

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

Norfolk Division



UNITED STATES OF AMERICA

v.

JAQUATE SIMPSON,
a/k/a "Quay," "J," Stacks," "Predator,"
(Counts 1-8)

LANDIS JACKSON,
a/k/a "Juve," "Juvie,"
(Counts 1-8)

KALUB SHIPMAN,
a/k/a "Kato," "Baydo,"
(Counts 4, 6-9)

NELSON EVANS,
(Counts 6-9)

PATRICE FARLAND,
a/k/a "Treece,"
(Counts 3, 5)

BRIAN TATE,
a/k/a "B. Tate,"
(Count 3)

MARIO LOVE,
a/k/a "O,"
(Count 3)

and

SHAFTER MANUEL,
a/k/a "Pete,"
(Count 3)

Defendants.

UNDER SEAL

CRIMINAL NO. 2:20-CR- **90**

21 U.S.C. § 848
Continuing Criminal Enterprise
(Count 1)

21 U.S.C. § 848(e)(1)(A) and 18 U.S.C. § 2
Murder While Engaged in a Continuing
Criminal Enterprise
(Count 2)

21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A), and
(b)(1)(D)
Conspiracy to Manufacture, Distribute, and
Possess with Intent to Manufacture and Distribute
Cocaine, Heroin, Fentanyl, and Marijuana
(Count 3)

21 U.S.C. §§ 841(b)(1)(A), 848(e)(1)(A), and
18 U.S.C. § 2
Murder While Engaged in a Drug Trafficking
Offense
(Count 4)

21 U.S.C. § 841(a)(1), (b)(1)(B) and 18 U.S.C. § 2
Distribution of Cocaine
(Count 5)

18 U.S.C. §§ 924(c)(1), and 924(j), and 2
Use of a Firearm Resulting in Death
(Count 6)

18 U.S.C. §§ 1958(a) and 2
Conspiracy to Commit Murder for Hire
(Count 7)

18 U.S.C. §§ 1958(a) and 2
Murder for Hire
(Count 8)

) 18 U.S.C. §§ 922(g)(1) and 924(a)(2)
) Felon in Possession of a Firearm
) (Count 9)
)
) 18 U.S.C. §§ 3591 and 3592
) Notice of Special Findings
)
) 18 U.S.C. §§ 924(d); 21 U.S.C.
) § 853; 28 U.S.C. § 2461
) Criminal Forfeiture

INDICTMENT

September 2020 – at Norfolk, Virginia

General Allegations

At all times relevant to this Indictment:

1. Defendants JAQUATE SIMPSON, a/k/a “Quay,” a/k/a, “J,” a/k/a “Stacks, a/k/a “Predator” (SIMPSON), and LANDIS JACKSON, a/k/a “Juve,” a/k/a “Juvie” (JACKSON), managed a large-scale, international drug trafficking organization (the SIMPSON DTO), principally based in Greensboro, North Carolina, that generated millions of dollars of illicit revenue from narcotics sales between 2012 and 2017.

2. The SIMPSON DTO principally sold cocaine but was also involved in the trafficking of heroin, fentanyl, and marijuana. The primary sources of supply for the SIMPSON DTO were multiple Mexican Drug Trafficking Organizations (the Mexican DTOs), one of which employed separately prosecuted co-conspirator Jorge Sandoval and furnished the SIMPSON DTO with kilogram quantities of cocaine from November 2015 until June 2016, when Sandoval was arrested with 50 kilograms of cocaine.

3. SIMPSON and JACKSON employed wholesale transporters, couriers, stash-house managers, and lower-level retail narcotics dealers as part of the SIMPSON DTO. Defendant MARIO LOVE, a/k/a “O” (LOVE), transported kilogram quantities of narcotics from

the Mexican DTOs to locations designated by SIMPSON. Defendant SHAFTER MANUEL, a/k/a “Pete” (MANUEL), transported kilogram quantities of narcotics to and from locations used by the SIMPSON DTO, as directed by SIMPSON. Defendant BRIAN TATE, a/k/a “B. Tate” (TATE), and separately prosecuted co-conspirator Joshua Wallington, a/k/a “Cap” (Wallington), managed a stash house location that received kilogram quantities of narcotics and then broke down those wholesale amounts for distribution to other retail level distributors, including separately prosecuted co-conspirator Jarvis Powell (Powell). Separately prosecuted co-conspirator Penny McCrimmon (McCrimmon) managed a stash house location that received wholesale quantities of narcotics that she broke down and sold directly to customers. Separately prosecuted co-conspirator Marcus Crouch, a/k/a “Boo” (Crouch), managed a stash house that received kilogram quantities of narcotics from MANUEL and then redistributed wholesale amounts of narcotics to retail-level distributors employed by the SIMPSON DTO. Defendant PATRICE FARLAND, a/k/a “Treece” (FARLAND), couriered kilogram quantities of cocaine from North Carolina to a drug trafficking organization in Virginia (the Beale DTO) on behalf of the SIMPSON DTO. Separately prosecuted co-conspirator Eric Crawford (Crawford) used a taxi to transport SIMPSON DTO narcotics and drug proceeds to and from locations designated by SIMPSON. Crawford also drove SIMPSON to meet with Mexican DTO employees to pick up wholesale quantities of cocaine. Separately prosecuted co-conspirator Whitney Ware (Ware), co-conspirator C.J., and McCrimmon allowed SIMPSON to store SIMPSON DTO narcotics and proceeds at their residences.

Dispute Between the SIMPSON DTO and a Member of the Beale DTO
Resulting in the Murder of Lillian Bond

4. From in or about 2012 to on or about April 19, 2016, the SIMPSON DTO regularly supplied kilogram quantities of cocaine to the Beale DTO, a large-scale drug-

trafficking organization based in Norfolk, Virginia, run by separately prosecuted defendant Reginald Beale.

5. The Beale DTO employed couriers, stash-house managers, and retail level narcotics distributors locally in Hampton Roads. Separately prosecuted Beale DTO member Brandon Williams regularly collected retail-level narcotics proceeds and then bundled them together to purchase kilogram quantities of cocaine from the SIMPSON DTO. The cocaine was regularly delivered to him by FARLAND in exchange for approximately \$36,000 per kilogram.

6. In or about April 2016, FARLAND delivered two kilograms of cocaine to Brandon Williams, expecting to receive United States currency in exchange, which she was then to return to the SIMPSON DTO. Williams accepted the cocaine, but failed to pay FARLAND.

7. In or about April 2016, FARLAND reported Williams's failure to pay to SIMPSON.

8. In or about April 2016, SIMPSON spoke to JACKSON about Williams's failure to pay, and JACKSON suggested that they should kill both FARLAND and Brandon Williams as retribution for the theft and loss of income to the SIMPSON DTO.

9. In or about April 2016, SIMPSON made FARLAND show him where Brandon Williams lived. FARLAND identified a residence on Trice Terrace, in Norfolk, Virginia, as the residence of Brandon Williams.

10. In or about April 2016, SIMPSON asked JACKSON to find a hitman who would kill someone associated with Brandon Williams's residence as a lesson to those who failed to pay the SIMPSON DTO.

11. In or about April 2016, JACKSON coordinated the hiring of co-defendant KALUB SHIPMAN, a/k/a "Kato," a/k/a "Baydo" (SHIPMAN), who was a member of the Nine

Trey Gangsters Bloods gang. SHIPMAN was hired to kill any person, or persons, associated with the Williams residence on Trice Terrace in Norfolk. In exchange, JACKSON offered to pay SHIPMAN \$10,000 in United States currency for each person killed at the Trice Terrace residence in retaliation for Brandon Williams's failure to pay.

12. On or about April 18, 2016, SHIPMAN and co-defendant NELSON EVANS (EVANS) traveled from North Carolina to Norfolk for the purpose of killing anyone associated with Brandon Williams's Norfolk residence.

13. On or about April 19, 2016, SHIPMAN and EVANS drove to Williams's Trice Terrace residence. Williams's aunt, Lillian Bond, exited the home she shared with her nephew to take out the trash at approximately 11:30 a.m. SHIPMAN and EVANS shot and killed Lillian Bond.

14. In or about late April 2016, SIMPSON told a member of the SIMPSON DTO words to the effect of, "his [Brandon Williams's] grandma had to feel it!" and "they caught the lady taking the trash out."

15. In or about April 2016, the SIMPSON DTO paid SHIPMAN an amount of United States currency for the murder of Lillian Bond.

Conversion of Illegal Narcotics Proceeds and Money Laundering

16. SIMPSON and JACKSON used SIMPSON DTO-generated illicit proceeds to purchase expensive jewelry and to pay for SIMPSON and large groups of associates to take international trips. SIMPSON purchased a Chevrolet Corvette and regularly leased other luxury cars, including a Rolls Royce Wraith, for thousands of dollars each month. SIMPSON purchased custom-made designer sneakers and courtside NBA tickets for himself and a date using SIMPSON DTO proceeds.

17. SIMPSON opened shell companies in the names of JQ Trucking LLC and JQ LLC Investments to help launder the proceeds of narcotics sales. SIMPSON's co-conspirator C.J. and several other associates helped SIMPSON create the shell companies and advised SIMPSON on structuring deposits below \$10,000 to avoid detection by law enforcement.

18. SIMPSON purchased distressed properties in nominee company names for the purpose of using narcotics proceeds to maintain, repair, and sell the properties, as another vehicle for laundering money.

19. In or about August 1, 2017, SIMPSON funded the purchase of a residence located at 2001 Apex Place in High Point, North Carolina, through McCrimmon's business, PHA Investments LLC, using SIMPSON DTO drug proceeds for the purpose of laundering money.

20. In or about the fall of 2017, SIMPSON and JACKSON also used SIMPSON DTO drug proceeds to sponsor a music show at Club Creed in Greensboro, North Carolina, as a means of laundering money.

Dispute with C.S. Over a Drug Debt and Conspiracy to Commit Murder-for-Hire

21. In or about September 2017, unindicted co-conspirator C.S. was living in a residence at 2001 Apex Place, in High Point, North Carolina, that McCrimmon had purchased

using SIMPSON DTO proceeds. C.S. purchased a substantial quantity of narcotics from TATE and then failed to pay for the drugs, generating a debt of approximately \$12,000 to the SIMPSON DTO.

22. In or about the end of October 2017, SIMPSON attempted to hire a hitman from unindicted co-conspirator A.H., who was based in Charlotte, North Carolina. On or about October 28, 2017, SIMPSON told A.H. that he would pay \$10,000 for each person killed who was associated with the Apex Place residence. SIMPSON indicated that it did not matter who the victim was or if there was more than one victim, so long as the victims were associated with the Apex Place residence. A.H. attempted to get a hitman from New York to fly in for the job, but that individual could not meet SIMPSON's timeframe.

23. In or about the end of October 2017, SIMPSON sought to hire unindicted co-conspirators A.P., a/k/a "Red," and S.P., a/k/a "Chub," to kill anyone associated with 2001 Apex Place as payback for the unpaid drug debt accrued by C.S. On or about October 28, 2017, SIMPSON told S.P., "I got something that needs to be smashed today, tomorrow, you know what I mean? ... 'cause basically the motherf*cker owe me like twelve racks, he don't even know I'm mad about it, it's been like three weeks, he ain't communicating so know what I mean, it's just like, long as anybody ... long as anybody in the house gets touched up, it's all good, you know what I'm saying?" SIMPSON further clarified, "But for real for real, I don't care, ... whoever answers the door they can feel it, as long as somebody get crushed. I don't care if it's actually him. I just want ... I just want him just to suffer, you feel me? Just anybody."

24. In or about the end of October 2017, S.P. told SIMPSON he (S.P.) would prefer to kill the man who actually owed SIMPSON money instead of just anyone associated with the residence. SIMPSON responded, "I don't give a damn, whoever answers the door, it's just him,

his girl and some type of lil' homey. I don't care who in that motherf*cker, to be honest with you."

25. On or about October 28, 2017, S.P. requested the address and SIMPSON texted, "2001 apex pl high point."

26. Between the end of October 2017 and December 2017, S.P., A.P., SIMPSON, and others performed surveillance at 2001 Apex Place, attempting to determine when a gray Mercury Grand Marquis, a vehicle associated with C.S., was present at the residence.

Statutory Allegations

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Continuing Criminal Enterprise)

1. The allegations contained in the General Allegations section of this Indictment are re-alleged and incorporated as if set forth fully herein.

2. From in or about 2012 until in or about December 2017, within the Eastern District of Virginia and elsewhere, the defendants, JAQUATE SIMPSON, a/k/a “Quay,” a/k/a, “J,” a/k/a “Stacks, a/k/a “Predator,” and LANDIS JACKSON, a/k/a “Juve,” a/k/a “Juvie,” did unlawfully, knowingly, and intentionally engage in a continuing criminal enterprise in that they unlawfully, knowingly, and intentionally violated Title 21, United States Codes, Sections 846, 841(a)(1), and 841(b)(1), which violations include, but are not limited to, the substantive violations alleged in Counts Three and Five of this Indictment, which are re-alleged and incorporated as if set forth fully herein, and which violations were part of a continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801 *et seq.*, undertaken by the defendants, in concert with at least five other persons with respect to whom the defendants occupied the positions of organizer, supervisor, and any position of management, and from which such continuing series of violations the defendants obtained substantial income and resources.

(In violation of Title 21, United States Code, Section 848.)

COUNT TWO

(Murder While Engaged in a Continuing Criminal Enterprise)

On or about April 19, 2016, in Norfolk, Virginia, in the Eastern District of Virginia, the defendants, JAQUATE SIMPSON, a/k/a “Quay,” a/k/a, “J,” a/k/a “Stacks, a/k/a “Predator,” and LANDIS JACKSON, a/k/a “Juve,” a/k/a “Juvie,” together with others known to the grand jury, while engaged in and working in furtherance of a continuing criminal enterprise, as alleged in the General Allegations section and Count One of this Indictment, which are re-alleged and incorporated as if set forth fully herein, did intentionally kill, and counsel, command, induce, procure, and cause the intentional killing of an individual, and such killing did result.

(In violation of Title 21, United States Code, Section 848(e)(1)(A), and Title 18, United States Code, Section 2.)

COUNT THREE

(Conspiracy to Manufacture, Distribute, and Possess with Intent to
Manufacture and Distribute Cocaine, Fentanyl, and Marijuana)

1. The allegations contained in the General Allegations section of this Indictment are re-alleged and incorporated as if set forth fully herein.

