

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

RAKIM ASAD, also known as “Poodie,”
AKEEM ASAD, also known as “Keemie,”
MARDI LANE,
MARTEZ EASTER, also known as “Tez,”
REGINALD JONES, also known as “Lil
Reggie,”
DIJON FOSTON, also known as “Popi,”
COTTRELL MACKEY, also known as
“Trell,”
CAREY HINTON, also known as “Spyda,”
TONY PARKER, also known as “Man,”
QUENTIN LUCIOUS, also known as
“Flocka,”
HARRIETTE MCPHERSON,
DERRICK MCNEAL, also known as “Bebo”
or “D-Bo,” and
RASHAD UNDERWOOD, also known as
“Mase.”

No. 17 CR 40

Violations: 18 U.S.C. §§ 922(g)(1),
924(c)(1)(A), 1512, 1962(d); 21 U.S.C.
§§ 841, 843(b), 846

UNDER SEAL

SUPERSEDING INDICTMENT

COUNT ONE

The SPECIAL JUNE 2018 GRAND JURY charges:

THE RACKETEERING ENTERPRISE

At all times material to this indictment:

1. The defendants, and others known and unknown to the Grand Jury, were members and associates of the LAFA Street Gang, a criminal organization whose members and associates engaged in acts of violence, including but not limited to acts involving murder, battery, robbery, intimidation, witness tampering, other acts of violence, and the illegal trafficking in controlled substances, and which

operated on the south side of Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere.

2. The LAFA Street Gang, including its leadership, membership, and associates, constituted an “enterprise,” as defined in Title 18, United States Code, Section 1961(4) (hereinafter, “the LAFA Street Gang”), that is, a group of individuals associated in fact, which enterprise engaged in, and the activities of which affected, interstate and foreign commerce. The LAFA Street Gang constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. RAKIM ASAD, a/k/a “Poodie,” AKEEM ASAD, a/k/a “Keemie,” MARDI LANE, MARTEZ EASTER, a/k/a “Tez,” REGINALD JONES, a/k/a “Lil Reggie,” DIJON FOSTON, a/k/a “Popi,” COTTRELL MACKEY, a/k/a “Trell,” CAREY HINTON, a/k/a “Spyda,” TONY PARKER, a/k/a “Man,” and QUENTIN LUCIOUS, a/k/a “Flocka,” the defendants, and others known and unknown to the Grand Jury, were leaders, members, and associates of the LAFA Street Gang who carried out and directed other members of the LAFA Street Gang in carrying out unlawful and other activities in furtherance of the conduct of the LAFA Street Gang’s affairs.

4. The LAFA Street Gang had been engaged in a longstanding and violent feud with other Chicago street gangs, including the “Merrill Park Gangster Disciples,” among others. Over the course of these conflicts, members and associates of the LAFA Street Gang have committed acts of violence against their rivals, inside rival areas, and inside any areas rivals were perceived to be.

PURPOSES OF THE ENTERPRISE

5. The purposes of the LAFA Street Gang included, but were not limited to, the following:

a. Acquiring, preserving, and protecting power, territory, operations and proceeds for the enterprise through acts involving murder, battery, robbery, intimidation, witness tampering, other acts of violence, and the illegal trafficking in controlled substances;

b. Promoting and enhancing the enterprise and its members' and associates' activities;

c. Preserving and protecting the power, territory, operations, and proceeds of the enterprise through the use of threats, intimidation, and violence, including, but not limited to, acts involving murder, battery, and other acts of violence;

d. Keeping victims, rival gang members, and witnesses in fear of the enterprise and its leaders, members, and associates through acts and threats of violence;

e. Taking steps designed to prevent law enforcement's detection of the enterprise's criminal activities;

f. Seeking to prevent punishment, including criminal punishment, for its leaders, members, and associates, through threats of, and by the use of, murder, violence, and intimidation directed towards witnesses, victims and others;
and

g. Enriching the leaders, members, and associates of the LAFA Street Gang through, among other things, the illegal trafficking of controlled substances and robberies.

