

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 8:12-cr-205-T-17MAP

NATHANIEL HARRIS,

a/k/a "Popo,"

a/k/a "Lil Brown,"

NAPOLEON HARRIS,

a/k/a "Pole,"

a/k/a "Mr. 760,"

CHARLIE L. GREEN,

a/k/a "Charlie Lee James Green,"

a/k/a "Mr. 30N32,"

JERRY W. GREEN, Jr.,

a/k/a "Jerry Wayne Green,"

a/k/a "Jerk,"

COREY DEONTA HARRIS,

a/k/a "Corey Harris,"

a/k/a "James," and

DEONTE JAMAL MARTIN,

a/k/a "Tang,"

a/k/a "Deonta Jamal Akerman Martin,"

a/k/a "Deonta Martin"

SEALED

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges:

I certify the foregoing to be a true
and correct copy of the original.

SHERYL L. LOESCH, Clerk
United States District Court
Middle District of Florida

By: *Sheryl L. Loesch*
Deputy Clerk

COUNT ONE
(RICO CONSPIRACY—18 U.S.C. § 1962(d))

A. THE ENTERPRISE

1. At all times material to this Second Superseding Indictment,

NATHANIEL HARRIS,
a/k/a “Popo,”
a/k/a “Lil Brown,”
NAPOLEON HARRIS,
a/k/a “Pole,”
a/k/a “Mr. 760,”
CHARLIE L. GREEN,
a/k/a “Charlie Lee James Green,”
a/k/a “Mr. 30N32,”
JERRY W. GREEN, Jr.,
a/k/a “Jerry Wayne Green,”
a/k/a “Jerk,”
COREY DEONTA HARRIS,
a/k/a “Corey Harris,”
a/k/a “James,” and
DEONTE JAMAL MARTIN,
a/k/a “Tang,”
a/k/a “Deonta Jamal Akerman Martin,”
a/k/a “Deonta Martin,”

the defendants herein, and others known and unknown to the Grand Jury, constituted an “Enterprise,” as that term is defined at Title 18, United States Code, Section 1961(4) (the “Enterprise”), to wit: a group of individuals associated in fact although not a legal entity, which Enterprise 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 the common purpose of achieving the objects of the Enterprise.

2. The principal purpose of the Enterprise was to generate money for its members through the commission of various criminal activities, including criminal acts involving the felonious manufacturing, receiving, concealing, buying, selling and otherwise dealing in controlled substances, robbery and other acts of violence. The members of the Enterprise also furthered the Enterprise's illegal activities by using and threatening to use various levels of violence, ranging from simple assault to murder.

B. THE ROLES OF THE DEFENDANTS

3. The principal roles of the defendants in the Enterprise and in support of the Enterprise include those set forth below:

a. NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," was a leader of the Enterprise whose responsibilities included participating in and directing acts of murder and other acts of violence, and the manufacturing and distribution of controlled substances for the Enterprise.

b. NAPOLEON HARRIS, a/k/a "Pole," a/k/a "Mr. 760," was a leader of the Enterprise whose responsibilities included directing and participating in acts of murder and other acts of violence, and the manufacturing and distribution of controlled substances for the Enterprise.

c. CHARLIE L. GREEN, a/k/a "Charlie Lee James Green," a/k/a "Mr. 30N32," was a leader of the Enterprise whose responsibilities included directing and participating in acts of murder and other acts of violence, and distributing controlled substances for the Enterprise.

d. JERRY W. GREEN, Jr., a/k/a "Jerry Wayne Green," a/k/a "Jerk," was a member of the Enterprise whose responsibilities included participating in acts of murder and other acts of violence, and distributing controlled substances for the Enterprise.

e. COREY DEONTA HARRIS, a/k/a "Corey Harris," a/k/a "James," was a member of the Enterprise whose responsibilities included participating in murder and other acts of violence, and distributing controlled substances for the Enterprise.

f. DEONTE JAMAL MARTIN, a/k/a/ "Tang," a/k/a "Deonta Jamal Ackerman Martin," a/k/a "Deonta Martin," was a member of the Enterprise whose responsibilities included participating in murder and other acts of violence, and distributing controlled substances for the Enterprise.

C. THE CONSPIRACY

4. Beginning on an unknown date and continuing until the date of this Second Superseding Indictment, in the Middle District of Florida and elsewhere, the defendants,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"
NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"
JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"
COREY DEONTA HARRIS,
a/k/a "Corey Harris,"
a/k/a "James," and
DEONTE JAMAL MARTIN,
a/k/a "Tang,"
a/k/a "Deonta Jamal Akerman Martin,"
a/k/a "Deonta Martin,"

together with other persons, being persons employed by and associated with the Enterprise described in Section "A" of this Count, which enterprise engaged in, and its activities affected, interstate and foreign commerce, knowingly, willfully, and unlawfully did combine, conspire, confederate and agree together and with each other and with other persons, both known and unknown to the Grand Jury, 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 Enterprise through a pattern of racketeering activity.

D. THE PATTERN OF RACKETEERING ACTIVITY

5. The pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), through which the defendants and their coconspirators agreed to conduct and participate in the conduct of the affairs of the Enterprise consisted of multiple acts and threats involving:

- a. Murder in violation of Sections 782.04, 777.04 and 777.011, Florida Statutes;
- b. Kidnapping in violation of Sections 787.01, 777.011 and 777.04, Florida Statutes;
- c. Robbery in violation of Sections 812.13, 777.011 and 777.04, Florida Statutes;
- d. Extortion in violation of Sections 836.05, 777.011 and 777.04, Florida Statutes;
- e. Dealing in Controlled Substances and Listed Chemicals, Attempt to Deal in Controlled Substances and Listed Chemicals, and Conspiracy to Deal in Controlled Substances and Listed Chemicals in violation of Sections 893.13, 777.011 and 777.04, Florida Statutes;

And acts which are indictable under the following provisions:

- f. Title 18, United States Code, Sections 1503 and 1512 (relating to obstruction of justice, and relating to tampering with a witness, victim, or an informant);
- g. Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion);
- h. Title 18, United States Code, Section 1952 (relating to racketeering);

- i. Title 18, United States Code, Section 1958 (relating to use of interstate commerce facilities in the commission of murder-for-hire); and,
- j. Multiple offenses involving the distribution of and possession with intent to distribute controlled substances, and conspiracy to do the same, in violation of Title 21, United States Code, Sections 841 and 846.

E. METHOD AND MEANS

6. It was part of the conspiracy that the defendants, along with others known and unknown to the Grand Jury, would and did act as members of the Enterprise, and would and did engage in an array of criminal conduct in the State of Florida, and elsewhere, for and on behalf of the Enterprise, the purpose of which was to illegally generate income by committing acts of murder, robbery and illegal drug trafficking.

7. It was further part of the conspiracy that each defendant would and did agree that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

8. It was further part of the conspiracy that Enterprise members would and did provide quantities of controlled substances on consignment ("front") to persons recently released from incarceration for resale to provide a source of income to and assist the recently-released persons financially while providing additional drug distribution opportunities and income for the Enterprise.