2. From in or about 2012 through in or about December 2017, in the Eastern District of Virginia and elsewhere, the defendants, JAQUATE SIMPSON, a/k/a “Quay,” a/k/a, “J,” a/k/a “Stacks, a/k/a “Predator,” LANDIS JACKSON, a/k/a “Juve,” a/k/a “Juvie,” PATRICE FARLAND, a/k/a “Treece,” BRIAN TATE, a/k/a “B. Tate,” MARIO LOVE, a/k/a “O,” and SHAFTER MANUEL, a/k/a “Pete,” did knowingly and intentionally combine, conspire, confederate and agree together and with other persons, both known and unknown to the grand jury, to commit one or more of the following offenses:

- a. To knowingly and intentionally manufacture, distribute, and possess with intent to manufacture and distribute five kilograms 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) and (b)(1)(A);
- b. To knowingly and intentionally manufacture, distribute, and possess with intent to manufacture and distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A);
- c. To knowingly and intentionally manufacture, distribute, and possess with intent to manufacture and distribute, 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); and
- d. To knowingly and intentionally distribute, and possess with intent to distribute, less than 50 kilograms of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

3. The quantity of controlled substances involved in the conspiracy is:
 - a. With respect to all of the named defendants, the amount of cocaine involved in the conspiracy attributable to each of them, as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to each of them, is five kilograms 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) and (b)(1)(A)(ii);
 - b. With respect to defendant JAQUATE SIMPSON, the amount of heroin involved in the conspiracy attributable to him, as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(i);
 - c. With respect to defendant JAQUATE SIMPSON, the amount of fentanyl involved in the conspiracy attributable to him, as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A)(vi); and
 - d. With respect to defendants JAQUATE SIMPSON, LANDIS JACKSON, BRIAN TATE, and MARIO LOVE, the amount of marijuana involved in the conspiracy attributable to each of them, as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is less than 50 kilograms of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

WAYS, MANNER AND MEANS OF THE CONSPIRACY

The ways, manner and means by which the conspiracy to distribute the controlled substances listed above was to be accomplished included, but were not limited to, the following:

1. It was part of the conspiracy for SIMPSON, on behalf of the SIMPSON DTO, to regularly receive shipments of cocaine in increments ranging from between four to six kilograms per week, from Mexican DTOs, for approximately \$29,000 per kilogram. The SIMPSON DTO then redistributed wholesale quantities of cocaine to other DTOs in North Carolina and Virginia. LOVE transported cocaine shipments from the Mexican DTOs to the SIMPSON DTO. The cocaine was then redistributed to other locations by MANUEL and to other co-conspirators, including BRIAN TATE, separately prosecuted co-conspirators Joshua Wallington, Peggy McCrimmon, Jarvis Powell, Marcus Crouch, Eric Crawford, Whitney Ware, and others.

2. It was part of the conspiracy for SIMPSON and JACKSON to supply wholesale quantities of cocaine and other drugs to other associates of the SIMPSON DTO for local resale, as well as to other DTOs, including the Beale DTO, located in Norfolk, Virginia, through frequent cocaine shipments.

3. It was part of the conspiracy for FARLAND to travel regularly from Greensboro, North Carolina, to Norfolk, Virginia, with wholesale quantities of cocaine from the SIMPSON DTO to sell to the Beale DTO. Separately prosecuted co-conspirator Brandon Williams, a member of the Beale DTO, commonly accepted and paid for those cocaine shipments. FARLAND would collect the money from Brandon Williams and return it to SIMPSON.

4. It was part of the conspiracy for SIMPSON and JACKSON to use violence or the threat of violence to maintain respect for and fear of the SIMPSON DTO.

5. It was part of the conspiracy for SIMPSON and JACKSON to employ hitmen to kill people who failed to pay drug debts to the SIMPSON DTO.

6. It was part of the conspiracy for SIMPSON and JACKSON to direct the hitmen to kill individuals associated with those who failed to pay drug debts to the SIMPSON DTO so as to send a message that the SIMPSON DTO was not an organization to cross.

7. It was part of the conspiracy for those hitmen, including defendants KALUB SHIPMAN, a/k/a "Kato," a/k/a "Baydo," and NELSON EVANS, and other unindicted co-conspirators, to plan, coordinate, and/or execute the killing of individuals present at locations affiliated with people who had stolen from or owed money to the SIMPSON DTO.

8. It was part of the conspiracy for SIMPSON or JACKSON to offer to pay an amount of United States currency for each victim, and to use coded language to describe the targets and the targets' locations.

9. It was part of the conspiracy for SIMPSON, JACKSON, TATE, and separately prosecuted co-conspirator Eric Crawford, to use rental cars and taxis to transport cocaine and other drugs to and from SIMPSON DTO "stash houses" maintained or used by TATE and separately prosecuted co-conspirators Marcus Crouch, a/k/a "Boo," and Joshua Wallington, a/k/a "Cap."

10. It was part of the conspiracy for SIMPSON to open "front" companies, including JQ Trucking LLC and JQ Investments LLC, for the purpose of laundering drug proceeds generated by the SIMPSON DTO through sponsoring musical events and purchasing real estate. Real estate was also purchased to launder drug proceeds through companies controlled by other members of the SIMPSON DTO.

11. It was part of the conspiracy for SIMPSON and JACKSON to use SIMPSON DTO proceeds to purchase jewelry, expensive trips, and event tickets.

OVERT ACTS

The objective of the conspiracy was to make money through the distribution of illegal controlled substances. In furtherance of the conspiracy, and to accomplish the objective thereof, the following overt acts, among others, were committed in the Eastern District of Virginia, the Middle District of North Carolina, and elsewhere:

1. On or about April 12, 2013, Brandon Williams and unindicted co-conspirator R.B. possessed approximately \$78,000 in United States currency generated by the Beale DTO, which they intended to use to purchase kilogram quantities of cocaine from the SIMPSON DTO.

2. On or about March 26, 2016, JACKSON and SHIPMAN, approximately three weeks before the murder of Lillian Bond, met in a car located in the Overland Heights neighborhood in Greensboro, North Carolina.

3. On or about March 26, 2016, SIMPSON formalized the purchase of approximately four kilograms of cocaine from a Mexican DTO, at a residence located on North Pugh Street, in Lexington, North Carolina.

4. In or about mid-April 2016, FARLAND traveled from Greensboro, North Carolina, to Norfolk, Virginia, with two kilograms of cocaine supplied by the SIMPSON DTO and delivered them to separately prosecuted co-conspirator Brandon Williams, a member of the Beale DTO.

5. In or about mid-April 2016, FARLAND called Brandon Williams multiple times in an effort to find out where the money was for the two kilograms of cocaine he had received from her on behalf of the SIMPSON DTO.

6. In or about mid-April 2016, SIMPSON unsuccessfully attempted to contact Brandon Williams to find out where the money was that Williams owed for the two kilograms of cocaine FARLAND had supplied to him.

7. In or about mid-April 2016, SIMPSON contacted JACKSON and asked his advice on how to handle Brandon Williams's failure to pay for the two kilograms of cocaine.

8. In or about early April 2016, JACKSON counseled SIMPSON to kill both FARLAND and Brandon Williams.

9. In or about early April 2016, SIMPSON threatened to kill FARLAND if she did not show him where Brandon Williams lived.

10. On or about April 13, 2016, FARLAND took SIMPSON to Norfolk and identified a residence on Trice Terrace that she knew to be associated with Brandon Williams.

11. On or about April 13, 2016, SIMPSON instructed JACKSON to find a man willing to kill a person or multiple persons at Williams's residence on Trice Terrace, in exchange for \$10,000 in United States currency per victim, as retaliation against Brandon Williams for the theft.

12. On or about April 13, 2016, JACKSON hired SHIPMAN, a member of the local Nine Trey Gangsters Bloods gang in Greensboro, North Carolina, to kill someone associated with Brandon Williams's residence for the purpose of retaliating against Williams for the drug debt he owed to the SIMPSON DTO.

13. On or about April 18, 2016, EVANS and SHIPMAN traveled from North Carolina to Portsmouth, Virginia, in a car registered to EVANS's girlfriend.

14. On or about April 18, 2016, EVANS and SHIPMAN discussed their plan to commit a murder the next day.

15. On or about April 19, 2016, EVANS and SHIPMAN purchased gasoline at a Speedway gas station in Portsmouth, Virginia.

16. On or about April 19, 2016, in Norfolk, Virginia, EVANS and SHIPMAN shot and killed Lillian Bond (Brandon Williams's aunt) in broad daylight after she walked out of her home on Trice Terrace to take out the trash.

17. On or about April 19, 2016, EVANS and SHIPMAN drove from Norfolk, Virginia, back to North Carolina.

18. On or about April 19, 2016, SHIPMAN posted a picture of himself at dinner with his Nine Trey Gangsters superior D.K., a/k/a "Diddo," with the caption, "Eat food see food or b food."

19. On or about April 19, 2016, FARLAND searched the social media platform Facebook for the Facebook page of Lillian Bond's daughter.

20. In or about the week of April 23, 2016, SIMPSON told a SIMPSON DTO associate, in sum and substance, "his grandma had to feel it!" and "they caught the lady taking the trash out."

21. On or about May 14, 2016, SHIPMAN contacted JACKSON to accept two additional contract killings. SHIPMAN sent a coded text message to JACKSON referring to the two killings: "if you give me two more eggs, I'll scramble the situation for breakfast."

22. On or about June 1, 2016, separately prosecuted co-conspirator Jorge Sandoval possessed fifty kilograms of cocaine, several of which were designated for distribution to the SIMPSON DTO.

23. After SHIPMAN was arrested in an unrelated matter on or about June 20, 2016, SIMPSON contacted JACKSON and expressed his concern that SHIPMAN might talk to the

police. SIMPSON asked JACKSON if he had gotten “solid” people to do the hit, referring to the murder of Lillian Bond. SHIPMAN attempted to communicate with JACKSON through intermediaries to request assistance in posting a bond for bail.

24. On or about August 25, 2017, while JACKSON and SIMPSON discussed packaging and purchasing narcotics, JACKSON told SIMPSON, “I need all top sh*t. I’m coming with forty bands, maybe thirty five.” SIMPSON responded, “Nah, for the top notch, that sh*t, you gotta pay for that,” and JACKSON replied, “Man, I got forty thousand, what the f*ck? Cash.”

25. On or about August 29, 2017, SIMPSON instructed LOVE to transport ten kilograms of cocaine using Crawford and his taxi.

26. On or about August 29, 2017, LOVE told SIMPSON that he was meeting Crawford, but that neither LOVE nor Crawford had a bag that could hold all ten kilograms of cocaine. SIMPSON replied, “You know what would be good? You could put uh, two in one bag and then you could put the other eight in ... in a separate one.”

27. On or about September 2, 2017, SIMPSON and unindicted co-conspirator R.Y., a California-based heroin supplier, agreed that R.Y. would mail a kilogram of heroin to SIMPSON at an address on Tuscaloosa Street in Greensboro, North Carolina. SIMPSON informed R.Y. that he would be in Miami at that time, and R.Y. replied, “Let’s get the green machine rolling.”

28. On or about September 2, 2017, SIMPSON told FARLAND that he was in Florida and had spoken to “Pootie” (Reginald Beale, the separately prosecuted head of the Beale DTO). Beale and SIMPSON spoke about how Brandon Williams had failed to pay for two kilograms of cocaine that the SIMPSON DTO had supplied in April 2016. SIMPSON told

FARLAND that he had denied playing a role in the murder of Lillian Bond when he spoke to Beale in Florida. SIMPSON said Beale agreed to stay out of SIMPSON's way.

29. On or about September 2, 2017, FARLAND and SIMPSON discussed Brandon Williams's reaction to the murder of his aunt, Lillian Bond. FARLAND told SIMPSON, "B still holdin' a grudge." SIMPSON replied by asking, "Oh, so you think B know what happened," and FARLAND responded, "Yeah, he, I mean, he ... he know what he did, like, yeah."

30. On or about September 2, 2017, SIMPSON related additional information to FARLAND about his previous conversation with Beale. SIMPSON told FARLAND that he had said to Beale, "you heard 'bout what happened with B ... what B did to me," referencing Brandon Williams. SIMPSON told FARLAND that Beale had replied, "I kinda heard it, but I ain't hear it all ... how much he get you for? I know he got you for some," and that SIMPSON had responded, "I was like ... it was for two joints."

31. On or about September 3, 2017, LOVE and SIMPSON discussed the SIMPSON DTO's current inventory of cocaine. LOVE told SIMPSON, "it will be twenty 'cause you took ten, I took one, took four and then five." SIMPSON and LOVE disagreed about how many kilograms were left, but agreed that the starting total was 30 kilograms. LOVE informed SIMPSON that some of the cocaine had been distributed to separately prosecuted co-conspirator Marcus Crouch a/k/a "Boo."

32. On or about September 7, 2017, SIMPSON told TATE that he had purchased real estate and registered the owners as other women employed by the SIMPSON DTO. SIMPSON informed TATE that he planned to fix up the houses as part of his effort to launder drug proceeds. SIMPSON referenced a house located on Apex Place in High Point, North Carolina,

and said, "the crib went on the market, so I ... I ... was like Penny, yo ... my real estate lawyer gonna call you, if you see a crib for the low, grab it."

33. On or about September 7, 2017, SIMPSON told TATE about an argument he had had with McCrimmon at the house on Apex Place and mentioned that "C.S.," who owed the SIMPSON DTO money for a drug debt, had been present in the back room.

34. On or about September 8, 2017, SIMPSON and TATE discussed drug proceeds, and SIMPSON asked, "How much you got? How much, how much is it on the, on the head?" TATE responded, "thirty," and SIMPSON instructed him, "Well, look, damn man. Drop it off to Boo."

35. On or about September 8, 2017, SIMPSON contacted separately prosecuted co-conspirator Marcus Crouch, a/k/a "Boo," to tell him that TATE was dropping off \$30,000 in SIMPSON DTO proceeds. SIMPSON explained, "Um, B. Tate 'bout to drop some cheese off, you ain't gotta count it. It's thirty on the head, I'mma come take care of you"

36. On or about September 8, 2017, SIMPSON asked McCrimmon about a customer TATE supplied with cocaine named "C.S.," who was living at the Apex Place home SIMPSON had purchased in McCrimmon's name. SIMPSON stated, "My man said he served him, served him a quarter ... a quarter of dog. He said he don't know what he get on the snow." SIMPSON and McCrimmon then discussed her management of the renovations to the Apex Place home.

37. On or about September 8, 2017, SIMPSON inquired about the delivery of a kilogram of heroin hidden inside a karaoke machine, which had been mailed from an address on Douglass Avenue in Riverside, California, to SIMPSON's father's house on Tuscaloosa Street in Greensboro, North Carolina. SIMPSON asked his father to let SIMPSON know if he saw a package at the house.

38. On or about September 8, 2017, SIMPSON and McCrimmon discussed drugs and drug proceeds. During the conversation, SIMPSON replied, "Naw, I'm talkin' 'bout thirty-six grand, first and foremost, then now I'm talkin' 'bout my respect." In response to a statement McCrimmon made that upset him, SIMPSON stated, "Who is you talkin' to? Do I gotta take your skull off? F*ck you mean? You playing with my paper, nobody plays with me. Nobody plays with me. You the only person that's playin' games with me right now ... I'm my own boss. I'm a shot caller, man."

39. On or about September 10, 2017, SIMPSON accused McCrimmon of working for the police. McCrimmon denied it. SIMPSON then demanded nine ounces of cocaine back from McCrimmon because, according to him, she was taking too long to sell it: "Give me a nine or either half and you can keep the rest until you done with it. You got too much, I can't wait on all that."

40. On or about September 20, 2017, SIMPSON and unindicted co-conspirator C.J. talked about the logistics of laundering drug proceeds by sponsoring a music show during the North Carolina A&T State University homecoming weekend in Greensboro. SIMPSON told C.J., "I don't wanna lose, but I'm really just tryin' to throw a nice party, probably break even. If I lose a couple bands, so what, know what I'm saying? I got my own POS system, so I get to put eighty clean grand in there, and just say hey, this legit. Know what I'm sayin', that's my whole thing of doing it." SIMPSON explained that "throwin' parties, and havin' that sh*t set up, Eventbrites and all that, that sh*t's smart as hell. I can get property and all that sh*t, clean as f*ck."

