

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 22-
	:	
WALTER BOYD,	:	18 U.S.C. § 1962(d)
a/k/a "Walt,"	:	
a/k/a "Walt Daddy,"	:	
ISIAH DANIELS,	:	
a/k/a "Ice,"	:	
JOEL LYONS,	:	
a/k/a "Jayski,"	:	
GEDE MACCELUS,	:	
a/k/a "G Baby,"	:	
ARMANDO ORTIZ,	:	
a/k/a "Mando,"	:	
MALIK STRINGER,	:	
a/k/a "Rambo," and	:	
KIMANI WANYOIKE,	:	
a/k/a "Ki"	:	

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

(Racketeering Conspiracy)

The Racketeering Enterprise

1. At various times relevant to this Indictment:
 - a. Defendants WALTER BOYD, a/k/a "Walt," a/k/a/ "Walt Daddy" (BOYD), ISIAH DANIELS, a/k/a "Ice" (DANIELS), JOEL LYONS, a/k/a "Jayski" (LYONS), GEDE MACCELUS, a/k/a "G Baby" (MACCELUS), ARMANDO ORTIZ, a/k/a "Mando" (ORTIZ), MALIK STRINGER, a/k/a "Rambo" (STRINGER), and KIMANI WANYOIKE, a/k/a "Ki" (WANYOIKE); and others, known and

unknown, were members and associates of a criminal organization operating in the District of New Jersey and elsewhere known as the “Bounty Hunter Bloods” (the “Bounty Hunter Bloods Enterprise” or the “Enterprise”).

b. The Bounty Hunter Bloods Enterprise, including its leadership, members, and associates, constituted an enterprise, as defined in Title 18, United States Code, Section 1961(4)—namely, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

History, Rules, and Organization of the Bounty Hunter Bloods Enterprise

c. The Enterprise originated in the Nickerson Gardens public housing projects in Watts, Los Angeles and operated in numerous states, including but not limited to California, Georgia, Virginia, North Carolina, Texas, Michigan, Pennsylvania, New York, and New Jersey.

d. In New Jersey, the Bounty Hunter Bloods Enterprise operated in Somerset, Middlesex, Passaic, and Mercer Counties, as well as within the New Jersey prison system. Members and associates of the Enterprise within New Jersey generally identify as part of the “Five Line” subset of the Bounty Hunter Bloods.

e. BOYD, DANIELS, LYONS, MACCELUS, ORTIZ, STRINGER, and WANYOIKE (collectively, the “Defendants”) operated in and around Somerset County, New Jersey and Middlesex County, New Jersey. Members and associates

of the Enterprise operating within Somerset and Middlesex Counties operate under the umbrella of the neighborhood street gangs known as “Parkside” and “The Ville.”

f. Members and associates of the Bounty Hunter Bloods Enterprise followed certain practices of the Enterprise, including:

i. visible demonstrations of gang affiliation, such as an identification with the number “115,” a reference to 115th Street in the Nickerson Gardens housing projects in Watts, Los Angeles, and the colors red and black, which appeared in clothing, hats, and bandanas that Bounty Hunter Bloods members wore;

ii. use of social media platforms to proclaim affiliation with, and highlight, the Enterprise by posting gang-related photographs and videos, including those paying homage to deceased members of the Enterprise and taunting rival gang members, as well as to communicate with other members and associates; and

iii. use of slogans and hand gestures, as well as the display of tattoos, signifying membership in the Enterprise.

g. Members and associates of the Bounty Hunter Bloods Enterprise engaged in, or controlled, drug trafficking and other criminal activities in various neighborhoods and public-housing complexes in and around New Brunswick and Somerset, New Jersey, including, among others:

i. Within New Brunswick, between Lee Avenue to Throop Avenue, from Suydam Street to Handy Street. The Enterprise’s primary area for

narcotics distribution within New Brunswick was Lee Avenue and Suydam Street.

ii. Within Somerset, the area around Naamen Williams Park and its surrounding vicinity, bordered by Victor Street and Route 27, from Millstone Road to Matilda Avenue.

iii. Within New Brunswick, the Robeson Village public-housing complex and its surrounding vicinity, bordered by Zebra Way and Route 27, from Van Dyke Avenue to Jennings Court.

h. Members and associates of the Bounty Hunter Bloods were expected to and did commit violent acts for the benefit of the Enterprise and as directed by other high-ranking members of the gang. Committing a violent act increased the respect accorded to that member and resulted in that member's maintaining and increasing position in the gang.

