DOGGETT fled the scene and later met to divide the proceeds of the robbery.

January 27, 2014
4844 Pulaski Avenue, Philadelphia, PA
Armed Home Invasion Robbery

6. On or about January 27, 2014:

a. Defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, LEVERN JACKSON, and JEFFREY BELLAMY met to discuss their plan to commit an armed home invasion robbery at 4844 Pulaski Avenue, Philadelphia, PA, a residence.

b. Defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, LEVERN JACKSON, and JEFFREY BELLAMY, drove to the residence and once there, defendants SMITH, WOODS, and BOWENS entered the residence as defendants JACKSON and BELLAMY remained outside as lookouts.

c. Defendants KHALIL SMITH, MARK WOODS, and MARCUS BOWENS subdued J.B., then restrained, threatened and assaulted him.

d. Defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, LEVERN JACKSON, and JEFFREY BELLAMY stole approximately ½ kilogram of cocaine, \$10,000 and other items.

e. Defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, LEVERN JACKSON, and JEFFREY BELLAMY fled the scene and later met to divide the proceeds of the robbery.

April 16, 2014
6067 Regent Street, Philadelphia, PA
Armed Home Invasion Attempted Robbery

7. In or about the beginning of April, to on or about April 16, 2014:

a. Defendants KHALIL SMITH, MARCUS BOWENS and JEFFREY BELLAMY conducted surveillance at the home of A.C., located at 6067 Regent Street, Philadelphia, PA, a residence.

b. Defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, and JEFFREY BELLAMY, and A.M., met to discuss their plan to rob A.C..

c. Defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, and JEFFREY BELLAMY, and A.M. drove to the residence.

d. Defendants KHALIL SMITH, MARCUS BOWENS, TERRANCE MUNDEN, HASAN CHANEY, and LEVERN JACKSON, and A.M. entered the residence as defendants MARK WOODS, JEFFREY BELLAMY and ROBERT HARTLEY remained outside as lookouts.

e. Defendants KHALIL SMITH, MARCUS BOWENS, TERRANCE MUNDEN, HASAN CHANEY, and LEVERN JACKSON, and A.M. subdued A.C. and I.C. forced them to strip naked, restrained them, threatened to sodomize them with a broom stick and kill them, and assaulted A.C. by striking him in the head with a shotgun, and water boarding and

pouring boiling water on him.

f. Defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, TERRANCE MUNDEN, ROBERTH HARTLEY, HASAN CHANEY, LEVERN JACKSON, and JEFFREY BELLAMY, and A.M. stole jewelry, an iPad, and a 2009 Toyota Camry.

g. Defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, TERRANCE MUNDEN, ROBERTH HARTLEY, HASAN CHANEY, LEVERN JACKSON, and JEFFREY BELLAMY, and A.M. fled the scene and later met to divide the proceeds of the robbery.

April 29, 2014
5736 Wyndale Avenue, Philadelphia, PA
Armed Home Invasion Attempted Robbery

8. On or about April 24, 2014:

a. Defendants KHALIL SMITH and MARCUS BOWENS placed GPS tracking devices on vehicles driven by L.T. to assist them in locating L.T.'s residence.

b. Defendant MARK WOODS tracked L.T. and defendant JEFFREY BELLAMY conducted surveillance at L.T.'s home located at 5736 Wyndale Avenue, Philadelphia, PA.

c. Defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, TERRANCE MUNDEN, ROBERT HARTLEY, and JEFFREY BELLAMY, and A.M. burglarized L.T.'s home and stole jewelry, bags, including a Louis Vuitton bag and a custom book bag, belts, an iPad, and a laptop computer.

9. On or about April 29, 2014:

d. Believing that they missed cocaine and proceeds from the sale of cocaine during the April 24, 2014 burglary, defendants KHALIL SMITH, MARK WOODS,

MARCUS BOWENS, TERRANCE MUNDEN, ROBERT HARTLEY, and JEFFREY BELLAMY, and A.M. returned to L.T.'s home to commit an armed home invasion robbery.

e. Defendants KHALIL SMITH, MARCUS BOWENS, and TERRANCE MUNDEN, and A.M. entered the residence to commit the robbery as defendants MARK WOODS, ROBERT HARTLEY, and JEFFREY BELLAMY remained outside as lookouts.

f. Defendant MARK WOODS continued to track L.T.'s vehicle and notified defendants KHALIL SMITH, MARCUS BOWENS, and TERRANCE MUNDEN, and A.M. that L.T. was driving toward his home in Philadelphia.

g. Defendant JEFFREY BELLAMY observed L.T.'s vehicle and notified defendant MARK WOODS that L.T. had arrived home.

h. Defendants KHALIL SMITH, MARCUS BOWENS, and TERRANCE MUNDEN, and A.M. hid inside L.T.'s home and awaited his arrival.

i. Defendants KHALIL SMITH, MARCUS BOWENS, and TERRANCE MUNDEN, and A.M. subdued L.T. and S.L., held them at gunpoint and shot L.T.

j. Defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, TERRANCE MUNDEN, ROBERTH HARTLEY, and JEFFREY BELLAMY fled the scene.

