

United States District Court

FOR THE
NORTHERN DISTRICT OF CALIFORNIA

VENUE: SAN FRANCISCO

FILED

DEC 17 2019

UNITED STATES OF AMERICA,

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

V.

UNDEF SEAL

ROBERT MANNING and
JAMARE COATS,

DEFENDANT(S).

SUPERSEDING INDICTMENT

VIOLATIONS:

- 18 U.S.C. §§ 924(j)(1) and (2) - Use of a Firearm in Furtherance of a Crime of Violence Resulting in Death;
- 18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm and Ammunition;
- 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) – Forfeiture Allegation

True Bill

A true bill.

[Signature]

Foreman

Filed in open court this 17 day of

December 2019

[Signature] ROSE MAHER

Clerk

[Signature]

NO BAIL WARRANT

THOMAS S. HIXSON
UNITED STATES MAGISTRATE JUDGE

Bail, \$ _____

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

- 18 USC 924(j) and 2: Use of Firearm in Furtherance of Crime of Violence Resulting in Death Petty
- 18 USC 922(g): Felon In Possession of a Firearm Minor
- Misdemeanor Misdemeanor
- Felony

PENALTY: See Attached

UNDER SEAL

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

FILED
DEC 17 2019

DEFENDANT - U.S. SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

▶ Robert Manning

DISTRICT COURT NUMBER
CR 19-00313 WHA

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

this is a reprosecution of charges previously dismissed which were dismissed on motion of:

U.S. ATTORNEY DEFENSE

SHOW DOCKET NO.

this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person Furnishing Information on this form David L. Anderson
 U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Kreuzkamp and Narayan

DEFENDANT

IS NOT IN CUSTODY

- Has not been arrested, pending outcome this proceeding.
- 1) If not detained give date any prior summons was served on above charges ▶
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction } Federal State
 - 6) Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No

} If "Yes" give date filed

DATE OF ARREST ▶ Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY ▶ Month/Day/Year

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

PROCESS:

SUMMONS NO PROCESS* WARRANT

Bail Amount: _____

If Summons, complete following:

Arraignment Initial Appearance

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address: _____

Date/Time: _____ Before Judge: _____

Comments: _____

CR 19-00313 WHA
Defendant Information Sheet for Superseding Indictment

FILED

DEC 17 2019

ROBERT MANNING

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA
18 U.S.C. § 8

Count 1: Use of Firearm in Furtherance of Crime of Violence Resulting in Death (18 U.S.C. §§ 924(j)(1) and 2)

- Maximum term of imprisonment: death
- Maximum term of supervised release: 5 years
- Maximum fine: greatest of (a) \$250,000, (b) twice the gross pecuniary gain to the defendant, or (c) twice the gross pecuniary loss inflicted on another
- Mandatory special assessment: \$100
- Forfeiture

UNDER SEAL

Count 2: Felon in Possession of a Firearm (18 U.S.C. § 922(g))

- Maximum term of imprisonment: 10 years
- Maximum term of supervised release: 5 years
- Maximum fine: greatest of (a) \$250,000, (b) twice the gross pecuniary gain to the defendant, or (c) twice the gross pecuniary loss inflicted on another
- Mandatory special assessment: \$100
- Forfeiture

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING

OFFENSE CHARGED

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- Misdemeanor
- Felony

PENALTY: See Attached

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

FILED
DEC 17 2019

DEFENDANT - U.S.

Jamare Coats

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

DISTRICT COURT NUMBER
CR 19-00313 WHA

UNDER SEAL

PROCEEDING

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U.S. Attorney Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) Kreuzkamp and Narayan

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- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
 - 5) On another conviction } Federal State
 - 6) Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution

Has detainer been filed? Yes No } If "Yes" give date filed

DATE OF ARREST Month/Day/Year

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Defendant Address: _____

Date/Time: _____ Before Judge: _____

Comments: _____

CR 19-00313 WHA
Defendant Information Sheet for Superseding Indictment

FILED

DEC 17 2019

JAMARE COATS

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

Count 1: Use of Firearm in Furtherance of Crime of Violence Resulting in Death (18 U.S.C. § 924(j)(1) and 2)

- Maximum term of imprisonment: death
- Maximum term of supervised release: 5 years
- Maximum fine: greatest of (a) \$250,000, (b) twice the gross pecuniary gain to the defendant, or (c) twice the gross pecuniary loss inflicted on another
- Mandatory special assessment: \$100
- Forfeiture

Count 3: Felon in Possession of a Firearm (18 U.S.C. § 922(g))

UNDER SEAL

- Maximum term of imprisonment: 10 years
- Maximum term of supervised release: 5 years
- Maximum fine: greatest of (a) \$250,000, (b) twice the gross pecuniary gain to the defendant, or (c) twice the gross pecuniary loss inflicted on another
- Mandatory special assessment: \$100
- Forfeiture

FILED

DEC 17 2019

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

UNDER SEAL

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.