41. On or about September 20, 2017, a SIMPSON DTO associate and SIMPSON discussed structuring bank deposits from the music show SIMPSON was promoting to launder

drug proceeds. The associate asked SIMPSON, "You know you cannot make a ten thousand dollar deposit in the bank at one time, right?" SIMPSON asked in response, "Oh, even ... even after the party? ... Or just keep puttin' like nine in there, eight in there." The associate replied, "You're gonna break it down within a twenty-four hour period. So we need to discuss that when you come in tomorrow."

42. On or about September 22, 2017, SIMPSON and MANUEL discussed MANUEL meeting LOVE to pick up multiple kilograms of cocaine. SIMPSON told MANUEL, "Sh*t, I need, um, I need you to damn meet 'O' and them um joints for me." MANUEL asked SIMPSON to send him the phone number associated with "O," and SIMPSON replied with the number by text message.

43. On or about September 22, 2017, SIMPSON instructed MANUEL to transport three kilograms of cocaine to Marcus Crouch, a/k/a "Boo." SIMPSON told MANUEL, "I need you to um, get three to Boo." MANUEL agreed.

44. On or about September 22, 2017, JACKSON told SIMPSON that his drug profits for that day were four thousand dollars. JACKSON and SIMPSON then discussed some of the SIMPSON DTO employees that JACKSON supervised directly and the amount of cocaine they were selling. JACKSON told SIMPSON that JACKSON "has got bread all over the place ... Man, I gotta lot of nig*as rocking man ... I got Elliot, and I got the joint dude, my High Point dude ..."

45. On or about September 23, 2017, SIMPSON called unindicted co-conspirator "Paul" to discuss the delivery of a kilogram of heroin from California. SIMPSON asked "Paul," "It should've been there today, right?" "Paul" replied, "Yeah, pretty sure ... that's what he said," and SIMPSON asked "Paul" to confirm the timing of the delivery. Approximately three hours

later, another unidentified co-conspirator, who worked with “Paul” in California, called SIMPSON, spoke with him about the timing of the package’s arrival, and then explained that “we’re gonna do it a different way ... probably like in thirds.” SIMPSON asked whether the package would be “a whole thing though,” and the man confirmed that it would be; he explained that the change was necessary because of a different kilogram of heroin that had disappeared in transit two weeks prior. SIMPSON then discussed structuring the payment for the heroin in amounts under \$10,000. The man replied, “We just gotta make sure it gets there. That’s the only thing I’m worried about. I’m gonna make sure it gets there first, and then we’ll worry about that later. I’m not trippin’ off the change.”

46. On or about September 24, 2017, JACKSON and SIMPSON discussed one of their sub-dealers, “Gucci,” who was directly supervised by JACKSON, and who had had his narcotics stolen from his residence. JACKSON and SIMPSON then discussed what JACKSON would do if he were robbed. JACKSON told SIMPSON, “If a nig*a get down on me, I’ll whack all his people. I ain’t ’bout to chase your ass. That’s my thing. I’m not gonna chase you ... I know you gonna hide out for two weeks until it blow over In the heat of the moment when I’m mad, I’m whacking somebody. I don’t give a f*ck.” Both JACKSON and SIMPSON began to laugh, and JACKSON continued, “You ... you gonna bury somebody, so f*ck it. That’s my motto. I’m whackin’ somebody. I’m on that for life, I don’t give a f*ck how much money I get, I’m doing it. I ain’t paying. I’m whackin’ your ass. I gotta get the, gotta get the ache out my heart.”

47. On or about September 25, 2017, TATE and SIMPSON discussed the music event SIMPSON was promoting to launder drug proceeds during a college homecoming weekend in Greensboro. TATE agreed to purchase a table for \$2,500. TATE and SIMPSON then began

talking about SIMPSON DTO drug proceeds. TATE told SIMPSON, "I'mma have you half tomorrow and ... I'mma have you twelve-five, then I'll meet you tomorrow." SIMPSON agreed.

48. On or about September 26, 2017, TATE informed SIMPSON that he had drug proceeds ready to provide him. TATE told SIMPSON, "I got some chips for you anyway though, that's why I'm really blowin' you up. I been havin' money on me all day." SIMPSON replied, "You can drop it off, but um, but you can um, wait till I see you though ... just don't be riding around with it." TATE responded, "I'mma be ... in here watching Narcos."

49. On or about September 27, 2017, LOVE told SIMPSON about an impending multi-kilogram cocaine delivery.

50. On or about September 28, 2017, SIMPSON spoke to unindicted co-conspirator "Paul" about the failed delivery of one kilogram of heroin to SIMPSON's Tuscaloosa Street location in Greensboro. SIMPSON told "Paul," "I told y'all I needed it, man. I don't even know what to tell my people, man, like, I can't keep lookin' fake in front of my people, man. I been doin' this too long, man, like y'all shoulda just said 'no' from the beginnin', I woulda just told my people 'no.'" "Paul" explained that the delay was due to the fact that his source of supply owed money on other kilograms of heroin, and confirmed, "They're here, just bring the change for them, 'cause we don't have ... like the thing is, I guess we have to cash out another one, we can't just shoot it like we did last time."

51. On or about September 29, 2017, SIMPSON called a West Coast heroin supplier, who introduced himself as working for Paul, to negotiate another shipment of heroin, since the last kilogram SIMPSON had ordered had not arrived safely. SIMPSON said, "It ain't even gotta be a whole one, it could be a nine or a half." The heroin source of supply responded, "I'm gonna do the whole thing ... I ain't tryin' to crash it or nothin', it's gonna be the whole thing, that way

it's worth it for everybody. You know what I mean?" SIMPSON responded by offering a price of \$55,000 for the kilogram of heroin and an additional \$5,000 for the risk associated with the shipment.

52. On or about September 29, 2017, SIMPSON told Crawford to drive to Cedar Fork to give JACKSON narcotics.

53. On or about October 3, 2017, JACKSON and SIMPSON discussed JACKSON's payment for a forthcoming narcotics delivery from SIMPSON. SIMPSON, seeking to confirm the amount of money that would be collected, asked JACKSON, "Seventeen hundred, or racks?" JACKSON confirmed the amount was \$17,000, *i.e.*, "seventeen bands." JACKSON called SIMPSON a few hours later and asked SIMPSON to send him four kilograms of cocaine. JACKSON agreed to bring SIMPSON money in exchange.

54. On or about October 3, 2017, SIMPSON discussed a multi-kilogram cocaine delivery he expected MANUEL to provide to JACKSON. SIMPSON asked MANUEL, "What you got? Four?" MANUEL confirmed the quantity of cocaine, and SIMPSON asked MANUEL to provide the cocaine as soon as possible.

55. On or about October 3, 2017, SIMPSON and JACKSON discussed a potential problem with a multi-kilogram cocaine delivery. JACKSON told SIMPSON, "You said them sh*ts opened up like somebody playin' with 'um."

56. On or about October 3, 2017, SIMPSON called MANUEL to talk to him about the status of a cocaine shipment. SIMPSON asked MANUEL, "Hey, did you open them up?" MANUEL responded, "Hell nah, I ain't touch nothin'." SIMPSON replied, "Oh, he said, his brother said somethin' like they was open like somebody been playin' with 'um." MANUEL told SIMPSON that "the way you gave it to me is the way I put it in that damn car."

57. On or about October 3, 2017, JACKSON reported to SIMPSON, "Yeah, the sh*t, the sh*t open, but it ain't down to like, where the food at, but that sh*t definitely opened, to like, somebody playin' with it They tried to get into it, 'cause it's down to where the grease at. It's grease all over it, like, the sh*t tore open, like in the middle, like a nig*a tryin' to cut a diamond in it or dig in it." JACKSON confirmed that only one of the kilograms of cocaine had been tampered with.

58. On or about October 3, 2017, SIMPSON and TATE discussed the timeliness of TATE's payments to SIMPSON for drugs. SIMPSON told TATE, "I said don't take all day payin' that bullsh*t back," and TATE responded, "Oh my God, I just gave you thirty racks, man, come on."

59. On or about October 4, 2017, McCrimmon reminded SIMPSON that she had run out of drugs to sell. She also informed him that she used some SIMPSON DTO drug proceeds to pay her rent, saying, "It's the first of the month. If I tell you five days ago I ain't got no food, then what the f*ck that tell you? I got seven bands, three of them yours, four of them was gonna be yours ... but you waited so goddamn long, I gotta take two outta the four to pay my rent."

60. On or about October 4, 2017, SIMPSON spoke to JACKSON about a partial payment of \$102,000 for four kilograms of cocaine. When SIMPSON asked JACKSON about the amount, JACKSON responded, "102 I told you, you askin' the dumb ass question ... I ain't them other dudes, my sh*t precise." SIMPSON replied, "Nah, you, you was saying 17 somethin' yesterday," and JACKSON confirmed, "I said I was 17 short."

61. On or about October 5, 2017, SIMPSON instructed unindicted co-conspirator C.J. to go to his house and pick up \$2,000 out of the \$102,000 SIMPSON had there; the \$2,000 was

to be spent on items for the show SIMPSON was promoting. SIMPSON sated, "There's 102 at the house, and um, just grab two and then just leave a even 100 up there Make sure it's nice and neat the way I got it, and it should be a odd two."

62. On or about October 5, 2017, SIMPSON reprimanded McCrimmon for not telling him where she was selling narcotics. SIMPSON said, "You all in nig*as faces, man, you gotta understand, I'll put a hole in your f*ckin' scalp. And I don't give a f*ck 'bout nobody's soul." SIMPSON then accused McCrimmon of misleading him about drug proceeds, and told her, "I'm the f*cking Grim Reaper." After McCrimmon asked SIMPSON what he was going to do, SIMPSON said, "You think I'm a pu*sy, man ... you and your little homies, your little homeboys you smiling with ... I'm telling you, I'm the f*cking devil."

63. On or about October 6, 2017, SIMPSON and JACKSON discussed the difficulties associated with organizing a music show at Club Creed, in Greensboro, North Carolina, which SIMPSON was using to launder drug proceeds. SIMPSON said, "I don't give a f*ck, anybody steal from me ... I'm shooting 'em. I'm the only motherf*cker goddamn getting up, meeting everybody" JACKSON later agreed and stated, "If you got a game plan, then that's really your duty though," to which SIMPSON responded, "Nah, man. I ain't doin' none of that sh*t man. I give up on that sh*t, I'm a drug dealer, man and I'mma just say look, whoever steals from me, it's war in the streets."

64. On or about October 7, 2017, MANUEL called SIMPSON to see how he was feeling after the Club Creed show had failed to generate a large turnout. SIMPSON indicated that he was not concerned because the show allowed him to launder \$80,000 of SIMPSON DTO proceeds. SIMPSON told MANUEL, "I'm so happy that I got a way to have some clean change, I got a way to throw a clean eighty in the bank and buy some property and write a check for

some property, you feel me?” SIMPSON then switched topics and asked MANUEL how many kilograms of narcotics he had available, and MANUEL told him he had four kilograms.

65. On or about October 7, 2017, MANUEL and SIMPSON discussed a gun that SIMPSON said he needed. MANUEL stated, “Yeah, Boo told me in the car ... he say he called and told somebody send for the strap.” SIMPSON replied, “My people gonna move some, put some work in with one.”

66. On or about October 19, 2017, MANUEL and SIMPSON discussed an unindicted co-conspirator and SIMPSON DTO drug dealer, C.K. a/k/a “Bow,” who wanted to move up in the organization and sell larger quantities of drugs. MANUEL told SIMPSON, “Hey um, Bow was tryin’ to get in touch with you ... he say he had a ... play for the other part.” SIMPSON asked, “The whole half?” MANUEL confirmed that C.K. wanted the whole half kilogram. Simpson later referred to the expected proceeds and said, “Yeah, tell him to give me thirty-four.”

67. On or about October 24, 2017, SIMPSON confirmed with separately indicted co-conspirator R.B. that there was a money counter in the spare bedroom closet of SIMPSON’s father’s home on Tuscaloosa Street in Greensboro.

68. On or about October 25, 2017, separately prosecuted co-conspirator Jarvis Powell possessed 405 grams of cocaine belonging to the SIMPSON DTO, which he had received from TATE.

69. On or about October 25, 2017, TATE and SIMPSON discussed the arrest of Powell, the police seizure of 405 grams of cocaine, and the potential danger Powell’s arrest might pose for the SIMPSON DTO. SIMPSON asked TATE, “What’d they get ’im with?” TATE responded, “Goddamn three, I just gave him three bigs.” SIMPSON instructed TATE to clean out a drug stash house in case the police planned to execute a search warrant. SIMPSON

said, "Get ery'thing outta there," and TATE responded, "Oh yeah, man, that sh*t gone. Like ... like ery'thing outta there If they try to hit it ... they ain't gonna do nothin' but damn get nothin'. Ain't gonna get sh*t." TATE, commenting on the seizure of drugs from Powell, stated, "Damn boy, that's twelve racks gone" SIMPSON, while attempting to placate TATE, replied, "Boy, I took a hundred and twenty grand loss last year, don't worry 'bout that loss You gotta take a loss to become a boss."

70. On or about October 25, 2017, TATE called SIMPSON and stated, "Somebody snitchin' on me, man." SIMPSON told TATE, "Damn man, you better switch ery'thing up, man, right now. They probably gonna come tonight," to which TATE replied, "Yeah, yeah. Everything gone though, I mean, na'mean?" SIMPSON told TATE to stop using the phone and demanded a face-to-face meeting.

71. On or about October 27, 2017, SIMPSON told TATE that they needed to get Jarvis Powell out of jail so that they could find out what the police were asking him. SIMPSON said, "We need to bail Jarvis out and see what the f*ck he, they saying." SIMPSON and TATE then discussed the money that would be needed to post for Powell, and TATE agreed to supply half the money.

72. On or about October 28, 2017, unindicted co-conspirator A.H. and SIMPSON discussed a plan to rob a drug dealer. A.H. asked SIMPSON, "Alright, if you got some uh, some hitters down there that are tryin' to eat some food? You know, uh, ... got a good, a good meal for 'em?" SIMPSON responded, "I definitely got that, how much is it? How much they got?" SIMPSON asked A.H. how difficult the robbery was going to be, and A.H. responded, "They gotta buckle in for sure." SIMPSON asked whether the robbery would be worth \$100,000. A.H.

replied, "Uh, probably not that much, but I mean, I'm not for sure how much he owe them, but he keeps stackin'" SIMPSON agreed to make arrangements for the robbery.

73. On or about October 28, 2017, SIMPSON called unindicted co-conspirator A.P., a/k/a "Red," and told him about A.H.'s robbery proposal and about a murder contract SIMPSON wanted to arrange in retaliation for a drug debt owed to the SIMPSON DTO by a person associated with 2001 Apex Place, in High Point, North Carolina. SIMPSON told A.P., "The motherf*cker got ... he counted ninety-seven grand in his house, and he got some work, know what I'm sayin'? He like, you got some soldiers? I said, a'ight, don't worry 'bout that. But I got another situation, it's at this crib in High Point. And basically, motherf*ckers done fucked my man out some change, so he say ... he say he don't care who it is, whoever drop in the house, it's ten, it's ten apiece. It's ten apiece. It don't matter who it is in that crib, it's ten apiece. So if y'all gonna hit four mother*ckers, that's forty bands." A.P. expressed interest in committing the robbery, but not in the second contract for murder.