RACKETEERING CONSPIRACY

6. Beginning no later than in or about 2008 and continuing through in or about December 2018, in the Northern District of Illinois, Eastern Division, in Duluth, Minnesota, in the District of Minnesota, and elsewhere, the defendants

RAKIM ASAD, also known as “Poodie,”
AKEEM ASAD, also known as “Keemie,”
MARDI LANE,
MARTEZ EASTER, also known as “Tez,”
REGINALD JONES, also known as “Lil Reggie,”
DIJON FOSTON, also known as “Popi,”
COTTRELL MACKKEY, also known as “Trell,”
CAREY HINTON, also known as “Spyda,”
TONY PARKER, also known as “Man,” and
QUENTIN LUCIOUS, also known as “Flocka,”

as well as others known and unknown to the grand jury, being persons employed by and associated with the LAFA Street Gang, an enterprise, which engaged in, and the activities of which affected, interstate and foreign commerce, knowingly conspired to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity consisting of:

a. Multiple acts involving murder, in violation of Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1(b), 5/8-2, 5/8-4, and 5/9-1;

b. Multiple acts involving robbery, in violation of Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1(a), 5/8-2, 5/8-4, 5/18-1, and 5/18-2;

c. Multiple acts indictable under Title 18, United States Code, Section 1512 (relating to tampering with a witness, victim, or an informant); and

d. Multiple offenses involving trafficking in controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

7. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

MEANS AND METHODS OF THE CONSPIRACY

8. It was further part of the conspiracy that the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise included the following:

a. Members of the LAFA Street Gang employed and used gang-related terminology, symbols and gestures to identify themselves to each other and to others, including writing and saying “5232,” the numbers associated with the letters L-A-F-A on a telephone keypad; using hand signs showing an “L” and hand signs disrespecting their rivals, the Merrill Park Gangster Disciples; and saying slogans like “on Matty” and “on Brian,” references to deceased LAFAs;

b. To perpetuate the enterprise and to maintain, protect, and extend their power, members of the LAFA Street Gang and their associates committed illegal

acts involving murder, battery, other acts of violence, and witness tampering against individuals who posed a threat to the enterprise and jeopardized its operations, including rival gang members, witnesses to the illegal activities of the enterprise, and individuals suspected of cooperating with law enforcement;

c. Members of the LAFA Street Gang and their associates shared in the proceeds of the enterprise's illegal activities, including, but not limited to, robberies and the illegal trafficking of controlled substances;

d. Members of the LAFA Street Gang and their associates used multiple cellular telephones to communicate with one another concerning and during the commission of the enterprise's illegal activities;

e. Members of the LAFA Street Gang and their associates obtained, used, carried, possessed, brandished, and discharged firearms in connection with the enterprise's illegal activities, including, but not limited to, acts involving murder, battery, robbery, other acts of violence, and the illegal trafficking of controlled substances;

f. Members of the LAFA Street Gang and their associates managed the procurement, transfer, use, maintenance, concealment, and disposal of firearms and dangerous weapons within the enterprise to protect their territory, personnel and operations, and to deter, eliminate and retaliate against competitors, rival criminal organizations and persons, and individuals suspected of cooperating with law enforcement;

g. Members of the LAFA Street Gang and their associates used threats of violence, intimidation, and retaliatory acts of violence to cause victims and witnesses to not report, and not be truthful about, the LAFA Street Gang's criminal acts to law enforcement;

h. Members of the LAFA Street Gang and their associates committed acts involving obstruction of justice, in the conduct of the affairs of the enterprise;

i. Members of the LAFA Street Gang and their associates conspired to possess and distribute, distributed, and possessed with intent to distribute quantities of controlled substances such as marijuana, cocaine, cocaine base, heroin, methamphetamine, and MDMA in the conduct of the affairs of the enterprise in or around Chicago, Illinois, Duluth, Minnesota, and elsewhere;

j. Members of the LAFA Street Gang and their associates earned money for their members, financed their activities by paying for, and promoted the affairs of the LAFA Street Gang by using, funds obtained by the illegal trafficking of controlled substances, including the distribution of and possession with intent to distribute marijuana, cocaine, cocaine base, heroin, methamphetamine, and MDMA;

k. Members of the LAFA Street Gang and their associates sold narcotics in Chicago, Illinois and Duluth, Minnesota where they earned money for themselves and for other members of the LAFA Street Gang, through the illegal trafficking of controlled substances, including distributing and possessing with intent to distribute heroin, cocaine base, cocaine, marijuana, methamphetamine, and