14 ROBERT MANNING and JAMARE COATS,
15 Defendants.

) CASE NO. CR 19-00313 WHA

) VIOLATIONS:

) 18 U.S.C. §§ 924(j)(1) and 2 – Use of a Firearm in
) Furtherance of a Crime of Violence Resulting in
) Death;
) 18 U.S.C. § 922(g)(1) – Felon in Possession of a
) Firearm;
) 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) –
) Forfeiture Allegation

) SAN FRANCISCO VENUE

18 _____
19
20 SUPERSEDING INDICTMENT

21 The Grand Jury charges:

22 COUNT ONE: (18 U.S.C. §§ 924(j)(1) and 2 – Use of a Firearm in Furtherance of a Crime of
23 Violence Resulting in Death)

24 1. At all times relevant to this Indictment, Mac Block was a criminal street gang that
25 operated in San Francisco’s Western Addition. Mac Block claimed the area of the Prince Hall
26 apartment complex in the Fillmore District, which encompasses the 1100 block of McAllister Street, and
27 also claimed the 1000 and 1100 blocks of Fillmore Street, the 1200 block of Golden Gate Avenue, and
28 the 900 block of Webster Street. The gang most commonly used the phrases and symbols Mac Block,

1 Swiss Cheese, 72, 1100, and MBSC (Mac Block/Swiss Cheese), to identify itself. “Mac” was a
2 reference to McAllister Street. “1100” was a reference to the 1100 block of McAllister Street. “7” and
3 “2” are the numbers associated with “S” and “C” (for Swiss Cheese) on a telephone keypad.

4 2. One of the primary rivals to the Mac Block gang was the Page Street gang. Members of
5 the Page Street gang claimed the Hayes Valley South Housing Development and the Hayes Valley
6 North Housing Development. Mac Block has engaged in violence against Page Street; similarly, Page
7 Street has engaged in violence against Mac Block. Indeed, one of the rules common to both gangs was
8 that members of each side attack members of the other side.

9 3. Some members of Mac Block have admitted their gang membership to law enforcement,
10 on social media, or in the court system. Some Mac Block gang members have one or more tattoos that
11 reflect gang affiliation. These tattoos include words and symbols that refer to Mac Block, such as
12 “MB,” references to Fillmore and McAllister streets (the center of Mac Block territory), the numbers 7
13 and 2, and memorial references to former Mac Block gang members who have been killed.

14 4. Members of Mac Block were expected to protect the name, reputation, and status of the
15 gang from rival gang members and other persons. Members of Mac Block required that others show
16 respect and deference to the gang and its membership. To protect the gang and to enhance its reputation,
17 Mac Block gang members were expected to use any means necessary to force respect from those who
18 showed disrespect, including acts of intimidation and violence.

19 5. Members of Mac Block engaged in criminal activity, including acts involving murder,
20 attempted murder, and robbery. Members of Mac Block were often required to commit acts of violence
21 to maintain membership and discipline within the gang, including violence against rival gang members
22 or those they perceived to be rival gang members. Participation in criminal activity by a member of
23 Mac Block, particularly violent acts directed at rival gang members, increased the level of respect
24 accorded that member, resulting in the maintaining or increasing position in the gang.

25 The Racketeering Enterprise

26 6. Mac Block, including its leadership, members, and associates, in the Northern District of
27 California, constitutes an “enterprise” as defined in Title 18, United States Code, 1959(b)(2), that is, a
28 group of individuals associated in fact, which is engaged in, and the activities of which affect, interstate

1 and foreign commerce. The enterprise constitutes an ongoing organization whose members function as
2 a continuing unit for a common purpose of achieving the objectives of the enterprise.

3 7. The purposes of the Mac Block enterprise include the following:

4 a. Preserving and protecting the power, territory, and reputation of the enterprise
5 through the use of intimidation, violence, threats of violence, and murder;

6 b. Promoting and enhancing the enterprise and the activities of its members and
7 associates through acts and threats involving murder, robbery, and other criminal activities;

8 c. Keeping rival gang members, potential informants and witnesses against the
9 enterprise, other victims and potential victims, fellow gang members, and community members in fear
10 of the enterprise and its members and associates through violence and threats of violence; and

11 d. Protecting the enterprise's members and associates who committed crimes by
12 hindering, obstructing, and preventing law enforcement officers from identifying the offenders,
13 apprehending the offenders, and successfully prosecuting and punishing the offenders.

