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SEP 22 2022

FAL/2017R00603

AT 8:30 <sup>40</sup> PM  
WILLIAM T. WALSH  
CLERK

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Susan D. Wigenton, U.S.D.J.
	:	
v.	:	Crim. No. 21-369
	:	
JASON FRANKLIN,	:	18 U.S.C. § 1962(d)
a/k/a "Freak,"	:	18 U.S.C. § 922(g)(1)
a/k/a "OG Freak,"	:	18 U.S.C. § 924(c)(1)(a)(i)
ELIJAH WILLIAMS,	:	18 U.S.C. § 924(c)(1)(a)(ii)
a/k/a "Lil Smith,"	:	18 U.S.C. § 2119(1)
TRE BYRD,	:	18 U.S.C. § 2
a/k/a "Bands,"	:	21 U.S.C. § 841(a)(1) and (b)(1)(C)
a/k/a "G Bandz,"	:	
KAREEM GREEN,	:	
a/k/a "Try Me,"	:	
TYHEIM TERRY,	:	
a/k/a "Ty,"	:	
a/k/a "Rollin' Ty,"	:	
AMIR WARDEN,	:	
a/k/a "Stamps,"	:	
a/k/a "Killa,"	:	
RAHJON COX,	:	
a/k/a "Tsu Surf,"	:	
AMIR EDMONDS,	:	
a/k/a "G Baby,"	:	
ABDUL YARRELL,	:	
a/k/a "Runit Up,"	:	
a/k/a "BB," and	:	
NYGEE JOHNSON,	:	
a/k/a "Gito"	:	



**SUPERSEDING INDICTMENT**

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

**COUNT ONE**  
**(Racketeering Conspiracy)**

**The Racketeering Enterprise**

1. At various times relevant to this Superseding Indictment, in the District of New Jersey, and elsewhere, defendants JASON FRANKLIN, a/k/a “Freak,” a/k/a “OG Freak” (“FRANKLIN”); ELIJAH WILLIAMS, a/k/a “Lil Smith” (“WILLIAMS”); TRE BYRD, a/k/a “Bandz,” a/k/a “G Bandz” (“BYRD”); Kareem Green, a/k/a “Try Me” (“GREEN”); Tyheim Terry, a/k/a “Ty,” a/k/a “Rollin’ Ty” (“TERRY”); AMIR WARDEN, a/k/a “Stampz,” a/k/a “Killa” (“WARDEN”); Rahjon Cox, a/k/a “Tsu Surf” (“COX”); Amir Edmonds, a/k/a “G Baby” (“EDMONDS”); Abdul Yarrell, a/k/a “Runit Up,” a/k/a “BB” (“YARRELL”); Nygee Johnson, a/k/a “Gito” (“JOHNSON”) and others, known and unknown, were members and associates of a criminal organization known as the Rollin’ 60s Neighborhood Crips (the “Rollin’ 60s” or the “Enterprise”). The Rollin’ 60s, 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 Rollin’ 60s Crips**

2. The Enterprise originated in the West Side of South Los Angeles and now operates in numerous states, including but not limited to California,

Pennsylvania, North Carolina, Florida, Tennessee, and New Jersey. Members and associates of the Enterprise within the District of New Jersey operate under the umbrella of the Silverbacc Gorillas, or “SBG,” and are then further divided into “districts” and “units.”

3. The Rollin’ 60s operated throughout the District of New Jersey, including in Essex, Middlesex, and Mercer Counties, as well as within the New Jersey prison system. At all relevant times, FRANKLIN, WILLIAMS, BYRD, GREEN, TERRY, WARDEN, COX, EDMONDS, YARRELL, and JOHNSON operated in and around Essex County, and WARDEN also operated in and around Union County.

4. The Rollin’ 60s members and associates followed certain traditions and protocols of the Enterprise, including:

a. visible demonstrations of gang affiliation, such as an identification with the colors blue and white, which appear in clothing, hats, and bandanas that Rollin’ 60s members wear;

b. greeting each other with the phrase, “NH,” which is an acronym for “neighborhood,” and thus shorthand for “Neighborhood Crip,” and referring to each other as “Hoodsta” and “Loc”;

c. using of social media platforms to proclaim their affiliation and highlight the Enterprise by posting gang-related photographs and videos and to communicate with other members and associates; and

d. tattoos, slogans, and hand gestures signifying membership in the Rollin’ 60s.

5. The rules governing the Rollin' 60s establish, among other things:

a. a hierarchical power structure in which members are given designations or ranks signifying their status within the gang and;

b. a system of discipline and punishment for those members who violated rules or failed to carry out orders from higher-ups.

6. Members and associates of the Rollin' 60s engaged in, or controlled, drug trafficking and other criminal activities in various neighborhoods and public-housing complexes in and around Newark, Irvington, Elizabeth, and East Orange, including, among others:

a. Within Newark, between Sanford Avenue to Stuyvesant Avenue, from South Orange Avenue to Tremont Avenue, as well as in the Blue Hills region of Newark, located in the vicinity of Clifton Avenue and Victoria Avenue, and on Livingston Street, between 18th Avenue and Avon Avenue. The Enterprise's primary area for narcotics distribution within Newark was South Orange Avenue and Salem Street.

b. Within Irvington, the Crescent Lane public-housing complex ("Crescent Lane") and its surrounding vicinity, bordered by Nye and Lyons Avenues, from Lincoln Place to Ball Street. The Enterprise's primary area for narcotics distribution outside Crescent Lane was between Lyons and Union Avenues. Within Crescent Lane, the Enterprise operated primarily within Building Eight.

c. Within Elizabeth, the Mravlag Manor housing complex and its surrounding vicinity, located within the Bayway section of the City.

d. Within East Orange, on Ashland Avenue between Park Avenue and William Street, which was an area referred to as “Cashland.”