9. It was further part of the conspiracy that Enterprise members would and did make threats to prevent people from reporting criminal activity to law enforcement.

10. It was further part of the conspiracy that Enterprise members would and did lend cellular phones to other Enterprise members and associates who would and did distribute controlled substances to individuals who placed orders over the phone.

11. It was further part of the conspiracy that Enterprise members would and did provide, transfer, sell, and deliver firearms and ammunition to persons the Enterprise members knew and had reason to believe were convicted felons.

12. It was further part of the conspiracy that Enterprise members would and did commit murder and other acts of violence for compensation and to promote and conduct the affairs of the Enterprise.

13. It was further part of the conspiracy that Enterprise members would and did manufacture and distribute quantities of controlled substances and otherwise deal in controlled substances.

14. It was further part of the conspiracy that Enterprise members would and did use violence and threats of violence to collect and attempt to collect debts owed to the Enterprise and its members.

15. It was further part of the conspiracy that Enterprise members would and did utilize wire and electronic communications to promote and conduct the affairs of the Enterprise.

16. It was further part of the conspiracy that Enterprise members would and did acquire automobiles which were used to promote and conduct the affairs of the Enterprise.

17. It was further part of the conspiracy that Enterprise members would and did utilize apartments, condominiums, and houses to store controlled substances, money, firearms, and ammunition, sell and manufacture controlled substances, and conduct meetings with Enterprise members and others.

18. It was further part of the conspiracy that Enterprise members and associates would and did seek to attain status by, and attribute status to, participation in violent acts, and would and did have discussions regarding their participation in acts of violence and the number of murders they had committed.

19. It was further part of the conspiracy that Enterprise members would and did threaten to commit and did commit acts of violence in an effort to control drug distribution activities in portions of Manatee County, Florida.

20. It was further part of the conspiracy that Enterprise members would and did direct and threaten other Enterprise members and associates not to socialize with persons whom the Enterprise deemed to be enemies.

21. It was further part of the conspiracy that Enterprise members would and did carry business cards to advertise their drug business.

22. It was further part of the conspiracy that Enterprise members would and did use violence and threats of violence to avoid paying debts.

23. It was further part of the conspiracy that Enterprise members would and did kill individuals viewed as threats to Enterprise members and for other reasons.

24. It was further part of the conspiracy that Enterprise members would and did communicate by code to help keep the statements and activities of Enterprise members and associates secure and for other reasons.

25. It was further part of the conspiracy that Enterprise members would and did misrepresent, conceal, and hide, and cause to be misrepresented, concealed, and hidden, the true purpose of acts done in furtherance of the Enterprise.

26. It was further part of the conspiracy that in order to promote the Enterprise, Enterprise members would and did publicly proclaim their activities and those of the Enterprise, to include distributing controlled substances and committing murders. The defendants used interviews, songs, and musical performances to communicate the activities and goals of co-conspirators and the Enterprise.

27. It was further part of the conspiracy that in order to promote the Enterprise, Enterprise members would and did publicly produce and appear in internet videos and social media, proclaiming their activities and those of the Enterprise, to include distributing controlled substances and committing murders.

28. It was further part of the conspiracy that Enterprise members would and did utilize associates and others to provide services, including:

- a. Manufacturing and packaging drugs,
- b. Selling and delivering drugs,
- c. Collecting money from drug sales,
- d. Holding drugs and money,
- e. Providing weapons, including firearms,
- f. Serving as straw purchasers,
- g. Beating people,
- h. Answering phones, and
- i. Producing, publishing, and distributing promotional videos and interviews, including internet-released videos and social media.

F. SPECIAL SENTENCING ALLEGATIONS

29. On or about April 8, 2007, in Manatee County, Florida, the defendant,

JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

did willfully, unlawfully and with premeditation murder Christopher W. Jenkins, a human being, in violation of Section 782.04(1)(a), Florida Statutes.

30. On or about September 4, 2010, in Manatee County, Florida, the defendants,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown," and

CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

did willfully, unlawfully and with premeditation murder Joseph Evans, a human being, while attempting to fulfill a contract and agreement to murder another human being, Demetrius Cunningham, a/k/a "Meat," in violation of Sections 782.04(1)(a), 777.04(2) and 777.011, Florida Statutes.

31. On or about October 26, 2010, in Manatee County, Florida, the defendants,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"
NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"
and
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

did forcibly and by threat kidnap, confine and abduct Calvin Barnes, a/k/a "Forty," against his will and without legal authority, with intent to commit and facilitate the commission of a felony, and inflict bodily harm upon another person, to wit: to ascertain the location of and murder Demetrius Cunningham, a/k/a "Meat," in violation of Sections 787.01, 777.04(2) and 777.011, Florida Statutes.

32. On or about October 26, 2010, in Manatee County, Florida, the defendants,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"
NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"
and
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

did willfully, unlawfully, with premeditation, and in fulfillment of a contract and agreement to murder, murder Demetrious Cunningham, a/k/a "Meat," a human being, in violation of Sections 782.04(1)(a), 777.04(2) and 777.011, Florida Statutes.

33. On or about October 26, 2010, in Manatee County, Florida, the defendants,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"
NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"
and
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

did willfully, unlawfully and with premeditation murder Calvin Barnes, a/k/a "Forty," a human being, while attempting to fulfill a contract and agreement to murder another human being, Demetrious Cunningham, a/k/a "Meat," and in order to

silence a witness, in violation of Sections 782.04(1)(a), 777.04(2) and 777.011, Florida Statutes.

34. On or about August 26, 2011, in Manatee County, Florida, the defendant,
NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"
did forcibly and by threat kidnap, confine and abduct C.M. against his will and without legal authority with the intent to commit and facilitate the commission of a felony, to wit: distribution of drugs, in violation of Sections 787.01 and 777.011, Florida Statutes.

35. On or about October 30, 2011, in Manatee County, Florida, the defendant,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"
did willfully, unlawfully and with premeditation attempt to murder, C.M., a human being, in violation of Sections 782.04(1)(a) and 777.04(1), Florida Statutes.

36. On or about January 23, 2012, in Manatee County, Florida, the defendant,

JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

did carry a firearm and use force, violence, assault, and fear to permanently take money and property from the person or custody of employees of the Subway restaurant located at 5108 15th Street, East Bradenton, Florida, in violation of Sections 812.13 and 777.011, Florida Statutes.

37. In or around the Spring of 2012, in Manatee County, Florida, the defendants,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760," and
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

did forcibly and by threat kidnap, confine and abduct T.S. against his will and without legal authority, with intent to commit and facilitate the commission of a felony, and inflict bodily harm upon and terrorize T.S., in violation of Sections 787.01, 777.011 and 777.04, Florida Statutes.

38. On or about July 3, 2012, in Manatee County, Florida, the defendants,

CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32," and
JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

did willfully, unlawfully and with premeditation murder Ceola Lazier, a human being, in violation of Sections 782.04(1)(a) and 777.011, Florida Statutes.

