

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Madeline Cox Arleo
	:	
v.	:	Crim. No. 14-220
	:	
KHALIL STAFFORD,	:	18 U.S.C. § 1959(a)
a/k/a "Stod,"	:	18 U.S.C. § 1962(d)
a/k/a "Homicide," and	:	18 U.S.C. § 924(c)
HANEE CURETON,	:	18 U.S.C. § 2
a/k/a "City,"	:	21 U.S.C. § 841
a/k/a "Fat Boy"	:	21 U.S.C. § 846

SEVENTH 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 Seventh Superseding Indictment, in the District of New Jersey, and elsewhere, defendants KHALIL STAFFORD, a/k/a "Stod," a/k/a "Homicide," HANEE CURETON, a/k/a "City," a/k/a "Fat Boy," and others, known and unknown, were members and associates of a criminal organization known as the New Jersey set of the Grape Street Crips (the "NJ Grape Street Crips"). The NJ Grape Street Crips, 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 Traditions of the NJ Grape Street Crips

2. The NJ Grape Street Crips is a set of the Grape Street Crips gang that originated in the Jordan Downs public-housing complex, which is located between Grape Street and 103rd Street in Watts, Los Angeles, California.

3. The NJ Grape Street Crips have followed many of the same traditions and protocols of the Grape Street Crips and other Crip street gangs, including:

- a. visible demonstrations of gang affiliation, such as an identification with the colors purple and blue, which appear in clothing, hats, and bandanas worn by NJ Grape Street Crips members;
- b. symbolic use of the number “103,” including yearly celebrations on October 3, also styled as “10/3” or “ten-trey day,” in reference to the founding of the Grape Street Crips at the Jordan Downs public-housing complex located on 103rd Street in Los Angeles;
- c. greeting each other with the phrases “Watts up” or “Watts Grapin,” in reference to the gang’s founding in Watts, Los Angeles;
- d. tattoos, slogans, and hand gestures signifying membership in the NJ Grape Street Crips; and

e. the use of a system of rules and regulations governing admission to and membership in the NJ Grape Street Crips.

4. The rules governing the NJ Grape Street Crips establish, among other things:

a. a hierarchical power structure in which members are given designations or ranks signifying their status within the gang, which ranks include, from senior rank to junior rank, “OOOG” (Triple OG; “OG” is short for “Original Gangster”); “OOG” (Double OG); “OG”; “G”; “BG” (Baby Gangster); followed by overseers, enforcers, and individual members, who are referred to as soldiers;

b. a system of discipline and punishment for those members who violated rules, failed to carry out orders from higher-ups, or “disrespected” the gang, in which offending members could be stripped of rank, placed on probationary status, and/or physically assaulted or killed; and

c. a system of incentives in which members who desired to maintain, or rise in, rank and stature within the NJ Grape Street Crips were expected and required to “put in work,” which meant engaging in murders, shootings, physical assaults, intimidation, drug trafficking, robberies, extortion, and other criminal activities.

Organization of the NJ Grape Street Crips Enterprise

5. Within the NJ Grape Street Crips, the primary unit of organization was by neighborhood and/or public-housing complex in and around Newark, New Jersey.

6. Members and associates of the NJ Grape Street Crips engaged in, or controlled, drug trafficking and other criminal activities in various neighborhoods and public-housing complexes in and around Newark, New Jersey, including, among others:

a. the area of 6th Avenue and North 5th Street (the “6th Avenue Location”);

b. the Pennington Court public-housing complex located at the intersection of Pennington Street and Pacific Street (the “Pennington Court Location”);

c. the Oscar Miles public-housing complex located at the intersection of Court Street and Broome Street (the “Court Street Location”);

d. the Millard Terrell Homes public-housing complex located at the intersections of Riverview Court and Chapel Street (the “Riverview Court Location”);

e. the John W. Hyatt public-housing complex located at the intersection of Hawkins Street and Horatio Street (the “Hyatt Court Location”);

f. the James Baxter public-housing complex formerly located near Nesbitt and Orange Streets (the “Baxter Terrace Location”); and

g. the Wynona Lipman Gardens and the Kemsco Village housing complex, both of which are located along Seventh Avenue (the “Seventh Avenue Locations”).

7. Each of these neighborhoods and public-housing complexes was controlled by a leader who was responsible for overseeing the NJ Grape Street Crips operations and for authorizing criminal activity on behalf of the enterprise.