74. On or about October 28, 2017, twenty minutes after speaking to A.P., SIMPSON called A.H. to discuss how SIMPSON could complete A.H.'s robbery job in exchange for A.H. accepting SIMPSON's murder contract. SIMPSON told A.H., "I got some people that'll take care of that down that way, um, if you'll take ... you can take care of somethin' down this way for me?" SIMPSON insisted that they "do the whole nine yards." A.H. indicated that he had people who could carry out SIMPSON's murder-for-hire contract. SIMPSON then described the murder contract related to the house on Apex Place. He informed A.H. that he was not worried about who was killed, so long as it was someone from the Apex Place house. SIMPSON offered to pay \$10,000 for each person killed. A.H. agreed and informed SIMPSON that he would send people from Atlanta to fulfill the contract.

75. On or about October 28, 2017, SIMPSON made another call to A.H. to provide additional details about the murder contract. SIMPSON insisted the murder take place in the daytime.

76. On or about October 28, 2017, A.H. attempted a three-way call with A.H.'s associate in Atlanta and SIMPSON, but the call was unsuccessful. A.H. then provided SIMPSON the telephone number for the Atlanta man A.H. believed would commit the murder for SIMPSON.

77. On or about October 28, 2017, SIMPSON, A.H., and an unidentified co-conspirator from Atlanta discussed SIMPSON's murder-for-hire contract. SIMPSON stated, "I got a situation ... it's basically like a cleanup job. But um, my man own the crib or whatever, and it's ... the motherf*ckers that's in there ... probably like two people in there, but they won't see it comin', just a boom, bam, and if you get both of them, that'd be ten a piece, but each person ten, know what I'm sayin'? I just didn't want it to get too late, and it look like and it be like a B & E." SIMPSON added, "it don't matter who in there ... it's really like a um, a lesson, know what I'm sayin'? Anybody in there, it don't matter." The unindicted co-conspirator responded, "Man, gimme 'bout thirty, forty-five minutes to put my team together."

78. On or about October 28, 2017, SIMPSON called A.H. to tell him that he was leaving town and it would be better if A.H.'s associates did the killings while he was gone.

79. On or about October 28, 2017, SIMPSON grew impatient with A.H. and his Atlanta associate when they could not provide SIMPSON with a definite time when the killings would take place, so SIMPSON called unindicted co-conspirator S.P., a/k/a "Chub," to offer him the murder contract he had previously discussed with A.H. SIMPSON provided S.P. with details about his plan, including the fact that the purpose of the contract was to punish someone who

owed the SIMPSON DTO \$12,000. SIMPSON told S.P., “the motherf*cker owe me like twelve racks, he don’t even know I’m mad about it, it’s been like three weeks, he ain’t communicatin’ ... long as anybody in the house gets touched up, it’s all good, you know what I’m saying?” SIMPSON clarified again that it did not matter to him which specific person was killed: “whoever answers the door they can feel it, as long as somebody get crushed. I don’t care if it’s actually him. I just want ... I just want him just to suffer, you feel me? Just anybody.” S.P. expressed his preference for killing the man who actually owed the SIMPSON DTO money, explaining, “I’d rather seen the dude that, get the one that owe the change.” SIMPSON disagreed and stated, “I don’t give a damn, whoever answers the door, it’s just him, his girl and some type of lil’ homie. I don’t care who in that motherf*cker, to be honest with you.”

80. On or about October 28, 2017, S.P. told SIMPSON that he would do the killing himself, using references to contracting work as coded language for murder. S.P. stated, “I’mma come up there and do the carpentry work myself.” SIMPSON and S.P. discussed a firearm that could be used for the job, and SIMPSON said, “I gave him a drill the last time ... he ain’t gotta give that back.” S.P. then asked, “can you text me the address?” SIMPSON responded, “Yeah, I’ll text it right now.”

81. On or about October 28, 2017, SIMPSON sent a text message to S.P. with the words, “2001 Apex Place.”

82. On or about October 28, 2017, S.P. responded to SIMPSON’s message with the text, “Got it.”

83. On or about October 29, 2017, SIMPSON continued to coordinate a planned murder with S.P.: “Y’all gonna wash some cabinets ... he drives that uh, silver Marquis out there, like it’s just him, know what I’m sayin’? He so green to the fact, you can be oh, you

can wait till he come out and do it the old ... the regular way, or they can just knock on the door, be like, 'hey man' ... you know what I'm saying?" S.P. asked for a description of the target, and SIMPSON provided a generalized description of C.S.'s weight and hairstyle. SIMPSON told S.P., "his car out there now ... it's simple, bam bam. He don't see it comin' or nothin', know what I'm sayin'?" SIMPSON reiterated that the killing was for a drug debt and stated, "On normal sh*t, I be like yo, we gotta plot it, know what I'm sayin' ... like on, na'mean, but this one, he a peon for real, it's just the fact that he plays with the chip, know what I'm sayin'? It's simple as hell but I just ... I just hate the fact that he ain't communicate."

84. On or about October 29, 2017, S.P. called SIMPSON again to confirm that S.P. had the correct location for the murder target. S.P. asked, "This a crib, right? Lil' house, ain't no apartment?" SIMPSON replied, "Yeah. A lil' blue, a lil' blue house." S.P. then confirmed the address from the earlier text and said, "I'mma send my construction worker to take a look at it today. They gonna look at it."

85. On or about October 29, 2017, S.P. called SIMPSON again to tell him that A.P. a/k/a "Red" had not kept his gun after his earlier failure to complete the requested murder. SIMPSON then called another unidentified co-conspirator and instructed him, "Call O.J. and let him know I said, um, I did wannna come by there and get that um, that ... that piece of cake Let me have it, and I'll give it right back to him." Three minutes later, S.P. called SIMPSON and told him that the grey car was not there; he also confirmed with SIMPSON that 2001 Apex Place was on the corner. S.P. then told SIMPSON, "Yeah, so just to let you know, like, he ain't, he ain't there, so we can't just go and just check the plumbin' and all that if he ain't there so ... But the next time you hear from me though, you'll, you'll hear about it ... It'll be all cleaned up and floors and ery'thing."

86. On or about October 30, 2017, S.P. and SIMPSON discussed the status of the firearm A.P. was supposed to obtain for the Apex Place murder contract. S.P. asked SIMPSON about C.S., the man whose theft from the SIMPSON DTO led to the contract. SIMPSON stated, "He feel like he got off ... that sh*t dumb, I can't sleep well when sh*t like that goin' on. Like a'ight, motherf*cker ... I just wanna, know what I'm saying? ... ASAP." S.P. confirmed he would contact A.P. about the gun.

87. On or about October 30, 2017, SIMPSON and an unindicted co-conspirator discussed the SIMPSON DTO's ability to supply drugs in Fredericksburg, Virginia. SIMPSON stated, "That's gonna be all love 'cause like that Fredericksburg ... now I got a line for that ... within the next five ... well, I say three to seven days, we gonna get the ball rollin'." The unindicted co-conspirator assured SIMPSON that he would assist: "Whatever's comfortable for you ... you make all the decisions, cuz ... I'm just following your lead."

88. On or about November 3, 2017, SIMPSON and S.P. discussed the status of the Apex Place murder contract. S.P. informed SIMPSON that he had people conducting surveillance on the house. SIMPSON told S.P. that the man who had stolen from him drove "one them long cars. Grand Marquis." S.P. stated, "Somebody might be comin' there with a black Pathfinder," and SIMPSON responded, "That's probably his uncle, man That's most definitely the crib, that's probably his uncle though." S.P. then called an unidentified man who was actively watching the house. SIMPSON, the unidentified male watching the house for S.P., and S.P. verified that the men were watching the correct house. The unidentified man told SIMPSON, "When he get to a good stoppin' point, I'mma just go on and get him right there." S.P. told SIMPSON that they needed to switch their phones. Later that day, S.P. called SIMPSON to give him an update. SIMPSON stated, "Hell yeah, tell him, sh*t, he probably gotta

mash on the Pathfinder then or somethin’.” S.P. asked, “We gotta do what?” SIMPSON restated, “mash on the Pathfinder.” S.P. replied, “I don’t understand what you said,” and SIMPSON restated again, “You probably gonna have to mash on the Pathfinder dude then.”

89. On or about November 4, 2017, SIMPSON called S.P. to inform him that C.S. was at the Apex Place house and that S.P.’s associate, whom SIMPSON referred to as “Bruh,” was not doing his job. S.P. answered SIMPSON’s call and said, “You can’t call my good phone.” SIMPSON replied, “I know, look man ... I just went by that joint, man ... Bruh ain’t on business, dude there ... light on, he in there ... I ain’t gonna hit the good line no more, I just had to let you know, man, Bruh ain’t on that sh*t.” S.P. replied, “He is, I’m about to call him right now.”

90. On or about November 4, 2017, SIMPSON called S.P. for an update on the Apex Place murder-for-hire, and S.P. stated, “Hey, he down there, but listen ... we can’t be doin’ all this phone play, like, know what I’m sayin’?” SIMPSON replied, “I woke you up, my bad, man ... I was up, man ... I know the damn cabinets didn’t just damn get all dusty that quick and leave.” S.P. replied, “Yeah ... yeah, we gonna strip and wax the floors and ery’thing. You know what I’m sayin’ He, he taking the stripper down there and ery’thing, so we gonna strip and wax the floors and buff and clean ery’thing up.”

91. On or about November 6, 2017, LOVE called SIMPSON to tell him about a drug delivery. SIMPSON requested 12 kilograms of cocaine using a coded reference to the number on a football player’s jersey. SIMPSON said he was at the Omni and asked LOVE to bring the “Tom Brady number.” LOVE told him in response, “Yeah, I got way more ... I got way more than that.” LOVE then asked, “Oh, you need me to take ... Brady to Boo?” SIMPSON answered in the affirmative.

92. On or about November 6, 2017, SIMPSON called Crouch a/k/a "Boo" to ask how many people were at the stash house before LOVE delivered 12 kilograms of cocaine to the house. SIMPSON asked, "Oh, is it a lotta people over there? Damn OK, 'cause Mario's about to pull up, I ain't want it to look too obvious." Crouch asked, "What is it? A bag, right?" SIMPSON answered, "Well, it's ... it's a lot ... it's kind of a lot."

93. On or about November 6, 2017, JACKSON used coded language to ask SIMPSON to send him two kilograms of cocaine. SIMPSON then called Crouch and said, "A'ight, well, you can just give him two" Crouch agreed to follow SIMPSON's directive.

94. On or about November 6, 2017, JACKSON agreed he would give SIMPSON \$49,250 to pay for a shipment of narcotics.

95. On or about November 6, 2017, A.P. a/k/a "Red" told SIMPSON that the murder-for-hire contract had been completed at the Apex Place house in High Point. A.P. said, "Bro called me and told me to tell you that uh, they just stripped and waxed the floors and put the cabinets in High Point." SIMPSON then asked if A.P. wanted to be paid. SIMPSON said, "I need to come see you don't I? Want me to give you the um, situation?" SIMPSON and A.P. coordinated the final price for the contract by text message.

96. On or about November 14, 2017, S.P. a/k/a "Chub" called SIMPSON. During the call, SIMPSON told S.P. that the murder-for-hire contract at the Apex Place residence had not been fulfilled. SIMPSON stated, "I talked to my man, man, yeah, he say ain't sh*t happenin' over there ...ain't no big deal though." S.P. replied, "Yeah, yeah it is. Cause' that mean, I'm in the... I'm in the red." SIMPSON reiterated, "they ain't touched no cabinets or nothing." S.P. later assured SIMPSON, "A'ight, well they gotta fix that though."

97. On or about November 17, 2017, McCrimmon called SIMPSON to talk about the drugs she was selling for him. McCrimmon told SIMPSON, "I don't wanna deal with you no more ... I give you, I can give you the uh, money and the rest of the stuff." SIMPSON replied, "Well what's the rest of the stuff nig*a? What's the rest of the sh*t?" McCrimmon then stated, "Well you know I mean, you know, the cocaine. What? You want me to say it on the phone?" SIMPSON responded, "Man! ... how many zips you got left I'm snatching that f*cking sh*t out your f*cking scalp when I f*cking see you too."

98. On or about November 19, 2017, MANUEL and SIMPSON discussed the structure of the SIMPSON DTO. SIMPSON said he spoke to "Q" about making money and that by February everyone should be reporting to "Q," "Darrell," and "Sonny."

99. On or about November 20, 2017, JACKSON requested a kilogram of cocaine from SIMPSON. SIMPSON and JACKSON also discussed SIMPSON's upcoming trip to Mexico, and SIMPSON said, "Tomorrow, gonna get there at one, then they got it set up, like we get there at one, then ... we reserved a yacht at two thirty, so we gonna take the speed boat to the yacht." SIMPSON and JACKSON then discussed a social media posting that included pictures of SIMPSON, A.P. a/k/a "Red," S.P. a/k/a "Chub," and another man SIMPSON called "they lil' shooter." SIMPSON went on to describe the jewelry he was wearing and the fact that he drove his Rolls Royce Wraith to the club rather than his yellow Corvette. In response to SIMPSON's comment about his watch, JACKSON recommended a place where SIMPSON could buy a Rolex watch for \$35,000.

100. On or about November 23, 2017, SIMPSON and JACKSON discussed a piece of jewelry that SIMPSON owned, purportedly worth \$500,000, but that he had never worn. JACKSON encouraged him to wear it: "Nah, you gotta wear that sh*t, you gotta come to the city

one time with that sh*t.” SIMPSON told JACKSON about his trip to Mexico, where he used SIMPSON DTO proceeds to pay for the travel of six people.

101. On or about November 23, 2017, TATE and SIMPSON discussed the Powell arrest and the amount of cocaine seized by the police. SIMPSON asked TATE whether he had “said it was three CD’s or one CD?” TATE responded, “Three CD’s.” SIMPSON exclaimed, “Goddamn that’s a lotta snow, boy.”

102. On or about November 25, 2017, SIMPSON asked S.P., a/k/a “Chub,” if A.P., a/k/a “Red,” still had the gun that was supposed to have been used at the Apex Place murder-for-hire; SIMPSON said that he wanted it back since nothing was being done against the targets at the Apex Place house. S.P. asked SIMPSON about whether he had seen the damage the men hired to do the shooting had done to the house, and specifically whether SIMPSON had looked at the back door. SIMPSON replied, “Yeah, I mean, it’s ... it’s holes at the bottom of the joint, I mean, that’s what they did, I guess they, they finessers, man.” S.P. responded, “Nah, they ain’t finessing. They ain’t finessing sh*t.” SIMPSON replied, “I thought they was hands on, like get right up on it, like, that gotta be in your bloodline, a lot of nig*as, they ain’t built for that ... you can’t just pay nobody for that, that gotta be ... that gotta be in your heart, they ain’t with that.”

103. On or about November 25, 2017, JACKSON requested a kilogram of cocaine from SIMPSON, asking him to “send me a joint right quick man. I told you yesterday, why you playin’ too much games?” SIMPSON responded, “I just got everything rollin’. I’m about to send it your way. I’ll call you in a little bit.” About four hours later, JACKSON called SIMPSON to complain about the packaging around the kilogram of cocaine. JACKSON told SIMPSON, “Man, whoever did that, tell the nig*a tighten up, man ... they just put the joint in there, no bag.” SIMPSON responded, “Yeah they told me they was rushin’, I was rushin’ the f*ck outta ’um,

I'm like, man ... put the sh*t in there, man They did that sh*t badly 'cause I was rushin' 'um."

104. On or about November 25, 2017, SIMPSON and LOVE discussed the amount of cocaine LOVE had previously delivered to SIMPSON.