MDMA. It was part of the operation of the LAFA Street Gang that members of the enterprise and their associates transported controlled substances from Chicago, Illinois to be distributed in Duluth, Minnesota.

l. Members of the LAFA Street Gang and their associates had nominees obtain rental vehicles and used vehicles registered in the names of other individuals for the purpose of concealing members' and associates' use of those vehicles during the commission of the enterprise's illegal activities;

m. Members of the LAFA Street Gang and their associates stole vehicles for their members and provided those vehicles to their members to use in the conduct of the affairs of the enterprise;

n. Members of the LAFA Street Gang and their associates committed murders in the conduct of the affairs of the enterprise including, but not limited to, the following:

i. The murders of Janeen Hancock and Alixi Johnson by AKEEM ASAD and others known and unknown to the Grand Jury, on or about July 23, 2012;

ii. The murder of Denero Appleton by MARTEZ EASTER, COTTRELL MACKEY, and others known and unknown to the Grand Jury, on or about June 1, 2014;

iii. The murder of Deonte Hoard by MARDI LANE and REGINALD JONES, on or about March 2, 2015;

o. Members of the LAFA Street Gang and their associates committed attempted murders in the conduct of the affairs of the enterprise including, but not limited to, the following:

i. The attempted murders of Victim 1 and Victim 2 by MARTEZ EASTER and others known and unknown to the Grand Jury, on or about August 3, 2008;

ii. The attempted murder of Victim 3 by MARTEZ EASTER and others known and unknown to the Grand Jury, on or about September 30, 2009;

iii. The attempted murder of Victim 4 by QUENTIN LUCIOUS, on or about October 14, 2009;

iv. The attempted murder of Victim 5 by AKEEM ASAD and others known and unknown to the Grand Jury, on or about December 11, 2014;

v. The attempted murder of Victim 6 by MARDI LANE and REGINALD JONES, on or about March 2, 2015;

vi. The attempted murders of Victim 7 and Victim 8 by QUENTIN LUCIOUS, MARDI LANE, and others known and unknown to the Grand Jury, on or about March 27, 2015;

vii. The attempted murders of Victim 9, Victim 10, and Victim 11 by MARDI LANE and QUENTIN LUCIOUS, on or about April 10, 2015; and

viii. The attempted murders of Victim 12 and Victim 13 by CAREY HINTON, TONY PARKER, and others known and unknown to the Grand Jury, on or about July 30, 2015;

p. Members of the LAFA Street Gang and their associates committed robberies in the conduct of the affairs of the enterprise including, but not limited to, the following:

i. The robbery of Victim 14 by MARTEZ EASTER, DIJON FOSTON, and COTTRELL MACKEY on or about April 25, 2015;

q. Members of the enterprise and their associates committed aggravated batteries with firearms in the conduct of the affairs of the enterprise; and

r. Members of the enterprise and their associates concealed, hid, and misrepresented, and caused to be concealed, hidden and misrepresented, the purposes of the acts done in furtherance of the enterprise, and used coded language, other techniques, and other means to avoid detection and apprehension by law enforcement.

NOTICE OF SPECIAL FINDINGS FOR COUNT ONE

1. The murder identified in Paragraph 8(n)(ii) was committed in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(a), in that MARTEZ EASTER killed the named victim without lawful justification in performing acts which caused the death of the named victim; (a) intending to kill and do great bodily harm to the named victim, and knowing that such acts would cause death to the named victim; and (b) knowing that such acts caused a strong probability of death and great bodily harm to the named victim.

2. The murder identified in Paragraph 8(n)(ii) was committed in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(b)(11), in that (a) the murder

was committed in a cold, calculated and premeditated manner pursuant to a preconceived plan, scheme and design to take a human life by unlawful means; and (b) the conduct of MARTEZ EASTER created a reasonable expectation that the death of a human being would result therefrom.

3. The murder identified in Paragraph 8(n)(ii) was committed in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(d)(iii), in that MARTEZ EASTER personally discharged a firearm that proximately caused great bodily harm, permanent disability, permanent disfigurement, and death to another person.

4. The murder identified in Paragraph 8(n)(iii) was committed in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(a), in that MARDI LANE killed the named victim without lawful justification in performing acts which caused the death of the named victim; (a) intending to kill and do great bodily harm to the named victim, and knowing that such acts would cause death to the named victim; and (b) knowing that such acts caused a strong probability of death and great bodily harm to the named victim.