8. The members, associates, and leaders of each of these neighborhoods and public-housing complexes fell under the overall leadership of Corey Hamlet, a/k/a "C-Blaze," a/k/a "Blaze," a/k/a "Blizzie," a/k/a "Castor Troy," who was the head of the NJ Grape Street Crips. One of Hamlet's top deputies was Kwasi Mack, a/k/a "Welchs," a/k/a "The Prince," a/k/a "Mini Me."

Purposes of the NJ Grape Street Crips Enterprise

9. The purposes of the NJ Grape Street Crips 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, extortion, 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. keeping victims and community members in fear of the enterprise and its members and associates through violence and threats of violence;

d. providing assistance to gang members and associates who are imprisoned after having committed crimes on behalf of the gang;

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; and

f. threatening, assaulting, or murdering individuals who cooperated (or were believed to have cooperated) with law enforcement against the enterprise.

Members and Associates of the Enterprise

10. Corey Hamlet, a/k/a "C-Blaze," a/k/a "Blaze," a/k/a "Blizzie," a/k/a "Castor Troy" ("Coconspirator Hamlet"), was the leader of the NJ Grape Street Crips. Among other things, Hamlet directed and authorized acts of violence against rivals of the NJ Grape Street Crips, as well as members and associates of the NJ Grape Street Crips.

11. KHALIL STAFFORD, a/k/a "Stod," a/k/a "Homicide" ("STAFFORD"), was a member of the NJ Grape Street Crips who operated, among other places, in and around the Baxter Terrace Location and in and around the Seventh Avenue Locations.

12. HANEE CURETON, a/k/a “City,” a/k/a “Fat Boy” (“CURETON”), was an associate of the NJ Grape Street Crips who operated, among other places, in and around the Baxter Terrace Location.

13. Aaron Terrell, a/k/a “Push” (“Coconspirator Terrell”), was a member of the NJ Grape Street Crips who operated, among other places, in and around the Baxter Terrace Location and in and around the Riverview Court Location.

The Racketeering Conspiracy

14. Beginning at least in or about 2003, and continuing through the date of this Seventh Superseding Indictment, in the District of New Jersey, and elsewhere, the defendants,

KHALIL STAFFORD,
a/k/a “Stod,”
a/k/a “Homicide,” and
HANEE CURETON,
a/k/a “City,”
a/k/a “Fat Boy,”

together with others known and unknown, each being a person employed by and associated with the NJ Grape Street Crips, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired and agreed with each other and 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 NJ Grape Street 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 acts involving murder, contrary to N.J.S.A. 2C:11-3(a)(1), 2C:11-3(a)(2), 2C:5-1(a), and 2C:5-2;
- b. 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).

15. 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 Enterprise

16. Among the manner and means by which the defendants and other members and associates of the NJ Grape Street Crips conducted and participated in the conduct of the affairs of the NJ Grape Street Crips were the following:

- a. It was part of the conspiracy that the defendants and other members and associates of the NJ Grape Street Crips committed and agreed to commit acts of intimidation and violence, including murder,

attempted murder, extortion, and robbery against rival gang members or others; to avenge attacks or perceived slights against other members and associates of the NJ Grape Street Crips; to punish enterprise members and associates who had been disloyal; to retaliate against rivals; to silence individuals who were perceived to be cooperating with law enforcement against members and associates of NJ Grape Street Crips; and to maintain and enhance the reputation of the NJ Grape Street Crips for the purpose of protecting and otherwise assisting their drug trafficking business.

b. 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.

c. It was further part of the conspiracy that members and associates of the NJ Grape Street Crips were directed to carry or have immediate access to firearms, and did in fact carry and use firearms, in order to protect themselves, their controlled substances, and their illegal proceeds, and to threaten others in furtherance of the interests of the criminal enterprise.

d. It was further part of the conspiracy that members and associates of the NJ Grape Street Crips trafficked in illegal drugs, including cocaine, cocaine base ("crack-cocaine"), and heroin. As referred to herein, a "brick" is a street term that refers to a package of heroin containing five "bundles" of heroin, which, in turn, is a package containing ten individual