105. On or about December 1, 2017, SIMPSON and C.K. a/k/a "Bow" discussed a drug debt that C.K. owed SIMPSON. C.K. stated, "I got like thirteen, I got like thirteen joints left, and um, like three bands, know what I'm sayin'?" SIMPSON asked, "Damn, bruh, how'd that happen?" C.K. answered, "Bruh ... I had to bond out, know what I'm sayin', that sh*t was two bands." C.K. promised SIMPSON that he would "have your bread though, you feel me, I just gotta bust down the work. It's gonna take me a couple more days, you feel me?" SIMPSON instructed C.K.: "Well just give Pete whatchu got. Just so we can keep knockin' the ticket down, 'cause I got a lot of sh*t going on, you know? I'll f*ck with you though, just ... I appreciate you bein' honest, but I'm trying to take care of a lot of things."

106. On or about December 1, 2017, SIMPSON told JACKSON about what he intended to spend SIMPSON DTO proceeds on, including professional sports events and hotels. SIMPSON told JACKSON that he wanted to take a woman and several children on a trip "to Africa next year."

107. On or about December 1, 2017, SIMPSON and MANUEL spoke about the drug debt that C.K. owed SIMPSON. SIMPSON recounted his previous conversation with C.K. and told MANUEL, "If he ain't got three grand, he probably got fifteen hundred, man ... I'm like, 'what happened, man?' I don't know what's goin' on, he can't handle it He just goin' crazy ... the man's just lost. He snapped bought a Beamer." MANUEL attempted to convince SIMPSON that C.K. would take care of the debt he owed. SIMPSON instructed MANUEL,

“Yeah, call ’um, man ... get that change up for me I wanna take all my sh*t back, man ... the work and ery’thing, ’cause I ... he gonna f*ck up more and more. I know he is.” MANUEL replied, “Yeah ... he don’t know how serious it can get though, man.”

108. On or about December 1, 2017, MANUEL and SIMPSON again discussed C.K.’s drug debt. MANUEL indicated he was going to collect the money, and SIMPSON said, “Yeah, he’s suspect right now, like I know you believe in ’im, but I, right now, he um, he suspect.” MANUEL replied, “It’s outta my hands ... ain’t nothin’ I can do about that. That’s your, you know what I’m saying? Whatever you say, go.”

109. On or about December 2, 2017, MANUEL told SIMPSON that he had collected some of the drug debt C.K. owed. SIMPSON asked MANUEL if C.K. was part of the Nine Trey Gangsters Bloods gang under “Diddo’s” command.

110. On or about December 2, 2017, JACKSON called SIMPSON to discuss a multi-kilogram narcotics delivery. SIMPSON told JACKSON, “You might have to hold, um, one for me. I’m gonna give you five, you might have to hold one.” SIMPSON and JACKSON discussed how to move the narcotics, and JACKSON said, “You can’t send the dude back over here man. Like once a week. It’s too much hotness. Just trust me, man.” SIMPSON and JACKSON then discussed narcotics proceeds and how much JACKSON had to pay SIMPSON. JACKSON stated, “I’m gonna give you goddamn, I got 119, but I got the rest of the sh*t on the way, so you come after the game.” SIMPSON responded, “Yeah, just hold it ’til I get back from the game.” JACKSON expressed his frustration, saying, “I gotta get that sh*t outta here, man,” and SIMPSON interrupted, “There’s no way I can grab all that money”

111. On or about December 2, 2017, SIMPSON informed LOVE about the four kilograms of cocaine JACKSON was going to receive. SIMPSON told LOVE, “Yeah, just do the

number right under Mario, the four we first talked about ... don't forget to count though." LOVE agreed to SIMPSON's request.

112. In or about the fall of 2017, SIMPSON stored narcotics and drug proceeds at the home of unindicted co-conspirator C.J.

113. On or about December 3, 2017, JACKSON told SIMPSON, "Man, come get this f*cking money out here, man ... I told you I ain't want to have this money, man, come get this f*cking money." SIMPSON responded, "Yeah, I'm on my way. I'll call you when I'm leavin' Greensboro." JACKSON told SIMPSON that the police had stopped him the previous night and provided a detailed description of the circumstances, including his memory of the last time he had spoken to a police officer, which was when he had been with SHIPMAN. JACKSON told SIMPSON, "I ain't talked to the police since me and Kato in Overland Heights."

114. On or about December 3, 2017, SIMPSON and C.J. discussed C.J.'s role in the SIMPSON DTO. C.J. became angry and stated, "You call my phone ten times a day. You come to my house 80 times a day, you stickin' cash over here, bringin' nig*as over here, you f*cking bring stuff over here." C.J. then began talking about aspects of the SIMPSON DTO in un-coded language, including SIMPSON's source of supply and SIMPSON's method of money laundering. SIMPSON told C.J. that she was saying too much over the phone and that he was coming over to her house to get his belongings. SIMPSON instructed her not to call the police.

115. On or about December 5, 2017, JACKSON asked SIMPSON to pick up drug proceeds. SIMPSON told him he would do so, and that he had "got some grow houses up off my man in Colorado I wanna talk to you 'bout." JACKSON asked where SIMPSON was so that they could meet to talk about potential marijuana sources of supply. SIMPSON indicated that he was at the home of separately prosecuted co-conspirator Whitney Ware.

116. On or about December 6, 2017, SIMPSON told TATE how he would respond to threats of violence: "Nig*as don't want me out here ridin' ... all that sh*t they doin' Yeah, I'm talking about motherf*ckers definitely goin' to funerals If you can hit 'um in the arm, you can hit 'um in the head. That's my M.O." SIMPSON and TATE then discussed how the combination of drug dealing and violence invited the attention of law enforcement. SIMPSON stated, "And then with you havin' the violence, with us havin' the violence cases, when you catch the dope case with it, it's Federal Once you violent, and then you catch some yay ... you can go to Fed you can't be violent and be hustlin', you gotta pick. 'Cause the Feds'll pick it up." SIMPSON then told TATE about how Federal law enforcement prosecuted drug organizations: "I'mma tell you how they work though, they watch you for eighteen months Soon as you feel like, damn I'm good ... they got ... they got a whole eighteen months to do what they gotta do ... Hell yeah ... My eighteen months up in February."

117. On or about December 7, 2017, SIMPSON told LOVE to put \$2,000 into his BB&T bank account and then give him \$3,200 in cash. SIMPSON explained, "Oh, I was gonna say, 'cause I been floodin' that account out, I don't want you to put too much in there, but um, if you could put two grand in there and just gimme ... where we at? Fifty-two? And just give me thirty-two in person that'd be dope." LOVE then called SIMPSON back for the details, and SIMPSON instructed, "Yeah, um, with JQ Trucking, JQ Trucking Services, LLC, and then put my full government name in there, 'Jaquate Simpson.' And they should know who I am, at ... Duke Street, my momma address. I don't got my account number on me, but they should."

118. On or about December 10, 2017, SIMPSON and TATE talked about selling marijuana. SIMPSON said, "I'mma be the only one on the east coast with the vanilla. I'm gettin' two hundred pounds of that the first week of February. So this gonna hold us over. I got all my

crops right. It's over now ... It's over, so the crop game over, so go on ahead and get your weed people." TATE asked what the price per bag was going to be, and SIMPSON said they would start with \$2,650 but that TATE should be able to sell it for \$2,830.

119. On or about December 11, 2017, SIMPSON accidentally called S.P. a/k/a "Chub" and stated, "I ain't know this was Chub, what's up man? I tried to call my ... y'all both got the two-six-eight number." S.P. asked, "Oh, you got it memorized or you just got it in your phone?" SIMPSON replied, "Nah, I got it in my ... I got your number in my family phone This my ... dirty phone right here." S.P. followed with, "Yeah, this my family number. You don't suppose to call me."

120. On or about December 11, 2017, SIMPSON instructed C.K. a/k/a "Bow" to pay the drug debt he owed the SIMPSON DTO.

121. On or about December 12, 2017, JACKSON told SIMPSON that JACKSON was getting mixed reviews on the marijuana samples. SIMPSON and JACKSON discussed the merits of growing marijuana inside an enclosed greenhouse. JACKSON indicated that the marijuana was of a higher quality than their clientele was used to smoking. SIMPSON told JACKSON that they were going to flood the streets with the new marijuana.

122. On or about December 12, 2017, SIMPSON and JACKSON discussed the possibility of setting up marijuana grow houses in Michigan: "It's alotta, it's alotta abandoned houses, alotta sh*t you can grab that's big right now. Know what I'm sayin'?" JACKSON agreed and predicted, "My word man, this sh*t gonna go crazy. Can't wait, can't wait ... we gotta get nig*as to motherf*cking bring that bread to the table."

123. On or about December 13, 2017, C.K. a/k/a "Bow" and SIMPSON discussed C.K.'s outstanding drug debt. C.K. told SIMPSON, "I got like five or six zips left I ... can

pay you back though after I bought the car and made bond, I had to flush a zip, but after I did all that, I still was over like twenty five hundred, I was still over, now goddamn, the sh*t, I'm short." SIMPSON confirmed with C.K. that he owed SIMPSON \$12,500 for narcotics. SIMPSON said, "Just let me know what you get at the end of the pack, we'll get it back up, but I ... you gotta give me all you got."

124. On or about December 13, 2017, SIMPSON called MANUEL to tell him about C.K. a/k/a "Bow's" outstanding drug debt. SIMPSON said, "This nig*a Bow just hit me, talking about some, you know he owe me twelve five, right?" MANUEL responded, "That sh*t making my face look bad, man," and SIMPSON replied, "So I'm a probably take it like, end up takin' a eight, nine grand loss f*cking with this nig*a, man. On f*cking Christmas ... man, that nig*a took from my f*cking kids. I hate this nig*a f*cking put a gun down your f*cking throat, rip your f*cking heart out. Hate this nig*a, man." SIMPSON then asked MANUEL, "matter of fact, man ... I might just say f*ck it, man, I'm like, man ... you care about this lil' nig*a?" MANUEL responded, "Man, if I didn't, I wouldn't put him in that situation, but, like you said before bro, once he do that, ain't nothin' I can do about that sh*t, man." SIMPSON continued to express his anger and said, "Nig*a don't even know he f*cking with a demon, man," to which MANUEL responded, "You feel like you gotta do somethin', that's sh*t is out my hands, man ... We talked about that sh*t before ... that sh*t got me feeling some type of way, 'cause now, 'cause I vouched for the nig*a. You know what I'm sayin', like ... put my neck out there for him, and he done f*cked that sh*t up."

125. On or about December 13, 2017, SIMPSON informed JACKSON that C.K. had not paid the drug debt owed to the SIMPSON DTO. JACKSON said, "The man made bond and bought a Beamer." SIMPSON then stated, "I already know he gonna end up comin' with five

bands or four bands, I got money in the street ... man, I'mma eat it ... I'm a probably roll his little ass though for example." JACKSON asked how old C.K. was and SIMPSON replied, "He definitely grown ... he playin' a grown man game, man." SIMPSON then told JACKSON that he was not going to front C.K. any more drugs. JACKSON asked, "What you wanna do, man? You want me to find somebody for you ... walk up on and sh*t?" SIMPSON replied, "He definitely be standing outside. Nah, it's even sweeter, I already know, like, where he rest at I'mma get all I can get out of So I'mma get that off him tomorrow, and it's game time, man."

126. On or about December 13, 2017, MANUEL called SIMPSON to discuss the situation with C.K.: "Man ... I said don't kill him, man." SIMPSON replied, "I ain't gonna kill him, man." MANUEL responded, "But you know I know you, nig*a." SIMPSON explained his feeling about the situation: "Nig*a f*ckin' with my money, man." MANUEL encouraged SIMPSON not to kill C.K.

127. On or about December 13, 2017, SIMPSON agreed to deliver marijuana to LOVE. SIMPSON told LOVE, "Got some Godfather OG, well matter of fact I'm just going to get a bud out of all these and bring it to you," to which LOVE responded, "A'ight, how long you think you gonna be?"

128. On or about December 13, 2017, SIMPSON and LOVE discussed C.K.'s drug debt and how MANUEL did not want SIMPSON to hurt C.K. SIMPSON described his previous conversations and said, "He owe me twelve-five, well twelve thousand five hundred. He said, 'man I don't know what happened man.' He said 'I only got six and a half zips left Keep in mind he don't know me like that. I met him through Pete ... Pete like, 'man don't do nothin' to him, man,' I'm like ... he's in a grown man's game, man."

129. On or about December 13, 2017, SIMPSON asked MANUEL about the security of the six kilograms of SIMPSON DTO cocaine located at Crouch a/k/a “Boo’s” house. SIMPSON asked, “You get it yet? I just don’t trust all that sh*t bein’ over there.” MANUEL asked, “What all you got over there?” SIMPSON responded, “Like, I ain’t got nothin’ but six joints over there.” SIMPSON indicated that he was considering having the six kilograms of cocaine transported to a female SIMPSON DTO employee’s residence.

130. On or about December 13, 2017, SIMPSON instructed Crawford to go to Crouch’s house and then to Whitney Ware’s house, which SIMPSON referred to as “West Market,” for the purposes of furthering the activities of the SIMPSON DTO.

131. On or about December 13, 2017, SIMPSON told Crouch to provide Crawford with kilogram quantities of cocaine. SIMPSON instructed Crouch, “Rick ’bout to... come over there and get the rest of ’em ... yeah, all six of ’em.” Crouch indicated he understood SIMPSON’s instruction, but SIMPSON then changed his mind and told Crouch, “Leave one there and give him five.”

132. On or about December 13, 2017, SIMPSON called Ware to ask her what part of her residence she wanted Crawford to deliver five kilograms of cocaine to. SIMPSON asked, “You wanna go to the top or the bottom,” and Ware replied, “The top.”

133. On or about December 13, 2017, SIMPSON told Crawford where to deliver the cocaine and how Crawford would be compensated for the delivery. SIMPSON stated, “Go to the top ... Um, and then look, um, wait ’bout thirty minutes and I’ll tell Boo to take care of you.”

134. On or about December 13, 2017, A.P. a/k/a “Red” called SIMPSON to determine which phone SIMPSON preferred to use to discuss criminal activities; in particular, A.P. wanted to discuss the 2001 Apex Place murder-for-hire contract with SIMPSON. A.P. asked, “A’ight,

whenever you get a chance, you um, this the good one or the bad one?" SIMPSON replied, "It's the good one," to which A.P. replied, "Oh OK, hit me um, I need to talk to you."

135. On or about December 13, 2017, A.P. called SIMPSON approximately three minutes after his previous call to him, this time dialing a different number, and told SIMPSON, "Yeah, I need to um, meet up, probably tomorrow so we can talk about somethin' ... Yeah, probably 'bout some cabinets or somethin' that ... probably need taking care of." SIMPSON replied, "OK, a'ight, say no more." SIMPSON and A.P. agreed to meet the next day.

136. On or about December 14, 2017, A.P. a/k/a "Red" and SIMPSON met in SIMPSON's car; during the meeting, A.P. said that he had left his phones and car at a gym.

137. On or about December 14, 2017, JACKSON and SIMPSON talked about how SIMPSON obtained his cars, including the Rolls Royce Wraith. SIMPSON stated that he had to put down a deposit of \$100,000, and then he had the option of paying \$3,500, \$5,000, or \$8,000 in monthly payments. SIMPSON then took a call from unidentified co-conspirator "Big John," who that indicated he had a kilogram of heroin ready to sell SIMPSON for \$55,000. SIMPSON asked "Big John" to bring him the heroin. SIMPSON returned to his call with JACKSON and stated, "I ain't lettin' up on these nig*as ... getting a joint of scoob right now." JACKSON replied, "You on your own with that."