i. Members and associates were expected to commit acts of violence against rival gang members whenever rival gang members were encountered. Failure to do so would result in "discipline" by fellow gang members and a lack of respect within the Enterprise. Specifically, the Enterprise engaged in retaliatory acts of violence with rival gangs, including those that identify as "Down Bottom," which is associated with the "Down Bottom" area of New Brunswick, New Jersey and "Uptown," which is associated with the "Uptown" area of New Brunswick, New Jersey.

j. Members and associates of the Bounty Hunter Bloods Enterprise paid homage to deceased members of the Enterprise and were expected to retaliate to seek retribution for deceased fellow gang members.

Purposes of the Bounty Hunter Bloods Enterprise

k. The purposes of the Bounty Hunter Bloods Enterprise included the following:

i. promoting and enhancing the Enterprise and the activities of its members and associates, both in and out of prison, which activities included, but were not limited to, drug trafficking, murder, robbery, wire and bank fraud and other criminal activities;

ii. preserving and protecting the power, territory, reputation, and profits of the Enterprise and of its members and associates, both in and out of prison, through the use of intimidation, violence, threats of violence, assaults, and murder;

iii. providing assistance to gang members and associates who were imprisoned after having committed crimes on behalf of the Enterprise;

iv. confronting and retaliating against rival gangs through intimidation, threats of violence, and acts of violence; and

v. hindering, obstructing, and preventing law enforcement from identifying participants in the gang's criminal activity, from apprehending the offenders of those crimes, and from successfully prosecuting and punishing those offenders.

Members and Associates of the Enterprise

l. Defendant WALTER BOYD, a/k/a “Walt,” a/k/a “Walt Daddy,” was a member and associate of the Bounty Hunter Bloods Enterprise.

m. Defendant ISIAH DANIELS, a/k/a “Ice,” was a member and associate of the Bounty Hunter Bloods Enterprise.

n. Defendant JOEL LYONS, a/k/a “Jayski,” was a member and associate of the Bounty Hunter Bloods Enterprise.

o. Defendant GEDE MACCELUS, a/k/a “G Baby” was a member and associate of the Bounty Hunter Bloods Enterprise.

p. Defendant ARMANDO ORTIZ, a/k/a “Mando” was a member and associate of the Bounty Hunter Bloods Enterprise.

q. Defendant MALIK STRINGER, a/k/a “Rambo,” was a member and associate of the Bounty Hunter Bloods Enterprise.

r. Defendant KIMANI WANYOIKE, a/k/a “Ki,” was a member and associate of the Bounty Hunter Bloods Enterprise.

s. Individual-1 was a member and associate of the Bounty Hunter Bloods Enterprise.

The Racketeering Conspiracy

2. Beginning at least as early as in or about 2019, and continuing through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendants,

WALTER BOYD,
a/k/a “Walt,”
a/k/a “Walt Daddy,”
ISIAH DANIELS,

a/k/a "Ice,"
JOEL LYONS,
a/k/a "Jayski,"
GEDE MACCELUS,
a/k/a "G Baby,"
ARMANDO ORTIZ,
a/k/a "Mando,"
MALIK STRINGER,
a/k/a "Rambo," and
KIMANI WANYOIKE,
a/k/a "Ki,"

together with others known and unknown, being persons employed by and associated with the Bounty Hunter Bloods Enterprise, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired and agreed with others 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 the Bounty Hunter Bloods Enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering activity consisted of:

- a. multiple acts involving murder, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:5-1(a), 2C:5-2, and 2C:2-6;
- b. multiple acts indictable under Title 18, United States Code, Sections 1343 (relating to wire fraud) and 1344 (relating to bank fraud); and
- c. multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance punishable under the laws of the United States, in violation of Title 21, United States Code, Section 846 (conspiracy to distribute and possess

with intent to distribute controlled substances), Section 841 (distribution and possession with intent to distribute controlled substances), and Section 843(b) (use of a communications facility to violate the Controlled Substances Act).