**Purposes of the Rollin’ 60s Crips Enterprise**

7. The purposes of the Rollin’ 60s included the following:

a. 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, automobile theft, and other criminal activities;

b. 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;

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

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

e. 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**

8. FRANKLIN was a senior member of the Rollin’ 60s. Among other responsibilities, FRANKLIN communicated with leaders of the Rollin’ 60s in other

states, to include California and Pennsylvania, and issued orders that lower members of the Rollin' 60s were expected to follow.

9. WARDEN was a senior member of the Rollin' 60s. Among other responsibilities, WARDEN organized the transport of large quantities of marijuana from California and other places to New Jersey and elsewhere. WARDEN also coordinated drug distribution, including heroin and marijuana, in and around Irvington and Elizabeth.

10. WILLIAMS, BYRD, TERRY, COX, EDMONDS, JOHNSON, and YARRELL were members of the Rollin' 60s who operated, among other places, in and around Smith Street and South Orange Avenue.

11. GREEN was a member of the Rollin' 60s who operated, among other places, in and around Crescent Lane.

**The Racketeering Conspiracy**

12. Beginning at least as early as in or about 2015, and continuing through the date of this Superseding Indictment, in the District of New Jersey, and elsewhere, the defendants,

**JASON FRANKLIN,  
a/k/a “Freak,”  
a/k/a “OG Freak,”  
ELIJAH WILLIAMS,  
a/k/a “Lil Smith,”  
TRE BYRD,  
a/k/a “Bands,”  
a/k/a “G Bandz,”  
KAREEM GREEN,  
a/k/a “Try Me,”  
TYHEIM TERRY,  
a/k/a “Ty,”  
a/k/a “Rollin’ Ty,”  
AMIR WARDEN,  
a/k/a “Stamps,”  
a/k/a “Killa,”  
RAHJON COX,  
a/k/a “Tsu Surf,”  
AMIR EDMONDS,  
a/k/a “G Baby,”  
ABDUL YARRELL,  
a/k/a “Runit Up,”  
a/k/a “BB,”  
NYGEE JOHNSON, and  
a/k/a “Gito”**

together with others known and unknown, being persons employed by and associated with the Rollin’ 60s Crips, 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 Rollin’ 60s Crips 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 offenses 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 offenses involving robbery, contrary to N.J.S.A. 2C:15-1(a)(1), 2C:5-1(a), 2C:5-2, and 2C:2-6;

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);

d. multiple offenses indictable under Title 18, United States Code, Section 1029 (relating to fraud and related activity in connection with access devices);

e. multiple offenses indictable under Title 18, United States Code, Section 1343 (relating to wire fraud);

f. multiple offenses indictable under Title 18, United States Code, Section 1344 (relating to financial institution fraud); and

g. multiple offenses indictable under Title 18, United States Code, Section 1512 (relating to tampering with a witness, victim, or an informant).



13. 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**

14. Among the manner and means by which the defendants and other members and associates of the Rollin' 60s agreed to conduct and participate in the conduct of the affairs of the Enterprise were the following:

a. It was part of the conspiracy that the members and associates of the Rollin' 60s acquired and maintained weapons, including firearms, to commit violent criminal acts on behalf of the Enterprise.

b. It was further part of the conspiracy that the members and associates of the Rollin' 60s shared firearms to use in committing violent criminal acts.

c. It was further part of the conspiracy that the members and associates of the Rollin' 60s committed, attempted, agreed, and threatened to commit violent acts, including murder and assault with deadly weapons, to avenge attacks or perceived slights against other members and associates of the Rollin' 60s; to punish Enterprise members and associates who had been disloyal; to retaliate against rivals; to maintain and enhance the reputation of the Rollin' 60s; and to protect and otherwise assist their drug trafficking business.

d. It was further part of the conspiracy that participation in criminal activity by a member, particularly violent acts directed at rivals or as directed by the gang leadership, increased the respect accorded to that member,

resulted in that member's maintaining and increasing position in the gang, and could result in a promotion to a leadership position.

e. It was further part of the conspiracy that members and associates of the Rollin' 60s used social media, including Instagram and Facebook, to intimidate witnesses and other members of the community, to promote the Rollin' 60s, and to share amongst members and associates information relating to members and associates of the Enterprise suspected of being disloyal to the Enterprise, as well as individuals who provided information to law enforcement related to the Enterprise's criminal activities.

f. It was further part of the conspiracy that members and associates of the conspiracy enriched themselves through drug trafficking, wire fraud, bank fraud, access device fraud, car theft, carjacking, and robberies.

#### **Overt Acts**

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

a. Beginning at least as early as in or around 2015, numerous members and associates of the Rollin' 60s, 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.

b. Beginning at least as early as in or around 2015, the defendants and other members and associates of the Rollin' 60s used social

media, to include Instagram and Facebook, to conduct the business of the enterprise, including: raising funds for the Enterprise's members; referencing penalties for violating the Rollin' 60s rules; discussing the initiation of new members; scheduling meetings; and paying homage to members and associates of the Rollin' 60s who were killed.

c. Beginning at least as early as in or around 2015, the defendants and other members and associates of the Rollin' 60s used social media, including: Instagram and Facebook, to conduct the illegal activities of the Enterprise, to include planning violent activities; purchasing, selling and exchanging firearms; and coordinating drug sales.

d. From at least as early as in or around 2017 through at least in or around 2020, FRANKLIN used social media, to include Instagram and Facebook, to vouch for other members and associates of the Rollin' 60s, or to confirm whether any such individuals were "certified"—or legitimate—members of the Enterprise.