5. The murder identified in Paragraph 8(n)(iii) was committed in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(b)(11), in that (a) the murder was committed in a cold, calculated and premeditated manner pursuant to a preconceived plan, scheme and design to take a human life by unlawful means; and (b) the conduct of MARDI LANE created a reasonable expectation that the death of a human being would result therefrom.

6. The murder identified in Paragraph 8(n)(iii) was committed in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(d)(iii), in that MARDI LANE personally discharged a firearm that proximately caused great bodily harm, permanent disability, permanent disfigurement, and death to another person.

7. The murder identified in Paragraph 8(n)(iii) was committed in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(b)(15), in that MARDI LANE intentionally discharged a firearm from a motor vehicle and the victim was not present within the motor vehicle.

8. Each of the attempted murders identified in Paragraphs 8(o)(i), (iv), (v), and (vi) was committed in violation of Chapter 720, Illinois Compiled Statutes, Sections 5/8-4(a) and 5/9-1(a), in that in each such instance (a) the named defendant(s) acted with intent to commit first-degree murder; namely, without lawful justification in performing the acts; (i) intending to kill and do great bodily harm to the named victim, and knowing that such acts would cause death to the named victim; and (ii) knowing that such acts caused a strong probability of death and great bodily harm to the named victim; and (b) the named defendant(s) did any act that constituted a substantial step toward the commission of that offense.

9. The attempted murder identified in Paragraph 8(o)(i) was committed in violation of Chapter 720, Illinois Compiled Statutes, Sections 5/8-4(a) and 5/8-4(c)(1), in that MARTEZ EASTER personally discharged a firearm that proximately caused great bodily harm, permanent disability, and permanent disfigurement to another person.

10. The attempted murder identified in Paragraph 8(o)(iv) was committed in violation of Chapter 720, Illinois Compiled Statutes, Sections 5/8-4(a) and 5/8-4(c)(1), in that AKEEM ASAD personally discharged a firearm that proximately caused great bodily harm, permanent disability, and permanent disfigurement to another person.

11. The attempted murder identified in Paragraph 8(o)(v) was committed in violation of Chapter 720, Illinois Compiled Statutes, Sections 5/8-4(a) and 5/8-4(c)(1), in that MARDI LANE personally discharged a firearm that proximately caused great bodily harm, permanent disability, and permanent disfigurement to another person.

12. The attempted murder identified in Paragraph 8(o)(vi) was committed in violation of Chapter 720, Illinois Compiled Statutes, Sections 5/8-4(a) and 5/8-4(c)(1), in that QUENTIN LUCIOUS personally discharged a firearm that proximately caused great bodily harm, permanent disability, and permanent disfigurement to another person.

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

COUNT TWO

The SPECIAL JUNE 2018 GRAND JURY further charges:

1. Beginning no later than in or around 2011 and continuing to in or around December 2018, at Chicago, in the Northern District of Illinois, Eastern Division, Duluth, in the District of Minnesota, and elsewhere,

RAKIM ASAD, also known as "Poodie,"
AKEEM ASAD, also known as "Keemie,"
MARTEZ EASTER, also known as "Tez,"
REGINALD JONES, also known as "Lil Reggie,"
CAREY HINTON, also known as "Spyda,"
TONY PARKER, also known as "Man,"
HARRIETTE MCPHERSON, and
DERRICK MCNEAL, also known as "Bebo" or "D-Bo,"

defendants herein, did conspire with each other, and with others known and unknown to the Grand Jury, to knowingly and intentionally possess with intent to distribute and distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled Substance, a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance, a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, and a quantity of a mixture and substance containing a detectable amount of MDMA, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

2. It was part of the conspiracy that defendants were members or associates of the LAFA Street Gang, and the allegations of paragraphs 8(i)-(k) of Count One are realleged here.

3. It was further part of the conspiracy that certain individuals transported heroin and marijuana from Chicago, Illinois to Duluth Minnesota, including, at various times, AKEEM ASAD, REGINALD JONES, and CAREY HINTON.