39. On or about April 1, 2013, in Manatee County, Florida, the defendants,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"
JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

did knowingly and intentionally combine, conspire and confederate and agree with each other and other persons, known and unknown to the Grand Jury, to murder Carlos Jurado, a/k/a "Giggles," a human being, in violation of Sections 782.04(1)(a) and 777.04(3), Florida Statutes.

40. On or about April 1, 2013, in Manatee County, Florida, the defendants,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760," and
JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

did willfully, unlawfully and with premeditation murder Carlos Jurado, a/k/a "Giggles," a human being, in violation of Sections 782.04(1)(a) and 777.011, Florida Statutes.

41. In or around the Summer of 2013, in Manatee County, Florida, the defendant,

CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

did use force, violence, assault, and fear to permanently take money and property from the person and custody of E.N., and in commission of this act did carry a firearm, in violation of Section 812.13, Florida Statutes.

42. On or about July 20, 2013, in Manatee County, Florida, the defendant,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"

did willfully, unlawfully and with premeditation attempt to murder C.P. and C.S., human beings, in violation of Sections 782.04(1)(a) and 777.04(1), Florida Statutes.

43. Beginning on an unknown date no later than July 2013, and continuing until on or about August 1, 2013, in Manatee County, and elsewhere in Florida, the defendants,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

COREY DEONTA HARRIS,
a/k/a "Corey Harris,"
a/k/a "James," and
DEONTE JAMAL MARTIN,
a/k/a "Tang,"
a/k/a "Deonta Jamal Akerman Martin,"
a/k/a "Deonta Martin,"

did knowingly and intentionally combine, conspire, confederate and agree with each other to unlawfully murder Brenton Coleman, a human being, in violation of Sections 782.04(1)(a) and 777.04(3), Florida Statutes.

44. On or about August 1, 2013, in Manatee County, Florida, in the vicinity of the 13th Avenue Recreation Center, commonly referred to as the "Dream Center," the defendants,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"
COREY DEONTA HARRIS,
a/k/a "Corey Harris,"
a/k/a "James," and
DEONTE JAMAL MARTIN,
a/k/a "Tang,"
a/k/a "Deonta Jamal Akerman Martin,"
a/k/a "Deonta Martin,"

did willfully, unlawfully and with premeditation murder Brenton Coleman, a human being, in violation of Sections 782.04(1)(a) and 777.011, Florida Statutes.

G. OVERT ACTS

45. In furtherance of the conspiracy and to accomplish the objects of the conspiracy, the defendants and their co-conspirators committed, among others, the following Overt Acts, within the Middle District of Florida and elsewhere, which are described in substance below:

- (1) On or about April 8, 2007, in Manatee County, Florida, the defendant, JERRY W. GREEN, Jr., a/k/a "Jerry Wayne Green," a/k/a "Jerk," did shoot and murder Christopher W. Jenkins.
- (2) On or about September 2, 2008, in Sarasota County, Florida, the defendant, JERRY W. GREEN, Jr., a/k/a "Jerry Wayne Green," a/k/a "Jerk," did shoot and murder Rodney D. Lamb, a/k/a "Hot Rod."
- (3) On or about September 2, 2008, in Sarasota County, Florida, the defendant, JERRY W. GREEN, Jr., a/k/a "Jerry Wayne Green," a/k/a "Jerk," did shoot and murder Erika Williams.
- (4) On an unknown date in 2010, in Manatee County, Florida, the defendant, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," sold a gun for \$100 to another person who later purchased cocaine from the defendant, NATHANIEL HARRIS.
- (5) Beginning on an unknown date and continuing until on or about October 26, 2010, in Manatee County, Florida, the defendants, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," NAPOLEON HARRIS, a/k/a "Pole," a/k/a

"Mr. 760," CHARLIE L. GREEN, a/k/a "Charlie Lee James Green," a/k/a "Mr. 30N32," and one or more other individuals did conspire and agree to murder Demetrious Cunningham, a/k/a "Meat."

(6) On or about September 4, 2010, in Manatee County, Florida, the defendants, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," and CHARLIE L. GREEN, a/k/a "Charlie Lee James Green," a/k/a "Mr. 30N32," did shoot and murder Joseph Evans, while mistakenly believing he was Demetrious Cunningham, a/k/a "Meat."

(7) On or about October 26, 2010, in Manatee County, Florida, the defendants, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," and NAPOLEON HARRIS, a/k/a "Pole," a/k/a "Mr. 760," did abduct and kidnap Calvin Barnes.

(8) On or about October 26, 2010, in Manatee County, Florida, the defendants, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," and NAPOLEON HARRIS, a/k/a "Pole," a/k/a "Mr. 760," did force Calvin Barnes to lure Demetrious Cunningham, a/k/a "Meat," from an apartment so he could be shot and murdered by NATHANIEL HARRIS.

(9) On or about October 26, 2010, in Manatee County, Florida, the defendant, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," did shoot and murder Demetrious Cunningham, a/k/a "Meat."

(10) On or about October 26, 2010, in Manatee County, Florida, the defendants, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," and NAPOLEON HARRIS, a/k/a "Pole," a/k/a "Mr. 760," did discuss whether to kill Calvin Barnes because he was a witness to their murder of Demetrious Cunningham.

(11) On or about October 26, 2010, in Manatee County, Florida, the defendants, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," and NAPOLEON HARRIS, a/k/a "Pole," a/k/a "Mr. 760," did shoot and murder Calvin Barnes, a 16-year-old minor.

(12) In the Fall of 2010, in Manatee County, Florida, the defendant, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," did collect a fee for the contract murder of Demetrious Cunningham, a/k/a "Meat."

(13) In or around January 2011, in Manatee County, Florida, the defendant, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," and others leased a residence at 805B 66th Avenue, West Bradenton, Florida, for the purpose of distributing controlled substances.

(14) Between in or around January 2011 and April 2011, in Manatee County, Florida, the defendant, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," sold quantities of controlled substances from 805B 66th Avenue, West Bradenton, Florida.

(15) In or around the Spring of 2011, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," and others drove to Texas from Manatee County, Florida to purchase cocaine.

(16) On or about August 23, 2011, in Manatee County, Florida, the defendant, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," provided on consignment ("fronted") one-half ounce of cocaine base (commonly referred to as "crack cocaine") to C.M.

(17) On or about August 26, 2011, in Manatee County, Florida, the defendant, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," and others did abduct, kidnap and threaten to murder C.M. for failure to pay for the cocaine base (commonly referred to as "crack cocaine") he was given on or about August 23, 2011.

(18) On or about October 30, 2011, in Manatee County, Florida, the defendant, NATHANIEL HARRIS, a/k/a "Popo," a/k/a "Lil Brown," did shoot and attempt to murder C.M.

(19) On or about January 23, 2012, in Manatee County, Florida, the defendant, JERRY W. GREEN, Jr., a/k/a "Jerry Wayne Green," a/k/a "Jerk," and an accomplice did use firearms to rob a Subway restaurant.

(20) In or around Spring 2012, the defendant, CHARLIE L. GREEN, a/k/a "Charlie Lee James Green," a/k/a "Mr. 30N32," hired a person known to the Grand Jury to operate a dwelling in Manatee County, Florida at which

drugs were sold (a “trap” house) and CHARLIE L. GREEN provided several pounds of marijuana daily. CHARLIE L. GREEN also provided the operator of the dwelling with firearms for protection of the dwelling and the drugs.