e. On or about December 6, 2017, FRANKLIN, using Instagram user ID "6ig\_kahuna," communicated with another member and associate of the Enterprise ("Co-Conspirator-1") regarding illegal drug sales. Specifically, FRANKLIN messaged Co-Conspirator-1, "[c]um to the crib I need a zip," and stated, "Put it all in one bag." Co-Conspirator-1 eventually informed FRANKLIN, "Give a second I'm call my Cuzin for u now and my phone died I'm hit you soon as it charge up."

f. On or about March 18, 2017, in or around Irvington, COX and another member and associate of the Enterprise (“Co-Conspirator-2”) shot a firearm at a member and associate of a rival gang known as the “Rollin’ 47 Neighborhood Crips” (“Victim-1”), who returned fire.

g. On or about April 14, 2018, COX, using Instagram user ID “tsu\_surf,” advised another individual to travel to the vicinity of South Orange Avenue and Smith Street in order to purchase one gram of 3,4-methylenedioxymethamphetamine, or “MDMA,” a Schedule I controlled substance.

h. On or about April 18, 2018, in the vicinity of South 15th Street and Madison Avenue, BYRD, YARRELL, and two others worked together to rob Victim-2 and Victim-3 of approximately \$550.

i. On or about May 31, 2018, in the vicinity of South Orange Avenue and Smith Street, EDMONDS and Co-Conspirator-1 sold narcotics to another individual.

j. On or about May 31, 2018, in the vicinity of Smith Street, between South Orange Avenue and Rockland Terrace, EDMONDS and Co-Conspirator-1 possessed with intent to distribute heroin and cocaine base.

k. On or about August 27, 2018, JOHNSON used Instagram user ID “gorillagang60\_” to advertise that he had stolen cars available for sale, stating, “I got sme hot wheels on decc ... Q7 and Benz ... Both for 1500 ... They 17.”

l. On or about September 25, 2018, in the vicinity of South Orange Avenue and Salem Street in Newark, WILLIAMS, utilizing a 9mm HiPoint

pistol ("Firearm-1"), shot at four individuals who were sitting in a car (hereinafter, "Victim-4," "Victim-5," "Victim-6," and "Victim-7"). At least two of these individuals were members and associates of the Jungle Boys, a rival gang of the Rollin' 60s. Victim-4 and Victim-5 suffered gunshot wounds, and Victim-4 was left paralyzed.

m. On or about January 30, 2019, TERRY, using Instagram user ID "rollinty," and JOHNSON used Instagram to discuss the sale of apparently stolen credit cards, with TERRY asking, "What Other ones u want sold crip," and JOHNSON stating, "That chase for sure ... Lemme see which other ones on the market."

n. On or about February 20, 2019, BYRD, utilizing Facebook user ID "Gtweeko Ctb," and YARELL, utilizing Facebook user ID "Runit Up Tns," discussed searching for cars to steal, with BYRD stating, ". . . freak [FRANKLIN] just waiting for me to hit him to come scoop us . . . so we can ride around n look for one."

o. On or about February 21, 2019, BYRD, utilizing Facebook user ID "Gtweeko CTB," and YARRELL, utilizing Facebook user ID "Runit Up Tns," again discussed stealing cars, with BYRD stating, "I jumped n some s—t but the key wasn't n so I only got down the bloc," and YARRELL responding, "Go ina will try again 2mar Tell freak [FRANKLIN] cause my phone boutta die."

p. On or about March 4, 2019, YARRELL, utilizing Facebook user ID "Runit Up Tns," used Facebook to message BYRD, who was utilizing Facebook user ID "Gtweeko CTB," "Start saving cause ik some body selling a 380

& 38 For 300 350.” BYRD responded, “Word that’s clean,” and YARELL answered, “Factz save up cuz, ion care if you gotta sell somethings cuz but we need them.”

q. On or about March 17, 2019, upon learning of the murder of Individual-1, a/k/a “Troub,” a member and associate of the Rollin’ 60s, FRANKLIN, using Facebook user ID “Jae Sixties,” contacted BYRD, who used Facebook user ID “Gtweeko Ctb,” and ordered BYRD to find a stolen car and a firearm in order to retaliate for Individual-1’s murder, stating, “Yo we need sum wheel ASAP . . . like now,” explaining, “Lil troub got shot . . . grab sumthing n pull up . . . Bring tht toy back we need tht.”

r. On or about March 17, 2019, in response to FRANKLIN’s messages, BYRD, utilizing Facebook user ID “Gtweeko Ctb,” messaged FRANKLIN, “Igh hold on ima tryna make calls to see if someone go watch [his son] n bb [YARRELL] got it I’m finna txt him.”

s. On or about March 18, 2019, BYRD, utilizing Facebook user ID “Gtweeko Ctb,” messaged YARRELL, who used Facebook user ID “Runit Up Tns,” “Yo, hit Freak so he can come get that,” and later that day, “bring that grip to the hood yo I’m in the g ride with Freak.”

t. On or about March 18, 2019 BYRD used his Facebook account, with associated user ID “Gtweeko Ctb,” to contact other individuals in order to locate a vehicle and to obtain a tool to use to steal a vehicle.

u. On or about March 19, 2019, WILLIAMS used Instagram user ID “lil.s6g” to post the following message: “I’m Starting a Whole Lotta Trouble4Troub.” The message was accompanied by three blue heart emojis.

v. On or about March 19, 2019, FRANKLIN used Facebook user ID “Jae Sixties” to advise another individual that he had the “paperwork,” or evidence, relating to at least three individuals suspected of cooperating with law enforcement.

w. On or about March 20, 2019, after BYRD was unable to locate a vehicle, citing childcare issues, FRANKLIN became angry, and used Facebook user ID “Jae Sixties” to message BYRD, “Lil n—a u think u the only mother Fucc era with kids and priorities N—a I got four kids n a wife N I got a job Ain’t nobody begging u to do s—t u sined up for this shot on ya own This is what cum with it Ain’t my fault u layed down n had a baby with a Dubb b—ch next time choose better.”