3. It was 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.

Manner and Means of the Conspiracy

4. Among the manner and means by which the Defendants and other members and associates of the Bounty Hunter Bloods Enterprise agreed to conduct and participate in conducting the affairs of the Enterprise were the following:

a. Acquiring, maintaining, and sharing weapons, including firearms, to use to commit violent criminal acts on behalf of the Enterprise.

b. Committing and agreeing to commit violent acts, including murder and assault with deadly weapons, on behalf of and for the benefit of the Bounty Hunter Bloods Enterprise, in order to: (i) punish disloyal Enterprise members and associates; (ii) retaliate against rivals; (iii) maintain and enhance the Enterprise's reputation; and (iv) protect and otherwise assist the Enterprise's drug trafficking activities. Specifically, beginning at least as early as in or around 2019, numerous members and associates of the Enterprise, including certain of the Defendants, engaged in multiple acts of violence for and on behalf of the Enterprise that targeted rival gang members and any others the Enterprise perceived as disrespecting the Enterprise or its members.

c. Using social media, including Instagram and Facebook, to intimidate rival gang members and other members of the community and to promote the Enterprise. Specifically, beginning at least as early as in or around 2019, the Defendants and other members and associates of the Enterprise utilized social media, including Facebook and Instagram, to conduct the Enterprise's business, including flaunting membership in the Enterprise, paying homage to deceased members and associates of the Enterprise, taunting rival gang members, and threatening retribution for acts of violence committed against members of the Enterprise.

d. Trafficking narcotics within Bounty Hunter Bloods territory and elsewhere to enrich themselves and the Enterprise, as well as preventing through violence and other means those not associated with the Enterprise from trafficking narcotics within the Enterprise's territory. Specifically, beginning at least as early as in or around 2019, members and associates of the Bounty Hunter Bloods Enterprise, including certain of the Defendants, engaged in multiple acts of distribution, and possession with intent to distribute, controlled substances.

e. Engaging in fraud schemes, including bank fraud, wire fraud and obtaining fraudulent Paycheck Protection Program (PPP) loans, as well as sharing tactics on how to conduct such schemes, all to enrich themselves and other members and associates of the Enterprise. Specifically, beginning at least as early as in or around 2020, members and associates of the Bounty Hunter

Bloods Enterprise, including certain of the Defendants, engaged in multiple acts of wire fraud and bank fraud, including fraudulently obtaining PPP loans.

Overt Acts

5. In furtherance of the conspiracy and to achieve its purposes, the defendants and their coconspirators committed the overt acts described in the following paragraphs, among others, in the District of New Jersey, and elsewhere.

6. Beginning at least as early as in or around 2019, numerous members and associates of the Bounty Hunter Bloods Enterprise, including, but not limited to, the defendants, engaged in multiple acts of distribution of controlled substances, and possession with intent to distribute controlled substances, in and around the District of New Jersey.

7. Beginning at least as early as in or around 2019, numerous members and associates of the Bounty Hunter Bloods Enterprise, including, but not limited to, certain of the defendants, engaged in multiple acts of violence for and on behalf of the Enterprise, which acts of violence targeted rival gang members and any other individuals who disrespected the Enterprise or its members.

8. Beginning at least as early as in or around 2019, the defendants and other members and associates of the Bounty Hunter Bloods Enterprise utilized social media, to include Facebook and Instagram, to conduct the business of the Enterprise, including flaunting membership in the Enterprise, paying homage to deceased members and associates of the Bounty Hunter Bloods Enterprise,

taunting rival gang members, and threatening retribution for acts of violence committed against members of the Enterprise.

9. Beginning at least as early as in or around 2020, numerous members and associates of the Bounty Hunter Bloods Enterprise, including, but not limited to, the defendants, engaged in multiple acts of wire fraud and bank fraud, including fraudulently obtaining PPP loans, in and around the District of New Jersey.

10. On or about June 10, 2020, DANIELS and another member of the Enterprise distributed and possessed with intent to distribute heroin within Bounty Hunter Bloods territory in New Jersey.

11. On or about June 12, 2020, DANIELS and other members and associates of the Enterprise drove at least two vehicles to a gathering in Franklin Township, New Jersey to pay homage to a purported rival gang member who had passed away. At the gathering, members of the Enterprise exited their vehicles, brandished firearms, and shot into a vehicle. During this incident, members of the Enterprise discharged at least seventeen rounds of ammunition.

12. On or about June 24, 2020, DANIELS distributed and possessed with intent to distribute heroin within Bounty Hunter Bloods territory in New Jersey.