4. It was further part of the conspiracy that certain individuals sold and distributed the controlled substances, in Chicago, Illinois, and Duluth, Minnesota, including at various times, RAKIM ASAD, AKEEM ASAD, MARTEZ EASTER, REGINALD JONES, CAREY HINTON, TONY PARKER, HARRIETTE MCPHERSON, and DERRICK MCNEAL.

5. With respect to RAKIM ASAD, AKEEM ASAD, HARRIETTE MCPHERSON, and DERRICK MCNEAL, the offense involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance; and 100 grams 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(b)(1)(B).

All in violation of Title 21, United States Code, Section 846.

COUNT THREE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about April 25, 2015, at Chicago, in the Northern District of Illinois,
Eastern Division,

MARTEZ EASTER, also known as “Tez,” and
DIJON FOSTON, also known as “Popi,”

defendants herein, each knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a loaded Glock, model 23, .40 caliber semi-automatic pistol, bearing serial number VMS981, and a loaded Smith & Wesson, Model M&P 9, 9 millimeter semi-automatic pistol, bearing serial number MCP6376, which firearm had traveled in interstate commerce prior to defendants’ possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1), and Title 18, United States Code, Section 924(e)(1).

COUNT FOUR

The SPECIAL JUNE 2018 GRAND JURY further charges:

Between on or about April 25, 2015 and on or about August 13, 2016, at or near Chicago, in the Northern District of Illinois, Eastern Division,

DIJON FOSTON, also known as “Popi,”

defendant herein, did knowingly use intimidation and threaten another person, namely, Victim 15, and attempted to do so, with the intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the commission and possible commission of a Federal offense, namely, racketeering conspiracy, as charged in Count One of this Superseding Indictment;

In violation of Title 18, United States Code, Section 1512(b)(3).

COUNT FIVE

The SPECIAL JUNE 2018 GRAND JURY further charges:

Between on or about April 25, 2015 and on or about May 12, 2015, at or near Chicago, in the Northern District of Illinois, Eastern Division,

COTTRELL MACKEY, also known as “Trell,”

defendant herein, did knowingly use intimidation and threaten another person, namely, Victim 14, and attempted to do so, with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the commission and possible commission of a Federal offense, namely, racketeering conspiracy, as charged in Count One of this Superseding Indictment;

In violation of Title 18, United States Code, Sections 1512(b)(3) and 2.

COUNT SIX

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about August 13, 2016, at Chicago, in the Northern District of Illinois,
Eastern Division,

DIJON FOSTON, also known as “Popi,”

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate commerce a firearm, namely, a loaded Smith & Wesson M&P 40 .40 caliber pistol, bearing serial number DVY4490, which firearm had traveled in interstate commerce prior to defendant’s possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1), and Title 18, United States Code, Section 924(e)(1).

COUNT SEVEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about August 13, 2016, at Chicago, in the Northern District of Illinois,
Eastern Division,

DIJON FOSTON, also known as “Popi,”

defendant herein, did knowingly and intentionally possess with intent to distribute a
controlled substance, namely, a quantity of a mixture and substance containing a
detectable amount of marijuana, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about August 13, 2016, at Chicago, in the Northern District of Illinois,
Eastern Division,

DIJON FOSTON, also known as “Popi,”

defendant herein, did knowingly possess a firearm, namely, a loaded Smith & Wesson M&P 40 .40 caliber pistol, bearing serial number DVY4490, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Seven of this Superseding Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT NINE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about March 18, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

RAKIM ASAD, also known as “Poodie,” and
DERRICK MCNEAL, also known as “Bebo” or “D-Bo,”

defendants herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity 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 Title 18, United States Code, Section 2.

COUNT TEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about March 18, 2017, at approximately 8:35 p.m. (Session 1151), in the Northern District of Illinois, Eastern Division, and elsewhere,

RAKIM ASAD, also known as “Poodie,” and
DERRICK MCNEAL, also known as “Bebo” or “D-Bo,”

defendants herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, in violation of Title 21, United States Code, Section 846, as charged in Count Two of this Superseding Indictment, and possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Nine of this Superseding Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT ELEVEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about March 17, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

RAKIM ASAD, also known as “Poodie,” and
HARRIETTE MCPHERSON,

defendants herein, did knowingly and intentionally distribute a controlled substance,
namely, a quantity of a mixture and substance containing a detectable amount of
cocaine base, a Schedule II Controlled Substance;