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

COUNT TWO

September 3, 2012, 392 Railroad Avenue, Ambler, PA
Armed Home Invasion Robbery

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 2 and 5 through 18 and Overt Acts 1 through 3 of Count One of this indictment are incorporated here.

2. On or about September 3, 2012, in Ambler, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a “Lil,”
WILLIAM JEFFERSON,
a/k/a “Money,”
a/k/a “Big Money,” and
ERIC SCOTT,**

and others unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, WILLIAM JEFFERSON, and ERIC SCOTT, and others unknown to the grand jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, controlled substances, from other persons against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, that is, by using loaded firearms to threaten and control the victims and steal controlled substances from them.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 3, 2012, in Ambler, in the Eastern District of Pennsylvania,
defendants

**KHALIL SMITH,
a/k/a “Lil,”
WILLIAM JEFFERSON,
a/k/a “Money,”
a/k/a “Big Money,” and
ERIC SCOTT,**

and others unknown to the grand jury, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Two of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT FOUR

September 11, 2013, 433 Bristol Street, Philadelphia, PA
Attempted Possession with Intent to Distribute Cocaine

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 11, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
WILLIAM JEFFERSON,
a/k/a "Money,"
a/k/a "Big Money," and
ROMEL ANTHONY,
a/k/a "Dame,"**

knowingly and intentionally attempted to possess with the intent to distribute, and aided and abetted the attempted possession with intent to distribute of, a controlled substance, that is, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 846, 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 11, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
WILLIAM JEFFERSON,
a/k/a "Money,"
a/k/a "Big Money," and
ROMEL ANTHONY,
a/k/a "Dame,"**

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a drug trafficking crime, for which they may be prosecuted in a court of the United States, that is, attempted possession with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 846, as charged in Count Four of this indictment.

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

COUNT SIX

July 15, 2013, Platinum Jewelers, 1136 Market Street, Philadelphia, PA
Attempted Armed Robbery

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 3 and 5 through 18 and Overt Act 4 of Count One of this indictment are incorporated here.

2. On or about July 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARK WOODS,
a/k/a "Bundles,"
a/k/a "Brian Bosket,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
MICHAEL QUEEN,
a/k/a "Little Has,"
a/k/a "Has,"
DANIEL HAYES,
a/k/a "Geez," and
JEFFREY BELLAMY,
a/k/a "Fats," and
BRANDON SEGERS,
a/k/a "B"**

and A.M., a person known to the grand jury to be deceased, attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, MICHAEL QUEEN, DANIEL HAYES, JEFFREY BELLAMY, and BRANDON SEGERS, and A.M. unlawfully attempted to take and obtain, and aided and abetted the attempted unlawful taking and obtaining of, property, that is, jewelry and cash, from other persons against their will by means of actual and

threatened force, violence, and fear of injury, immediate and future, to their persons and property, that is, by using semiautomatic pistols to threaten and control the victims and attempt to steal jewelry and cash from them.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARK WOODS,
a/k/a "Bundles,"
a/k/a "Brian Bosket,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
MICHAEL QUEEN,
a/k/a "Little Has,"
a/k/a "Has,"
DANIEL HAYES,
a/k/a "Geez," and
JEFFREY BELLAMY,
a/k/a "Fats," and
BRANDON SEGERS,
a/k/a "B"**

and A.M., a person known to the grand jury to be deceased, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Six of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT EIGHT

November 7, 2013, 1471 Leas Way, Hatfield, PA
Armed Home Invasion Attempted Robbery

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 5 through 18 and Overt Act 5 of Count One of this indictment are incorporated here.
2. On or about November 7, 2013, in Philadelphia, and Hatfield, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a “Lil,”
MARCUS BOWENS,
a/k/a “Money,”
a/k/a “Little Money,”
a/k/a “Junior,”
MICHAEL QUEEN,
a/k/a “Little Has,”
a/k/a “Has,”
BRAHEIM BALLARD,
a/k/a “Big Fellow,”
a/k/a “Big Homie,”
a/k/a “Brian Moore,” and
JAMAL DOGGETT,
a/k/a “Jersey,”**

attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARCUS BOWENS, MICHAEL QUEEN, BRAHEIM BALLARD, and JAMAL DOGGETT attempted to take and obtain, and aided and abetted the attempted unlawful taking and obtaining of, property, that is, marijuana and proceeds from the sale of marijuana, from M.M. against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by using semiautomatic pistols to threaten and control M.M. and attempt to steal marijuana and

proceeds from the sale of marijuana from M.M.

