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- V. -

Defendants.

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17 Cr. 506 ( )

COUNT ONE

The Grand Jury charges:

THE ENTERPRISE

1. At all times relevant to this Indictment, DOUGLAS OWENS, a/k/a "Born Truth," JIHAD WILLIAMS, a/k/a "Goodie," NICHOLAS HARRIS, a/k/a "Bados," DIMETRI MOSELEY, a/k/a "Pancho," JAQUEZ HILL, a/k/a "Quez," a/k/a "Quezzy," MARKEL GREEN, a/k/a "Booge," RAHIEM MILLER, a/k/a "Bigs," a/k/a "Bigs Miller" a/k/a "Rippy," CHRISTIAN BLADES, a/k/a "C Blades," a/k/a "JT," ASHANTI BUNN, a/k/a "Shan D," RAYSHAWN CASANOVA, a/k/a "Cass," a/k/a "Uber Jack," TREQUON DANCY, a/k/a "Tre Pound," a/k/a "Trigga Tre," RASHMI RUPARELIA, a/k/a "Baby Rash," the defendants, and others known and unknown, were members and associates of the Uptown Gang ("Uptown" or the "Enterprise"), a criminal organization whose members and associates engaged in, among other things, narcotics trafficking, acts involving robbery, acts involving murder, and other acts of violence. Uptown operated principally in and around the City of Poughkeepsie, New York.

2. Uptown, including its leadership, membership, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving

the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise has engaged in, and its activities affected, interstate and foreign commerce. The defendants participated in the operation of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

3. DOUGLAS OWENS, a/k/a "Born Truth," JIHAD WILLIAMS, a/k/a "Goodie," NICHOLAS HARRIS, a/k/a "Bados," DIMETRI MOSELEY, a/k/a "Pancho, JAQUEZ HILL, a/k/a "Quez," a/k/a "Quezzy," MARKEL GREEN, a/k/a "Booge," RAHIEM MILLER, a/k/a "Bigs," a/k/a "Bigs Miller" a/k/a "Rippy," CHRISTIAN BLADES, a/k/a "C Blades," a/k/a "JT," ASHANTI BUNN, a/k/a "Shan D," RAYSHAWN CASANOVA, a/k/a "Cass," a/k/a "Uber Jack," TREQUON DANCY, a/k/a "Tre Pound," a/k/a "Trigga Tre," RASHMI RUPARELIA, a/k/a "Baby Rash," the defendants, and others known and unknown, were leaders, members, and associates of the Enterprise who carried out and directed other members of the Enterprise in carrying out unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

4. Uptown has been engaged in a long-standing, and violent, feud with a rival Poughkeepsie street gang referred to as "Downtown." Over the course of this conflict, Uptown members and associates have committed several acts of violence directed against their Downtown rivals, including several non-fatal shootings and at least two fatal shootings. Some of these

shootings have affected innocent bystanders, who have at times been shot at or killed amid this ongoing gang violence.

5. Uptown is a criminal organization whose members referred to themselves by and were known by several different names. Those names include the "Mob Stars," "Spready Gang," "400," and "Boogotti Boys." Members of Uptown referred to themselves and each other by different combinations of these names, all of which referred to the same Enterprise. Members who referred to themselves by these names resided and/or operated in and around Poughkeepsie. These different names typically arose from various musical groups within the organization or fallen members or associates. Although members of Uptown referred to themselves by different names, there was significant overlap in the names individual members used, and members, regardless of name, worked together as a single organization protecting the same territory. Members who referred to themselves by these various names were not confined to a subgroup territory to engage in criminal activities. The members who referred to themselves by these different names did not possess territory separate and apart from Uptown. Members who called themselves by these different names had permission to engage in criminal activities anywhere within Uptown territory without fear of retaliation from members who referred to themselves by other names because, at their core, they are all members of Uptown.

6. Although Uptown did not maintain a formal or rigid hierarchy, certain members and associates enjoyed significant power and respect within the organization. DOUGLAS OWENS, a/k/a "Born Truth," and JIHAD WILLIAMS, a/k/a "Goodie," the defendants, acted as two of Uptown's leaders who could, and did, call meetings of Uptown members. WILLIAMS and OWENS evaluated the contributions of Uptown members to the Enterprise's endeavors. At these meetings, Uptown gang members discussed, among other things, their criminal activities.

