

2020R00746/DGL

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Madeline Cox Arleo
v.	:	Crim. No. 20- 864
MARKELL BROWN,	:	18 U.S.C. § 2
a/k/a "Sayboy,"	:	18 U.S.C. § 924(c)(1)(A)(iii)
TERENCE SHAW, and	:	18 U.S.C. § 924(j)(1)
a/k/a "Sweet Meat"	:	18 U.S.C. § 1959(a)(1)
	:	18 U.S.C. § 1959(a)(5)

I N D I C T M E N T

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

The Racketeering Enterprise

1. At all times relevant to this Indictment, MARKELL BROWN, a/k/a "Sayboy," TERENCE SHAW, a/k/a "Sweet Meat," and others, known and unknown, were members and associates of a criminal organization known as the Neighborhood Bloods or "NHB" (the "Neighborhood Bloods" or the "enterprise"). At all times relevant to this Indictment, the Neighborhood Bloods was a violent street gang operating in Hudson County, in the District of New Jersey and elsewhere. The Neighborhood Bloods, including its leaders members and associates, constituted an "enterprise" as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in and the activities of which affected interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned

as a continuing unit that had a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

2. The purposes of the Neighborhood Bloods included the following:

- a. preserving and expanding the power, reputation, territory, and profits of the enterprise through the use of violence, threats of violence, and intimidation;
- b. 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, and other criminal activities;
- c. 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;
- d. keeping victims and community members in fear of the enterprise and its members and associates through violence and threats of violence;
- e. providing assistance to gang members and associates who are imprisoned after having committed crimes on behalf of the gang;
- f. 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; and

g. threatening, assaulting, or murdering witnesses, or potential witnesses, who were perceived as potential cooperators against the enterprise.

The Defendants

3. Defendant MARKELL BROWN, a/k/a "Sayboy" ("BROWN") was a high-ranking member of the Neighborhood Bloods. Among other things, BROWN committed acts of violence, including murder, and distributed narcotics, for and on behalf of the enterprise.

4. Defendant TERENCE SHAW, a/k/a "Sweet Meat" ("SHAW") was a member of the Neighborhood Bloods. Among other things, SHAW committed acts of violence, including murder, and distributed narcotics, for and on behalf of the enterprise.

Manner and Means of the Enterprise

5. It was part of the enterprise that the members and associates of the Neighborhood Bloods acquired and maintained weapons, including firearms, to use during violent criminal acts on behalf of the enterprise.

6. It was further part of the enterprise that the members and associates of the Neighborhood Bloods committed and agreed to commit violent criminal acts, including murder, conspiracy to commit murder, and assaults.

7. It was further part of the enterprise that the members and associates of the Neighborhood Bloods used violence and threats of violence to

impose discipline within the gang, including against disloyal and/or disobedient gang members.

8. It was further part of the enterprise that the members and associates of the Neighborhood Bloods distributed controlled substances, and agreed to distribute controlled substances, on behalf of the enterprise.

9. At all times relevant to this Indictment, the Neighborhood Bloods, through its leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), consisting of:

- a. Multiple acts involving murder, in violation of N.J.S.A. 2C:11-3, 2C:5-1, 2C:5-2, and 2C:2-6;
- b. Multiple acts indictable under Title 18, United States Code, Section 1952 (use of interstate facilities to further unlawful activity);
- 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).

COUNT ONE
(CONSPIRACY TO COMMIT MURDER)

The allegations set forth in Paragraphs 1 through 9 above are incorporated as if set forth in full herein.

In or around December 2016 and January 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendants

MARKELL BROWN,
a/k/a "Sayboy," and
TERENCE SHAW,
a/k/a "Sweet Meat,"

for the purpose of gaining entrance to and maintaining and increasing position in the Neighborhood Bloods, an enterprise engaged in racketeering activity, together with others known and unknown, did knowingly and intentionally conspire and agree with each other and others to murder Victim-1, Victim-2, and Victim-3, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), and 2C:5-2.

In violation of Title 18, United States Code, Section 1959(a)(5).

COUNT TWO
(Murder in Aid of Racketeering)

The allegations set forth in Paragraphs 1 through 9 above are incorporated as if set forth in full herein.

On or about January 16, 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendants

MARKELL BROWN,
a/k/a "Sayboy," and
TERENCE SHAW,
a/k/a "Sweet Meat,"

for the purpose of gaining entrance to and maintaining and increasing position in the Neighborhood Bloods, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim-1, 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 1959(a)(1) and Section 2.