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 5 through 18 and Overt Act 5 of Count One of this indictment are incorporated here.

2. On or about November 7, 2013, in Philadelphia, and Hatfield, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a “Lil,”
MARCUS BOWENS,
a/k/a “Money,”
a/k/a “Little Money,”
a/k/a “Junior,”
MICHAEL QUEEN,
a/k/a “Little Has,”
a/k/a “Has,”
BRAHEIM BALLARD,
a/k/a “Big Fellow,”
a/k/a “Big Homie,”
a/k/a “Brian Moore,” and
JAMAL DOGGETT,
a/k/a “Jersey,”**

with intent to cause death and serious bodily harm, took, and aided and abetted the taking of, from the person and presence of another, by force and violence, and by intimidation, a motor vehicle, that is, a 2003 BMW 525, VIN WBADS43483GE11191, that had been transported, shipped, and received in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 7, 2013, in Philadelphia, and Hatfield, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
MICHAEL QUEEN,
a/k/a "Little Has,"
a/k/a "Has,"
BRAHEIM BALLARD,
a/k/a "Big Fellow,"
a/k/a "Big Homie,"
a/k/a "Brian Moore,"
JAMAL DOGGETT,
a/k/a "Jersey,"**

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Eight of this indictment, and carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count Nine of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT ELEVEN

January 27, 2014, 4844 Pulaski Avenue, Philadelphia, PA
Armed Home Invasion Robbery

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 5 through 18 and Overt Act 6 of Count One of this indictment are incorporated here.
2. On or about January 27, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARK WOODS,
a/k/a "Bundles,"
a/k/a "Brian Bosket,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
LEVERN JACKSON,
a/k/a "Bucket,"
a/k/a "V," and
JEFFREY BELLAMY,
a/k/a "Fats,"**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, LEVERN JACKSON, and JEFFREY BELLAMY unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, cocaine and the proceeds from the sale of cocaine, from J.B. against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by using semiautomatic pistols to threaten and control J.B. and steal cocaine and the proceeds from the sale of cocaine from him.

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

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 27, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARK WOODS,
a/k/a "Bundles,"
a/k/a "Brian Bosket,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
LEVERN JACKSON,
a/k/a "Bucket,"
a/k/a "V," and
JEFFREY BELLAMY,
a/k/a "Fats,"**

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Eleven of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT THIRTEEN

April 16, 2014, 6067 Regent Street, Philadelphia, PA
Armed Home Invasion Attempted Robbery

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 5 through 18 and Overt Act 7 of Count One of this indictment are incorporated here.

2. On or about April 16, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARK WOODS,
a/k/a "Bundles,"
a/k/a "Brian Bosket,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
TERRANCE MUNDEN,
a/k/a "Boob,"
a/k/a "Boo,"
ROBERT HARTLEY,
a/k/a "Do,"
a/k/a "Doo,"
a/k/a "Dooman,"
HASAN CHANEY,
a/k/a "Has,"
a/k/a "Big Has,"
LEVERN JACKSON,
a/k/a "Bucket,"
a/k/a "V," and
JEFFREY BELLAMY,
a/k/a "Fats,"**

and A.M., a person known to the grand jury to be deceased, attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, TERRANCE MUNDEN,

ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, and JEFFREY BELLAMY, and A.M. attempted to take and obtain, and aided and abetted the attempted unlawful taking and obtaining of, property, that is, cocaine and proceeds from the sale of cocaine, from other persons against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by using semiautomatic pistols to threaten and control the victims and attempting to steal cocaine and proceeds from the sale of cocaine from the victims.

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

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 5 through 18 and Overt Act 7 of Count One of this indictment are incorporated here.
2. On or about April 16, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARK WOODS,
a/k/a "Bundles,"
a/k/a "Brian Bosket,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
TERRANCE MUNDEN,
a/k/a "Boob,"
a/k/a "Boo,"
ROBERT HARTLEY,
a/k/a "Do,"
a/k/a "Doo,"
a/k/a "Dooman,"
HASAN CHANEY,
a/k/a "Has,"
a/k/a "Big Has,"
LEVERN JACKSON,
a/k/a "Bucket,"
a/k/a "V," and
JEFFREY BELLAMY,
a/k/a "Fats,"**

and A.M., a person known to the grand jury to be deceased, with intent to cause death and serious bodily harm, took, and aided and abetted the taking of, from the person and presence of another, by force and violence, and by intimidation, a motor vehicle, that is, a 2009 Toyota Camry, VIN 4T1BE46K19U805047, that had been transported, shipped, and received in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT FIFTEEN

