

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	
	:	Crim. No. 16-
AARON TERRELL,	:	
a/k/a "Push,"	:	
JAHAD LEMONS,	:	18 U.S.C. §§ 1951(a), 924(c), 924(j),
a/k/a "J-Bird," and	:	and 2
PAPAYAW MACK,	:	
a/k/a "GY"	:	

INDICTMENT

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

COUNT ONE
(Hobbs Act Robbery Conspiracy)

1. On or about August 18, 2015, in Essex County, in the District of
New Jersey and elsewhere, the defendants,

AARON TERRELL,
a/k/a "Push,"
JAHAD LEMONS,
a/k/a "J-Bird," and
PAPAYAW MACK,
a/k/a "GY,"

did knowingly and willfully conspire and agree with each other and others to
obstruct, delay, and affect commerce, as that term is defined in Title 18, United
States Code, Section 1951, and the movement of articles and commodities in
commerce by robbery, as that term is defined in Title 18, United States Code,
Section 1951, and to commit and threaten physical violence to the person and

property of Victim 1, a heroin trafficker, in furtherance of a plan and purpose to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery.

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that defendants AARON TERRELL, a/k/a “Push” (“TERRELL”), JAHAD LEMONS, a/k/a “J-Bird” (“LEMONS”), and PAPAYAW MACK, a/k/a “GY” (“MACK”), were members and/or associates of the New Jersey set of the Grape Street Crips, a street gang operating in and around Newark, New Jersey (the “NJ Grape Street Crips”), whose members and associates enrich themselves by, among other things, committing robberies.

3. It was further part of the conspiracy that members of the conspiracy would use firearms forcibly to steal, or attempt to steal, heroin, heroin proceeds, and heroin paraphernalia from Victim-1, a heroin trafficker.

OVERT ACTS

4. In furtherance of conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the District of New Jersey, and elsewhere:

a. On or about August 18, 2015, at approximately 11:39 p.m., immediately outside a residential building located on Sanford Avenue in Newark, New Jersey (the “Building”), defendants TERRELL and LEMONS met with Victim-1, who afterwards proceeded alone inside the Building to a basement apartment (“Victim-1’s Apartment”).

b. Defendant MACK, coconspirator-1, and coconspirator-2 then entered the Building and walked up a flight of stairs. MACK then walked back downstairs and exited the Building.

c. Shortly thereafter, Victim-1 returned to the Building's foyer, at which point MACK re-entered the Building, coconspirator-1 and coconspirator-2 descended the stairwell, and all five men, including TERRELL and LEMONS, surrounded Victim-1.

d. TERRELL, LEMONS, MACK, and their coconspirators searched Victim-1, while TERRELL and coconspirator-2 brandished handguns.

e. While accompanied by his coconspirators, TERRELL, at gunpoint, forced Victim-1 downstairs in the direction of Victim-1's Apartment.

f. Coconspirator-2 entered Victim-1's Apartment first and pointed a revolver at Victim-2 and Victim-3, who were inside Victim-1's Apartment.

g. TERRELL forced Victim-1 into Victim-1's Apartment, while LEMONS, MACK, and coconspirator-1 also entered the apartment.

h. Inside Victim-1's Apartment, TERRELL, LEMONS, MACK, and their coconspirators robbed from Victim-1, Victim-2, and Victim-3 of a sum of United States currency and personal effects, while asking, in sum and substance, where the heroin was located.

i. Inside Victim-1's Apartment, both TERRELL and coconspirator-2 discharged their firearms, which killed Victim-1 and maimed Victim-2.

j. Following the murder and shooting referenced in Overt Act 4(i), TERRELL, LEMONS, MACK, and their coconspirators fled Victim-1's apartment. LEMONS, MACK, and other coconspirators were carrying various items stolen from inside Victim-1's Apartment, including the shoes that Victim-1 was wearing before being killed.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO
(Hobbs Act Robbery)

On or about August 18, 2015, in Essex County, in the District of New Jersey and elsewhere, the defendants,

AARON TERRELL,
a/k/a "Push,"
JAHAD LEMONS,
a/k/a "J-Bird," and
PAPAYAW MACK,
a/k/a "GY,"

did knowingly and willfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully attempt to take and obtain personal property from the person of Victim 1, a heroin trafficker, against Victim 1's will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the person and property of Victim 1.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

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

On or about August 18, 2015, in Essex County, in the District of New Jersey and elsewhere, the defendants,

AARON TERRELL,
a/k/a "Push,"
JAHAD LEMONS,
a/k/a "J-Bird," and
PAPAYAW MACK,
a/k/a "GY,"

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, specifically, the Hobbs Act robbery conspiracy set forth in Count One and the Hobbs Act robbery set forth in Count Two, did knowingly use, carry, and in furtherance of such crimes, possess a firearm, which was discharged, and did aid and abet the same.

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

COUNT FOUR
(Murder During a Crime of Violence)

On or about August 18, 2015, in Essex County, in the District of New Jersey and elsewhere, the defendants,

AARON TERRELL,
a/k/a "Push,"
JAHAD LEMONS,
a/k/a "J-Bird," and
PAPAYAW MACK,
a/k/a "GY,"


during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, specifically, the Hobbs Act robbery conspiracy set forth in Count One and the Hobbs Act robbery set forth in Count Two, did knowingly and intentionally use and carry a firearm, and, in the course of that crime did cause the death of a person, namely, Victim 1, through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a).

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

A TRUE BILL



Foreperson


PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 16-

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

UNITED STATES OF AMERICA

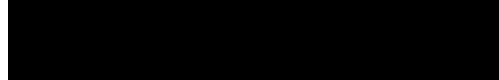
v.

**AARON TERRELL
a/k/a “Push,”
JAHAD LEMONS,
a/k/a “J-Bird,” and
PAPAYAW MACK,
a/k/a “GY”**

INDICTMENT FOR

18 U.S.C. §§ 1951(a), 924(c), 924(j), and 2

A True Bill,



Foreperson

PAUL J. FISHMAN

*U.S. ATTORNEY
NEWARK, NEW JERSEY*

OSMAR J. BENVENUTO
BARRY A. KAMAR
*ASSISTANT U.S. ATTORNEYS
(973)645-2869*
