

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

ELIJAH MELTON, a/k/a "Nice"
and/or "E-Nice" and

KAREEM PIRES, a/k/a "Reem"

Defendant.

Cr. No. 1:24CR59JJM-LDA

In violation of:

COUNT 1: Conspiracy to Commit Murder
for Hire

18 U.S.C. § 1958

COUNT 2: Solicitation to Commit a Crime
of Violence

18 U.S.C. § 373(a)

COUNT 3: Solicitation to Commit a Crime
of Violence

18 U.S.C. § 373(a)

COUNT 4: Conspiracy to Tamper With a
Witness, Victim, or Informant by Killing or
Attempting to Kill

18 U.S.C. § 1512(k)

COUNT 5: Solicitation to Commit a Crime
of Violence

18 U.S.C. § 373(a)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

Conspiracy to Commit Use of Interstate Commerce Facilities in Commission of Murder-For-Hire

18 U.S.C. § 1958(a)

Beginning on or about February 28, 2024, the exact date being unknown to the Grand Jury, and continuing through on or about April 27, 2024, in the District of Rhode Island and elsewhere, the defendants, ELIJAH MELTON, and KAREEM PIRES, did knowingly and

willfully combine, conspire, confederate, and agree with one another, and with others known and unknown to the Grand Jury, to cause another to travel in interstate commerce, and use and cause another to use a facility of interstate commerce, with intent that murder of victims #1, #2 and #3 be committed in violation of the laws of any State or the United States as consideration for the receipt of and as consideration for a promise and agreement to pay money and anything of pecuniary value, in violation of 18 U.S.C. § 1958(a).

COUNT TWO

Solicitation to Commit a Crime of Violence
18 U.S.C. § 373(a)

Beginning on or about February 28, 2024, and continuing through on or about April 27, 2024, in the District of Rhode Island and elsewhere, the defendant, ELIJAH MELTON, with the intent that another person known to the Grand Jury engage in conduct constituting a felony that has as an element, the use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce and endeavor to persuade such person known to the Grand Jury to engage in such conduct, that is to murder an Assistant United States Attorney #1 in violation of 18 U.S.C. § 1114, all in violation of 18 U.S.C. § 373.

COUNT THREE

Solicitation to Commit a Crime of Violence
18 U.S.C. § 373(a)

Beginning on or about February 28, 2024, and continuing through on or about April 27, 2024, in the District of Rhode Island and elsewhere, the defendant, ELIJAH MELTON, with the intent that another person known to the Grand Jury engage in conduct constituting a felony that has as an element the use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit,

command, induce and endeavor to persuade such person known to the Grand Jury to engage in such conduct, that is to murder an Assistant United States Attorney #2 in violation of 18 U.S.C. § 1114, all in violation of 18 U.S.C. § 373.

COUNT FOUR

*Conspiracy to Tamper With a Witness, Victim, or Informant
by Killing or Attempting to Kill
18 U.S.C. § 1512(k)*

Beginning on or about February 28, 2024, the exact date unknown to the Grand Jury, and continuing through on or about April 27, 2024, in the District of Rhode Island and elsewhere, the defendants, ELIJAH MELTON, and KAREEM PIRES, did knowingly and intentionally combine, conspire, confederate and agree with other individuals known and unknown to the Grand Jury, to murder a person known to the Grand Jury with intent to prevent the attendance and testimony of the person, Victim #1, in an official proceeding against ELIJAH MELTON in the United States District Court for the District of Massachusetts, in violation of 18 U.S.C. §§ 1512 (a)(1)(A) and (k).