x. On or about March 20, 2019, BYRD, in response to FRANKLIN’s messages, used Facebook user ID “Gtweeko Ctb” to respond: “Igh but ur [baby mother] don’t be on b.s. like my [baby mother] do cuz n I know I signed up for it all I’m saying is give me some time juheard cuz ima get the gride.”

y. On or about March 20, 2019, in response to BYRD’s messages, FRANKLIN used Facebook user ID “Jae Sixties” to message BYRD, “Like I said ain’t nobody make u turn Crip that was ya choice . . . u got a job to do get a g ride ain’t nobody ask u to drive or nothing . . . Stop faking if u ain’t 160% with this shit we don’t need u I’ll told at that meeting u had one job n one



job only n u looked the whole set in our face including lil troub n said u was gone hold it down so so keep your word.”

z. On or about March 20, 2019, utilizing Facebook user ID “Jae Sixties,” FRANKLIN indicated to another member and associate of the Rollin’ 60s, “we at war out here need hot wheels from n—as.”

aa. On or about March 20, 2019, utilizing Facebook user ID “Jae Sixties,” FRANKLIN reached out to YARRELL, complaining: “Ya man bands [BYRD] looking like a fraud out here . . .”

bb. On or about March 20, 2019, utilizing Facebook user ID “Runit Up Tns,” YARRELL communicated with BYRD, stating, “Freak [FRANKLIN] just hit me . . . You looking like a fraud out there, cause you still aint got no wheels . . . he knows you the car thief that’s why he’s on you . . . [you’re] the only [one] in the hood that know how to steel one.”

cc. On or about March 20, 2019, WILLIAMS traveled as a passenger in FRANKLIN’s Jeep Cherokee to the vicinity of Irvington High School in Irvington.

dd. On or about March 20, 2019, once reaching the vicinity of Irvington High School, WILLIAMS used Firearm-1 to fatally shoot Victim-8, a member and associate of the Jungle Boys who was suspected of murdering Individual-1, a/k/a “Troub.”

ee. On or about April 2, 2019, YARRELL, utilizing Facebook user ID “Runit Up Tns,” used Facebook to message BYRD, who used Facebook user ID “Gtweeko Ctb,” “I got 15 dollars 8ths.”

ff. On or about May 1, 2019, JOHNSON, using Instagram user ID “gorrillagang60\_,” chided Co-Conspirator-4, for improperly shooting a gun, with Co-Conspirator 4 explaining, “Shit was by a accident,” and JOHNSON responding, “So if it woulda hit him in his head how you woulda felt.” Co-Conspirator 4 then responded, “Couldn’t of the gun was down I would’ve been done up.” JOHNSON instructed, “Tighting up know ya hamma b4 u tryna nail sumn,” and Co-Conspirator 4 responded, “Gotchu big crodie.”

gg. On or about May 29, 2019, WILLIAMS used Instagram user ID “lil.s6g” to post a photograph depicting Individual-1, a/k/a “Troub,” and Individual-2, a/k/a “Mayhem,” and with the accompanying message, “WISH THE NCCAS THAT KILLED Y’ALL WASN’T DEAD SO I COULD KILL EM AGAIN.”

hh. On or about July 24, 2019, COX possessed a Beretta Px4 Storm .40 caliber firearm, bearing serial number PY44520, loaded with nine rounds of ammunition (“Firearm-2”), and a 9mm Taurus Brazil PT111 handgun, bearing serial number TCR76915, loaded with three rounds of ammunition (“Firearm-3”).

ii. On or about August 6, 2019, COX used Instagram user ID “tsu\_surf” to discuss the firearms alleged in overt act “hh,” which law enforcement had seized, admitting, “They got my FOURTY [Firearm-2] and my 9 [Firearm-3],” together with several crying emojis, adding, “Shit like losing FRIENDS.”

jj. On or about August 19, 2019, in the vicinity of West Stratford Place and Union Avenue in Irvington, WARDEN distributed heroin to another individual.

kk. On or about August 19, 2019, a member and associate of the Enterprise (“Co-Conspirator-3”) used Instagram to send a message to EDMONDS, asking EDMONDS to “shake” a “n—a” who had stolen money from that person’s family member, and asking if EDMONDS had a ski mask. EDMONDS agreed to join this individual but explained, “hurry up I gotta lick [rob] little cuz.”

ll. On or about December 12, 2019, JOHNSON, using Instagram user ID “gorillagang60\_,” asked another Enterprise member and associate if he wanted to “trap,” or sell marijuana, with him, explaining, “ima come up there and break it dwn with u.”

mm. On or about January 7, 2020, in the vicinity of South Orange Avenue and Salem Street in Newark, EDMONDS possessed a loaded black Smith & Wesson 9mm handgun, bearing serial number HTP4186 (“Firearm-4”), as well as approximately 40 glassines of fentanyl and approximately eight bags of cocaine.

nn. On or about January 15, 2020, WILLIAMS, utilizing Instagram user ID lil.s6g, discussed his role in the September 25 shooting alleged in overt act “1”, referencing Victim-5 by Victim-5’s nickname, “Mackey.” Specifically, WILLIAMS stated to a member and associate of the Rollin’ 60s, “fucc that n—a I shot him and his manz like a year ago that n—a snake 🐍 😏,” and went on to

explain, “I had to tho ❤️ he shot at me first with some opp n—as so when it was my turn I just made shore I an miss.”

oo. On or about February 17, 2020, WILLIAMS used Instagram user ID “lil.s6g” to post the following message: “i kno the opps like ‘damn that’s dem again dey comin AGAIN’ 😊 I had a dream that I saw the n—a kill trou6 wit a gun in my hand he was under me 😊.”