138. On or about December 14, 2017, "Big John" told SIMPSON he would have the kilogram of heroin in about an hour and a half, but that he wanted to send his cousin to do the deal down the street from SIMPSON's father's house. SIMPSON replied, "I mean, long as he, long as ery'thing good, na'mean?" Big John stated, "Bruh, bruh, bruh, you been dealin' with me goddamn motherf*cking over a year now, my nig*a." SIMPSON agreed to the plan.

139. On or about December 14, 2017, SIMPSON asked MANUEL to get the heroin he was storing and bring it to Crouch a/k/a "Boo's" house. SIMPSON said, "You know all that, all that scoob I gave you? Just the scoob. Before you go to work, can you get it to Boo?" MANUEL agreed.

140. On or about December 14, 2017, SIMPSON provided "Big John" the address of his father's home.

141. On or about December 14, 2017, "Big John" told SIMPSON that he was en route for the deal and that his people were ten to fifteen minutes behind him. SIMPSON reported that he was going to be 15 minutes behind "Big John" as well.

142. On or about December 14, 2017, S.P. a/k/a "Chub" asked SIMPSON about a delivery of cocaine. S.P. said, "Nah, you know I got "C" comin' round here too, you told me get him to come down here ... you situated?" SIMPSON asked, "Be straight, what's he gonna want?" S.P. replied, "A whole one," and SIMPSON stated, "Yeah, tell 'im to come on."

143. On or about December 14, 2017, SIMPSON spoke with unindicted co-conspirator "Paul" about paying for a shipment of heroin from the West Coast. SIMPSON asked "Paul" whether he could "just give y'all some change, one of y'all some change and a plane ticket to get over and just fly the money back?" "Paul" said that that arrangement was not possible because SIMPSON was responsible for the money and because "Paul's" organization had been taking "hits." SIMPSON replied, "Damn, they ain't take no hit with me." "Paul" responded, "We already took one, what do you mean?" SIMPSON admitted, "Oh yeah ... yeah, they did" "Paul" responded, "I'm still in the hole because of that," and SIMPSON agreed, "A'ight, well I'm um, try to get a plane ticket over there."

144. On or about December 14, 2017, SIMPSON called MANUEL, looking for heroin that MANUEL was keeping for the SIMPSON DTO. SIMPSON asked, "How many bags in there," to which MANUEL replied, "Man, it's like five, six bags." The men discussed which of the bags held "snow," or cocaine, and which held "scoob," or heroin. SIMPSON, after joining Crouch to a three-way call, confirmed that the yellow substance was heroin and asked MANUEL to bring it to SIMPSON's father's house.

145. On or about December 14, 2017, SIMPSON connected a three-way call with MANUEL and Crouch to discuss the whereabouts of the heroin. SIMPSON stated, "Hey, Pete say you didn't give him no dog. That was the same dog we was moving right?" After MANUEL and Crouch argued about which bag had held the heroin, Crouch agreed to look again into the whereabouts of the heroin.

146. On or about December 14, 2017, S.P. a/k/a "Chub" told SIMPSON, "You gotta bring the greenery too now, 'cause Red up here too, we all up here waitin' on you." SIMPSON agreed.

147. On or about December 14, 2017, SIMPSON attempted to meet with McCrimmon at her residence to coordinate the activities of the SIMPSON DTO. McCrimmon asked SIMPSON, "Why you even lettin' me sit up in my house with my garage door open like that?" SIMPSON replied, "I'm backing in now."

148. On or about December 14, 2017, the SIMPSON DTO possessed approximately one kilogram of cocaine, a Glock .40 caliber firearm, and \$4,251 in United States currency, located at a residence on O'Ferrell Street, Greensboro, North Carolina (at the residence of Wallington); five kilograms of cocaine located at a residence on Hiltin Place, Greensboro, North Carolina (at the residence of Ware); 175 grams of cocaine, 1,710 grams of marijuana, \$31,403 in

United States currency, a .22 caliber Arms Co. revolver, a .22 caliber pistol, a .410 gauge Winchester model 41 shotgun, and a Remington Model 550-1 .22 caliber rifle, located at a residence on Tuscaloosa Street, Greensboro, North Carolina (operated by Crouch a/k/a “Boo”); a money counter and a Winchester 12-gauge shotgun, located at a residence on Tuscaloosa Street, Greensboro, North Carolina (at the residence of SIMPSON’s father); 110 grams of cocaine, 3 grams of marijuana and \$679 in United States currency, located at a residence on Mizell Road, Greensboro, North Carolina (at the residence of TATE); 45.5 pounds of marijuana, 2,118 grams of cocaine, 999 grams of fentanyl, and three kilogram presses, located at a residence on Alamosa Drive, High Point, North Carolina (at the residence of McCrimmon); and various items of jewelry with an appraised value in excess of \$400,000, \$69,607 in United States currency, a yellow Chevrolet Corvette, and a leased Rolls Royce Wraith, located at a residence on Casper Lane, Lexington, North Carolina (a residence rented by SIMPSON).

(All in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A), and 841(b)(1)(D).)

COUNT FOUR

(Murder While Engaged in a Drug Trafficking Offense)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April, 19, 2016, in Norfolk, Virginia, in the Eastern District of Virginia, the defendants, JAQUATE SIMPSON, a/k/a “Quay,” a/k/a, “J,” a/k/a “Stacks, a/k/a “Predator,” LANDIS JACKSON, a/k/a “Juve,” a/k/a “Juvie,” and KALUB SHIPMAN, a/k/a “Kato,” a/k/a “Baydo,” while engaged in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A), to wit: conspiracy to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, as alleged in the General Allegations section of this Indictment and Count Three of this Indictment, which are re-alleged and incorporated as if set forth fully herein, did intentionally kill, and did counsel, command, induce, procure, and cause the intentional killing of, victim Lillian Bond, and such killing did result.

(In violation of Title 21, United States Code, Sections 841(b)(1)(A) and 848(e)(1)(A),
and Title 18, United States Code, Section 2.)

COUNT FIVE

(Distribution of Cocaine)

THE GRAND JURY FURTHER CHARGES THAT:

In or about April 2016, in Norfolk, Virginia, in the Eastern District of Virginia and elsewhere, the defendants, JAQUATE SIMPSON, a/k/a “Quay,” a/k/a, “J,” a/k/a “Stacks, a/k/a “Predator,” and PATRICE FARLAND, a/k/a “Treece,” did knowingly and intentionally distribute 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) and (b)(1)(B), and Title 18, United States Code, Section 2.)

COUNT SIX

(Use of a Firearm Resulting in Death)

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 19, 2016, within the Eastern District of Virginia, and elsewhere, the defendants, JAQUATE SIMPSON, a/k/a “Quay,” a/k/a, “J,” a/k/a “Stacks, a/k/a “Predator,” LANDIS JACKSON, a/k/a “Juve,” a/k/a “Juvie,” KALUB SHIPMAN, a/k/a “Kato,” a/k/a “Baydo,” and NELSON EVANS, did knowingly use, carry, and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, to wit:

- a. As to defendants SIMPSON and JACKSON, Murder While Engaged in a Continuing Criminal Enterprise, in violation of 21 U.S.C. § 848(e)(1)(A) and 18 U.S.C. § 2, as set forth in Count Two of this Indictment;
- b. As to defendants SIMPSON, JACKSON, and SHIPMAN, Murder While Engaged in a Drug Trafficking Offense, in violation of 21 U.S.C. §§ 841(b)(1)(A) and 848(e)(1)(A), and 18 U.S.C. § 2, as set forth in Count Four of this Indictment;
- c. As to defendants SIMPSON, JACKSON, SHIPMAN, and EVANS, Conspiracy to Commit Murder for Hire, in violation of 18 U.S.C. §§ 1958(a) and 2, as set forth in Count Seven of this Indictment; and
- d. As to defendants SIMPSON, JACKSON, SHIPMAN, and EVANS, Murder for Hire, in violation of 18 U.S.C. §§ 1958(a) and 2, as set forth in Count Eight of this Indictment;

each of which is re-alleged and incorporated as if set forth fully herein;

and as to defendants SIMPSON and JACKSON, did knowingly use, carry, and discharge a firearm during and in relation to a drug trafficking crime for which they may be prosecuted in a Court of the United States, to wit:

- a. Continuing Criminal Enterprise, in violation of 21 U.S.C. § 848, as set forth in Count One of this Indictment; and
- b. Conspiracy to Distribute and Possess with Intent to Distribute Cocaine, Heroin, Fentanyl, and Marijuana, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 841(b)(1)(D), as set forth in Count Three of this Indictment;

each of which is re-alleged and incorporated as if set forth fully herein;

and in the course of said offenses, caused the death of a person through the use of a firearm, and the killing constituted murder, as defined in 18 U.S.C. § 1111(a), in that the defendant and defendants did willfully, deliberately, maliciously, and with premeditation and malice aforethought, kill Lillian Bond by shooting her with a firearm, and did aid, abet, counsel, command, induce, and procure the commission of that said offense.

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

COUNT SEVEN

(Conspiracy to Commit Murder for Hire)

THE GRAND JURY FURTHER CHARGES THAT:

1. The allegations contained in the General Allegations section of this Indictment are re-alleged and incorporated as if set forth fully herein.

2. Beginning in or about April 2016, and continuing to on or about April 19, 2016, within the Eastern District of Virginia, and elsewhere, JAQUATE SIMPSON, a/k/a "Quay," a/k/a, "J," a/k/a "Stacks, a/k/a "Predator," LANDIS JACKSON, a/k/a "Juve," a/k/a "Juvie," KALUB SHIPMAN, a/k/a "Kato," a/k/a "Baydo," and NELSON EVANS, did knowingly and intentionally conspire with one another to travel in, and to cause another and others to travel in, interstate commerce, and to use, and to cause another and others to use facilities in interstate commerce, that is, automobiles and cellular telephones, with intent that a murder be committed, in violation of the laws of the United States and the Commonwealth of Virginia, as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, resulting in the death of Lillian Bond.

OBJECT OF THE CONSPIRACY

The purpose and object of the conspiracy was to commission the murder of a person, and to in fact murder a person, in retaliation for the theft of cocaine from the SIMPSON DTO.

WAYS, MANNER AND MEANS OF THE CONSPIRACY

The ways, manner and means by which the foregoing objective of the conspiracy to commit murder-for-hire was to be accomplished included, but were not limited to, the following:

1. It was part of the conspiracy that the defendants combined, conspired, and contracted with one another to cause the death of Lillian Bond by forming a plan to cause

defendants SHIPMAN and EVANS to travel from Greensboro, North Carolina, to Norfolk, Virginia, in order to murder a person at a specific residence in Norfolk, Virginia. It was part of the conspiracy that the defendants arranged where the murder would take place, as well as the roles each defendant would play in accomplishing the purposes of the conspiracy.

2. It was further a part of the conspiracy that the defendants agreed that the target of the murder would be a person at the Trice Terrace residence in Norfolk, Virginia, associated with Brandon Williams. When SHIPMAN and EVANS were in position, they shot and killed Lillian Bond after she exited that residence.

3. It was further a part of the conspiracy that the murder would be committed in retaliation for the theft of cocaine from the SIMPSON DTO by Brandon Williams.

4. It was further a part of the conspiracy that SIMPSON and JACKSON promised SHIPMAN and EVANS substantial income, in the form of \$10,000 in United States currency, for killing a person at the Trice Terrace residence in Norfolk.

5. It was further a part of the conspiracy that SIMPSON and JACKSON paid SHIPMAN and EVANS an amount of United States currency for their murder of Lillian Bond.

6. It was further a part of the conspiracy that the defendants used cellular telephones when communicating with one another and coordinating the details and plans for the murder-for-hire plot.

OVERT ACTS

In furtherance of the conspiracy and to accomplish one or more of the purposes thereof, the following overt acts, among others, were committed in the Eastern District of Virginia and elsewhere:

1. In or about April 2016, after Brandon Williams took delivery of two kilograms of cocaine from the SIMPSON DTO and failed to pay for them, SIMPSON called Brandon Williams several times to determine if Brandon Williams was going to pay for the cocaine.

2. In or about April 2016, SIMPSON contacted JACKSON and asked what he should do about Brandon Williams's theft of two kilograms of cocaine from the SIMPSON DTO.

3. In or about April 2016, JACKSON counseled SIMPSON that he should kill both Brandon Williams and Patrice Farland, the SIMPSON DTO drug courier who delivered to Brandon Williams the two kilograms of cocaine that he ultimately stole.

4. On or about April 13, 2016, SIMPSON instructed Farland to identify the Norfolk, Virginia, residence associated with Brandon Williams.

5. On or about April 14, 2016, SIMPSON asked JACKSON to find a hitman who would kill whomever the hitman saw walk out of the Norfolk residence associated with Brandon Williams.

6. On or about April 14, 2016, JACKSON coordinated the hiring of SHIPMAN, who was a member of the local Nine Trey Gangsters Bloods gang in Greensboro, North Carolina, to kill whomever SHIPMAN saw walk out of the Norfolk residence on Trice Terrace that was associated with Brandon Williams, and promised SHIPMAN \$10,000 for the murder.

7. On or about April 14, 2016, SHIPMAN met with fellow Bloods member J.M. and then traveled to Portsmouth, Virginia, to meet with separately prosecuted Nine Trey Gangsters member Alvaughn Davis. SHIPMAN, J.M., and Davis performed reconnaissance on the Trice Terrace residence occupied by Brandon Williams.

8. On or about April 14, 2016, SHIPMAN offered to give some of the money promised for the “hit” to Alvaughn Davis if Davis would shoot someone associated with the Trice Terrace residence. Davis approached the residence with a firearm but did not shoot anyone.

9. On or about April 15, 2016, SHIPMAN and J.M. left the Tidewater area and returned to North Carolina.

10. On or about April 17, 2016, SHIPMAN posted a video on Facebook displaying United States currency and titled the video, “OG getting money.”

11. On or about April 18, 2016, SHIPMAN and EVANS traveled from North Carolina to Portsmouth, Virginia, where they stayed overnight at the residence of Alvaughn Davis.

12. On or about April 18, 2016, in the evening, SHIPMAN and EVANS performed reconnaissance of Brandon Williams’s Trice Terrace residence in Norfolk, Virginia.

13. On or about April 19, 2016, SHIPMAN and EVANS bought gasoline at a Speedway gas station in Portsmouth, Virginia.

14. On or about April 19, 2016, SHIPMAN and EVANS traveled eastbound through the Elizabeth River Tunnel towards Norfolk, Virginia.

15. On or about April 19, 2016, at approximately 11:30 a.m., SHIPMAN and EVANS shot and killed Lillian Bond on the front lawn of Brandon Williams’s Trice Terrace residence.

16. On or about April 19, 2016, SHIPMAN and EVANS returned to North Carolina.

17. On or about April 19, 2016, SHIPMAN posted a video on Facebook entitled “Eat food see food or b food,” a Bloods gang reference to the commission of violence, which showed him eating dinner with his Nine Trey Gangsters superior “Diddo.”

18. In or about April 2016, SIMPSON and JACKSON paid SHIPMAN and EVANS for the murder of Lillian Bond.

19. In or about the week of April 23, 2016, SIMPSON told a co-conspirator, in sum and substance, “his grandma had to feel it!” and “they caught the lady taking the trash out.”

20. On May 14, 2016, SHIPMAN sent a text message to JACKSON that stated, in sum and substance, “if you give me two more eggs, I’ll scramble the situation for breakfast,” referring to two future contracts for killing other people.