COUNT THREE
(Discharging a Firearm During a Crime of Violence)

On or about January 16, 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendants

MARKELL BROWN,
a/k/a "Sayboy," and
TERENCE SHAW,
a/k/a "Sweet Meat,"

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Murder in Aid of Racketeering of Victim-1 alleged in Count Two of this Indictment, did knowingly use and carry a firearm, and in furtherance of that crime, did possess a firearm, which was discharged.

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

COUNT FOUR

(Causing Death Through Use of a Firearm)

On or about January 16, 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendants

MARKELL BROWN,
a/k/a "Sayboy," and
TERENCE SHAW,
a/k/a "Sweet Meat,"

in the course of a violation of Title 18, United States Code, Section 924(c), as alleged in Count Three of this Indictment, did knowingly and purposely cause the death of Victim-1 through the use of a firearm, which killing constituted murder as defined in Title 18, United States Code, Section 1111.

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

COUNT FIVE
(Murder in Aid of Racketeering)

The allegations set forth in Paragraphs 1 through 9 above are incorporated as if set forth in full herein.

On or about January 16, 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendants

MARKELL BROWN,
a/k/a "Sayboy," and
TERENCE SHAW,
a/k/a "Sweet Meat,"

for the purpose of gaining entrance to and maintaining and increasing position in the Neighborhood Bloods, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim-2, 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 1959(a)(1) and Section 2.

COUNT SIX
(Discharging a Firearm During a Crime of Violence)

On or about January 16, 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendants

MARKELL BROWN,
a/k/a "Sayboy," and
TERENCE SHAW,
a/k/a "Sweet Meat,"

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Murder in Aid of Racketeering of Victim-2 alleged in Count Five of this Indictment, did knowingly use and carry a firearm, and in furtherance of that crime, did possess a firearm, which was discharged.

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

COUNT SEVEN

(Causing Death Through Use of a Firearm)

On or about January 16, 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendants

MARKELL BROWN,
a/k/a "Sayboy," and
TERENCE SHAW,
a/k/a "Sweet Meat,"

in the course of a violation of Title 18, United States Code, Section 924(c), as alleged in Count Six of this Indictment, did knowingly and purposely cause the death of Victim-2 through the use of a firearm, which killing constituted murder as defined in Title 18, United States Code, Section 1111.

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

COUNT EIGHT
(Murder in Aid of Racketeering)

The allegations set forth in Paragraphs 1 through 9 above are incorporated as if set forth in full herein.

On or about January 16, 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendants

MARKELL BROWN,
a/k/a "Sayboy," and
TERENCE SHAW,
a/k/a "Sweet Meat,"

for the purpose of gaining entrance to and maintaining and increasing position in the Neighborhood Bloods, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Victim-3, 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 1959(a)(1) and Section 2.

COUNT NINE
(Discharging a Firearm During a Crime of Violence)

On or about January 16, 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendants

MARKELL BROWN,
a/k/a "Sayboy," and
TERENCE SHAW,
a/k/a "Sweet Meat,"

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Murder in Aid of Racketeering of Victim-3 alleged in Count Eight of this Indictment, did knowingly use and carry a firearm, and in furtherance of that crime, did possess a firearm, which was discharged.

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

COUNT TEN

(Causing Death Through Use of a Firearm)

On or about January 16, 2017, in Hudson County, in the District of New Jersey, and elsewhere, defendants

MARKELL BROWN,
a/k/a "Sayboy," and
TERENCE SHAW,
a/k/a "Sweet Meat,"

in the course of a violation of Title 18, United States Code, Section 924(c), as alleged in Count Nine of this Indictment, did knowingly and purposely cause the death of Victim-1 through the use of a firearm, which killing constituted murder as defined in Title 18, United States Code, Section 1111.

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

A TRUE BILL

FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 20-864

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

MARKELL BROWN,
a/k/a "Sayboy," and

TERENCE SHAW,
a/k/a "Sweet Meat"

INDICTMENT FOR

18 U.S.C. § 1959(a)(5)

18 U.S.C. § 1959(a)(1)

18 U.S.C. § 924(c)(1)(A)(iii)

18 U.S.C. § 924(j)(1)

18 U.S.C. § 2

A True Bill


Foreperson

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NEWARK, NEW JERSEY

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