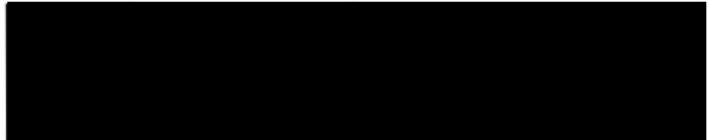
COUNT FIVE

*Solicitation to Commit a Crime of Violence
18 U.S.C. § 373(a)*

Beginning on or about February 28, 2024, the exact date being unknown to the Grand Jury, and continuing through on or about April 27, 2024, in the District of Rhode Island and elsewhere, the defendant, ELIJAH MELTON, with the intent that another person known to the Grand Jury engage in conduct constituting a felony that has an element, the use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did solicit, command, induce and endeavor to persuade such person known to the Grand Jury to engage in such conduct, that is to kill a

person, Victim #1, with intent to prevent the attendance and testimony of the person known to the Grand Jury in an official proceeding against ELIJAH MELTON in the United States District Court for the District of Massachusetts, in violation of 18 U.S.C. § 1512 (a)(1)(A).


A TRUE BILL:




GRAND JURY FOREPERSON

Dated: 6/26/24

ZACHARY A. CUNHA
United States Attorney


PETER I. ROKLAN
Assistant U.S. Attorney


STACEY A. ERICKSON
Assistant U.S. Attorney
Criminal Division Deputy Chief

Dated: June 26, 2024

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINT

CASE NO. 1:24CR59JJM-LDA-01

Matter Sealed: ☐ Juvenile ☐ Other than Juvenile
☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND Divisional OfficeName and Office of Person
Furnishing Information on
THIS FORM ZACHARY A. CUNHA
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (401) 709-5000Name of Asst.
U.S. Attorney Stacey Erickson & Peter Roklan
(if assigned)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI~ Zachary Brune, Special Agent

☐ person is awaiting trial in another Federal or State Court
(give name of court)☐ this person/proceeding transferred from another district
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges
previously dismissed which were
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant. (Notice of Related
Case must still be filed with the
Clerk.)☒ prior proceedings or appearance(s)
before U.S. Magistrate Judge
regarding this defendant were
recorded underSHOW
DOCKET NO.MAG. JUDGE
CASE NO.

PGL/ 24-MJ-8316

Place of
offense RHODE ISLAND County

USA vs.

Defendant: Elijah Melton

Address:

☐ Interpreter Required Dialect: _____Birth Date _____ ☒ Male ☐ Alien
☐ Female (if applicable)

Social Security Number _____

DEFENDANT

Issue: ☒ Warrant ☐ Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

☒ Currently in Federal Custody☐ Currently in State Custody☐ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any): _____

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 7

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	See Attached		<input checked="" type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony <input type="checkbox"/> Misdemeanor

Submit

Go

**ATTACHMENT TO DEFENDANT INFORMATION RELATIVE TO A CRIMINAL
ACTION - IN U.S. DISTRICT COURT**

DEFENDANT: Elijah Melton 1:24CR59JJM-LDA-01

COUNT I: 18 U.S. Code § 1958(a) - Conspiracy to Commit Use of Interstate Commerce Facilities in Commission of Murder-For-Hire – Felony.

MAXIMUM PENALTIES: Imprisonment: 10 years; Supervised release: 3 years; Fine: \$250,000; and Special assessment: \$100.

COUNT II: 18 USC § 373(a) - Solicitation to commit a crime of violence - Felony

MAXIMUM PENALTIES: Imprisonment: 20 years; Supervised release: 3 years; Fine: \$125,000; and Special assessment: \$100.

COUNT III: 18 USC § 373(a) - Solicitation to commit a crime of violence - Felony

MAXIMUM PENALTIES: Imprisonment: 20 years; Supervised release: 3 years; Fine: \$125,000; and Special assessment: \$100.

COUNT IV: 18 U.S.C. § 1512(k) - Conspiracy to Tamper With a Witness, Victim, or Informant by Killing or Attempting to Kill – Felony.

MAXIMUM PENALTIES: Imprisonment: 30 years; Supervised release: years; Fine: \$; and Special assessment: \$100.

COUNT V: 18 USC § 373(a) - Solicitation to commit a crime of violence - Felony.