13. On or about June 25, 2020, STRINGER posted three photographs of himself, along with other members of the Enterprise, to Instagram, with the caption "I'm gang related with a gang of n----s you kould google [NG emoji][heart

emoji][horse emoji][shark emoji][gorilla emoji],” declaring his membership in the Enterprise.

14. On or about July 2, 2020, DANIELS distributed and possessed with intent to distribute heroin within Bounty Hunter Bloods territory in New Jersey.

15. On or about July 8, 2020, DANIELS distributed and possessed with intent to distribute heroin within Bounty Hunter Bloods territory in New Jersey.

16. On or about July 14, 2020, DANIELS distributed and possessed with intent to distribute heroin within Bounty Hunter Bloods territory in New Jersey.

17. On or about July 14, 2020, ORTIZ posted a video of himself to Instagram which showed him in the hospital in New Brunswick, New Jersey with tape on his chest after being stabbed by a purported rival gang member. In the video, ORTIZ stated and displayed the words “too smart, clever,” indicating that he could survive acts of violence taken upon him by purported rival gang members and was ready to retaliate.

18. On or about July 28, 2020, DANIELS and LYONS distributed and possessed with intent to distribute heroin within Bounty Hunter Bloods territory in New Jersey.

19. On or about July 28, 2020, LYONS, while with DANIELS in New Jersey, possessed a Glock 17 9mm firearm with a 30-round magazine, which he purchased in Pennsylvania in or around January 2020.

20. On or about July 31, 2020, ORTIZ directed members and associates of the Enterprise, including MACCELUS and WANYOIKE, to conduct a shooting in the area of “Down Bottom.”

21. On or about August 1, 2020, members and associates of the Enterprise, including MACCELUS and WANYOIKE, drove to the area of the Hope Manor housing complex in "Down Bottom" in a stolen vehicle. Upon arriving in that area, WANYOIKE and another member and associate of the Enterprise exited the vehicle, brandished firearms, and shot Victim 1, a purported rival of the Bounty Hunter Bloods Enterprise, and Victim 2 and Victim 3. During this incident, members of the Enterprise discharged at least sixteen rounds of ammunition from at least two firearms, including .40 caliber rounds.

22. On or about August 5, 2020, DANIELS possessed with intent to distribute approximately 60 grams of heroin along with one round of 9mm ammunition within Bounty Hunter Bloods territory in New Jersey.

23. On or about September 12, 2020, members and associates of the Enterprise stole a gray Honda Accord that they understood likely would be used by members and associates of the Enterprise to commit a shooting. Members and associates of the Enterprise cleaned out the gray Honda Accord and provided it to higher ranking members of the Enterprise.

24. On or about September 13, 2020, LYONS, DANIELS and other members and associates of the Enterprise used the gray Honda Accord stolen by other members and associates of the Enterprise to commit a shooting in New Brunswick, New Jersey, causing the deaths of Victim 4, a purported rival of the Bounty Hunter Bloods Enterprise, and Victim 5, and resulting in injuries to Victim 6, Victim 7, Victim 8, Victim 9, Victim 10, Victim 11, and Victim 12. During this incident, members of the Enterprise discharged at least thirty-one

rounds of ammunition from at least four firearms, including .40 caliber rounds and 9mm rounds.

25. On or about September 27, 2020, DANIELS posted to social media multiple photographs of himself sitting inside a vehicle. The photographs displayed the following wording: "I been outside I don't run frm these n----s I used to throw the hands but I gkot a [gun emoji] for these n----s," thereby representing that he would be armed for any future attempts of violence between the Enterprise and rival gang members.

26. On or about October 1, 2020, BOYD posted a photo to Instagram depicting his hand tattoo, which reads "B.H.B.," demonstrating his membership with the Enterprise.

27. In or around October 2020, ORTIZ, along with other members of the Enterprise, distributed and possessed with intent to distribute heroin within Bounty Hunter Bloods territory in New Jersey.

28. In or around November 2020, BOYD, DANIELS, WANYOIKE, and other members and associates of the Enterprise, traveled from New Jersey to Nickerson Gardens in Watts, Los Angeles for the purpose of demonstrating their membership with the Enterprise.

29. On or about December 29, 2020, BOYD, and another member of the Enterprise, possessed with intent to distribute heroin within the Bounty Hunter Bloods territory in New Jersey.