7. Uptown had multiple criminal objectives, one of which was the operation of drug markets in certain locations in Poughkeepsie, which distributed heroin, cocaine base, or "crack," and marijuana. In particular, Uptown controlled drug markets from east of Hamilton Street to the Poughkeepsie city limits, specifically in the vicinity of the Hudson Garden housing projects, commonly referred to as "the Bricks."

8. Uptown allowed its members and associates, no matter the name they used, to sell narcotics in areas of Poughkeepsie, New York controlled by Uptown. As part of these endeavors, members and associates of Uptown assisted each other with the sale of narcotics, held narcotics for each other, and held and shared firearms to protect Uptown members from rivals. Generally speaking, non-members, outsiders, and rival narcotics dealers/gang members were prohibited or prevented from

distributing narcotics in areas controlled by Uptown, most notably in the Bricks.

9. Other individuals who were not members of Uptown conspired with Uptown gang members to operate the drug markets in Poughkeepsie. Among other things, these associates of Uptown helped supply its members with narcotics, and otherwise aided the criminal activities of Uptown, including narcotics distribution.

10. Certain members and associates of Uptown committed, 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 the Enterprise. These acts of violence included, assaults, robbery, attempted murder, and murder, intended either to protect Uptown's members, enforce discipline amongst members of Uptown, or to otherwise promote the standing and reputation of Uptown.

#### PURPOSES OF THE ENTERPRISE

11. The purposes of the Enterprise included but were not limited to the following:

a. Preserving and protecting the power, territory, and profits of the Enterprise through assaults, attempted murders, murders, and other acts of violence, and threats of violence.

b. Promoting and enhancing the Enterprise and the activities of its members and associates.

c. Keeping victims and potential victims in fear of the Enterprise 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 the Enterprise.

e. Enriching the members and associates of the Enterprise through, among other things, robberies, and the distribution and sale of controlled substances, including crack cocaine, heroin, and marijuana.

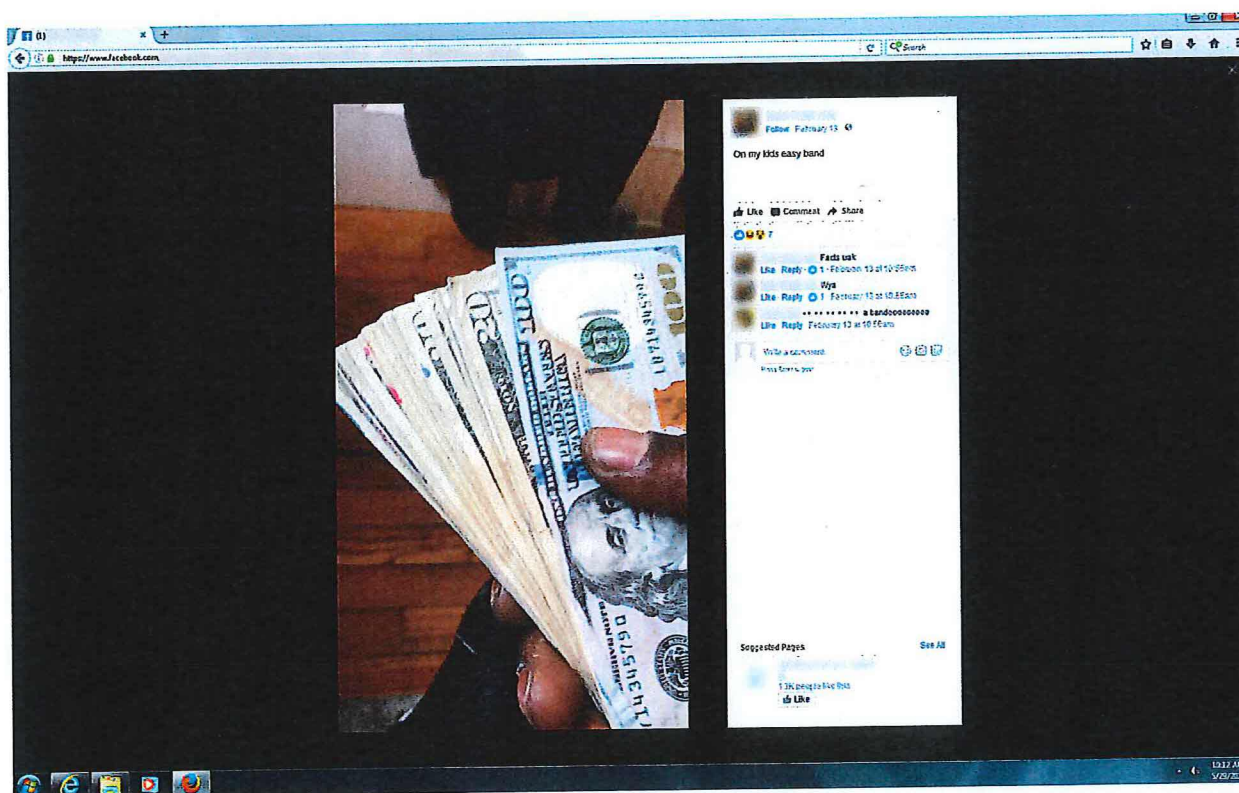
#### MEANS AND METHODS OF THE ENTERPRISE