21. On or about June 20, 2016, after the arrest of SHIPMAN for an unrelated matter, SIMPSON expressed concern to JACKSON that SHIPMAN would talk to the authorities, causing SIMPSON to ask JACKSON if he had gotten “solid” people to do the “hit.”

(In violation of Title 18, United States Code, Sections 1958 and 2.)

COUNT EIGHT

(Murder for Hire)

THE GRAND JURY FURTHER CHARGES THAT:

1 The allegations contained in the General Allegations section of this Indictment are re-alleged and incorporated as if set forth fully herein.

2. Beginning in or about April 2016, and continuing to on or about April 19, 2016, within the Eastern District of Virginia, and elsewhere, JAQUATE SIMPSON, a/k/a "Quay," a/k/a, "J," a/k/a "Stacks, a/k/a "Predator," LANDIS JACKSON, a/k/a "Juve," a/k/a "Juvie," KALUB SHIPMAN, a/k/a "Kato," a/k/a "Baydo," and NELSON EVANS, aided and abetted by each other, did knowingly and intentionally travel in and cause another and others to travel in interstate commerce, and to use and cause another and others to use facilities in interstate commerce, that is, automobiles and cellular telephones, with intent that a murder be committed, in violation of the laws of the United States and the Commonwealth of Virginia, as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, resulting in the death of Lillian Bond.

(In violation of Title 18, United States Code, Sections 1958 and 2.)

COUNT NINE

(Felon in Possession of a Firearm)

THE GRAND JURY FURTHER CHARGES THAT:

In or about April 2016, in the Eastern District of Virginia and elsewhere, the defendant, KALUB SHIPMAN, a/k/a “Kato,” a/k/a “Baydo,” knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, which had previously been shipped and transported in interstate and foreign commerce.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).)

NOTICE OF SPECIAL FINDINGS

THE GRAND JURY FURTHER CHARGES THAT:

1. The General Allegations section and the allegations of Counts Two, Four, Six, Seven, and Eight of this Indictment are hereby re-alleged and incorporated as if set forth fully herein.

2. As to Count Two of this Indictment, the defendants, JAQUATE SIMPSON, a/k/a “Quay,” a/k/a, “J,” a/k/a “Stacks, a/k/a “Predator,” and LANDIS JACKSON, a/k/a “Juve,” a/k/a “Juvie”:

- a. Were more than 18 years old at the time of the offense. (Title 18, United States Code, Section 3591(a));
- b. Intentionally participated in an act, contemplating that the life of a person would be taken, or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act. (Title 18, United States Code, Section 3591(a)(2)(C));
- c. Committed the offense after having been previously convicted of a Federal or State offense punishable by a term of imprisonment of more than one year, involving the use or attempted or threatened use of a firearm (as defined in Title 18, United States Code, Section 921) against another person. (Title 18, United States Code, Section 3592(c)(2)) (Defendant SIMPSON only);
- d. In commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or

more persons in addition to the victim of the offense. (Title 18, United States Code, Section 3592(c)(5));

- e. Procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. (Title 18, United States Code, Section 3592(c)(7));
- f. Committed the offense after substantial planning and premeditation to cause the death of a person. (Title 18, United States Code, Section 3592(c)(9));
- g. Committed the offense after previously having been convicted of two or more Federal or State offenses, each punishable by a term of imprisonment of more than one year, committed on different occasions, involving the distribution of a controlled substance. (Title 18, United States Code, Section 3592(c)(10)) (Defendant JACKSON only).

3. As to Count Four of this Indictment, the defendants, JAQUATE SIMPSON, a/k/a “Quay,” a/k/a, “J,” a/k/a “Stacks, a/k/a “Predator,” LANDIS JACKSON, a/k/a “Juve,” a/k/a “Juvie,” and KALUB SHIPMAN, a/k/a “Kato,” a/k/a “Baydo”:

- a. Were more than 18 years old at the time of the offense. (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed Lillian Bond. (Title 18, United States Code, Section 3591(a)(2)(A)) (Defendant SHIPMAN only);
- c. Intentionally inflicted serious bodily injury that resulted in the death of Lillian Bond. (Title 18, United States Code, Section 3591(a)(2)(B)) (Defendant SHIPMAN only);

- d. Intentionally participated in an act, contemplating that the life of a person would be taken, or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act. (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life, and Lillian Bond died as a result of the act. (Title 18, United States Code, Section 3591(a)(2)(D) (Defendant SHIPMAN only);
- f. Committed the offense after having been previously convicted of a Federal or State offense punishable by a term of imprisonment of more than one year, involving the use or attempted or threatened use of a firearm (as defined in Title 18, United States Code, Section 921) against another person. (Title 18, United States Code, Section 3592(c)(2)) (Defendant SIMPSON only);
- g. In commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. (Title 18, United States Code, Section 3592(c)(5));

- h. Procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. (Title 18, United States Code, Section 3592(c)(7)) (Defendants SIMPSON and JACKSON only);
- i. Committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value. (Title 18, United States Code, Section 3592(c)(8)); (Defendant SHIPMAN only);
- j. Committed the offense after substantial planning and premeditation to cause the death of a person. (Title 18, United States Code, Section 3592(c)(9));
- k. Committed the offense after previously having been convicted of two or more Federal or State offenses, each punishable by a term of imprisonment of more than one year, committed on different occasions, involving the distribution of a controlled substance. (Title 18, United States Code, Section 3592(c)(10)) (Defendants JACKSON and SHIPMAN only).

4. As to Count Six, Seven, and Eight of this Indictment, the defendants, JAQUATE SIMPSON, a/k/a “Quay,” a/k/a, “J,” a/k/a “Stacks, a/k/a “Predator,” LANDIS JACKSON, a/k/a “Juve,” a/k/a “Juvie,” KALUB SHIPMAN, a/k/a “Kato,” a/k/a “Baydo,” and NELSON EVANS:

- a. Were more than 18 years old at the time of the offense. (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed Lillian Bond. (Title 18, United States Code, Section 3591(a)(2)(A)) (Defendants SHIPMAN and EVANS only);

- c. Intentionally inflicted serious bodily injury that resulted in the death of Lillian Bond. (Title 18, United States Code, Section 3591(a)(2)(B)) (Defendants SHIPMAN and EVANS only);
- d. Intentionally participated in an act, contemplating that the life of a person would be taken, or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act. (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life, and Lillian Bond died as a result of the act. (Title 18, United States Code, Section 3591(a)(2)(D) (Defendants SHIPMAN and EVANS only);
- f. Committed the offense after having been previously convicted of a Federal or State offense punishable by a term of imprisonment of more than one year, involving the use or attempted or threatened use of a firearm (as defined in Title 18, United States Code, Section 921) against another person. (Title 18, United States Code, Section 3592(c)(2)) (Defendant SIMPSON only);
- g. In commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or

more persons in addition to the victim of the offense. (Title 18, United States Code, Section 3592(c)(5));

- h. Procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. (Title 18, United States Code, Section 3592(c)(7)) (Defendants SIMPSON and JACKSON only);
- i. Committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value. (Title 18, United States Code, Section 3592(c)(8)); (Defendants SHIPMAN and EVANS only);
- j. Committed the offense after substantial planning and premeditation to cause the death of a person. (Title 18, United States Code, Section 3592(c)(9));
- k. Committed the offense after previously having been convicted of two or more Federal or State offenses, each punishable by a term of imprisonment of more than one year, committed on different occasions, involving the distribution of a controlled substance. (Title 18, United States Code, Section 3592(c)(10)) (Defendants JACKSON and SHIPMAN only).

(Pursuant to Title 18, United States Code, Sections 3591 and 3592.)

FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of any of the violations alleged in this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any firearm or ammunition used in or involved in the violation.
2. The defendants, if convicted of any of the violations alleged in Counts One through Five of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2:
 - a. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the violation; and
 - b. Any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violation.
3. The defendants, if convicted of either of the violations alleged in Counts Seven and Eight of this Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.
4. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).
5. The assets subject to forfeiture include, but are not limited to, a monetary judgment in the amount of the proceeds obtained by each defendant.

(In accordance with Title 18, United States Code, Sections 924(d) and 981(a)(1)(C); Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

United States v. Jaquate Simpson et al., 2:20cr 90

Pursuant to the E-Government Act,
the information on this page has been filed
under seal in the Clerk's Office.


A TRUE BILL:

REDACTED CC

FOREPERSON

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By:



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John F. Butler
Andrew Bosse
Assistant United States Attorneys
Kristin G. Bird
Special Assistant United States Attorney
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kristin.bird@usdoj.gov

REDACTED

JS 45 (11/2002)

Criminal Case Cover Sheet**U.S. District Court**

Place of Offense:		Under Seal: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Judge Assigned:
City: <u>EDVA</u>	Criminal Complaint:		Criminal Number:
County/Parish:	Same Defendant:		New Defendant:
	Magistrate Judge Case Number:	Arraignment Date: •	
	Search Warrant Case Number:		
	R 20/R 40 from District of _____.		

Defendant Information:

Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	FBI#				
Defendant Name: Jaquate SIMPSON			Alias Name(s): "Quay" "J" "Stacks" "Predator"		
Greensboro, NC					
Birth Date: 1984	SS#: xxx-xx-1131	Sex: Male	Race: Black	Nationality: USA	Place of Birth:
Height: 6'0"	Weight: lbs.	Hair: Brown	Eyes: Brown	Scars/Tattoos:	
Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		List Language and/or dialect:			

Location Status:

Arrest Date:		
<input type="checkbox"/> Already in Federal Custody as of: _____ in: _____		
<input checked="" type="checkbox"/> Already in State Custody	<input type="checkbox"/> On Pretrial Release	<input type="checkbox"/> Not in Custody
<input checked="" type="checkbox"/> Arrest Warrant Requested	<input type="checkbox"/> Fugitive	<input type="checkbox"/> Summons Requested
<input type="checkbox"/> Arrest Warrant Pending	<input checked="" type="checkbox"/> Detention Sought	<input type="checkbox"/> Bond

Defense Counsel Information:

Name:	<input type="checkbox"/> Court Appointed
Address:	<input type="checkbox"/> Retained
Telephone:	<input type="checkbox"/> Public Defender
	<input type="checkbox"/> Office of Federal Public Defender should not be appointed due to conflict of interest
	<input type="checkbox"/> CJA attorney: _____ should not be appointed due to conflict of interest

U.S. Attorney Information:

AUSA: Joseph DePadilla	Telephone No. 757-441-6331	Bar #:
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Complainant Agency, Address & Phone Number or Person & Title:

Mark Gripka & Justin Terry, Special Agents, FBI, Chesapeake, VA 23320

U.S.C. Citations:

	Code/Section	Description of Offense Charged	Count(s)	Capital/Felony/Misd/Petty
Set 1	21 U.S.C. § 848	Continuing Criminal Enterprise	1	Felony
Set 2	21 U.S.C. §§ 848(e)(1)(A) and 18 U.S.C. § 2	Murder While Engaged in a Continuing Criminal Enterprise	2	Felony
Set 3	21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A) and (b)(1)(D)	Conspiracy to Manufacture, Distribute, and Possess with Intent to Manufacture and Distribute Cocaine, Heroin, Fentanyl, and Marijuana	3	Felony

Set 4	21 U.S.C. §§ 841(b)(1)(A), 848(e)(1)(A) and 18 U.S.C. § 2	Murder While Engaged in a Drug Trafficking Offense	4	Felony
Set 5	21 U.S.C. § 841(a)(1), (b)(1)(B) and 18 U.S.C. § 2	Distribution of Cocaine	5	Felony
Set 6	18 U.S.C. §§ 924(c)(1), and 924(j), and 2	Use of a Firearm Resulting in Death	6	Felony
Set 7	18 U.S.C. §§ 1958(a) and 2	Conspiracy to Commit Murder for Hire	7	Felony
Set 8	18 U.S.C. §§ 1958(a) and 2	Murder for Hire	8	Felony
Set 9	18 U.S.C. §§ 3591 and 3592	Notice of Special Findings		
Set 10	18 U.S.C. §§ 924(d); 21 U.S.C. § 853; 28 U.S.C. § 2461	Criminal Forfeiture		

REDACTED

JS 45 (11/2002)

Criminal Case Cover Sheet**U.S. District Court**

Place of Offense:		Under Seal: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Judge Assigned:
City: <u>EDVA</u>	Criminal Complaint:		Criminal Number:
County/Parish:	Same Defendant:		New Defendant:
	Magistrate Judge Case Number:		Arraignment Date:
	Search Warrant Case Number:		•
	R 20/R 40 from District of _____		

Defendant Information:

Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		FBI#			
Defendant Name: Landis JACKSON			Alias Name(s): "Juve", "Juvie"		
Greensboro, NC					
Birth Date: 1984	SS#: xxx-xx-9034	Sex: Male	Race: Black	Nationality: USA	Place of Birth: MI
Height: 5'9"	Weight: lbs.	Hair: Brown	Eyes: Brown	Scars/Tattoos:	
Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		List Language and/or dialect:			

Location Status:

Arrest Date:			
<input type="checkbox"/> Already in Federal Custody as of: _____ in: _____			
<input type="checkbox"/> Already in State Custody	<input type="checkbox"/> On Pretrial Release		<input checked="" type="checkbox"/> Not in Custody
<input checked="" type="checkbox"/> Arrest Warrant Requested	<input type="checkbox"/> Fugitive		<input type="checkbox"/> Summons Requested
<input type="checkbox"/> Arrest Warrant Pending	<input checked="" type="checkbox"/> Detention Sought		<input type="checkbox"/> Bond

Defense Counsel Information:

Name:	<input type="checkbox"/> Court Appointed
Address:	<input type="checkbox"/> Retained
Telephone:	<input type="checkbox"/> Public Defender
	<input type="checkbox"/> Office of Federal Public Defender should not be appointed due to conflict of interest
	<input type="checkbox"/> CJA attorney: _____ should not be appointed due to conflict of interest

U.S. Attorney Information:

AUSA: Joseph DePadilla	Telephone No. 757-441-6331	Bar #:
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Complainant Agency, Address & Phone Number or Person & Title:

Mark Gripka & Justin Terry, Special Agents, FBI, Chesapeake, VA 23320

U.S.C. Citations:

	Code/Section	Description of Offense Charged	Count(s)	Capital/Felony/Misd/Petty
Set 1	21 U.S.C. § 848	Continuing Criminal Enterprise	1	Felony
Set 2	21 U.S.C. §§ 848(e)(1)(A) and 18 U.S.C. § 2	Murder While Engaged in a Continuing Criminal Enterprise	2	Felony
Set 3	21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A) and (b)(1)(D)	Conspiracy to Manufacture, Distribute, and Possess with Intent to Manufacture and Distribute Cocaine, Heroin, Fentanyl, and Marijuana	3	Felony

Set 4	21 U.S.C. §§ 841(b)(1)(A), 848(e)(1)(A) and 18 U.S.C. § 2	Murder While Engaged in a Drug Trafficking Offense	4	Felony
Set 5	21 U.S.C. § 841(a)(1), (b)(1)(B) and 18 U.S.C. § 2	Distribution of Cocaine	5	Felony
Set 6	18 U.S.C. §§ 924(c)(1), and 924(j), and 2	Use of a Firearm Resulting in Death	6	Felony
Set 7	18 U.S.C. §§ 1958(a) and 2	Conspiracy to Commit Murder for Hire	7	Felony
Set 8	18 U.S.C. §§ 1958(a) and 2	Murder for Hire	8	Felony
Set 9	18 U.S.C. §§ 3591 and 3592	Notice of Special Findings		
Set 10	18 U.S.C. §§ 924(d); 21 U.S.C. § 853; 28 U.S.C. § 2461	Criminal Forfeiture		