30. On or about January 1, 2021, DANIELS posted a photo to Instagram with the words “Happy New Year’s to all my 115 NGBH SQUAD!!! Stay Dangkerous!!!,” thus demonstrating his membership with the Enterprise.

31. In or around February 2021, BOYD confirmed through text messages sent to another individual that he had shared information with Individual-1 about methods of obtaining fraudulent PPP loans in order to profit from the proceeds.

32. In or around March 2021, WANYOIKE and other members and associates of the Enterprise utilized social media to solicit individuals to cash checks for them in exchange for payment.

33. On or about March 4, 2021, WANYOIKE and other members and associates of the Enterprise met with an individual (Individual-2) in North Brunswick, New Jersey and caused Individual-2 to fraudulently deposit a check into Individual-2’s bank account.

34. On or about March 5, 2021, WANYOIKE and other members and associates of the Enterprise again met with Individual-2 and caused Individual-2 to withdraw money from Individual-2’s bank account and provide it to them.

35. On or about March 29, 2021, DANIELS possessed a 9mm Smith & Wesson SD9VE Model semi-automatic handgun, bearing serial number FCD3770, loaded with a high-capacity magazine and sixteen 9mm rounds of ammunition within Bounty Hunter Bloods territory.

36. On or about June 1, 2021, WANYOIKE operated a red Hyundai motor vehicle while wearing a red ski mask.

37. On or about June 18, 2021, BOYD and other members and associates of the Enterprise gathered outside of a hospital in New Brunswick to support and pay homage to Individual-1, who had been shot by purported rivals of the Enterprise hours prior. Upon observing a white Jeep occupied by individuals who BOYD and other members of the Enterprise appeared to have recognized to be members of a rival gang, BOYD, and two other members of the Enterprise entered a silver Honda and followed the Jeep to the area of Easton Avenue in New Brunswick. Upon arriving in that area, a member of the Enterprise exited the Honda, brandished a firearm, and shot into the Jeep, causing the death of Victim 14 and resulting in injury to Victim 15, both purported rivals of the Bounty Hunter Bloods Enterprise. During this incident, a member of the Enterprise discharged at least seven rounds of .40 caliber ammunition from one firearm.

38. On or about July 19, 2021, WANYOIKE possessed a .40 caliber Semi-Automatic PF940C handgun, with a defaced serial number, a 9mm Ruger Semi-Automatic EC9S handgun, bearing serial number 454-85174, and seven rounds of ammunition, along with several ski masks, fraudulent checks, fraudulent, debit cards, and fraudulent pieces of identification. The .40 caliber Semi-Automatic PF940C handgun was used in a shooting on or about April 30, 2021, where at least seven rounds of .40 caliber ammunition were discharged from a red Hyundai motor vehicle as it chased at Victim 13, a purported rival of the Bounty Hunter Bloods Enterprise, in a black BMW.

39. In or around July 2021, MACCELUS posted a photograph of himself to Instagram which appeared to depict him while incarcerated at Somerset County Jail and displayed the words “Gk back [100 emoji][yelling emoji] focused mind set ona mission [footprints emoji],” representing that he had been released from incarceration and was ready to engage in acts of violence for the Enterprise.

40. In or around July 2021, STRINGER distributed and possessed with the intent to distribute a quantity of heroin within Bounty Hunter Bloods territory in New Jersey.

41. On or about July 24, 2021, STRINGER, while gathered with other members and associates of the Enterprise in New Brunswick, New Jersey, possessed a firearm and ammunition, and attempted to fire the firearm at a purported rival gang member who had fired several shots at a gathering of members and associates of the Bounty Hunter Bloods Enterprise.

42. On or about August 2, 2021, STRINGER possessed with intent to distribute a quantity of heroin within Bounty Hunter Bloods territory in New Jersey.

43. On or about November 20, 2021, LYONS possessed a black Ruger Security 9mm handgun, loaded with a high-capacity magazine and 15 rounds of 9mm ammunition within Bounty Hunter Bloods territory.

44. On or about January 9, 2022, STRINGER, while with another member and associate of the Enterprise, got into a confrontation regarding narcotics distribution within the Bounty Hunter Bloods territory with purported rival gang members. During this confrontation, STRINGER brandished a firearm

and shot at the purported rival gang members, causing the death of Victim 16 and resulting in injury to Victim 17. During this incident, STRINGER discharged approximately nine rounds of 9mm caliber ammunition. Following this shooting, STRINGER fled the area and met up with a high-ranking member of the Enterprise.