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

COUNT TWELVE

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about March 17, 2017, at approximately 7:52 p.m. (Session 829), in the Northern District of Illinois, Eastern Division, and elsewhere,

RAKIM ASAD, also known as “Poodie,” and
HARRIETTE MCPHERSON,

defendants herein, did knowingly and intentionally use a communication facility, namely, a cellular telephone, in committing and in causing and facilitating the commission of a felony, namely, conspiracy to possess with intent to distribute and distribute a controlled substance, in violation of Title 21, United States Code, Section 846, as charged in Count Two of this Superseding Indictment, and distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Eleven of this Superseding Indictment;

In violation of Title 21, United States Code, Section 843(b).

COUNT THIRTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about March 28, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

RAKIM ASAD, also known as “Poodie,”

defendant herein, did knowingly and intentionally distribute a controlled substance,
namely, 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).

COUNT FOURTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about March 28, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

RASHAD UNDERWOOD,

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, 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).

COUNT FIFTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about June 20, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

RAKIM ASAD, also known as “Poodie,”

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about June 20, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

RAKIM ASAD, also known as “Poodie,”

defendant herein, did knowingly possess a firearm, namely, a loaded Glock, .40 caliber pistol, bearing serial number BUX627, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Fifteen of this Superseding Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT SEVENTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about November 24, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

REGINALD JONES, also known as “Lil Reggie,”

defendant herein, did knowingly and intentionally possess with intent to distribute a controlled substance, namely, a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I Controlled Substance;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTEEN

The SPECIAL JUNE 2018 GRAND JURY further charges:

On or about November 24, 2017, at Chicago, in the Northern District of Illinois,
Eastern Division,

REGINALD JONES, also known as “Lil Reggie,”

defendant herein, did knowingly possess a loaded firearm, namely, a Glock model 23, .40 caliber pistol, bearing serial number HBE413; and an FN Herstal Belgium, model 57, 5.7 x 28 millimeter caliber pistol, bearing serial number 386311961; in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, possession with intent to distribute a controlled substance, in violation of Title 21 United States Code, Section 841(a)(1), as charged in Count Seventeen of this Superseding Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A).

FORFEITURE ALLEGATION ONE

The SPECIAL JUNE 2018 GRAND JURY further alleges:

1. The allegations of Counts One, Two, Three, Six, Seven, Eight, Nine, Ten, Eleven, Twelve, Thirteen, Fifteen, Sixteen, Seventeen, and Eighteen of this Superseding Indictment are incorporated here for the purpose of alleging that certain property is subject to forfeiture to the United States, pursuant to Title 18, United States Code, Section 1963.

2. As a result of their violation of Title 18, United States Code, Section 1962(d), as alleged in the foregoing Superseding Indictment,

RAKIM ASAD, also known as "Poodie,"
AKEEM ASAD, also known as "Keemie,"
MARDI LANE,
REGINALD JONES, also known as "Lil Reggie,"
MARTEZ EASTER, also known as "Tez,"
DIJON FOSTON, also known as "Popi,"
COTTRELL MACKEY, also known as "Trell,"
CAREY HINTON, also known as "Spyda,"
TONY PARKER, also known as "Man," and
QUENTIN LUCIOUS, also known as "Flocka,"

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 1963(a)(1), (a)(2), and (a)(3), any interest acquired or maintained in violation of Section 1962; any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the person has established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962; and any property consisting, or derived from, any proceeds which the person obtained, directly or indirectly, from racketeering activity in violation of Section 1962.

3. The property to be forfeited includes, but is not limited to the following specific property:

a. A Glock, model 23, .40 caliber semi-automatic pistol, bearing serial number VMS981;

b. A Smith & Wesson, Model M&P 9, 9 millimeter semi-automatic pistol, bearing serial number MCP6376, and associated ammunition;

c. \$26,200 seized from Rakim Asad by law enforcement on June 2, 2017;

d. One Rolex watch seized from Rakim Asad by law enforcement on June 2, 2017;

e. One necklace containing a 14 carat yellow gold chain and attached to a 14 carat yellow gold pendant with the initials "LAFA" written in diamonds, seized from Rakim Asad by law enforcement on June 2, 2017;

