

OJB/JS/2010R00733/2014R00375

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

FILED

JUL 26 2019

AT 3:15 P.M. *SG*
WILLIAM T. WALSH
CLERK

UNITED STATES OF AMERICA

: Hon.

v.

: Crim. No. 19- *CR- 530 (MCA)*

SEAN HILLS,

: 18 U.S.C. § 1962(d)

a/k/a "Half A Brain,"

: 21 U.S.C. §§ 841(a)(1) & (b)(1)(C)

a/k/a "Half,"

a/k/a "Rydaman"

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 Indictment, in the District of New Jersey, and elsewhere, defendant SEAN HILLS, a/k/a "Half A Brain," a/k/a "Half," a/k/a "Rydaman," 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

I HEREBY CERTIFY that the above and foregoing is a true and correct copy of the original on file in my office.
ATTEST *7/29/19*
WILLIAM T. WALSH, Clerk
United States District Court
District of New Jersey

By: *M. Drayton*
Deputy Clerk

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" on behalf of the enterprise, 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 South 14th Street and 14th Avenue (the “South 14th Street Location”);
- b. the area of 6th Avenue and North 5th Street (the “6th Avenue Location”);
- c. the Pennington Court public-housing complex located at the intersection of Pennington Street and Pacific Street (the “Pennington Court Location”);
- d. the Oscar Miles public-housing complex located at the intersection of Court Street and Broome Street (the “Court Street Location”);
- e. the Millard Terrell Homes public-housing complex located at the intersections of Riverview Court and Chapel Street (the “Riverview Court Location”);
- f. the John W. Hyatt public-housing complex located at the intersection of Hawkins Street and Horatio Street (the “Hyatt Court Location”); and
- g. the James Baxter public-housing complex formerly located near Nesbitt and Orange Streets (the “Baxter Terrace Location”).

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 Individual-1, 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.

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 were 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. Individual-1, a/k/a "C-Blaze," a/k/a "Blaze," a/k/a "Blizzie," a/k/a "Castor Troy" ("Individual-1"), was the leader of the NJ Grape Street Crips.

11. Individual-2, a/k/a "Welchs," a/k/a "The Prince," a/k/a "Mini Me" ("Individual-2"), was a member of the NJ Grape Street Crips who served as one of the top deputies of the NJ Grape Street Crips. Among other responsibilities, Individual-2 communicated with the leader of the NJ Grape Street Crips and acted as an enforcer of the rules of the NJ Grape Street Crips.

12. SEAN HILLS, a/k/a "Half A Brain," a/k/a "Half," a/k/a "Rydaman" ("HILLS"), was a member of the NJ Grape Street Crips who operated, among other places, in and around the South 14th Street Location and the Court Street Location. In addition to being a member of the NJ Grape Street Crips, HILLS was a member of "ABG," which stands for "Anybody Gets It," a violent subset of the NJ Grape Street Crips. HILLS had "ABG" tattooed under his left eye. Tattooed under his right eye, HILLS had the letters "WBL," which stands for "Watts Baby Loc," a phrase frequently used by members of the NJ Grape Street Crips. Below the letters "WBL," HILLS had tattoos of,

among other gang names, "Welchs," and "Castor," referring to Individual-2 and Individual-1, respectively.

The Racketeering Conspiracy

13. Beginning at least in or about 2003, and continuing through the date of this Indictment, in the District of New Jersey, and elsewhere, the defendant,

SEAN HILLS,
a/k/a "Half A Brain,"
a/k/a "Half,"
a/k/a "Rydaman,"

together with others known and unknown, 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 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).

14. It was part of the conspiracy that the 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

15. Among the manner and means by which the defendant 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 defendant 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, assault with a deadly weapon, 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.

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

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

a. On or about December 15, 2012, near the South 14th Street Location, HILLS and at least one other individual shot Victim-1 numerous times.

b. On or about February 1, 2013, in Newark, New Jersey, HILLS shot Victim-2 numerous times.

c. On or about February 23, 2013, HILLS posted a photograph on a social media account showing him making gang signs associated with the NJ Grape Street Crips and ABG, and HILLS wrote, "Anybody culd get it' but blood is my main focus."

d. On or about April 21, 2013, HILLS, while incarcerated at the Essex County Correctional Facility, spoke with Coconspirator-1 about a dispute that members of the NJ Grape Street Crips and ABG were having with rival gang members. Coconspirator-1 reported to HILLS that rival gang-members had "tried to pop on Lil Half too, so you know it's on." In response, HILLS told Coconspirator-1 to "fall back son wait til I get out there, son, we are going to hit hard son, on baby son, on the family son, we are going to hit hard, everyday seven days straight son, on the set, bro." HILLS then repeated: "Just

wait till Wednesday to see if they lower my shit [i.e., bail] bro, to see if I'm going to be right-- to see if I get right back out there son. Please bro, on the set, but every day, seven days straight bro, we going to give them niggas a week straight, brother, on the set bro!" When Coconspirator-1 told HILLS that he (Coconspirator-1) was "mad as hell," HILLS responded: "Yeah son, but like you give a f**k about losing the battle when you are going to win the war?"

e. On or about July 27, 2013, HILLS, while incarcerated at the Essex County Correctional Facility, spoke with Individual-2. During that call, Individual-2 ordered HILLS to assault a fellow gang-member named Moonie because "C-Murder hot on that nigga." HILLS responded, "Aight, say no more."

f. On or about November 19, 2018, HILLS sold more than 40 grams of cocaine in exchange for approximately \$1,900 in United States currency.

g. On or about December 27, 2018, HILLS engaged in what appeared to be a hand-to-hand drug transaction in the area of the Krechtmer Elderly Homes in Newark, New Jersey.

h. HILLS then ran away when law enforcement officers approached HILLS and identified themselves. As he was fleeing, HILLS reached into his pockets and attempted to throw numerous items—subsequently identified to contain heroin and cocaine—onto the rooftops of nearby buildings. After he was apprehended, HILLS possessed an additional quantity of heroin, approximately \$183 in United States currency, and three cell phones.

COUNT TWO
(Distribution and Possession with Intent to Distribute Cocaine)

On or about November 19, 2018, in Essex County, in the District
of New Jersey, and elsewhere, the defendant,

SEAN HILLS,
a/k/a "Half A Brain,"
a/k/a "Half,"
a/k/a "Rydaman,"

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

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

FORFEITURE ALLEGATION

1. The allegations contained in Count One of this 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, the defendant,

SEAN HILLS,
a/k/a "Half A Brain,"
a/k/a "Half,"
a/k/a "Rydaman,"

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 defendant:

- (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).

FORFEITURE ALLEGATION AS TO CONTROLLED SUBSTANCE COUNT

1. The allegations contained in Count Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. As a result of committing the controlled substance offenses alleged in Count Two of this Indictment, the defendant,

SEAN HILLS,
a/k/a "Half A Brain,"
a/k/a "Half,"
a/k/a "Rydaman,"

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 defendant 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 Count Two of this Indictment.

Substitute Assets Provision

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

- (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

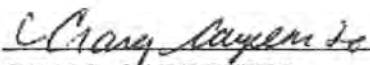
subdivided without difficulty

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 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

Foréperson


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 19- CR- 530(MCA)

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

UNITED STATES OF AMERICA

v.

**SEAN HILLS,
a/k/a "Half A Brain,"
a/k/a "Half,"
a/k/a "Rydaman"**

INDICTMENT

**18 U.S.C. § 1962(d)
21 U.S.C. §§ 841(a)(1) & (b)(1)(C)**

A True Bill,

Foreperson

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