MAXIMUM PENALTIES: Imprisonment: 20 years; Supervised release: 3 years; Fine: \$125,000; and Special assessment: \$100.

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT

BY: ☐ INFORMATION ☒ INDICTMENT ☐ COMPLAINTCASE NO. 1:24CR59JJM-LDA-02Matter Sealed: ☐ Juvenile ☐ Other than Juvenile☐ Pre-Indictment Plea ☐ Superseding ☐ Defendant Added
☐ Indictment ☐ Charges/Counts Added
☐ Information

Name of District Court, and/or Judge/Magistrate Location (City)

UNITED STATES DISTRICT COURT RHODE ISLAND
DISTRICT OF RHODE ISLAND Divisional OfficeName and Office of Person
Furnishing Information on
THIS FORM ZACHARY A. CUNHA
☒ U.S. Atty ☐ Other U.S. Agency
Phone No. (401) 709-5000Name of Asst.
U.S. Attorney
(if assigned) Stacey Erickson & Peter Roklan

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI~ Zachary Brune, Special Agent



☐ person is awaiting trial in another Federal or State Court
(give name of court)☐ this person/proceeding transferred from another district
per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges
previously dismissed which were
dismissed on motion of:☐ U.S. Atty ☐ Defense☐ this prosecution relates to a
pending case involving this same
defendant. (Notice of Related
Case must still be filed with the
Clerk.)☒ prior proceedings or appearance(s)
before U.S. Magistrate Judge
regarding this defendant were
recorded underSHOW
DOCKET NO.MAG. JUDGE
CASE NO.

PGL/ 24-MJ-8316

Place of
offense RHODE ISLAND

County

USA vs.

Defendant: Kareem PiresAddress: ☐ Interpreter Required Dialect: _____Birth Date  ☒ Male ☐ Alien
☐ Female (if applicable)

Social Security Number _____

DEFENDANT

Issue: ☒ Warrant ☐ Summons

Location Status:

Arrest Date _____ or Date Transferred to Federal Custody _____

☐ Currently in Federal Custody☒ Currently in State Custody☐ Writ Required☐ Currently on bond☐ Fugitive

Defense Counsel (if any): _____

☐ FPD ☐ CJA ☐ RET'D☐ Appointed on Target Letter☐ This report amends AO 257 previously submitted

OFFENSE CHARGED - U.S.C. CITATION - STATUTORY MAXIMUM PENALTIES - ADDITIONAL INFORMATION OR COMMENTS

Total # of Counts 6

Set	Title & Section/Offense Level (Petty = 1 / Misdemeanor = 3 / Felony = 4)	Description of Offense Charged	Felony/Misd.
	See Attached		<input checked="" type="checkbox"/> Felony
			<input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony
			<input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony
			<input type="checkbox"/> Misdemeanor
			<input type="checkbox"/> Felony
			<input type="checkbox"/> Misdemeanor
		Estimated Trial Days: 5	<input type="checkbox"/> Felony
			<input type="checkbox"/> Misdemeanor

Submit

Go

**ATTACHMENT TO DEFENDANT INFORMATION RELATIVE TO A CRIMINAL
ACTION - IN U.S. DISTRICT COURT**

DEFENDANT: Kareem Pires 1:24CR59JJM-LDA-02

COUNT I: 18 U.S. Code § 1958(a) - Conspiracy to Commit Use of Interstate Commerce Facilities in Commission of Murder-For-Hire – Felony.

MAXIMUM PENALTIES: Imprisonment: 10 years; Supervised release: 3 years; Fine: \$250,000; and Special assessment: \$100.

COUNT IV: 18 U.S.C. § 1512(k) - Conspiracy to Tamper With a Witness, Victim, or Informant by Killing or Attempting to Kill – Felony.

MAXIMUM PENALTIES: Imprisonment: 30 years; Supervised release: years; Fine: \$; and Special assessment: \$100.