(21) In or around the Spring of 2012, in Manatee County, Florida, the defendants, NAPOLEON HARRIS, a/k/a “Pole,” a/k/a “Mr. 760,” CHARLIE L. GREEN, a/k/a “Charlie Lee James Green,” a/k/a “Mr. 30N32,” and an unindicted co-conspirator (deceased) did kidnap T.S. because they suspected he had burglarized a “trap” house which was used to sell marijuana.

(22) On or about July 3, 2012, in Manatee County, Florida, the defendants, CHARLIE L. GREEN, a/k/a “Charlie Lee James Green,” a/k/a “Mr. 30N32,” and JERRY W. GREEN, Jr., a/k/a “Jerry Wayne Green,” a/k/a “Jerk,” did ambush, shoot, and murder Ceola Lazier, a/k/a “Bo.”

(23) On or about April 1, 2013, in Manatee County, Florida, the defendants, NAPOLEON HARRIS, a/k/a “Pole,” a/k/a “Mr. 760,” and JERRY W. GREEN, Jr., a/k/a “Jerry Wayne Green,” a/k/a “Jerk,” did arrange to obtain one kilogram of cocaine from Carlos Jurado, a/k/a “Giggles,” and upon receipt of the cocaine did shoot and murder Carlos Jurado, a/k/a “Giggles.”

(24) In or around the Summer of 2013, in Manatee County, Florida, the defendant, NAPOLEON HARRIS, a/k/a “Pole,” a/k/a “Mr. 760,” did utilize a minor to distribute marijuana.

(25) In or around the Summer of 2013, in Manatee County, Florida, the defendant, CHARLIE L. GREEN, a/k/a "Charlie Lee James Green," a/k/a "Mr. 30N32," did rob a minor of money.

(26) On or about July 20, 2013, in Manatee County, Florida, the defendant, NAPOLEON HARRIS, a/k/a "Pole," a/k/a "Mr. 760," and an unindicted co-conspirator (deceased) did attempt to murder C.P., a human being, and in the attempt to murder C.P., did shoot and injure C.P. and C.S.

(27) On or about August 1, 2013, in Manatee County, Florida, at the 13th Avenue Recreation Center, commonly referred to as the "Dream Center," the defendants, COREY DEONTA HARRIS, a/k/a "Corey Harris," a/k/a "James," and DEONTE JAMAL MARTIN, a/k/a "Tang," a/k/a "Deonta Jamal Akerman Martin," a/k/a "Deonta Martin," ran through a crowd of young children who were attending pee wee football practice with their families and shot and murdered Brenton Coleman.

(28) On or about August 1, 2013, in Manatee County, Florida, DEONTE JAMAL MARTIN, a/k/a "Tang," a/k/a "Deonta Jamal Akerman Martin," a/k/a "Deonta Martin," directed another individual, who was a witness to the murder of Brenton Coleman, to give a false name to detectives with the Manatee County Sheriff's Office.

(29) In or around early August 2013, in Manatee County, Florida, NAPOLEON HARRIS, a/k/a "Pole," a/k/a "Mr. 760," CHARLIE L. GREEN, a/k/a

“Charlie Lee James Green,” a/k/a “Mr. 30N32,” COREY DEONTA HARRIS, a/k/a “Corey Harris,” a/k/a “James,” and DEONTE JAMAL MARTIN, a/k/a “Tang,” a/k/a “Deonta Jamal Akerman Martin,” a/k/a “Deonta Martin,” met to discuss the murder of Brenton Coleman. NAPOLEON HARRIS and CHARLIE L. GREEN congratulated COREY DEONTA HARRIS and DEONTE JAMAL MARTIN on the successful murder of Brenton Coleman as revenge for an earlier drive-by shooting of an automobile belonging to NAPOLEON HARRIS and the injury of an occupant of said automobile.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO

Beginning on an unknown date no later than January 1, 2006, and continuing until the date of this Second Superseding Indictment, in Manatee County, in the Middle District of Florida, and elsewhere, the defendants,

NATHANIEL HARRIS,
a/k/a “Popo,”
a/k/a “Lil Brown,”
NAPOLEON HARRIS,
a/k/a “Pole,”
a/k/a “Mr. 760,”
CHARLIE L. GREEN,
a/k/a “Charlie Lee James Green,”
a/k/a “Mr. 30N32,”
JERRY W. GREEN, Jr.,
a/k/a “Jerry Wayne Green,”
a/k/a “Jerk,”
COREY DEONTA HARRIS,
a/k/a “Corey Harris,”
a/k/a “James,” and

DEONTE JAMAL MARTIN,
a/k/a "Tang,"
a/k/a "Deonta Jamal Akerman Martin,"
a/k/a "Deonta Martin,"

did knowingly and willfully combine, conspire and agree with each other and other persons, both known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute one (1) kilogram or more of mixture or substance containing a detectable amount of heroin, a quantity of a mixture or substance containing a detectable amount of 3,4-methylenedioxymethamphetamine (MDMA), commonly referred to as "ecstasy," a quantity of a mixture or substance containing a detectable amount of oxycodone, and 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, Schedule I controlled substances, and five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, and two-hundred and eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base (commonly referred to as "crack cocaine"), Schedule II controlled substances, contrary to the provisions of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846, 841(b)(1)(A), 841(b)(1)(B) and 841(b)(1)(C).

COUNT THREE

On or about April 8, 2007, in Manatee County, in the Middle District of Florida, the defendant,

JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

did knowingly use, carry and discharge a firearm during and in relation to Count One of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendant may be prosecuted in a court of the United States, and in the course of said violation caused the death of Christopher Jenkins, as defined in Title 18, United States Code, Section 1111, through the use of a firearm.

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

COUNT FOUR

On or about September 4, 2010, in Manatee County, in the Middle District of Florida, the defendants,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown," and
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

did knowingly use, carry and discharge a firearm during and in relation to Count One of this Second Superseding Indictment, which allegations the Grand Jury

does reallege and incorporate herein by reference, a crime of violence, for which the defendants may be prosecuted in a court of the United States, and in the course of said violation caused the death of Joseph Evans, as defined in Title 18, United States Code, Section 1111, through the use of a firearm.

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

COUNT FIVE

On or about October 26, 2010, in Manatee County, in the Middle District of Florida, the defendants,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"
NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760," and
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

did knowingly use, carry and discharge a firearm during and in relation to Count One of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendants may be prosecuted in a court of the United States, and in the course of said violation caused the death of Demetrius Cunningham, as defined in Title 18, United States Code, Section 1111, through the use of a firearm.

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

COUNT SIX

On or about October 26, 2010, in Manatee County, in the Middle District of Florida, the defendants,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"
NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760," and
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

did knowingly use, carry and discharge a firearm during and in relation to Count One of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendants may be prosecuted in a court of the United States, and in the course of said violation caused the death of Calvin Barnes, as defined in Title 18, United States Code, Section 1111, through the use of a firearm.

