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(Murder in Aid of Racketeering)

The Cash Money Boys Enterprise

2. CMB, including its leadership, its membership, and its associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which 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. From at least in or about 2006 up to and including in or about 2010, members and associates of CMB were engaged in a violent rivalry with a rival street gang operating in and around the Jefferson Housing Projects in Manhattan (the "Jefferson Houses Crew").

4. Members and associates of CMB sold cocaine base, commonly known as "crack cocaine," and marijuana, primarily in and around the intersection of 122nd Street and Lexington Avenue in Manhattan, New York. CMB controlled drug sales within this area by prohibiting and preventing non-members, outsiders, and rival drug dealers from distributing controlled substances in the area controlled by CMB.

5. Certain members and associates of CMB committed and agreed, attempted, and threatened to commit acts of violence to protect and expand their drug trafficking operation and to protect fellow members and associates of CMB. These acts of violence included assaults, attempted murder, and murder intended either to protect CMB's drug territory, retaliate against members of rival gangs who had encroached on the

territory controlled by CMB, or to otherwise promote the standing and reputation of CMB amongst rival gangs.

Purposes of CMB

6. The purposes of CMB included the following:

- a. Preserving and protecting the power, territory, and profits of CMB through murder, attempted murder, and other acts of violence, and threats of violence.
- b. Promoting and enhancing CMB and the activities of its members and associates.
- c. Keeping victims and potential victims in fear of CMB and its members and associates through acts and threats of violence.
- d. Providing assistance to members and associates, who committed crimes for and on behalf of CMB.
- e. Enriching the members and associates of CMB through, among other things, the distribution and sale of controlled substances, including crack cocaine and marijuana.
- f. Protecting CMB and its members and associates from detection and prosecution by law enforcement authorities through acts of intimidation and violence against potential witnesses to crimes committed by members of CMB.

### Means and Methods of CMB

7. Among the means and methods employed by the members and associates in conducting and participating in the conduct of the affairs of CMB were the following:

a. Members and associates of CMB committed, conspired, attempted, and threatened to commit acts of violence, including murder, to protect and expand CMB's criminal operations, and in connection with the rivalries with members of other street gangs, including the Jefferson Houses Crew.

b. Members and associates of CMB used threats of violence and physical violence against other members and associates to enforce and maintain discipline within the Enterprise.

c. Members and associates of CMB committed, conspired, attempted, and threatened to commit acts of violence, including murder and attempted murder, against rival gang members and other individuals adverse to CMB.

d. Members and associates of CMB obtained, possessed, and used firearms, which were shared by and accessible to members and associates of CMB.

e. Members and associates of CMB distributed controlled substances, including crack cocaine and marijuana.

f. Members and associates of CMB committed acts of intimidation and made threats as a means of deterring and

punishing any potential witnesses to its crimes and in connection with protecting CMB and its members and associates from detection and prosecution by law enforcement authorities.

The Murder of David Moore

8. At all times relevant to this Indictment, the above-described CMB Enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder in violation of the laws of New York State, and offenses involving drug trafficking in violation of 21 U.S.C. §§ 812, 841, and 846.

9. On or about June 20, 2010 in the Southern District of New York, JAMAL ADAMSON, a/k/a "J-Rock," and HASAHN MURRAY, a/k/a "Sauce," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay a thing of pecuniary value from CMB, and for the purpose of gaining entrance to and maintaining and increasing position in CMB, an enterprise engaged in racketeering activity, as described above, intentionally and knowingly murdered, and aided and abetted the murder of David Moore, an associate of the Jefferson Houses Crew, that is, with the intent to cause the death of Moore, did cause the death of Moore, and under circumstances evincing a depraved indifference to human life, did recklessly engage in conduct which created a

grave risk of death to another person and thereby caused the death of Moore, in the vicinity of 122nd Street and Lexington Avenue in Manhattan, New York, in violation of New York Penal Law, Sections 125.25 and 20.00.

(Title 18, United States Code,  
Sections 1959(a)(1) and 2.)



**COUNT TWO**  
**(Murder Through the Use of a Firearm)**



The Grand Jury further charges:

10. On or about June 20, 2010, in the Southern District of New York, JAMAL ADAMSON, a/k/a "J-Rock," and HASAHN MURRAY, a/k/a "Sauce," the defendants, willfully and knowingly, during and in relation to (1) a crime of violence for which they may be prosecuted in a court of the United States, namely, the murder in aid of racketeering charged in Count One of this Indictment, and (2) a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, a conspiracy to distribute controlled substances, in violation of 21 U.S.C. § 846, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and in the course of that crime did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), and did aid and abet the same, to wit, ADAMSON and MURRAY caused the death of David Moore by shooting Moore, and aiding and abetting the same, in the vicinity of

122nd Street and Lexington Avenue in Manhattan, New York.

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

  
Foreperson  


  
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GEOFFREY S. BERMAN   
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

JAMAL ADAMSON, a/k/a "J-Rock,"  
HASAHN MURRAY, a/k/a "Sauce,"

Defendants.

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SELED INDICTMENT

19 Cr. ( )

(18 U.S.C. §§ 924(j), 1959, and 2.)

[REDACTED]  
[REDACTED] Foreperson.

GEOFFREY S. BERMAN  
United States Attorney.

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