45. On or about January 20, 2022, MACCELUS, while with another member and associate of the Enterprise, possessed a .40 caliber Taurus Semi-Automatic G2 handgun, bearing serial number SIR25717, which was utilized in a shooting on or about January 20, 2020 in the area of Throop Avenue in New Brunswick, New Jersey.

NOTICE OF SPECIAL SENTENCING FACTORS

46. On or about September 13, 2020, in Middlesex County, in the District of New Jersey and elsewhere, the defendants,

ISIAH DANIELS,
a/k/a “Ice,” and
JOEL LYONS,
a/k/a “Jayski,”

did knowingly and purposely cause the death and serious bodily injury resulting in the death of other persons, namely Victim 4, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6.

47. On or about September 13, 2020, in Middlesex County, in the District of New Jersey and elsewhere, the defendants,

ISIAH DANIELS,
a/k/a “Ice,” and
JOEL LYONS,
a/k/a “Jayski,”

did knowingly and purposely cause the death and serious bodily injury resulting in the death of other persons, namely Victim 5, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6.

48. On or about June 18, 2021, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

WALTER BOYD,
a/k/a “Walt,”

did knowingly and purposely cause the death and serious bodily injury resulting in the death of another person, namely Victim 14, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6.

49. On or about January 9, 2022, in Middlesex County, in the District of New Jersey and elsewhere, the defendant,

MALIK STRINGER,
a/k/a “Rambo,”

did knowingly and purposely cause the death and serious bodily injury resulting in the death of another person, namely Victim 16, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:2-6.

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

FORFEITURE ALLEGATIONS

1. The allegations contained in this indictment are realleged here for the purpose of noticing forfeiture.

2. Pursuant to Title 18, United States Code, Section 1963, upon conviction of the offense charged in this Indictment, defendants,

WALTER BOYD,
a/k/a "Walt,"
a/k/a "Walt Daddy,"
ISIAH DANIELS,
a/k/a "Ice,"
JOEL LYONS,
a/k/a "Jayski,"
GEDE MACCELUS,
a/k/a "G Baby,"
ARMANDO ORTIZ,
a/k/a "Mando,"
MALIK STRINGER,
a/k/a "Rambo," and
KIMANI WANYOIKE,
a/k/a "Ki,"

shall forfeit to the United States of America:

(a) any interest acquired or maintained in violation of 18 U.S.C. § 1962;

(b) 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 defendants established, operated, controlled, conducted, or participated in the conduct of, in violation of 18 U.S.C. § 1962; and

(c) any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity in violation of 18 U.S.C. § 1962.

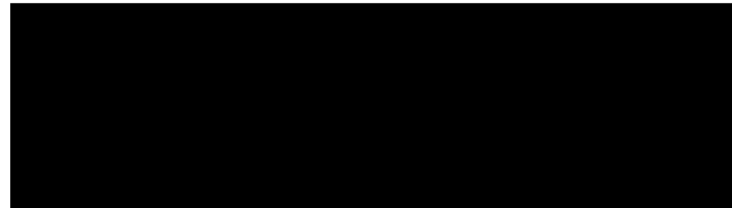
Substitute Assets Provision
(Applicable to All Forfeiture Allegations)


3. If any of the above-described forfeitable property, 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 or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute assets pursuant to Title 18, United States Code, Section 1963(m), and Title 21, United States Code, Section 853(p).

A TRUE BILL



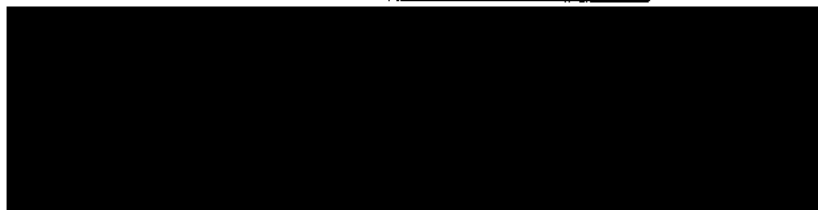

PHILIP R. SELLINGER
United States Attorney

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**United States District Court
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UNITED STATES OF AMERICA
v.
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INDICTMENT FOR
18 U.S.C. § 1962(d)



PHILIP R. SELLINGER
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

KENDALL RANDOLPH
ASSISTANT U.S. ATTORNEY
973-645-3659