14 8. At all times relevant to this Indictment, Mac Block, the above-described enterprise,
15 through its leaders, members, and associates engaged in racketeering activity, as defined in Title 18,
16 United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving murder, in violation of
17 California Penal Code Sections 187, 188, 189, 182, 31, 21a, and 664; and robbery, in violation of
18 California Penal Code Sections 211, 212, 212.5, 213, 182, 21a, and 664.

19 9. On or about March 23, 2019, in the Northern District of California, ROBERT
20 MANNING and JAMARE COATS, for the purpose of maintaining and increasing position in Mac
21 Block, an enterprise engaged in racketeering activity, did knowingly murder the Victim, in violation of
22 California Penal Code Sections 187, 188, and 31, all in violation of Title 18, United States Code,
23 Sections 1959(a) and 2.

24 10. On or about March 23, 2019, in the Northern District of California, the defendants,

25 ROBERT MANNING and

26 JAMARE COATS,

27 together with others known and unknown, each aided and abetted by the other, committed a violation of
28 Title 18, United States Code, Section 924(c), that is, unlawfully and knowingly, used and carried a

1 firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the
2 United States, namely, the Murder in Aid of Racketeering (Title 18, United States Code, Section
3 1959(a)(1), as set forth above) of the Victim, and knowingly possessed a firearm in furtherance of such
4 crime, and in the course of such violation, caused the death of the Victim through the use of a firearm,
5 which killing was murder as defined in Title 18, United States Code, Section 1111(a), all in violation of
6 Title 18, United States Code, Sections 924(j)(1) and 2.

7 COUNT TWO: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)

8 11. On or about March 23, 2019, in the Northern District of California, the defendant,
9
10 ROBERT MANNING,
11 knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding
12 one year, knowingly possessed a firearm, namely, one Glock Model 23 .40 Caliber pistol bearing serial
13 number VZP047, and the firearm was in and affecting interstate and/or foreign commerce, all in
14 violation of Title 18, United States Code, Section 922(g)(1).

14 COUNT THREE: (18 U.S.C. § 922(g)(1) – Felon in Possession of a Firearm)

15 12. On or about March 23, 2019, in the Northern District of California, the defendant,
16
17 JAMARE COATS,
18 knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding
19 one year, knowingly possessed a firearm, namely, one Glock Model 30 .45 caliber pistol bearing serial
20 number BBUP196, and the firearm was in and affecting interstate and/or foreign commerce, all in
21 violation of Title 18, United States Code, Section 922(g)(1).

21 FORFEITURE ALLEGATION: (18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c))

22 13. The allegations contained in Counts One, Two, and Three are re-alleged and
23 incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code,
24 Section 924(d) and Title 28, United States Code, Section 2461(c).

25 14. Upon conviction of any of the offenses set forth in this Indictment, defendants
26
27 ROBERT MANNING and
28 JAMARE COATS,
shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28,

1 United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the
2 offense, including, but not limited to, the following property:

- 3 a. one Glock Model 30 .45 caliber pistol bearing serial number BBUP196;
- 4 b. one Glock Model 23 .40 caliber pistol bearing serial number VZP047; and
- 5 c. four rounds of Winchester .45 caliber ammunition.

6 15. If any of the property described above, as a result of any act or omission of any
7 defendant:

- 8 a. cannot be located upon exercise of due diligence;
- 9 b. has been transferred or sold to, or deposited with, a third party;
- 10 c. has been placed beyond the jurisdiction of the court;
- 11 d. has been substantially diminished in value; or
- 12 e. has been commingled with other property which cannot be divided without difficulty,

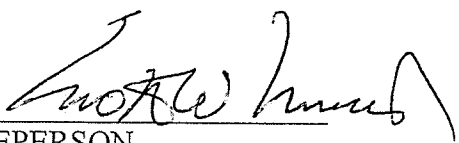
13 the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21,
14 United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

15 All pursuant to Title 18, United States Code, Section 924(d), Title 28, United States Code,
16 Section 2461(c), and Federal Rule of Criminal Procedure 32.2.

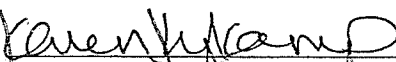
17
18 DATED:

A TRUE BILL.

19 12/17/19

20 
21 FOREPERSON

22 DAVID L. ANDERSON
23 United States Attorney

24 
25 KAREN KREUZKAMP
26 RAVI T. NARAYAN
27 Assistant United States Attorneys
28