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

a. Members and associates of the Enterprise committed, conspired, attempted, and threatened to commit acts of violence, including robbery, assault, attempted murder, and murder against rival gang members and other individuals adverse to the Enterprise to protect and expand the Enterprise's criminal operations, including the distribution of narcotics.

b. Members and associates of the Enterprise used threats of violence, including murder, against other members and associates to enforce and maintain discipline within the Enterprise.

c. Members and associates promoted the Enterprise on social media websites such as Facebook and YouTube. For example, Uptown members posted written posts, videos, and photographs during which they, among other things, referenced various subgroup names, shootings, firearms, and drug dealing. As one specific example, on or about February 13, 2017, ASHANTI BUNN, a/k/a "Shan D," the defendant, posted the following photograph, which has been redacted, displaying a wad of cash, representing proceeds of drug sales:



d. Members and associates of the Enterprise displayed certain signs and wore certain clothing emblazoned with various Uptown subgroup names to identify themselves and communicate with one another.

e. Members and associates of the Enterprise obtained, possessed, and used firearms.

f. Members and associates of the Enterprise distributed controlled substances, including heroin, crack cocaine, and marijuana.

g. Members and associates of the Enterprise held meetings to discuss gang business and discuss current and future activities.

#### THE RACKETEERING CONSPIRACY

13. From at least in or about 2012, up to and including in or about 2017, in the Southern District of New York and elsewhere, DOUGLAS OWENS, a/k/a "Born Truth," JIHAD WILLIAMS, a/k/a "Goodie," NICHOLAS HARRIS, a/k/a "Bados," DIMETRI MOSELEY, a/k/a "Pancho, JAQUEZ HILL, a/k/a "Quez," a/k/a "Quezzy," MARKEL GREEN, a/k/a "Booge," RAHIEM MILLER, a/k/a "Biggs," a/k/a "Biggs Miller" a/k/a "Rippy," CHRISTIAN BLADES, a/k/a "C Blades," a/k/a "JT," ASHANTI BUNN, a/k/a "Shan D," RAYSHAWN CASANOVA, a/k/a "Cass," a/k/a "Uber Jack," TREQUON DANCY, a/k/a "Tre Pound," a/k/a "Trigga Tre," RASHMI RUPARELIA, a/k/a "Baby Rash," the defendants, and others known and unknown, being persons employed by and associated with the Enterprise described in paragraphs One through Eleven of this Indictment, to wit, Uptown, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the United States, to wit,

Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of Uptown, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity consisting of:

a. Multiple acts involving murder, chargeable under the following provisions of state law:

i. New York Penal Law, Sections 20.00, 110.00 and 125.25 (attempted murder);

ii. New York Penal Law, Sections 105.15 and 125.25 (conspiracy to commit murder);

iii. New York Penal Law, Sections 20.00 and 125.25 (murder);

b. Multiple acts involving robbery, chargeable under the following provisions of state law:

i. New York Penal Law, Sections 20.00, 110.00, 160.00, 160.05, 160.10, and 160.15 (attempted robbery);

ii. New York Penal Law, Sections 105.05, 105.10, 160.00, 160.05, 160.10, and 160.15 (conspiracy to commit robbery);

iii. New York Penal Law, Sections 20.00, 160.00, 160.05, 160.10, and 160.15 (robbery);

c. Multiple offenses involving the distribution of controlled substances, including crack cocaine, heroin, and marijuana, in violation of the laws of the United States, namely Title 21, United States Code, Sections 812, 841(a)(1), and 846, and Title 18, United States Code, Section 2;

d. Multiple acts indictable under Title 18, United States Code, Sections 1951 and 2.

14. It was part of the conspiracy that DOUGLAS OWENS, a/k/a "Born Truth," JIHAD WILLIAMS, a/k/a "Goodie," NICHOLAS HARRIS, a/k/a "Bados," DIMETRI MOSELEY, a/k/a "Pancho, JAQUEZ HIL, a/k/a "Quez," a/k/a "Quezzy," MARKEL GREEN, a/k/a "Booge," RAHIEM MILLER, a/k/a "Bigs," a/k/a "Bigs Miller" a/k/a "Rippy," CHRISTIAN BLADES, a/k/a "C Blades," a/k/a "JT," ASHANTI BUNN, a/k/a "Shan D," RAYSHAWN CASANOVA, a/k/a "Cass," a/k/a "Uber Jack," TREQUON DANCY, a/k/a "Tre Pound," a/k/a "Trigga Tre," RASHMI RUPARELIA, a/k/a "Baby Rash," the defendants, and others known and unknown, each agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

(Title 18, United States Code, Sections 1962(d).)

#### COUNT TWO

The Grand Jury further charges:

15. At all times relevant to this Indictment, Uptown, as more fully described in Paragraphs One through Twelve of this

Indictment, which are realleged and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its 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 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.

16. At all times relevant to this Indictment, the above-described 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 and robbery in violation of the laws of New York State, offenses involving drug trafficking in violation of Title 21, United States Code, Sections 812, 841, and 846, and acts indictable under Title 18, United States Code, Sections 1951 and 2.

17. On or about December 23, 2012, in the Southern District of New York, MARKEL GREEN, a/k/a "Booge," and RAHIEM MILLER, a/k/a "Bigs," a/k/a "Bigs Miller," a/k/a "Trippy," 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 Uptown, and for the purpose

of gaining entrance to and maintaining and increasing position in Uptown, an enterprise engaged in racketeering activity, as described above, intentionally and knowingly murdered and aided and abetted the murder of Daquelle LeBlanc, a/k/a "Hamo" in the vicinity of a Gyro King Restaurant located at 364 Main Street, Poughkeepsie, New York, in that GREEN and MILLER, with intent to kill LeBlanc, caused LeBlanc's death, and aided and abetted the same, to wit, in retaliation for an altercation with LeBlanc, who was a member of a rival Poughkeepsie gang known as "Downtown," at a pizza parlor in Poughkeepsie earlier on December 23, 2012, GREEN and MILLER -- to enhance their position in Uptown and advance the criminal objectives of Uptown -- retrieved at least one shared gang gun from at least one other Uptown member, confronted LeBlanc outside of the Gyro King, and shot Leblanc, causing his death, and aided and abetted the same, 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 THREE

The Grand Jury further charges:

18. At all times relevant to this Indictment, Uptown, as more fully described in Paragraphs One through Twelve of this Indictment, which are realleged and incorporated by reference as though fully set forth herein, including its leadership, its membership, and its 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 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.

19. At all times relevant to this Indictment, the above-described 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 and robbery in violation of the laws of New York State, offenses involving drug trafficking in violation of Title 21, United States Code, Sections 812, 841, and 846, and acts indictable under Title 18, United States Code, Sections 1951 and 2.