REDACTED

JS 45 (11/2002)

Criminal Case Cover Sheet**U.S. District Court**

Place of Offense:		Under Seal: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Judge Assigned:
City: EDVA	Criminal Complaint:		Criminal Number:
County/Parish:	Same Defendant:		New Defendant:
Magistrate Judge Case Number:		Arraignment Date:	
Search Warrant Case Number:			
R 20/R 40 from District of _____			

Defendant Information:

Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		FBI#			
Defendant Name: Kalub SHIPMAN			Alias Name(s): "Kato", "Baydo"		
Burlington, NC					
Birth Date: 1987	SS#: XXX-XX-4305	Sex: Male	Race: Black	Nationality: USA	Place of Birth: NC
Height: 6'0"	Weight: lbs.	Hair: Brown	Eyes: Brown	Scars/Tattoos: Many TATS	
Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		List Language and/or dialect:			

Location Status:

Arrest Date:		
<input type="checkbox"/> Already in Federal Custody as of: _____ in: _____		
<input checked="" type="checkbox"/> Already in State Custody	<input type="checkbox"/> On Pretrial Release	<input type="checkbox"/> Not in Custody
<input checked="" type="checkbox"/> Arrest Warrant Requested	<input type="checkbox"/> Fugitive	<input type="checkbox"/> Summons Requested
<input type="checkbox"/> Arrest Warrant Pending	<input checked="" type="checkbox"/> Detention Sought	<input type="checkbox"/> Bond

Defense Counsel Information:

Name:	<input type="checkbox"/> Court Appointed
Address:	<input type="checkbox"/> Retained
Telephone:	<input type="checkbox"/> Public Defender
<input type="checkbox"/> Office of Federal Public Defender should not be appointed due to conflict of interest	
<input type="checkbox"/> CJA attorney: _____ should not be appointed due to conflict of interest	

U.S. Attorney Information:

AUSA: Joseph DePadilla	Telephone No. 757-441-6331	Bar #:
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Complainant Agency, Address & Phone Number or Person & Title:

Mark Gripka & Justin Terry, Special Agents, FBI, Chesapeake, VA 23320

U.S.C. Citations:

	Code/Section	Description of Offense Charged	Count(s)	Capital/Felony/Misd/Petty
Set 1	21 U.S.C. §§ 841(b)(1)(A), 848(e)(1)(A) and 18 U.S.C. § 2	Murder While Engaged in a Drug Trafficking Offense	4	Felony
Set 2	18 U.S.C. §§ 924(c)(1), and 924(j), and 2	Use of a Firearm Resulting in Death	6	Felony
Set 3	18 U.S.C. §§ 1958(a) and 2	Conspiracy to Commit Murder for Hire	7	Felony
Set 4	18 U.S.C. §§ 1958(a) and 2	Murder for Hire	8	Felony
Set 5	18 U.S.C. §§ 922(g)(1) and 924 (a)(2)	Felon in Possession of a Firearm	9	Felony

Set 6	18 U.S.C. §§ 3591 and 3592	Notice of Special Findings		
Set 7	18 U.S.C. §§ 924(d); 21 U.S.C. § 853; 28 U.S.C. § 2461	Criminal Forfeiture		

REDACTED

JS 45 (11/2002)

Criminal Case Cover Sheet**U.S. District Court**

Place of Offense:		Under Seal: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Judge Assigned:
City: <u>EDVA</u>	Criminal Complaint:		Criminal Number:
County/Parish:	Same Defendant:		New Defendant:
	Magistrate Judge Case Number:		Arraignment Date:
	Search Warrant Case Number:		•
	R 20/R 40 from District of _____		

Defendant Information:

Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		FBI#			
Defendant Name: Nelson EVANS			Alias Name(s):		
Greensboro, NC					
Birth Date: 1990	SS#: xxx-xx-1835	Sex: Male	Race: Black	Nationality: USA	Place of Birth:
Height: 6'5"	Weight: 0 lbs.	Hair: Brown	Eyes: Brown	Scars/Tattoos:	
Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		List Language and/or dialect:			

Location Status:

Arrest Date:		
<input type="checkbox"/> Already in Federal Custody as of: _____ in: _____		
<input type="checkbox"/> Already in State Custody	<input type="checkbox"/> On Pretrial Release	<input checked="" type="checkbox"/> Not in Custody
<input checked="" type="checkbox"/> Arrest Warrant Requested	<input type="checkbox"/> Fugitive	<input type="checkbox"/> Summons Requested
<input type="checkbox"/> Arrest Warrant Pending	<input checked="" type="checkbox"/> Detention Sought	<input type="checkbox"/> Bond

Defense Counsel Information:

Name:	<input type="checkbox"/> Court Appointed
Address:	<input type="checkbox"/> Retained
Telephone:	<input type="checkbox"/> Public Defender
	<input type="checkbox"/> Office of Federal Public Defender should not be appointed due to conflict of interest
	<input type="checkbox"/> CJA attorney: _____ should not be appointed due to conflict of interest

U.S. Attorney Information:

AUSA: Joseph DePadilla	Telephone No. 757-441-6331	Bar #:
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Complainant Agency, Address & Phone Number or Person & Title:

Mark Gripka & Justin Terry, Special Agents, FBI, Chesapeake, VA 23320

U.S.C. Citations:

	Code/Section	Description of Offense Charged	Count(s)	Capital/Felony/Misd/Petty
Set 1	18 U.S.C. §§ 924(c)(1), and 924(j), and 2	Use of a Firearm Resulting in Death	6	Felony
Set 2	18 U.S.C. §§ 1958(a) and 2	Conspiracy to Commit Murder for Hire	7	Felony
Set 3	18 U.S.C. §§ 1958(a) and 2	Murder for Hire	8	Felony
Set 4	18 U.S.C. §§ 922(g)(1) and 924 (a)(2)	Felon in Possession of a Firearm	9	Felony
Set 5	18 U.S.C. §§ 3591 and 3592	Notice of Special Findings		

Set 6	18 U.S.C. §§ 924(d); 21 U.S.C. § 853; 28 U.S.C. § 2461	Criminal Forfeiture		
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REDACTED

JS 45 (11/2002)

Criminal Case Cover Sheet**U.S. District Court**

Place of Offense:		Under Seal: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Judge Assigned:
City: <u>EDVA</u>	Criminal Complaint:		Criminal Number:
County/Parish:	Same Defendant:		New Defendant:
	Magistrate Judge Case Number:	Arraignment Date:	
	Search Warrant Case Number:	•	
	R 20/R 40 from District of _____		

Defendant Information:

Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	FBI# 988246KC6				
Defendant Name: Patrice FARLAND			Alias Name(s): "Treece"		
Greensboro, NC					
Birth Date: 1978	SS#: xxx-xx-1765	Sex: Female	Race: Black	Nationality: USA	Place of Birth:
Height: 5'5"	Weight: 143 lbs.	Hair: Brown	Eyes: Brown	Scars/Tattoos:	
Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		List Language and/or dialect:			

Location Status:

Arrest Date:		
<input type="checkbox"/> Already in Federal Custody as of: _____ in: _____		
<input type="checkbox"/> Already in State Custody	<input type="checkbox"/> On Pretrial Release	<input checked="" type="checkbox"/> Not in Custody
<input checked="" type="checkbox"/> Arrest Warrant Requested	<input type="checkbox"/> Fugitive	<input type="checkbox"/> Summons Requested
<input type="checkbox"/> Arrest Warrant Pending	<input checked="" type="checkbox"/> Detention Sought	<input type="checkbox"/> Bond

Defense Counsel Information:

Name:	<input type="checkbox"/> Court Appointed
Address:	<input type="checkbox"/> Retained
Telephone:	<input type="checkbox"/> Public Defender
	<input type="checkbox"/> Office of Federal Public Defender should not be appointed due to conflict of interest
	<input type="checkbox"/> CJA attorney: _____ should not be appointed due to conflict of interest

U.S. Attorney Information:

AUSA: Joseph DePadilla	Telephone No. 757-441-6331	Bar #:
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Complainant Agency, Address & Phone Number or Person & Title:

Mark Gripka & Justin Terry, Special Agents, FBI, Chesapeake, VA 23320

U.S.C. Citations:

	Code/Section	Description of Offense Charged	Count(s)	Capital/Felony/Misd/Petty
Set 1	21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A) and (b)(1)(D)	Conspiracy to Manufacture, Distribute, and Possess with Intent to Manufacture and Distribute Cocaine, Heroin, Fentanyl, and Marijuana	3	Felony
Set 2	21 U.S.C. § 841(a)(1), (b)(1)(B) and 18 U.S.C. § 2	Distribution of Cocaine	5	Felony
Set 3	18 U.S.C. §§ 3591 and 3592	Notice of Special Findings		

Set 4	18 U.S.C. §§ 924(d); 21 U.S.C. § 853; 28 U.S.C. § 2461	Criminal Forfeiture		
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REDACTED

JS 45 (11/2002)

Criminal Case Cover Sheet**U.S. District Court**

Place of Offense:		Under Seal: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Judge Assigned:
City: <u>EDVA</u>	Criminal Complaint:		Criminal Number:
County/Parish:	Same Defendant:		New Defendant:
	Magistrate Judge Case Number:	Arraignment Date:	
	Search Warrant Case Number:		
	R 20/R 40 from District of _____		

Defendant Information:

Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	FBI#
Defendant Name: Brian TATE	Alias Name(s): "B. Tate"
Birth Date: 1985	SS#: xxx-xx-1842
Sex: Male	Race: Black
Nationality: USA	Place of Birth:
Height: 5'10"	Weight: lbs.
Hair: Brown	Eyes: Brown
Scars/Tattoos:	
Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	List Language and/or dialect:

Location Status:

Arrest Date:	
<input type="checkbox"/> Already in Federal Custody as of:	in:
<input type="checkbox"/> Already in State Custody	<input type="checkbox"/> On Pretrial Release
<input checked="" type="checkbox"/> Arrest Warrant Requested	<input type="checkbox"/> Fugitive
<input type="checkbox"/> Arrest Warrant Pending	<input type="checkbox"/> Bond
<input checked="" type="checkbox"/> Not in Custody	<input type="checkbox"/> Summons Requested
<input checked="" type="checkbox"/> Detention Sought	

Defense Counsel Information:

Name:	<input type="checkbox"/> Court Appointed
Address:	<input type="checkbox"/> Retained
Telephone:	<input type="checkbox"/> Public Defender
	<input type="checkbox"/> Office of Federal Public Defender should not be appointed due to conflict of interest
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U.S.C. Citations:

	Code/Section	Description of Offense Charged	Count(s)	Capital/Felony/Misd/Petty
Set 1	21 U.S.C. §§ 846 and 841(a)(1), (b)(1)(A) and (b)(1)(D)	Conspiracy to Manufacture, Distribute, and Possess with Intent to Manufacture and Distribute Cocaine, Heroin, Fentanyl, and Marijuana	3	Felony
Set 2	18 U.S.C. §§ 3591 and 3592	Notice of Special Findings		
Set 3	18 U.S.C. §§ 924(d); 21 U.S.C. § 853; 28 U.S.C. § 2461	Criminal Forfeiture		

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JS 45 (11/2002)

Criminal Case Cover Sheet**U.S. District Court**

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City: <u>EDVA</u>	Criminal Complaint:		Criminal Number:
County/Parish:	Same Defendant:		New Defendant:
	Magistrate Judge Case Number:		Arraignment Date:
	Search Warrant Case Number:		•
	R 20/R 40 from District of _____.		

Defendant Information:

Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		FBI#			
Defendant Name: Mario Love			Alias Name(s): "O"		
Cornelius, NC or High Point, NC					
Birth Date: 1984	SS#: xxx-xx-0637	Sex: Male	Race: Black	Nationality: USA	Place of Birth:
Height: 5'11"	Weight: lbs.	Hair:	Eyes:	Scars/Tattoos:	
Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		List Language and/or dialect:			

Location Status:

Arrest Date:		
<input type="checkbox"/> Already in Federal Custody as of: _____ in: _____		
<input type="checkbox"/> Already in State Custody	<input type="checkbox"/> On Pretrial Release	<input checked="" type="checkbox"/> Not in Custody
<input checked="" type="checkbox"/> Arrest Warrant Requested	<input type="checkbox"/> Fugitive	<input type="checkbox"/> Summons Requested
<input type="checkbox"/> Arrest Warrant Pending	<input checked="" type="checkbox"/> Detention Sought	<input type="checkbox"/> Bond

Defense Counsel Information:

Name:	<input type="checkbox"/> Court Appointed
Address:	<input type="checkbox"/> Retained
Telephone:	<input type="checkbox"/> Public Defender
	<input type="checkbox"/> Office of Federal Public Defender should not be appointed due to conflict of interest
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U.S.C. Citations:

	Code/Section	Description of Offense Charged	Count(s)	Capital/Felony/Misd/Petty
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Set 2	18 U.S.C. §§ 3591 and 3592	Notice of Special Findings		
Set 3	18 U.S.C. §§ 924(d); 21 U.S.C. § 853; 28 U.S.C. § 2461	Criminal Forfeiture		

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JS 45 (11/2002)

Criminal Case Cover Sheet**U.S. District Court**

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City: <u>EDVA</u>	Criminal Complaint:		Criminal Number:
County/Parish:	Same Defendant:		New Defendant:
	Magistrate Judge Case Number:	Arraignment Date:	
	Search Warrant Case Number:	•	
	R 20/R 40 from District of _____.		

Defendant Information:

Juvenile: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		FBI#			
Defendant Name: Shafter MANUEL			Alias Name(s): "Pete"		
Greensboro, NC					
Birth Date: 1983	SS#: N/A illegal alien	Sex: Male	Race: Black	Nationality:	Place of Birth:
Height: 5'4"	Weight: lbs.	Hair: Brown	Eyes: Brown	Scars/Tattoos:	
Interpreter: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		List Language and/or dialect:			

Location Status:

Arrest Date:		
<input type="checkbox"/> Already in Federal Custody as of: _____ in: _____		
<input type="checkbox"/> Already in State Custody	<input type="checkbox"/> On Pretrial Release	<input checked="" type="checkbox"/> Not in Custody
<input checked="" type="checkbox"/> Arrest Warrant Requested	<input type="checkbox"/> Fugitive	<input type="checkbox"/> Summons Requested
<input type="checkbox"/> Arrest Warrant Pending	<input checked="" type="checkbox"/> Detention Sought	<input type="checkbox"/> Bond

Defense Counsel Information:

Name:	<input type="checkbox"/> Court Appointed
Address:	<input type="checkbox"/> Retained
Telephone:	<input type="checkbox"/> Public Defender
	<input type="checkbox"/> Office of Federal Public Defender should not be appointed due to conflict of interest
	<input type="checkbox"/> CJA attorney: _____ should not be appointed due to conflict of interest

U.S. Attorney Information:

AUSA: Joseph DePadilla	Telephone No. 757-441-6331	Bar #:
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Complainant Agency, Address & Phone Number or Person & Title:

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U.S.C. Citations:

	Code/Section	Description of Offense Charged	Count(s)	Capital/Felony/Misd/Petty
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Set 2	18 U.S.C. §§ 3591 and 3592	Notice of Special Findings		
Set 3	18 U.S.C. §§ 924(d); 21 U.S.C. § 853; 28 U.S.C. § 2461	Criminal Forfeiture		