“hits,” or doses, of heroin. These individual doses are packaged in glassine envelopes that are referred to as “decks” or “bags” of heroin. Thus, one “brick” contains fifty “decks,” or doses, of heroin. As referred to herein, a “clip” is a street term that refers to a package of crack-cocaine containing ten individual “hits,” or doses, of crack-cocaine.

e. It was further part of the conspiracy that members and associates of the NJ Grape Street Crips used social media, including Instagram and YouTube, and hip-hop songs to disseminate the rules and protocols of the enterprise, to intimidate witnesses and other members of the community, and to bolster the reputation of the NJ Grape Street Crips for violence and drug trafficking.

f. It was further part of the conspiracy that members and associates of the NJ Grape Street Crips sought to conceal their criminal activities by, among other means, obstructing justice and threatening and intimidating witnesses.

Overt Acts

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

a. From at least in and around 2003 through in or around 2009, numerous members and associates of the NJ Grape Street Crips, including, but not limited to, STAFFORD and CURETON, engaged in multiple

acts of heroin and cocaine distribution, and possession with intent to distribute heroin and cocaine, in and around the Baxter Terrace Location.

b. On or about December 1, 2003, in and around the Baxter Terrace Location, STAFFORD possessed approximately 24 vials of cocaine, which he intended to distribute. STAFFORD fled when he was approached by law enforcement officers, and he attempted to discard the vials of cocaine.

c. On or about February 4, 2004, in and around the Baxter Terrace Location, STAFFORD possessed approximately 24 decks of heroin and approximately 18 vials of cocaine, both of which STAFFORD intended to distribute. STAFFORD fled when he was approached by law enforcement officers.

d. On or about March 17, 2010, STAFFORD possessed approximately 164 vials of cocaine, which he intended to distribute.

e. On or about Saturday, June 19, 2010, in the vicinity of 92 Garside Street in Newark, New Jersey, which is near the Seventh Avenue Locations, STAFFORD confronted Victim I.W. about an amount of money that STAFFORD believed that Victim I.W. owed to STAFFORD. STAFFORD then left the area of 92 Garside Street.

f. Later that same day, STAFFORD and several other individuals, including Coconspirator Aaron Terrell, returned to the area of 92 Garside Street to confront Victim I.W.

g. STAFFORD and Coconspirator Terrell, among others, were carrying firearms.

h. STAFFORD and Coconspirator Terrell, among others, fired at Victim I.W. and Victim M.S., an associate of Victim I.W.

i. In the ensuing shootout, Victim H.W., a bystander who had been on a nearby porch, was shot and killed.

j. On or about June 23, 2010, following the murder of Victim H.W., STAFFORD and Victim I.W. spoke by telephone. During the conversation, STAFFORD told Victim I.W., “Yo, what’s up man, what’s up with these police, man?” STAFFORD then told Victim I.W. that “it wasn’t gangsta” or “part of the game” to speak with the police.

k. On or about November 12, 2013, coconspirator Lateef Grimsley (“Coconspirator Grimsley”) managed a heroin packaging operation on behalf of CURETON located in Newark, New Jersey (the “Heroin Mill”). Inside the Heroin Mill, CURETON, Coconspirator Grimsley, and others had stored, among other things, more than one kilogram of heroin and numerous items used to cut and package heroin for distribution, including grinders, scales, rubber-bands, tape, and glassine envelopes with the stamp “Obama Care” in red ink.

l. On or about November 21, 2013, STAFFORD stored numerous glassine envelopes containing heroin with the stamp “Obama Care” in red ink inside his residence.

m. In or about September 2014, STAFFORD sold approximately 60 bricks of heroin stamped with the labels "Kiss my Ass" in red ink and "Spartacus" in green ink, in exchange for over \$9,000 in United States currency.

n. In or about September 2014, CURETON sold approximately 60 bricks of heroin stamped with the labels "Kiss my Ass" in red ink and "Spartacus" in green ink, in exchange for over \$9,000 in United States currency.

NOTICE OF SPECIAL SENTENCING FACTORS REGARDING COUNT ONE

1. On or about June 19, 2010, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide,"

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

2. From in or about November 2013 through in or about May 2015, in Essex and Hudson Counties, in the District of New Jersey, and elsewhere, the defendants,

KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide," and
HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy,"

did knowingly and intentionally conspire and agree with each other and others to distribute, and to possess with intent to distribute, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a) and (b)(1)(A), in violation of Title 21, United States Code, Section 846.