pp. On or about May 5, 2020, WILLIAMS used Facebook user ID LilSbg SixOwe to communicate with an apparent rival, stating, “ ... if I was u i would hate me too my n—a ... something was supposed to happen to me since march 20 ... matter facts since September 25 of 2018 ....,” referencing the September 25 shooting alleged in overt act “l” and the March 20 homicide alleged in overt acts “q” through “dd” and “gg.”

qq. On or about May 6, 2020, WILLIAMS used Facebook user ID LilSbg SixOwe to send a video depicting the shooting death of Victim-8, as alleged in overt acts “q” through “dd” and “gg,” to a member and associate of the Jungle Boys, stating, “now watch ya manz die again.”

rr. On or about May 7, 2020, JOHNSON used Instagram user ID “gorillagang60\_” to negotiate the sale of a stolen car that was registered in New York.

ss. On or about June 20, 2020, in Newark, BYRD and YARRELL used a .22 caliber revolver (“Firearm-5”) to rob Victim-9 of approximately \$1,000.

tt. On or about July 16, 2020, FRANKLIN sent electronic messages to Co-Conspirator 4, including a cellular phone number, with the following instructions: “That’s the 60S homie from LA number link with him soon u getbacc to LA .. I told cuhz u was gone hit him . Just let him know u Freak lil homie baby Blu,” and Co-Conspirator 4 responded, “Bett ima be out there tmr cuzz.”

uu. On or about July 20, 2020, FRANKLIN used Instagram user ID “sbg\_houdini” to comment on a social media post, writing, “If you a rat we gotta kill you Cuhz , Family or not !!!!”

vv. On or around September 26, 2020, WILLIAMS used Instagram user ID “gorillagang.bn” to post an Instagram “story” that included the following statement, in which WILLIAMS mocked Victim-4 for the injuries Victim-4 sustained two years previously as a result of the shooting alleged in overt act “1”:



ww. On or about October 6, 2020, COX, WARDEN, and other members and associates of the Enterprise participated in a group discussion through use of Instagram relating to profiting from the sale of marijuana and shirts, with COX stating, “I don’t NEED n—as to go in with me on nothing, I can handle that. I need help moving,” and WARDEN “liking,” or showing his agreement, with COX’s statement.

xx. On or about October 6, 2020, JOHNSON, using Instagram user ID “gorillagang60\_,” negotiated illegal drug sales, writing, “Slice 50 quarter 90 half 150 zip 250.”

yy. On or about October 10, 2020, JOHNSON, using Instagram user ID “gorillagang60\_,” instructed an Enterprise member and associate, “I need you to mail a 30 [magazine] uptop for me cuzzo,” and the Enterprise member and associate responded, “Aigh cet just lemme sno.”

zz. On or about October 14, 2020, YARRELL, using Facebook user ID “Runit Up Tns,” communicated with a member and associate of the Enterprise regarding the purchase of a firearm, with YARRELL asking if the cost of the firearm might be decreased from “450” to “like 370 400.”

aaa. On or about December 1, 2020, GREEN used Instagram user ID “tryme\_\_60” to negotiate an illegal drug sale, and provided the prospective purchaser with the address of a building located within Crescent Lane.

bbb. On or about December 8, 2020, in Newark, EDMONDS possessed a loaded .40 caliber handgun bearing serial number K28LVN (“Firearm-6”), two 9mm rounds of ammunition, one .40 caliber round of ammunition, approximately 10 glassines of heroin, and approximately ten jugs of cocaine base.

ccc. On or about January 16, 2021, WARDEN, using Instagram user ID “bossmanstampz,” and GREEN, using Instagram user ID “rr\_chase,” communicated regarding a debt owed by GREEN to WARDEN, with WARDEN stating, “U betta b ona bloc n hav my cash I’m bouta start tweakin on yal n—as fucking my bread up,” and GREEN responding, “I’m tryna get it right now I got a new job from 5 to 12 p.m. That’s y I came out there to get a couple dollars up I didn’t forget I know I owe u and I’m a make it right onna set cuz.”

ddd. On or about January 4, 2021, JOHNSON used Instagram user ID “gorillagang60\_” to negotiate the sale of at least one firearm.

eee. On or about February 21, 2021, in the vicinity of Oraton Street and Grafton Avenue in Newark, TERRY, Co-Conspirator 4, and other members



and associates of the Enterprise carjacked a Kia Sorrento (the “Sorrento”) from Victim-10. TERRY, Co-Conspirator 4, and their co-conspirators displayed firearms to Victim-10 as Victim-10 sat in the Sorrento, and two of the co-conspirators blocked the Sorrento’s flight with a Kia Soul (the “Soul”).

fff. On or about February 21, 2021, in the vicinity of Schuyler Avenue and Eckert Avenue, in Newark, TERRY and Co-Conspirator 4 carjacked a Volvo from Victim-11 at gunpoint.

ggg. On or about February, 22, Co-Conspirator-4 used Instagram user ID “rtgbankroll” to inform another person, “I just hit a lick for a car ... come get me 😊 ... I’m bout to see if these cards work so if u see money on ya cash app that’s me.”

hhh. On or about February 22, 2021, TERRY, Co-Conspirator 4, and other members and associates of the Enterprise traveled in the Soul and the Sorrento to West Orange and Orange, where they committed a string of thefts and attempted thefts from approximately 12 cars.

iii. On or about February 22, 2021, in the vicinity of Highland Place and Fairway Drive, in West Orange, TERRY and Co-Conspirator 4 attempted to carjack a Nissan Pathfinder from Victim-12 at gunpoint.

jjj. On or about February 22, 2021, in Newark, to evade law enforcement, Co-Conspirator 4 fled from the Sorrento, in possession of TERRY’s cell phone and identification, and keys and documentation relating to Victim-10, leaving inside the Sorrento: a Ruger SR 1911, bearing serial number

672-16562, loaded with six rounds of .45 caliber ammunition and one round of 9mm ammunition (“Firearm-7”).