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

COUNT SEVEN

From on or about January 28, 2011, through on or about April 13, 2011, at 405B 66th Avenue West, in Bradenton, in Manatee County, in the Middle District of Florida, the defendant,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"

knowingly maintained a place for the purpose of manufacturing and distributing a controlled substance, to wit: cocaine base, commonly referred to as "crack cocaine", cocaine, heroin, marijuana, and 3, 4-methylenedioxymethamphetamine (MDMA) commonly referred to as "ecstasy."

In violation of Title 21, United States Code, Sections 856(a)(1), 856(b) and Title 18, United States Code, Section 2.

COUNT EIGHT

From on or about January 28, 2011, through on or about April 13, 2011, at 405B 66th Avenue West, in Bradenton, in Manatee County, in the Middle District of Florida, the defendant,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"

did knowingly possess a firearm in furtherance of Counts Two and Seven of this Second Superseding Indictment, which allegations the Grand Jury does reallege

and incorporate herein by reference, drug trafficking crimes, for which the defendant may be prosecuted in a court of the United States.

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

COUNT NINE

On or about August 26, 2011, in Manatee County, in the Middle District of Florida, the defendant,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"

did knowingly use, carry and brandish a firearm during and in relation to the kidnapping of C.M., described in Count One of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendant may be prosecuted in a court of the United States.

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

COUNT TEN

On or about October 30, 2011, in Manatee County, in the Middle District of Florida, the defendant,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"

did knowingly use, carry and discharge a firearm during and in relation to the attempted murder of C.M., as described in Count One of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendant may be prosecuted in a court of the United States.

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

COUNT ELEVEN

On or about October 30, 2011, in Manatee County, in the Middle District of Florida, the defendant,

NATHANIEL HARRIS
a/k/a "Popo,"
a/k/a "Lil Brown,"

did knowingly possess, in and affecting interstate commerce, ammunition, after having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, that is, a felony offense, to wit:

1. Possession of ammunition by a convicted felon, possession of a firearm by a convicted felon and aggravated fleeing and eluding in the Circuit Court for Manatee County, Florida, in case number 07-4417, on or about January 31, 2008;
2. Possession of a firearm by a convicted felon, carrying a concealed firearm and possession of ammunition by a convicted felon in the Circuit Court for Manatee County, Florida, in case number 08-4402, on or about April 22, 2009;

3. Fleeing and eluding in the Circuit Court for Manatee County, Florida, in case number 09-4347, on or about February 3, 2010; and
4. Driving while license cancelled, suspended or revoked (3rd offense) in the Circuit Court for Manatee County, Florida, in case number 10-3881, on or about February 17, 2011.

In violation of Title 18, United States Code, Section 922(g)(1) and 2.

COUNT TWELVE

On or about November 2, 2011, at or near 3309 5th Street Court East, Bradenton, in Manatee County, in the Middle District of Florida, the defendant,

NATHANIEL HARRIS
a/k/a "Popo"
a/k/a "Lil Brown",

did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine, and a quantity of a mixture or substance containing a detectable amount of cocaine base (commonly referred to as "crack cocaine"), Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT THIRTEEN

On or about November 2, 2011, at or near 3309 5th Street Court East, Bradenton, in Manatee County, in the Middle District of Florida, the defendant,

NATHANIEL HARRIS
a/k/a "Popo,"
a/k/a "Lil Brown,"

did knowingly possess firearms, namely an Israel Military Industries LTD .50 caliber Desert Eagle handgun and a Zephyr 12 gauge double barreled shotgun, in furtherance of Counts Two and Twelve of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, drug trafficking crimes, for which the defendant may be prosecuted in a court of the United States.

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

COUNT FOURTEEN

On or about November 2, 2011, at or near 3309 5th Street Court East, Bradenton, in Manatee County, in the Middle District of Florida, the defendant,

NATHANIEL HARRIS
a/k/a "Popo,"
a/k/a "Lil Brown,"

did knowingly possess, in and affecting interstate commerce, firearms and ammunition; that is, an Israel Military Industries LTD .50 caliber Desert Eagle handgun, several .50 caliber cartridges, a Zephyr 12 gauge double barreled shotgun, and a .45 caliber Winchester cartridge, after having been previously convicted of crimes punishable by a term of imprisonment exceeding one year, that is, felony offenses, to wit:

1. Possession of ammunition by a convicted felon, possession of a firearm by a convicted felon and aggravated fleeing and eluding in the Circuit Court for Manatee County, Florida, in case number 07-4417, on or about January 31, 2008;

2. Possession of a firearm by a convicted felon, carrying a concealed firearm and possession of ammunition by a convicted felon in the Circuit Court for Manatee County, Florida, in case number 08-4402, on or about April 22, 2009;
3. Fleeing and eluding in the Circuit Court for Manatee County, Florida, in case number 09-4347, on or about February 3, 2010; and
4. Driving while license cancelled, suspended or revoked (3rd offense) in the Circuit Court for Manatee County, Florida, in case number 10-3881, on or about February 17, 2011.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT FIFTEEN

On or about January 23, 2012, in Manatee County, in the Middle District of Florida, the defendant,

JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

did knowingly obstruct, delay, and affect commerce, and the movement of any article and commodity in commerce, at the Subway Restaurant located at 5108 15th Street, East, Bradenton, Florida, by robbery in that the defendant did unlawfully take and obtain property, to wit: U.S. currency, belonging to the Subway restaurant from the care, custody and control of an employee of the Subway restaurant against the employee's will and did commit and threaten physical

violence to the Subway restaurant employee in furtherance of a plan and purpose to commit robbery.

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

COUNT SIXTEEN

On or about January 23, 2012, in Manatee County, in the Middle District of Florida, the defendant,

JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

did knowingly use, carry and brandish a firearm during and in relation to Count Fifteen of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendant may be prosecuted in a court of the United States, and in the course of said violation committed the robbery at the Subway restaurant.

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

COUNT SEVENTEEN

In or around the Spring of 2012, in Bradenton, in Manatee County, in the Middle District of Florida, the defendants,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760," and

CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

did knowingly use, carry, and brandish a firearm during and in relation to the kidnapping of T.S. as described in Count One of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendants may be prosecuted in a court of the United States.

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

COUNT EIGHTEEN

On or about July 3, 2012, in Manatee County, in the Middle District of Florida, the defendants,

CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32," and
JERRY GREEN,
a/k/a "Jerk,"

did knowingly use, carry and discharge a firearm during and in relation to Count One of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendants may be prosecuted in a court of the United States, and in the course of said violation caused the death of Ceola Lazier, as defined in Title 18, United States Code, Section 1111, through the use of a firearm.

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

COUNT NINETEEN

On or about April 1, 2013, in Manatee County, in the Middle District of Florida, the defendants,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760," and
JERRY GREEN,
a/k/a "Jerk,"

did knowingly use, carry and discharge a firearm during and in relation to Count One of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendants may be prosecuted in a court of the United States, and in the course of said violation caused the death of Carlos Jurado, a/k/a "Giggles," as defined in Title 18, United States Code, Section 1111, through the use of a firearm.

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

COUNT TWENTY

On or about May 29, 2013, in Pinellas County, in the Middle District of Florida, the defendant,

COREY DEONTA HARRIS,
a/k/a "Corey Harris,"
a/k/a "James,"

did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of cocaine base (commonly referred to as “crack cocaine”), a Schedule II controlled substance.

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

COUNT TWENTY-ONE

On or about July 2, 2013, in Pinellas County, in the Middle District of Florida, the defendant,

COREY DEONTA HARRIS,
a/k/a “Corey Harris,”
a/k/a “James,”

did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of cocaine base (commonly referred to as “crack cocaine”), a Schedule II controlled substance.

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

COUNT TWENTY-TWO

On or about July 17, 2013, in Pinellas County, in the Middle District of Florida, the defendant,

COREY DEONTA HARRIS,
a/k/a “Corey Harris,”
a/k/a “James,”

did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of cocaine base (commonly referred to as “crack cocaine”), a Schedule II controlled substance.

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

COUNT TWENTY-THREE

On or about July 20, 2013, in Manatee County, in the Middle District of Florida, the defendant,

NAPOLEON HARRIS,
a/k/a “Pole,”
a/k/a “Mr. 760,”

did knowingly use, carry and discharge a firearm during and in relation to Count One of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendant may be prosecuted in a court of the United States, and in the course of said violation attempted to cause the deaths of C.P. and C.S.

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

COUNT TWENTY-FOUR

On or about July 20, 2013, in Manatee County, in the Middle District of Florida, the defendant,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"

did knowingly possess, in and affecting interstate commerce, ammunition, which was used in the attempted murder of C.P. and C.S., after having been previously convicted of a crime punishable by a term of imprisonment exceeding one year, that is, a felony offense, to wit:

1. Attempted robbery with a firearm/deadly weapon and robbery with a firearm/deadly weapon, in the Twelfth Judicial Circuit, in and for Sarasota County, Florida, in case number 2002-CF-0991, on or about October 1, 2002;
2. Possession of controlled substance (cocaine), driving while license suspended (habitual), fleeing or attempting to elude a law enforcement officer, in the Twelfth Judicial Circuit Court, in and for Manatee, County, Florida, in case number 2004-CF-4612, on or about February 8, 2006;
3. Driving while license revoked-habitual, in the Twelfth Judicial Circuit Court, in and for Manatee, County, Florida, in case number 2005-CF-1016, on or about February 8, 2006; and
4. Driving while license revoked-habitual, in the Circuit Court, in the Twelfth Judicial Circuit Court, in and for Manatee, County, Florida, in case number 2005-CF-1832, on or about February 8, 2006.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

COUNT TWENTY-FIVE

On or about August 2, 2013, at the 13th Avenue Recreation Center, commonly referred to as the "Dream Center," in Manatee County, in the Middle District of Florida, the defendants,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"
COREY DEONTA HARRIS,
a/k/a "Corey Harris,"
a/k/a "James," and

DEONTE JAMAL MARTIN,
a/k/a "Tang,"
a/k/a "Deonta Jamal Akerman Martin,"
a/k/a "Deonta Martin,"

did knowingly use, carry and discharge a firearm during and in relation to Count One of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, a crime of violence, for which the defendants may be prosecuted in a court of the United States, and in the course of said violation caused the death of Brenton Coleman, as defined in Title 18, United States Code, Section 1111, through the use of a firearm.

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

COUNT TWENTY-SIX

On or about August 8, 2013, in Manatee County, in the Middle District of Florida, the defendant,

DEONTE JAMAL MARTIN,
a/k/a "Tang,"
a/k/a "Deonta Jamal Akerman Martin,"
a/k/a "Deonta Martin,"

did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine base (commonly referred to as “crack cocaine”), a Schedule II controlled substance.

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

COUNT TWENTY-SEVEN

On or about August 8, 2013, in Manatee County, in the Middle District of Florida, the defendant,

DEONTE JAMAL MARTIN,
a/k/a “Tang,”
a/k/a “Deonta Jamal Akerman Martin,”
a/k/a “Deonta Martin,”

did knowingly possess a firearm in furtherance of Counts Two and Twenty-Six of this Second Superseding Indictment, which allegations the Grand Jury does reallege and incorporate herein by reference, drug trafficking crimes, for which the defendant may be prosecuted in a court of the United States.

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

COUNT TWENTY-EIGHT

On or about August 8, 2013, in Manatee County, in the Middle District of Florida, the defendant,

DEONTE JAMAL MARTIN,
a/k/a "Tang,"
a/k/a "Deonta Jamal Akerman Martin,"
a/k/a "Deonta Martin,"

did knowingly possess, in and affecting interstate and foreign commerce, a firearm, namely, a .45 caliber Glock handgun, after having been previously convicted of crimes punishable by a term of imprisonment exceeding one year, that is, felony offenses, to wit:

1. Carjacking, in the Eighteenth Judicial Circuit Court, in and for Seminole County, Florida, in case number 2007-CF-2926A, on or about October 5, 2009; and
2. Sale or delivery of cocaine within 1,000 feet of a school, in the Twelfth Judicial Circuit Court, in and for Manatee County, Florida, in case number 2009-CF-1245, on or about November 17, 2009.

In violation of Title 18, United States Code, Sections 922(g)(1) and 2.

NOTICE OF SPECIAL FINDINGS AS TO
JERRY W. GREEN, Jr.
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Three are realleged and incorporated by reference as though fully set forth herein.
2. As to Count Three of this Second Superseding Indictment, the defendant,

JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Three (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Christopher Jenkins (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Christopher Jenkins (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Christopher Jenkins, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D)); and
- e. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Christopher Jenkins (Title 18, United States Code, Section 3592(c)(5)).

NOTICE OF SPECIAL FINDINGS AS TO
NATHANIEL HARRIS,
a/k/a “Popo,”
a/k/a “Lil Brown”

The Grand Jury makes the following findings of fact:

- 1. The allegations set forth in Count Four are realleged and incorporated by reference as though fully set forth herein.

2. As to Count Four of this Second Superseding Indictment, the defendant,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Four (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Joseph Evans (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Joseph Evans (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Joseph Evans died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Joseph Evans, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Joseph Evans (Title 18, United States Code, Section 3592(c)(5));

g. Committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8)); and

h. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

NOTICE OF SPECIAL FINDINGS AS TO
CHARLIE L. GREEN,
a/k/a "MR. 30N32"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Counts Four are realleged and incorporated by reference as though fully set forth herein.

2. As to Count Four of this Second Superseding Indictment, the defendant,

CHARLIE L. GREEN
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

a. Was at least eighteen years of age at the time of the offense alleged in Count Four (Title 18, United States Code, Section 3591(a));

- b. Intentionally killed the victim of the charged offense, Joseph Evans (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Joseph Evans (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Joseph Evans died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Joseph Evans, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
- f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Joseph Evans (Title 18, United States Code, Section 3592(c)(5));
- g. Committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value; (Title 18, United States Code, Section 3592(c)(8));

- h. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)); and
- i. Had previously been convicted of two or more State or Federal offenses punishable by a term of imprisonment of more than one year, committed on different occasions, involving the distribution of a controlled substance (Title 18, United States Code, Section 3592(c)(10)).

NOTICE OF SPECIAL FINDINGS AS TO
NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Five are realleged and incorporated by reference as though fully set forth herein.
2. As to Count Five of this Second Superseding Indictment, the defendant,

NATHANIEL HARRIS
a/k/a "Popo,"
a/k/a "Lil Brown,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Five (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Demetrious Cunningham (Title 18, United States Code, Section 3591(a)(2)(A));

c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Demetrious Cunningham (Title 18, United States Code, Section 3591(a)(2)(B));

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

e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Demetrious Cunningham, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Demetrious Cunningham (Title 18, United States Code, Section 3592(c)(5)); and,

g. Committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8));

h. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)); and

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

NOTICE OF SPECIAL FINDINGS AS TO
NAPOLEON HARRIS,
a/k/a "POLE,"
a/k/a "MR. 760"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Five are realleged and incorporated by reference as though fully set forth herein.
2. As to Count Five of this Second Superseding Indictment, the defendant,

NAPOLEON HARRIS
a/k/a "Pole,"
a/k/a "Mr. 760,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Five (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Demetrious Cunningham (Title 18, United States Code, Section 3591(a)(2)(A));

c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Demetrious Cunningham (Title 18, United States Code, Section 3591(a)(2)(B));

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

e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Demetrious Cunningham, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Demetrious Cunningham (Title 18, United States Code, Section 3592(c)(5));

g. Committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8));

h. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)); and

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

NOTICE OF SPECIAL FINDINGS AS TO
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
A/K/A "MR. 30N32,"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Five are realleged and incorporated by reference as though fully set forth herein.
2. As to Count Five of this Second Superseding Indictment, the defendant,

CHARLIE L.GREEN,
a/k/a "Mr. 30N32,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Five (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Demetrious Cunningham (Title 18, United States Code, Section 3591(a)(2)(A));

c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Demetrious Cunningham (Title 18, United States Code, Section 3591(a)(2)(B));

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

e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Demetrious Cunningham, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Demetrious Cunningham (Title 18, United States Code, Section 3592(c)(5));

g. Committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8));

h. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9));

i. Had previously been convicted of two or more State or Federal offenses punishable by a term of imprisonment of more than one year, committed on different occasions, involving the distribution of a controlled substance (Title 18, United States Code, Section 3592(c)(10)); and

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

NOTICE OF SPECIAL FINDINGS AS TO
NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Six are realleged and incorporated by reference as though fully set forth herein.

2. As to Count Six of this Second Superseding Indictment, the defendant,

NATHANIEL HARRIS,
a/k/a "Popo,"
a/k/a "Lil Brown,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Six (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Calvin Barnes (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Calvin Barnes (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Calvin Barnes died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Calvin Barnes, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
- f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Calvin Barnes (Title 18, United States Code, Section 3592(c)(5));

g. Committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim (Title 18, United States Code, Section 3592(c)(6));

h. Committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8));

h. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9));

i. The victim was particularly vulnerable due to old age, youth, or infirmity (Title 18, United States Code, Section 3592 (c)(11)); and

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

NOTICE OF SPECIAL FINDINGS AS TO
NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "MR. 760"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Six are realleged and incorporated by reference as though fully set forth herein.

2. As to Count Six of this Second Superseding Indictment, the defendant,

NAPOLEON HARRIS
a/k/a "Pole,"
a/k/a "Mr. 760,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Six (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Calvin Barnes (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Calvin Barnes (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Calvin Barnes died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Calvin Barnes, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Calvin Barnes (Title 18, United States Code, Section 3592(c)(5));

g. Committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim (Title 18, United States Code, Section 3592 (c)(6));

h. Committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8));

i. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9));

j. The victim was particularly vulnerable due to old age, youth, or infirmity (Title 18, United States Code, Section 3592 (c)(11)); and

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

NOTICE OF SPECIAL FINDINGS AS TO
CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "MR. 30N32"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Counts Six are realleged and incorporated by reference as though fully set forth herein.
2. As to Count Six of this Second Superseding Indictment, the defendant,

CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "Mr. 30N32,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Six (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Calvin Barnes (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Calvin Barnes (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Calvin Barnes died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Calvin Barnes, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Calvin Barnes (Title 18, United States Code, Section 3592(c)(5));

g. Committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim (Title 18, United States Code, Section 3592(c)(6));

h. Committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8));

i. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9));

j. Had previously been convicted of two or more State or Federal offenses punishable by a term of imprisonment of more than one year, committed on different occasions, involving the distribution of a controlled substance (Title 18, United States Code, Section 3592(c)(10));

- k. The victim was particularly vulnerable due to old age, youth, or infirmity. (Title 18, United States Code, Section 3592 (c)(11)); and
- I. Intentionally killed or attempted to kill more than one person in a single criminal episode (Title 18, United States Code, Section 3592(c)(16)).

NOTICE OF SPECIAL FINDINGS AS TO CHARLIE L. GREEN,
a/k/a "Charlie Lee James Green,"
a/k/a "MR. 30N32"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Eighteen are realleged and incorporated by reference as though fully set forth herein.
2. As to Count Eighteen of this Second Superseding Indictment, the defendant,

CHARLIE L.GREEN,
a/k/a "Mr. 30N32,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Eighteen (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Ceola Lazier (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Ceola Lazier (Title 18, United States Code, Section 3591(a)(2)(B));

- d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Ceola Lazier died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Ceola Lazier, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
- f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Ceola Lazier (Title 18, United States Code, Section 3592(c)(5));
- g. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)); and
- h. Had previously been convicted of two or more State or Federal offenses punishable by a term of imprisonment of more than one year, committed on different occasions, involving the distribution of a controlled substance (Title 18, United States Code, Section 3592(c)(10)).

NOTICE OF SPECIAL FINDINGS AS TO
JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Eighteen are realleged and incorporated by reference as though fully set forth herein.
2. As to Count Eighteen of this Second Superseding Indictment, the defendant,

JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Eighteen (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Ceola Lazier (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Ceola Lazier (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in

connection with a person, other than one of the participants, and Ceola Lazier died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Ceola Lazier, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Ceola Lazier (Title 18, United States Code, Section 3592(c)(5)); and

g. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

NOTICE OF SPECIAL FINDINGS AS TO
NAPOLEON HARRIS,
a/k/a “POLE.”
a/k/a “MR. 760”

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Nineteen are realleged and incorporated by reference as though fully set forth herein.

2. As to Count Nineteen of this Second Superseding Indictment, the defendant,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Nineteen (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Carlos Jurado (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Carlos Jurado (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Carlos Jurado died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Carlos Jurado, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Carlos Jurado (Title 18, United States Code, Section 3592(c)(5));

g. Procured the commission of the offense by payment or promise of payment, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(7); and

h. Committed the offense in as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8)).

NOTICE OF SPECIAL FINDINGS AS TO

JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Nineteen are realleged and incorporated by reference as though fully set forth herein.

2. As to Count Nineteen of this Second Superseding Indictment, the defendant,

JERRY W. GREEN, Jr.,
a/k/a "Jerry Wayne Green,"
a/k/a "Jerk,"

a. Was at least eighteen years of age at the time of the offense alleged in Count Nineteen (Title 18, United States Code, Section 3591(a));

- b. Intentionally killed the victim of the charged offense, Carlos Jurado (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Carlos Jurado (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Carlos Jurado died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Carlos Jurado, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
- f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Carlos Jurado (Title 18, United States Code, Section 3592(c)(5)); and
- g. Committed the offense in as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8)).

NOTICE OF SPECIAL FINDINGS AS TO
NAPOLEON HARRIS,
a/k/a "POLE,"
a/k/a "MR. 760"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Twenty-Five are realleged and incorporated by reference as though fully set forth herein.
2. As to Count Twenty-Five of this Second Superseding Indictment, the defendant,

NAPOLEON HARRIS,
a/k/a "Pole,"
a/k/a "Mr. 760,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Twenty-Five (Title 18, United States Code, Section 3591(a));
- b. Intentionally killed the victim of the charged offense, Brenton Coleman (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Brenton Coleman (Title 18, United States Code, Section 3591(a)(2)(B));

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

e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Brenton Coleman, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Brenton Coleman (Title 18, United States Code, Section 3592(c)(5)); and

g. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592 (c)(9)).

NOTICE OF SPECIAL FINDINGS AS TO
CHARLES L. GREEN,
a/k/a "MR. 30N32"

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Twenty-Five are realleged and incorporated by reference as though fully set forth herein.

2. As to Count Twenty-Five of this Second Superseding Indictment, the defendant,

CHARLES L. GREEN,
a/k/a "Mr. 30N32,"

- a. Was at least eighteen years of age at the time of the offense alleged in Count Twenty-Five (Title 18, United States Code, Section 3591(a));
 - b. Intentionally killed the victim of the charged offense, Brenton Coleman (Title 18, United States Code, Section 3591(a)(2)(A));
 - c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Brenton Coleman (Title 18, United States Code, Section 3591(a)(2)(B));
 - d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Brenton Coleman died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
 - e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Brenton Coleman, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Brenton Coleman (Title 18, United States Code, Section 3592(c)(5));

g. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)); and

h. Had previously been convicted of two or more State or Federal offenses punishable by a term of imprisonment of more than one year, committed on different occasions, involving the distribution of a controlled substance (Title 18, United States Code, Section 3592(c)(10)).

NOTICE OF SPECIAL FINDINGS AS TO
COREY DEONTA HARRIS,
a/k/a “Corey Harris,”
a/k/a “James”

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Twenty-Five are realleged and incorporated by reference as though fully set forth herein.

2. As to Count Twenty-Five of this Second Superseding Indictment, the defendant,

COREY DEONTA HARRIS,
a/k/a “Corey Harris,”
a/k/a “James,”

- a. Was at least eighteen years of age at the time of the offense alleged in Count Twenty-Five (Title 18, United States Code, Section 3591(a));
 - b. Intentionally killed the victim of the charged offense, Brenton Coleman (Title 18, United States Code, Section 3591(a)(2)(A));
 - c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Brenton Coleman (Title 18, United States Code, Section 3591(a)(2)(B));
 - d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Brenton Coleman died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
 - e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Brenton Coleman, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
 - f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Brenton Coleman (Title 18, United States Code, Section 3592(c)(5));

g. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)); and

h. Had previously been convicted of two or more State or Federal offenses punishable by a term of imprisonment of more than one year, committed on different occasions, involving the distribution of a controlled substance (Title 18, United States Code, Section 3592(c)(10)).

NOTICE OF SPECIAL FINDINGS AS TO
DEONTE JAMAL MARTIN,
a/k/a “Tang,”
a/k/a “Deonta Akerman Martin,”
a/k/a “Deonta Martin”

The Grand Jury makes the following findings of fact:

1. The allegations set forth in Count Twenty-Five realleged and incorporated by reference as though fully set forth herein.
2. As to Count Twenty-Five of this Second Superseding Indictment, the defendant,

DEONTE JAMAL MARTIN,
a/k/a “Tang,”
a/k/a “Deonta Akerman Martin,”
a/k/a “Deonta Martin,”

- a. Was at least eighteen years of age at the time of the offense alleged in Count Twenty-Five (Title 18, United States Code, Section 3591(a));

- b. Intentionally killed the victim of the charged offense, Brenton Coleman (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Brenton Coleman (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants, and Brenton Coleman died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Brenton Coleman, died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
- f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Brenton Coleman (Title 18, United States Code, Section 3592(c)(5)); and
- g. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

FORFEITURES

1. The allegations contained in Count One through Twenty-Eight of this Second Superseding Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant Title 18, United States Code, Section 1963; Title 21, United States Code, Section 853(a); and Title 18, United States Code, Sections 924(d) and 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. Upon conviction of a violation of Title 18, United States Code, Section 1962, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 1963:

- 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 defendants 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 1962.

3. Upon conviction of a violation of Title 18, United States Code, Section 922(g), 924(c) or (j), the defendants shall forfeit to the United States, under Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense.

4. Upon conviction of a violation of Title 21, United States Code, Section 841 or 856, the defendants shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense.

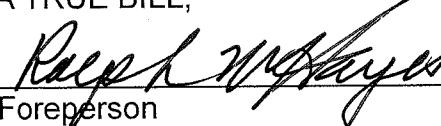
5. Upon conviction of a violation of Title 18, United States Code, Section 1958, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

6. If any of the property described above, as a result of any act or omission of the defendants:

- 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 divided without difficulty,

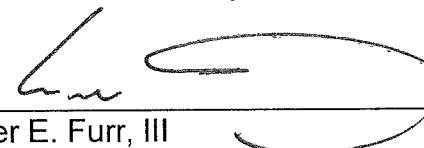
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18, United States Code, Section 1963(m) and Title 21, United States Code, Section 853(p), directly and as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL,

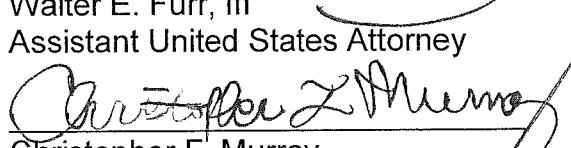

Ralph W. Mayes
Foreperson

A. LEE BENTLEY, III
United States Attorney

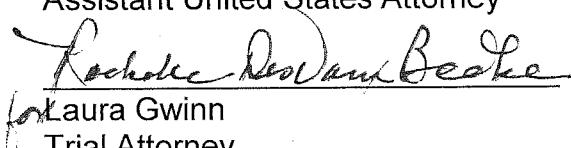
By:


Walter E. Furr, III
Assistant United States Attorney

By:


Christopher F. Murray
Assistant United States Attorney

By:


Rachelle DesVaux Bedke
Laura Gwinn
Trial Attorney
Department of Justice
Organized Crime and Gang Section

By:


Rachelle DesVaux Bedke
Assistant United States Attorney
Chief, Criminal Division (South)