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

COUNT TWO
(Murder in Aid of Racketeering)
(Defendant Stafford)

1. The allegations contained in Paragraphs One through Thirteen and Sixteen through Seventeen of Count One of this Seventh Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. At all times relevant to this Seventh Superseding Indictment, the NJ Grape Street Crips, 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 that was 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 for a common purpose of achieving the objectives of the enterprise.

3. At all times relevant to this Seventh Superseding Indictment, the NJ Grape Street Crips, the above-described enterprise, 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), that is:

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), and 2C:5-2; and

b. 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).

4. On or about June 19, 2010, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide,"

for the purpose of gaining entrance to, and maintaining and increasing position in, the NJ Grape Street Crips, an enterprise engaged in racketeering activity, did knowingly and purposely murder Victim H.W., 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
(Use and Carrying of a Firearm During a Crime of Violence)
(Defendant Stafford)

On or about June 19, 2010, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide,"

during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, the murder in aid of racketeering alleged in Count Two, specifically the murder of Victim H.W., 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 Title 18, United States Code, Section 2.

COUNT FOUR
(Conspiracy to Distribute Heroin)
(Defendants Cureton and Stafford)

From in or about November 2013, through in or about May 2015,
in Essex County, in the District of New Jersey, and elsewhere, the defendants,

HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy," and
KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide,"

did knowingly and intentionally conspire and agree with each other and others
to distribute, and to possess with intent to distribute, one kilogram or more of
a mixture and substance containing a detectable amount of heroin, a Schedule
I controlled substance, contrary to Title 21, United States Code, Sections 841(a)
and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

COUNT FIVE
(Distribution, and Possession with
Intent to Distribute, Heroin)
(Defendant Cureton)

On or about November 12, 2013, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy,"

did knowingly and intentionally distribute, and possess with intent to distribute, one kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

COUNT SIX
(Distribution, and Possession with
Intent to Distribute, Heroin)
(Defendant Stafford)

On or about September 25, 2014, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide,"

did knowingly and intentionally distribute, and possess with intent to distribute, a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

COUNT SEVEN
(Distribution, and Possession with
Intent to Distribute, Heroin)
(Defendant Cureton)

On or about September 12, 2014, in Hudson County, in the District of New Jersey, and elsewhere, the defendant,

HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy,"

did knowingly and intentionally distribute, and possess with intent to distribute, 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

FORFEITURE ALLEGATION
(Defendants Stafford and Cureton)

1. The allegations contained in Count One and Count Two of this Seventh Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures 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, the defendants,

KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide," and
HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy,"

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 or unlawful debt collection in violation of Section 1962.

Substitute Assets Provision

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 property pursuant to Title 18, United States Code, Section 1963(m).

FORFEITURE ALLEGATION AS TO CONTROLLED SUBSTANCE COUNTS

1. As a result of committing one or more of the controlled substance offenses alleged in Counts Four through Seven of this Seventh Superseding Indictment, the defendants,

KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide," and
HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy,"

shall forfeit to the United States pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Counts Four and Five of this Seventh Superseding Indictment.

Substitute Assets Provision

2. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

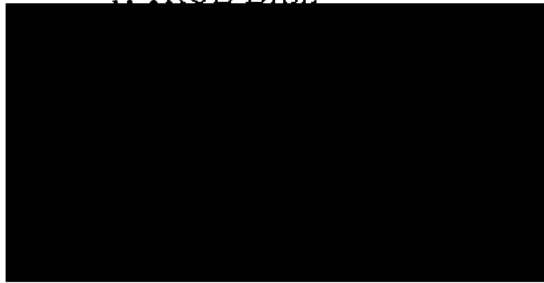
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

subdivided without difficult

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant(s) up to the value of the above forfeitable property.

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

A TRUE BILL




CRAIG CARPENITO
United States Attorney

CASE NUMBER: 14-220

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

UNITED STATES OF AMERICA

v.

**KHALIL STAFFORD,
a/k/a "Stod,"
a/k/a "Homicide," and
HANEE CURETON,
a/k/a "City,"
a/k/a "Fat Boy"**

SEVENTH SUPERSEDING INDICTMENT

**18 U.S.C. §§ 1959(a), 1962(d), 924(c), 2
21 U.S.C. §§ 841, 846**

A True Bill,

Foreperson

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