f. One necklace containing a 14 carat pink gold chain and attached to a 14 carat pink gold pendant with the initials "LAFA" written in diamonds, seized from Rakim Asad by law enforcement on June 2, 2017;

g. A 10 millimeter Colt, model Delta Elite, bearing serial number DE01914E, and associated ammunition seized by law enforcement on June 2, 2017;

h. Jewelry seized by the Federal Bureau of Investigation on June 20, 2017, from 1935 South Wabash, #311, Chicago, Illinois 60616, associated with Federal Bureau of Investigation forfeiture proceeding 17-FBI-004257;

i. Clothing and accessories seized by the Federal Bureau of Investigation on June 20, 2017, from 1935 South Wabash, #311, Chicago, Illinois 60616, associated with Federal Bureau of Investigation forfeiture proceeding No. 17-FBI-004259;

j. \$27,151 seized by the Federal Bureau of Investigation on June 20, 2017, from 1935 South Wabash Avenue, #311, Chicago, Illinois 60616;

k. A machete and sheath seized by the Federal Bureau of Investigation on June 20, 2017, from 1935 South Wabash Avenue, #311, Chicago, Illinois 60616;

l. Six .357 S&B cartridges and handgun magazine and associated ammunition seized by the Federal Bureau of Investigation on June 20, 2017;

m. A Glock, .40 caliber pistol, bearing serial number BUX627, and associated ammunition seized by the Federal Bureau of Investigation on June 20, 2017;

n. A Glock, .40 caliber pistol, bearing serial number PEH244, and associated ammunition seized by law enforcement on June 20, 2017;

o. \$89,050 seized by the Federal Bureau of Investigation on June 23, 2017, from safe deposit box #342 located at U.S. Bank, N.A. at 801 North Clark Street, Chicago, Illinois 60610;

p. A Smith & Wesson M&P 40 .40 caliber pistol, bearing serial number DVY4490, and associated ammunition seized by law enforcement from Dijon Foston on August 13, 2016;

q. A Glock model 23, .40 caliber pistol, bearing serial number HBE413, and associated ammunition seized by law enforcement from Reginald Jones on November 24, 2017;

r. A FN Herstal Belgium, model 57, 5.7 x 28 millimeter caliber pistol, bearing serial number 386311961, and associated ammunition seized by law enforcement from Reginald Jones on November 24, 2017; and

s. Approximately \$12,548 seized by law enforcement from Reginald Jones on November 24, 2017.

4. If any property described above as being subject to forfeiture pursuant to Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), as a result of any act or omission of the defendants:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred to, sold to, or deposited with a third person;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value;
- e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of substitute property belonging to the defendants under the provisions of Title 18, United States Code, Section 1963(m).

FORFEITURE ALLEGATION TWO

The SPECIAL JUNE 2018 GRAND JURY further alleges:

1. The allegations of Count Three of this Superseding Indictment are re-alleged and incorporated here by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 922(g), as alleged in this Superseding Indictment,

MARTEZ EASTER, also known as “Tez,” and
DIJON FOSTON, also known as “Popi,”

defendants herein, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d)(1), any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

3. The property to be forfeited includes, but is not limited to a Glock, model 23, .40 caliber semi-automatic pistol, bearing serial number VMS981, and a Smith & Wesson, Model M&P 9, 9 millimeter semi-automatic pistol, bearing serial number MCP6376, and associated ammunition.

FORFEITURE ALLEGATION THREE

The SPECIAL JUNE 2018 GRAND JURY further alleges:

1. The allegations of Counts Two, Nine, Ten, Eleven, Twelve, Thirteen, Fifteen, Sixteen, Seventeen, and Eighteen of this Superseding Indictment are re-alleged and incorporated here by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 21, United States Code, Sections 841, 843, and 846, as set forth in this Superseding Indictment,

RAKIM ASAD, also known as "Poodie,"
AKEEM ASAD, also known as "Keemie,"
MARTEZ EASTER, also known as "Tez,"
REGINALD JONES, also known as "Lil Reggie,"
CAREY HINTON, also known as "Spyda,"
TONY PARKER, also known as "Man,"
HARRIETTE MCPHERSON, and
DERRICK MCNEAL, also known as "Bebo" or "D-Bo,"

defendants herein shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 21, United States Code, Section 853(a).