kkk. On or about March 5, 2021, in the vicinity of Lyons Avenue and Union Avenue in Irvington, GREEN and Co-Conspirator-5 distributed cocaine.

lll. On or about March 5, 2021, in the vicinity of Lyons Avenue and Union Avenue in Irvington, GREEN and Co-Conspirator-5 possessed with the intent to distribute cocaine and fentanyl.

mmm. On or about March 9, 2021, after learning of the fatal shooting of a member of the Enterprise, WILLIAMS used Instagram user ID “lil.s6g” to discuss the related arrest of a member and associate of the Jungle, stating, “Ima kill him son.”

nnn. On or about March 11, 2021, after learning of the fatal shooting of a member of the Enterprise, GREEN used Instagram user ID “tryme\_\_60” to communicate with at least one other member and associate of the Enterprise to learn the location of a member of the Jungle, explaining, “I need them lil 7 n—az,” later informing the member of another Enterprise member’s recent murder, and explaining, “Yeah that’s y I’m lookin for them.”

ooo. On or about March 20, 2021, after learning that other members and associates of the Enterprise, including Co-Conspirator-6, had shot at a vigil held in the memory of Victim-8, WILLIAMS used Instagram user ID “lil.s6g” to mock that Co-Conspirator-6 for “letting off 30 [rounds]” and only shooting “somebody in the leg.” In response, Co-Conspirator-6 stated, “I know

you probably mad I ain't complete the mission But I'm steady hunting I love you #ForTroub #SendshotzzGang #LilSmithBoyz," and WILLIAMS responded, "Nah u green gang u know I love you 5eva It's the attempt [that] count #LongLiveTrou6."

ppp. On or about March 20, 2021, FRANKLIN used Instagram user ID "bkig\_houdini" to instruct another member and associate of the Enterprise, "Mandatory today in the hooda at 6 let the homies know."

qqq. From on or about March 26, 2021 through on or about March 29, 2021, FRANKLIN and WARDEN used Instagram to discuss drug distribution, with FRANKLIN utilizing Instagram user ID "bkig\_houdini," and WARDEN utilizing Instagram user ID "bossmanstampz." During the conversation, FRANKLIN stated, "Aye u lit ... my cussen he be playing around if u can get me the bags for 14 or lower I can bust a play for like 30-40 of them straight cash. With my family cuhk down 19 n a half bands with my lil bro loco out here ... He spent 19 n a half two weeks again ... we can cover tht ... Twice," and WARDEN stating, "I just seen ya messages, 4show ... U know I ca get em dwn here I just sent 17 plates to my uncle in Matthews."

rrr. On or about March 29, 2021, FRANKLIN, utilizing Instagram user ID "bkig\_houdini," sent a message to WARDEN, who used Instagram user ID "bossmanstampz," informing WARDEN that JOHNSON had been "poked up in the county," by "Loc opps ... 200s," meaning that he had been stabbed while in custody by gang rivals. FRANKLIN then ordered WARDEN, "So have Tryme [GREEN] and them spin," or violently retaliate. The two then discussed the gang

rivals who murdered the Enterprise member in March 2021, as alleged in overt acts “mmm” and “nnn.”

sss. On or about March 29, 2021, FRANKLIN, utilizing Instagram user ID “bkig\_houdini,” sent a message to WARDEN, who used Instagram user ID “bossmanstampz,” explaining the importance of recruiting young men to the Enterprise, by stating, “Cuhk u gotta get sum 128 sum young boys. It only take three to start a whole generation . Cause u know them three gone bring more lil n—as.”

ttt. On or about April 5, 2021, TERRY, GREEN, and a third individual (“Co-Conspirator-7”) traveled in a stolen Honda sedan (the “Honda”) to the vicinity of Avon Avenue and South 19th Street in Newark, where the occupants used a 9mm firearm (“Firearm-8”) and a .40 caliber firearm (“Firearm-9”) to shoot Victim-13.

uuu. On or about April 5, 2021, TERRY, GREEN, and Co-Conspirator-7 traveled in the Honda to the vicinity of 14th Avenue and South 17th Street in Newark, where the occupants of the car used Firearm-8 and Firearm-9 to shoot Victim-14.

vvv. On or about April 5, 2021, TERRY, GREEN, and Co-Conspirator-7 traveled in the Honda to the vicinity of 18th Avenue and Alexander Street in Newark, where the three occupants of the car used Firearm-8 and Firearm-9 to strike Victim-15.

www. On or about April 10, 2021, FRANKLIN used Instagram user ID “bkig\_houdini” to send a video depicting members and associates of the

Jungle mocking certain deceased members of the Enterprise, to GREEN, and instructed GREEN to violently retaliate: “Make sure n—as put them in white tees.”.

xxx. On or about April 11, 2021, in the vicinity of Palm Street and Tremont Avenue in Newark, TERRY displayed a firearm to Victim-16 and demanded that Victim-16 give TERRY her purse, which contained the keys to her Jeep, which she had just exited (the “Jeep”). TERRY then drove off in the Jeep.

yyy. On or about April 11, 2021, GREEN and others traveled in the Jeep to the vicinity of Bergen Street and Shepard Avenue in Newark, where the three occupants of the car used Firearm-8 and Firearm-9 to shoot at several individuals.

zzz. On or about April 11, 2021, GREEN and others traveled in the Jeep to the vicinity of 18th Street and 21st Avenue in Irvington, where the occupants used Firearm-8 and Firearm-9 to shoot Victim-17.

aaaa. On or about April 12, 2021, GREEN, using Instagram user ID “tryme\_\_60,” messaged an associate, stating, “I’ll be bacc jus sold bby girl ... Need a new one but yo I’m on n—az ass’s out here.”

bbbb. On or about April 13, 2021, GREEN, using Instagram user ID “tryme\_\_60,” sent a photograph of Victim-17 to a member and associate of the Enterprise, along with following message: “I’m up 3 on em cuz they can’t d me.”

cccc. On or about April 28, 2021, FRANKLIN used Instagram user ID “bkig\_houdini” to send photographs of court documents to another member

and associate of the Rollin' 60s, in an attempt to share information regarding an individual who he believed was cooperating with law enforcement.

dddd. On or about June 26, 2021, while traveling in a car in the vicinity of Melmore Gardens and Prospect Street in East Orange, COX threatened another man, stating in substance, "I'm going to kill you when I catch you, on 6-0 Crip," and displaying a firearm with an extended magazine.

eeee. On or about December 17, 2021, FRANKLIN possessed: a Rock River Arms LAR-15M rifle, bearing serial number AP107516; an Essex Arms Corp handgun, bearing serial number 16787; a Hi-Point 9mm handgun, bearing serial number PO20412; approximately four magazines containing ammunition; suspected cocaine; suspected marijuana; approximately 11 cellular phones; two digital scales; a heat sealer used to package drugs; packaging and packaging labels; ledgers; and the transcript of a legal proceeding relating to a former Enterprise member and associate suspected of cooperating with law enforcement.

**NOTICE OF SPECIAL SENTENCING FACTORS REGARDING COUNT ONE**

On or about March 20, 2019, in Essex County, in the District of New Jersey, defendants

**JASON FRANKLIN,  
a/k/a “Freak,”  
a/k/a “OG Freak,”  
ELIJAH WILLIAMS,  
a/k/a “Lil Smith,” and  
TRE BYRD,  
a/k/a “Bands,”  
a/k/a “G Bandz,**

did knowingly and purposely cause the death and serious bodily injury resulting in the death of another person, namely, Victim-8, 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).



**COUNT TWO**  
**(Possession of a Firearm by a Convicted Felon)**

On or about March 20, 2019, in Essex County, in the District of New Jersey, the defendant,

**JASON FRANKLIN,**  
**a/k/a “Freak,”**  
**a/k/a “OG Freak,”**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce a firearm, namely, a 9mm HiPoint pistol.

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

**COUNT THREE**  
**(Possession of Firearms and Ammunition by a Convicted Felon)**

On or about July 24, 2019, in Essex County, in the District of New Jersey,  
the defendant,

**RAHJON COX,**  
**a/k/a "Tsu Surf,"**

knowing that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce firearms and ammunition, namely, a Beretta PX4 Storm .40 caliber handgun, bearing serial number PY44520, loaded with nine rounds of .40 caliber ammunition, and a Taurus Brazil PT111 Pro 9mm firearm, bearing serial number TCR76915, loaded with three rounds of 9mm ammunition.

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

**COUNT FOUR**

**(Possession with Intent to Distribute Fentanyl and Cocaine)**

On or about January 7, 2020, in Essex County, in the District of New Jersey, the defendant,

**AMIR EDMONDS,  
a/k/a “G Baby,”**

did knowingly and intentionally possess with intent to distribute fentanyl, a Schedule II controlled substance, and cocaine, a Schedule II controlled substance.

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

**COUNT FIVE**  
**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

On or about January 7, 2020, in Essex County, the District of New Jersey,  
the defendant,

**AMIR EDMONDS,  
a/k/a “G Baby,”**

during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute of fentanyl and cocaine, as charged in Count Four of this Superseding Indictment, did knowingly possess, use, and carry a firearm.

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

**COUNT SIX**

**(Possession with Intent to Distribute Fentanyl and Cocaine Base)**

On or about December 8, 2020, in Essex County, in the District of New Jersey, the defendant,

**AMIR EDMONDS,  
a/k/a “G Baby,”**

did knowingly and intentionally possess with intent to distribute fentanyl, a Schedule II controlled substance, and cocaine base, a Schedule II controlled substance.

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

**COUNT SEVEN**

**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

On or about December 8, 2020, in Essex County, the District of New Jersey, the defendant,

**AMIR EDMONDS,  
a/k/a “G Baby,”**

during and in relation to a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute of fentanyl and cocaine, as charged in Count Six of this Superseding Indictment, did knowingly possess, use, and carry a firearm.

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

**COUNT EIGHT**  
**(Carjacking)**

On or about February 21, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**TYHEIM TERRY,**  
**a/k/a "Ty,"**

did take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of another by force, violence, and intimidation, with the intent to cause death or serious bodily harm.

In violation of Title 18, United States Code, Section 2119(1) and Section 2.



**COUNT NINE**  
**(Possession of a Firearm in Furtherance of a Crime of Violence)**

On or about February 21, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**TYHEIM TERRY,**  
**a/k/a “Ty,”**

in furtherance of a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, carjacking, as charged in Count Eight of this Superseding Indictment, did knowingly brandish a firearm.

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

**COUNT TEN**  
**(Carjacking)**

On or about February 21, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendants,

**TYHEIM TERRY,**  
**a/k/a “Ty,”**

did take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of another by force, violence, and intimidation, with the intent to cause death or serious bodily harm.

In violation of Title 18, United States Code, Section 2119(1) and Section 2.

**COUNT ELEVEN**  
**(Possession of a Firearm in Furtherance of a Crime of Violence)**

On or about February 21, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**TYHEIM TERRY,**  
**a/k/a “Ty,”**

in furtherance of a crime of violence for which the defendant may be prosecuted in a court of the United States, namely, carjacking, as charged in Count Ten of this Superseding Indictment, did knowingly brandish a firearm.

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

**COUNT TWELVE**  
**(Carjacking)**

On or about April 11, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**TYHEIM TERRY,**  
**a/k/a “Ty,”**

did take a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce from the person and presence of another by force, violence, and intimidation, with the intent to cause death or serious bodily harm.

In violation of Title 18, United States Code, Section 2119(1).

**COUNT THIRTEEN**

**(Possession of a Firearm in Furtherance of a Crime of Violence)**

On or about April 11, 2021, in Essex County, in the District of New Jersey and elsewhere, the defendants,

**TYHEIM TERRY,  
a/k/a "Ty,"**

in furtherance of a crime of violence for which the defendants may be prosecuted in a court of the United States, namely, carjacking, as charged in Count Twelve of this Superseding Indictment, did knowingly brandish a firearm.

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

**FORFEITURE ALLEGATION ONE**

1. The allegations contained in Count One of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 1963.

2. Pursuant to Title 18, United States Code, Section 1963, upon conviction of an offense in violation of Title 18, United States Code, Section 1962, defendants,

**JASON FRANKLIN,  
a/k/a "Freak,"  
a/k/a "OG Freak,"  
ELIJAH WILLIAMS,  
a/k/a "Lil Smith,"  
TRE BYRD,  
a/k/a "Bands,"  
a/k/a "G Bandz,"  
KAREEM GREEN,  
a/k/a "Try Me,"  
TYHEIM TERRY,  
a/k/a "Ty,"  
a/k/a "Rollin' Ty,"  
AMIR WARDEN,  
a/k/a "Stamps,"  
a/k/a "Killa,"  
RAHJON COX,  
a/k/a "Tsu Surf,"  
AMIR EDMONDS,  
a/k/a "G Baby,"  
ABDUL YARRELL,  
a/k/a "Runit Up,"  
a/k/a "BB," and  
NYGEE JOHNSON,  
a/k/a "Gito"**

shall forfeit to the United States of America:

(a) any interest acquired or maintained in violation of Section 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 defendant[s] established, operated, controlled, conducted, or participated in the conduct of, in violation of Section 1962; and

(c) any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity in violation of Section 1962.

**FORFEITURE ALLEGATION TWO**

1. The allegations set forth in Count Two of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

2. Upon conviction of the offense alleged in Count Two of this Superseding Indictment, the defendant,

**JASON FRANKLIN,  
a/k/a “Freak,”  
a/k/a “OG Freak,”**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offense, including but not limited to a 9mm HiPoint pistol.



**FORFEITURE ALLEGATION THREE**

1. The allegations set forth in Count Two of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

2. Upon conviction of the offense alleged in Count Three of this Superseding Indictment, the defendant,

**RAHJON COX,  
a/k/a "Tsu Surf,"**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offense, including but not limited to:

- a. a Beretta PX4 Storm .40 caliber handgun, bearing serial number PY44520;
- b. Nine rounds of .40 caliber ammunition;
- c. a Taurus Brazil PT111 Pro 9mm firearm, bearing serial number TCR76915; and
- d. Three rounds of 9mm ammunition.

**FORFEITURE ALLEGATION FOUR**

1. The allegations set forth in Counts Four and Six of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of any of the controlled substance offenses alleged in Counts Four and Six of this Superseding Indictment, the defendant,

**AMIR EDMONDS,  
a/k/a “ G Baby,”**

shall forfeit to the United States of America any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of these offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of these offenses.

**FORFEITURE ALLEGATION FIVE**

3. The allegations set forth in Counts Five and Seven of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

4. Upon conviction of the offense alleged in Counts Five and Seven of this Superseding Indictment, the defendant,

**AMIR EDMONDS,  
a/k/a “G Baby,”**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offense, including but not limited to:

- a. a Smith & Wesson 9mm handgun, bearing serial number HTP4186;
- b. Eight rounds of 9mm ammunition;
- c. a .40 caliber Taurus G2S firearm;
- d. Two rounds of 9mm ammunition; and
- e. One round of .40 caliber ammunition.

**FORFEITURE ALLEGATION SIX**

5. The allegations set forth in Counts Eight, Ten, and Twelve of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 982(a).

6. Upon conviction of the offenses alleged in Counts Eight, Ten, and Thirteen of this Superseding Indictment, the defendant,

**TYHEIM TERRY,  
a/k/a “Ty,”**

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(5), any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such violations.

**FORFEITURE ALLEGATION SEVEN**

7. The allegations set forth in Counts Nine, Eleven, and Thirteen of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c).

8. Upon conviction of the offenses alleged in Counts Nine, Eleven, and Sixteen of this Superseding Indictment, the defendant,

**TYHEIM TERRY,  
a/k/a “Ty,”**

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offenses, including but not limited to a Ruger SR 1911 firearm, bearing serial number 672-16562, six rounds of .45 caliber ammunition, and one round of 9mm ammunition.

**SUBSTITUTE ASSETS PROVISION**  
(Applicable to all Forfeiture Provisions)

**Substitute Assets Provision**

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).

A TRUE BILL

  
Foreperson

*Philip R. Sellinger*  
PHILIP R. SELLINGER  
United States Attorney

**CASE NUMBER: 21-369 (SDW)**

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**JASON FRANKLIN,  
ELIJAH WILLIAMS,  
KAREEM GREEN,  
TYHEIM TERRY,  
AMIR WARDEN,  
RAHJON COX,  
AMIR EDMONDS,  
ABDUL YARRELL, and  
NYGEE JOHNSON**

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**SUPERSEDING INDICTMENT FOR**

18 U.S.C. § 1962(d)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(c)(1)(a)(i)  
18 U.S.C. § 924(c)(1)(a)(ii)  
18 U.S.C. § 2119(1)  
18 U.S.C. § 2  
21 U.S.C. § 841(a)(1) and (b)(1)(C)

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**A True Bill,**

**Foreperson**

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**PHILIP R. SELLINGER**  
*UNITED STATES ATTORNEY*  
*NEWARK, NEW JERSEY*

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FRANCESCA LIQUORI  
*ASSISTANT U.S. ATTORNEY*  
*973-297-4373*

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