20. On or about March 9, 2016, in the Southern District of New York, NICHOLAS HARRIS, a/k/a "Bados," DIMETRI MOSELEY, a/k/a "Pancho," and JAQUEZ HILL, a/k/a "Quez," a/k/a "Quezzy," 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 Uptown, and for the purpose of gaining entrance to and maintaining and increasing position in Uptown, an enterprise engaged in racketeering activity, as described above, intentionally and knowingly murdered and aided

and abetted the murder of Caval Haylett in the vicinity of Winnikee Avenue, Poughkeepsie, New York, in that HARRIS, MOSELEY, and HILL, with intent to kill Downtown gang members, caused Haylett's death, and aided and abetted the same, to wit, in response to provocations posted on Facebook by Downtown gang members, HARRIS, MOSELEY, and HILL -- to enhance their position in Uptown and advance the criminal objectives of Uptown -- brought at least two of Uptown's shared guns to a barbeque on Winnikee Avenue where Downtown members and other people who were not affiliated with any gang were present. Upon approaching the barbeque, HARRIS, MOSELEY, and HILL fired multiple shots from at least two guns at the Downtown members who were present, one of which struck Caval Haylett, who was attending the barbeque and was not a member of a gang, in the head, causing his death, and aided and abetted the same, 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 FOUR

The Grand Jury further charges:

21. From at least in or about 2012 up to and including in or about 2017, in the Southern District of New York and elsewhere, RASHMI RUPARELLA, a/k/a "Baby Rash," and JIHAD WILLIAMS, a/k/a "Goodie," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely the racketeering conspiracy charged

in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

#### COUNT FIVE

The Grand Jury further charges:

22. From at least in or about 2012 up to and including in or about 2017, in the Southern District of New York and elsewhere, CHRISTIAN BLADES, a/k/a "C Blades," a/k/a "JT," ASHANTI BUNN, a/k/a "Shan D," and RAYSHAWN CASANOVA, a/k/a "Cass," a/k/a "Uber Jack," the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely the racketeering conspiracy charged in Count One of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms, some of which firearms were brandished and discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.)

#### COUNT SIX

The Grand Jury further charges:

23. On or about December 23, 2012, in the Southern District of New York, MARKEL GREEN, a/k/a "Booge," and RAHIEM MILLER, a/k/a "Bigs," a/k/a "Bigs Miller," a/k/a "Rippy," the

defendants, willfully and knowingly, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the racketeering conspiracy charged in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime of violence, did possess a firearm, and in the course of that crime of violence did, through the use of a firearm, cause the death of a person, which killing is murder as defined in Title 18, United States Code, Section 1111(a), and did aid and abet the same, to wit, in retaliation for an altercation with Daquelle LeBlanc, a/k/a "Hamo," who was a member of a rival Poughkeepsie gang known as "Downtown," at a pizza parlor in Poughkeepsie earlier on December 23, 2012, GREEN and MILLER retrieved at least one shared gun from at least one other Uptown member, confronted LeBlanc outside of the Gyro King, and shot Leblanc, causing his death, and aided and abetted the same.

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

#### COUNT SEVEN

The Grand Jury further charges:

24. On or about March 9, 2016, in the Southern District of New York, NICHOLAS HARRIS, a/k/a "Bados," DIMETRI MOSELEY, a/k/a "Pancho," and JAQUEZ HILL, a/k/a "Quez," a/k/a "Quezzy," the defendants, willfully and knowingly, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the racketeering conspiracy charged in

Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime of violence, did possess a firearm, and in the course of that crime of violence did, through the use of a firearm, cause the death of a person, which killing is murder as defined in Title 18, United States Code, Section 1111(a), and did aid and abet the same, to wit, in response to provocations posted on Facebook by Downtown gang members, HARRIS, MOSELEY, and HILL brought at least two of Uptown's shared guns to a barbeque on Winnikee Avenue in Downtown territory where Downtown members and other people who were not affiliated with any gang were present. Upon approaching the barbeque, HARRIS, MOSELEY, and HILL fired at the Downtown members who were present and shot Caval Haylett, who was not a member of a gang, causing his death, and aided and abetted the same.

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

**FORFEITURE ALLEGATION AS TO COUNT ONE**

25. As a result of committing the offense alleged in Count One of this Indictment, DOUGLAS OWENS, a/k/a "Born Truth," JIHAD WILLIAMS, a/k/a "Goodie," NICHOLAS HARRIS, a/k/a "Bados," DIMETRI MOSELEY, a/k/a "Pancho," JAQUEZ HIL, a/k/a "Quez," a/k/a "Quezzy," MARKEL GREEN, a/k/a "Booge," RAHIEM MILLER, a/k/a "Bigs," a/k/a "Bigs Miller" a/k/a "Rippy," CHRISTIAN BLADES, a/k/a "C Blades," a/k/a "JT," ASHANTI BUNN, a/k/a "Shan D," RAYSHAWN CASANOVA, a/k/a "Cass," a/k/a "Uber Jack," TREQUON DANCY, a/k/a

"Tre Pound," a/k/a "Trigga Tre," RASHMI RUPARELIA, a/k/a "Baby Rash," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963:

a. Any interest acquired or maintained in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

b. Any interest in, security of, claim against, or property or contractual right which afford a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); and

c. Any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

#### Substitute Assets Provision

26. If any of the above-described forfeitable property, as a result of any act or omission of DOUGLAS OWENS, a/k/a "Born Truth," JIHAD WILLIAMS, a/k/a "Goodie," NICHOLAS HARRIS, a/k/a

"Bados," DIMETRI MOSELEY, a/k/a "Pancho, JAQUEZ HIL, a/k/a "Quez," a/k/a "Quezzy," MARKEL GREEN, a/k/a "Booge," RAHIEM MILLER, a/k/a "Bigs," a/k/a "Bigs Miller" a/k/a "Rippy," CHRISTIAN BLADES, a/k/a "C Blades," a/k/a "JT," ASHANTI BUNN, a/k/a "Shan D," RAYSHAWN CASANOVA, a/k/a "Cass," a/k/a "Uber Jack," TREQUON DANCY, a/k/a "Tre Pound," a/k/a "Trigga Tre," RASHMI RUPARELIA, a/k/a "Baby Rash," the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, 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 Title 18, United State Code, Section 1963(m) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 1963, and Title 21, United States Code, Section 853.)

SPECIAL FINDINGS AS TO NICHOLAS HARRIS

26. Counts Three and Seven of this Indictment are realleged and incorporated by reference as though fully set forth herein. As to Counts Three and Seven, alleging the murder of Caval Haylett, the defendant NICHOLAS HARRIS, a/k/a "Bados":

a. was 18 years of age or older at the time of the offense;

b. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

c. intentionally killed or attempted to kill more than one person in a single criminal episode (Title 18, United States Code, Section 3592(c)(16)).

SPECIAL FINDINGS AS TO DIMETRI MOSELEY

27. Counts Three and Seven of this Indictment are realleged and incorporated by reference as though fully set forth herein. As to Counts Three and Seven, alleging the murder of Caval Haylett, the defendant DIMETRI MOSELEY, a/k/a "Pancho":

a. was 18 years of age or older at the time of the offense;

b. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

c. intentionally killed or attempted to kill more than one person in a single criminal episode (Title 18, United States Code, Section 3592(c)(16)).

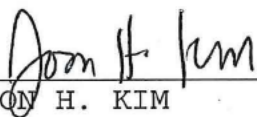
SPECIAL FINDINGS AS TO JAQUEZ HILL

28. Counts Three and Seven of this Indictment are realleged and incorporated by reference as though fully set forth herein. As to Counts Three and Seven, alleging the murder of Caval Haylett, the defendant JAQUEZ HILL, a/k/a "Quez," a/k/a "Quezzy":

a. was 18 years of age or older at the time of the offense;

b. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C)).

  
FOREPERSON

  
JOON H. KIM  
Acting 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. -

DOUGLAS OWENS, et al.,

Defendants.

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SEALED INDICTMENT


17 Cr. ( )

(18 U.S.C. §§ 924(c), 924(j) 1959, 1962,  
and 2.)

JOON H. KIM

Acting United States Attorney.

A TRUE BILL

  
Foreperson.

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