On or about April 16, 2014, in Philadelphia, in the Eastern District of Pennsylvania,

defendants

KHALIL SMITH,
a/k/a “Lil,”
MARK WOODS,
a/k/a “Bundles,”
a/k/a “Brian Bosket,”
MARCUS BOWENS,
a/k/a “Money,”
a/k/a “Little Money,”
a/k/a “Junior,”
TERRANCE MUNDEN,
a/k/a “Boob,”
a/k/a “Boo,”
ROBERT HARTLEY,
a/k/a “Do,”
a/k/a “Doo,”
a/k/a “Dooman,”
HASAN CHANEY,
a/k/a “Has,”
a/k/a “Big Has,”
LEVERN JACKSON,
a/k/a “Bucket,”
a/k/a “V,” and
JEFFREY BELLAMY,
a/k/a “Fats,”

and A.M., a person known to the grand jury to be deceased, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Thirteen of this indictment, and carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count Fourteen, and brandished, and aided and abetted the brandishing of, those firearms.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT SIXTEEN

April 29, 2014, 5736 Wyndale Avenue, Philadelphia, PA
Armed Home Invasion Attempted Robbery

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 5 through 18 and Overt Act 9 of Count One of this indictment are incorporated here.

2. On or about April 29, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARK WOODS,
a/k/a "Bundles,"
a/k/a "Brian Bosket,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
TERRANCE MUNDEN,
a/k/a "Boob,"
a/k/a "Boo,"
ROBERT HARTLEY,
a/k/a "Do,"
a/k/a "Doo,"
a/k/a "Dooman," and
JEFFREY BELLAMY,
a/k/a "Fats,"**

and A.M., a person known to the grand jury to be deceased, attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS, MARCUS BOWENS, TERRANCE MUNDEN, ROBERT HARTLEY, and JEFFREY BELLAMY, and A.M. attempted to take and obtain, and aided and abetted the attempted unlawful taking and obtaining of, property, that is, cocaine and proceeds from the sale of cocaine, from L.T. against his will by means of actual and threatened

force, violence, and fear of injury, immediate and future, to his person and property, that is, by using semiautomatic pistols to threaten and control L.T. and attempt to steal cocaine and proceeds from the sale of cocaine from L.T.

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

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 29, 2014, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARK WOODS,
a/k/a "Bundles,"
a/k/a "Brian Bosket,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
TERRANCE MUNDEN,
a/k/a "Boob,"
a/k/a "Boo,"
ROBERT HARTLEY,
a/k/a "Do,"
a/k/a "Doo,"
a/k/a "Dooman," and
JEFFREY BELLAMY,
a/k/a "Fats,"**

and A.M., a person known to the grand jury to be deceased, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Sixteen of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1), as set forth in this indictment, defendants

**KHALIL SMITH,
a/k/a "Lil,"
MARK WOODS,
a/k/a "Bundles,"
a/k/a "Brian Bosket,"
MARCUS BOWENS,
a/k/a "Money,"
a/k/a "Little Money,"
a/k/a "Junior,"
MICHAEL QUEEN,
a/k/a "Little Has,"
a/k/a "Has,"
TERRANCE MUNDEN,
a/k/a "Boob,"
a/k/a "Boo,"
ROBERT HARTLEY,
a/k/a "Do,"
a/k/a "Doo,"
a/k/a "Dooman,"
HASAN CHANEY,
a/k/a "Has,"
a/k/a "Big Has,"
LEVERN JACKSON,
a/k/a "Bucket,"
a/k/a "V,"
BRAHEIM BALLARD,
a/k/a "Big Fellow,"
a/k/a "Big Homie,"
a/k/a "Brian Moore,"
WILLIAM JEFFERSON,
a/k/a "Money,"
a/k/a "Big Money,"
DANIEL HAYES,
a/k/a "Geez,"
JAMAL DOGGETT,
a/k/a "Jersey,"**

**JEFFREY BELLAMY,
a/k/a “Fats,”
ROMEL ANTHONY,
a/k/a “Dame,”
ERIC SCOTT, and
BRANDON SEGERS,
a/k/a “B,”**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of these offenses, that is,

1. A Smith & Wesson, Model SW40VE, .40 caliber semi-automatic pistol, serial number PBE4270 and 14 rounds of .40 caliber ammunition;
2. A Taurus, Model Millennium Pro, 9mm semi-automatic pistol, serial number TIX25370 and 12 rounds of 9mm ammunition;
3. A Smith & Wesson, Model M&P357C, .357 Sig caliber semi-automatic pistol, serial number DUK4677 and four rounds of .357 Sig caliber ammunition;
4. A Smith & Wesson, Model SW40VE, .40 caliber semi-automatic pistol, serial number DSD0048; and
5. A Ruger, Model P97DC, .45 caliber semi-automatic pistol, serial number 663-03080.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1).

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**