3. In addition, defendants shall forfeit to the United States of America, any firearm and ammunition involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

4. The property to be forfeited includes, but is not limited to the following specific property:

a. \$26,200 seized from Rakim Asad by law enforcement on June 2, 2017;

b. One Rolex watch seized from Rakim Asad by law enforcement on June 2, 2017;

c. One necklace containing a 14 carat yellow gold chain and attached to a 14 carat yellow gold pendant with the initials "LAFA" written in diamonds, seized from Rakim Asad by law enforcement on June 2, 2017;

d. One necklace containing a 14 carat pink gold chain and attached to a 14 carat pink gold pendant with the initials "LAFA" written in diamonds, seized from Rakim Asad by law enforcement on June 2, 2017;

e. A 10 millimeter Colt, model Delta Elite, bearing serial number DE01914E, and associated ammunition seized by law enforcement on June 2, 2017;

f. Jewelry seized by the Federal Bureau of Investigation on June 20, 2017, from 1935 South Wabash, #311, Chicago, Illinois 60616, associated with Federal Bureau of Investigation forfeiture proceeding 17-FBI-004257;

g. Clothing and accessories seized by the Federal Bureau of Investigation on June 20, 2017, from 1935 South Wabash, #311, Chicago, Illinois 60616, associated with Federal Bureau of Investigation forfeiture proceeding No. 17-FBI-004259;

h. \$27,151 seized by the Federal Bureau of Investigation on June 20, 2017, from 1935 South Wabash Avenue, #311, Chicago, Illinois 60616;

i. A machete and sheath seized by the Federal Bureau of Investigation on June 20, 2017, from 1935 South Wabash Avenue, #311, Chicago, Illinois 60616;

j. Six .357 S&B cartridges and handgun magazine and associated ammunition seized by the Federal Bureau of Investigation on June 20, 2017;

k. A Glock, .40 caliber pistol, bearing serial number BUX627, and associated ammunition seized by the Federal Bureau of Investigation on June 20, 2017;

l. A Glock, .40 caliber pistol, bearing serial number PEH244, and associated ammunition seized by law enforcement on June 20, 2017; and

m. \$89,050 seized by the Federal Bureau of Investigation on June 23, 2017, from safe deposit box #342 located at U.S. Bank, N.A. at 801 North Clark Street, Chicago, Illinois 60610.

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

FORFEITURE ALLEGATION FOUR

The SPECIAL JUNE 2018 GRAND JURY further alleges:

1. The allegations of Counts Six, Seven, and Eight of this Superseding Indictment are re-alleged and incorporated here by reference incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 21, United States Code, Section 841, as set forth in Count Seven of this Superseding Indictment, defendant DIJON FOSTON shall forfeit to the United States of America any property used, and intended to be used, in any manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a)(2).

3. In addition, defendant DIJON FOSTON shall forfeit to the United States of America, any firearm and ammunition:

a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession and under the immediate control of the defendant at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in Title 18, United States Code, Section 3665.

4. The property to be forfeited includes, but is not limited, a Smith & Wesson M&P 40 .40 caliber pistol, bearing serial number DVY4490, and associated ammunition.

All pursuant to Title 18, United States Code, Section 924(d)(1), Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461(c).

FORFEITURE ALLEGATION FIVE

The SPECIAL JUNE 2018 GRAND JURY further alleges:

1. The allegations of Counts Seventeen and Eighteen of this Superseding Indictment are re-alleged and incorporated here by reference incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 21, United States Code, Section 841, as set forth in Count Seventeen of this Superseding Indictment, defendant REGINALD JONES shall forfeit to the United States of America any property used, and intended to be used, in any manner and part, to commit and to facilitate commission of the offense, as provided in Title 21, United States Code, Sections 853(a)(2).

3. In addition, defendant REGINALD JONES shall forfeit to the United States of America, any firearm and ammunition:

a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession and under the immediate control of the defendant at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in Title 18, United States Code, Section 3665.

4. The property to be forfeited includes, but is not limited to the following specific property:

a. A Glock, model 23, .40 caliber pistol, bearing serial number HBE413, and associated ammunition;

b. A FN Herstal Belgium, model 57, 5.7 x 28 millimeter caliber pistol, bearing serial number 386311961, and associated ammunition; and

c. Approximately \$12,548 seized by law enforcement on November 24, 2017.

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

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY