

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 07-038

v. : DATE FILED: _____

EDDIE LEE WALKER, (1) : 21 U.S.C. § 846 (conspiracy to
a/k/a “Mo,” : distribute 5 kilograms or more of cocaine
a/k/a “Mike,” : and 50 grams or more of cocaine base
 (“crack”) – 1 count)

NAJEE NAIM HARPER (2) : 21 U.S.C. § 841(a)(1) (distribution of 5
grams or more of cocaine base (“crack”)
– 3 counts)

REGINALD FREEMAN, (3) : 21 U.S.C. § 841(a)(1) (distribution of
a/k/a “Reggie,” : cocaine base (“crack”) – 28 counts)

EARL STEVENSON FULTON, (4) : 21 U.S.C. § 846 (attempted distribution of
a/k/a “Butch,” : cocaine base (“crack”) – 1 count)
a/k/a “Big Man,” : 21 U.S.C. § 841(a)(1) (possession with
intent to distribute cocaine base (“crack”)
and heroin – 1 count)

RONIER ROBERT KENNEDY, (5) : 21 U.S.C. § 841(a)(1) (distribution of
a/k/a “Nier,” : cocaine – 1 count)
a/k/a “Black,” : 21 U.S.C. § 841(a)(1) (possession with
intent to distribute cocaine – 1 count)

JAMES ERIC JONES, (6) : 21 U.S.C. § 860(a) (distribution of a
a/k/a “Bird,” : controlled substance within 1,000 feet
of a playground – 15 counts)

COREY NATHANIEL HUSBANDS, (7) : 21 U.S.C. § 860(a) (attempt to distribute
a/k/a “New York,” : a controlled substance within 1,000 feet
a/k/a “NY,” : of a playground – 1 count)
a/k/a “York,” : 21 U.S.C. § 860(a) (possession with intent
to distribute a controlled substance
within 1,000 feet of a playground – 3
counts)

RONNELLE MCMILLIAN, (8) : 21 U.S.C. § 856 (maintaining a drug
a/k/a “Michael Hampton,” : house – 1 count)

SHATAAN JINGLES ADAMS, (9) : 18 U.S.C. § 924(c) (possession of a firearm
a/k/a “Shady,” : in furtherance of a drug trafficking crime
a/k/a “Green Eyes,” : – 1 count)
a/k/a “Jingles,” : 18 U.S.C. § 922(g)(1) (felon in possession
of a firearm and ammunition – 2 counts)

ALAALDIN ABDULLAH CREWS, (10) :
a/k/a “La-La,” :

CRAIG ANDRE EVANS, (11)	:	18 U.S.C. § 922(g)(1) (felon in possession
a/k/a “Craig Hodges,”	:	of a firearm – 1 count)
JAVILLE LAMONT GORDON (12)	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture
GARY BENJAMIN HARRIS, (13)	:	
a/k/a “Rizzy,”	:	
a/k/a “Gauge,”	:	
JAMAL B. HARRIS-MUHAMMAD, (14)	:	
a/k/a “Jamal Harris,”	:	
a/k/a “Mal,”	:	
BRENT LAMAR HULL, (15)	:	
a/k/a “Brent Hall,”	:	
a/k/a “B,”	:	
a/k/a “EZ,”	:	
CLYDE THOMAS HULL, (16)	:	
a/k/a “Clyde Hall,”	:	
a/k/a “Banks,”	:	
THOMAS EDWARD JONES, (17)	:	
a/k/a “Eddie,”	:	
a/k/a “Eddie Kane,”	:	
a/k/a “Chris,”	:	
MATHIS MCMICKLE, (18)	:	
a/k/a “Mathis Avery,”	:	
a/k/a “Mac,”	:	
ANDRE LEE MOSLEY, (19)	:	
a/k/a “Fat Dre,”	:	
KAREEM SHAHEER, (20)	:	
a/k/a “Scooby,”	:	
BRANDON LAMONT TOWNES (21)	:	

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about 2003, to on or about May 20, 2009, in Chester, in the Eastern District of Pennsylvania, and elsewhere, defendants

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”
NAJEE NAIM HARPER,
REGINALD FREEMAN,
a/k/a “Reggie,”
EARL STEVENSON FULTON,
a/k/a “Butch,”
a/k/a “Big Man,”
RONIER ROBERT KENNEDY,
a/k/a “Nier,”
a/k/a “Black,”
JAMES ERIC JONES,
a/k/a “Bird,”
COREY NATHANIEL HUSBANDS,
a/k/a “New York,”
a/k/a “NY,”
a/k/a “York,”
RONNELLE MCMILLIAN,
a/k/a “Michael Hampton,”
SHATAAN JINGLES ADAMS,
a/k/a “Shady,”
a/k/a “Green Eyes,”
a/k/a “Jingles,”
ALAALDIN ABDULLAH CREWS,
a/k/a “La-La,”
CRAIG ANDRE EVANS,
a/k/a “Craig Hodges,”
JAVILLE LAMONT GORDON,
GARY BENJAMIN HARRIS,
a/k/a “Rizzy,”
a/k/a “Gauge,”
JAMAL B. HARRIS-MUHAMMAD,
a/k/a “Jamal Harris,”
a/k/a “Mal,”
BRENT LAMAR HULL,**

**a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,”
CLYDE THOMAS HULL,
a/k/a “Clyde Hall,”
a/k/a “Banks,”
THOMAS EDWARD JONES,
a/k/a “Eddie,”
a/k/a “Eddie Kane,”
a/k/a “Chris,”
MATHIS MCMICKLE,
a/k/a “Mathis Avery,”
a/k/a “Mac,”
ANDRE LEE MOSLEY,
a/k/a “Fat Dre,”
KAREEM SHAHEER,
a/k/a “Scooby,”
BRANDON LAMONT TOWNES,**

conspired and agreed, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute, and possess with intent to distribute, controlled substances, that is, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 50 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack” or “crack cocaine”), both Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

It was part of the conspiracy that:

2. Defendant EDDIE LEE WALKER was the leader and organizer of a cocaine and crack cocaine distribution organization that came to be known as “The Cut-Off,” which was located in the Highland Gardens section of the city of Chester, in Delaware County, Pennsylvania. From in or about 2003, to on or about May 20, 2009, The Cut-Off distributed in excess of 5 kilograms of cocaine and 50 grams of crack cocaine.

3. Defendant EDDIE LEE WALKER, and others known and unknown to the grand jury, obtained kilogram quantities of cocaine from suppliers, including defendants COREY NATHANIEL HUSBANDS and RONNELLE MCMILLIAN and others, both outside and within the Eastern District of Pennsylvania.

4. Defendant EDDIE LEE WALKER sold the cocaine supplied by defendants COREY NATHANIEL HUSBANDS and RONNELLE MCMILLIAN and others himself, or supplied the cocaine to other members of The Cut-Off, including: defendants NAJEE NAIM HARPER, REGINALD FREEMAN, EARL STEVENSON FULTON, RONIER ROBERT KENNEDY, JAMES ERIC JONES, SHATAAN JINGLES ADAMS, ALAALDIN ABDULLAH CREWS, CRAIG ANDRE EVANS, JAVILLE LAMONT GORDON, GARY BENJAMIN HARRIS, JAMAL B. HARRIS-MUHAMMAD, BRENT LAMAR HULL, CLYDE THOMAS HULL, THOMAS EDWARD JONES, ANDRE LEE MOSLEY, KAREEM SHAHEER, BRANDON LAMONT TOWNES, D.J., a male juvenile, and others known and unknown to the grand jury, to sell.

5. Defendant EDDIE LEE WALKER also converted or “cooked” cocaine into crack cocaine, or had others do so for him, and then sold the crack cocaine himself, or supplied the crack cocaine to other members of The Cut-Off, including: defendants NAJEE NAIM HARPER, REGINALD FREEMAN, EARL STEVENSON FULTON, RONIER ROBERT KENNEDY, JAMES ERIC JONES, SHATAAN JINGLES ADAMS, ALAALDIN ABDULLAH CREWS, CRAIG ANDRE EVANS, JAVILLE LAMONT GORDON, GARY BENJAMIN HARRIS, JAMAL B. HARRIS-MUHAMMAD, BRENT LAMAR HULL, CLYDE THOMAS HULL, THOMAS EDWARD JONES, ANDRE LEE MOSLEY, KAREEM

SHAHEER, BRANDON LAMONT TOWNES, D.J., and others known and unknown to the grand jury, to sell.

6. Defendant NAJEE NAIM HARPER supplied defendant MATHIS MCMICKLE with cocaine for defendant MCMICKLE to sell or to convert or “cook” into crack cocaine to sell. Defendants HARPER and MCMICKLE converted or “cooked” cocaine into crack cocaine inside MCMICKLE’s residence, which was located at 1303 Perkins Street in Chester. Defendant MCMICKLE allowed defendant NAJEE NAIM HARPER to store in and distribute crack cocaine out of his residence, which served as a “stash” house for The Cut-Off. Defendant MCMICKLE distributed crack cocaine out of his residence, and allowed his and defendant HARPER’s customers to use his residence to smoke or in other ways ingest into their systems the crack cocaine that defendants MCMICKLE and HARPER sold to them.

7. Members of The Cut-Off, including defendants EDDIE LEE WALKER, NAJEE NAIM HARPER, REGINALD FREEMAN, EARL STEVENSON FULTON, RONIER ROBERT KENNEDY, JAMES ERIC JONES, SHATAAN JINGLES ADAMS, ALAALDIN ABDULLAH CREWS, CRAIG ANDRE EVANS, JAVILLE LAMONT GORDON, GARY BENJAMIN HARRIS, JAMAL B. HARRIS-MUHAMMAD, BRENT LAMAR HULL, CLYDE THOMAS HULL, THOMAS EDWARD JONES, MATHIS MCMICKLE, ANDRE LEE MOSLEY, KAREEM SHAHEER, BRANDON LAMONT TOWNES, D.J., and others both known and unknown to the grand jury, distributed cocaine, crack cocaine, and, on some occasions, heroin and marijuana, to customers of The Cut-Off both inside and outside The Cut-Off’s geographic territory, which primarily included a series of streets immediately adjacent to the Highland Gardens exit in the city of Chester on Interstate-95. These streets included the:

- 2700 block of Swarts Street,
- 1300 block of Culhane Street,
- 2700 block of Nolan Street, and the
- 1300 block of Perkins Street.

A large part of the territory of The Cut-Off within which members distributed, and possessed with intent to distribute, cocaine, crack cocaine, and other controlled substances, was located within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street in Chester.

8. Customers of The Cut-Off who purchased cocaine, crack cocaine, and other illegal controlled substances inside its territory would walk, drive, or bicycle to The Cut-Off to purchase drugs. Members of The Cut-Off often hid the drugs that they were selling in various “stash” locations near where they were selling, in order to avoid having drugs on their person in the event police were in the area or police stopped them. Those stash locations included abandoned houses, trash cans, mailboxes, grass, potato chip bags, and other locations in The Cut-Off. Members of The Cut-Off tried to get customers to buy from them individually, or sold drugs in concert with each other, with multiple members providing “pieces” – usually small bags of cocaine or crack cocaine that were sold for \$5, \$10, or \$20, with increased dollar value correlating to increased quantity of drugs. When drugs were sold by multiple members in concert with each other, each participating member would receive a portion of the profits from the sale that was relative to his contribution of drugs to the sale.

9. Members of The Cut-Off used various residences as “stash houses” in The Cut-Off’s territory, some of which were abandoned, to store and package cocaine and crack

cocaine for distribution, including, but not limited to:

- 1303 Perkins Street,
- 1306 Perkins Street,
- 1307 Perkins Street,
- 1308 Perkins Street,
- 1310 Perkins Street,
- 2718 Swarts Street,
- 2726 Swarts Street,
- 2722 Kane Street, and
- 2724 Kane Street,

in Chester.

10. More established members of The Cut-Off were regularly referred to as “oldheads,” while younger members of The Cut-Off were regularly referred to as “youngbulls.” Members of The Cut-Off also used juveniles, including but not limited to D.J., to store, “stash,” and retrieve stored or “stashed” drugs, and to approach and sell illegal controlled substances to customers of The Cut-Off. Defendant EDDIE LEE WALKER and other “oldheads” periodically held meetings with members of The Cut-Off to discuss issues concerning the successful operation of their drug trafficking organization.

11. Members of The Cut-Off controlled the drug sales in The Cut-Off’s geographic territory, and did not permit non-members to sell drugs in that territory. To sell drugs in The Cut-Off, an individual had to be “from” – either born, raised, or residing in – that territory, or had to have permission from a member of The Cut-Off to do so.

12. Members of The Cut-Off routinely used physical violence and threats of violence to:

(a) prevent non-members or individuals without permission from selling drugs in The Cut-Off's territory;

(b) protect the reputation of The Cut-Off and to ensure its continued status and stature in The Cut-Off's territory;

(c) prevent non-members (and sometimes members) from stealing from, or "disrespecting," members of The Cut-Off;

(d) discipline and maintain control over The Cut-Off's members;

(e) keep members of The Cut-Off and others from cooperating with law enforcement authorities; and

(f) deter and eliminate competition from other drug dealers.

Because of the physical violence and threats of violence, customers of The Cut-Off sometimes referred to the loop or circle of streets that made up The Cut-Off's territory as the "Circle of Death."

13. To further their objectives of physical violence and threats, members of The Cut-Off routinely carried loaded firearms or had firearms available in hidden locations.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objects, the defendants and others known and unknown to the grand jury committed the following overt acts, among others, s in the Eastern District of Pennsylvania and elsewhere:

1. On or about January 6, 2004, inside the abandoned house located at 1306 Perkins Street in Chester, members of The Cut-Off stored a replica submachine gun, M.P. Uzi IMI, serial # 820119, and a Sunbeam digital scale.

2. On or about December 17, 2005, at the intersection of 9th and Grace Streets in Chester, a person known to the grand jury ("Person #1"), who is associated with members of The Cut-Off, possessed a Smith & Wesson, Model 457, .45 caliber semi-automatic firearm, serial #VJN6959, loaded with four live rounds of ammunition.

3. Or about January 22, 2006, inside the house located at 2623 Nolan Street in Chester, defendant CLYDE THOMAS HULL knowingly and intentionally possessed with intent to distribute approximately 3.6 grams of cocaine; and possessed one Uniden Bearcat scanner programmed to the Chester City Police Department frequency, and numerous new and unused plastic ziplock bags.

4. On or about January 29, 2006, in the area of the 1300 block of Perkins Street and the 2700 block of Swarts Street in Chester, defendant CRAIG ANDRE EVANS possessed a Sig-Sauer, Model P220, .45 caliber semi-automatic firearm, serial #G326400, loaded with seven live rounds of ammunition in the magazine and one live round of ammunition in the chamber.

5. On or about June 6, 2006, inside and around the abandoned property located at 1308 Perkins Street in Chester, members of The Cut-Off stored or “stashed”:

- approximately 12.27 grams of crack cocaine;
- approximately 185.1 grams of cocaine;
- approximately 431.5 grams of marijuana;
- three new and unused razors;
- two Acculab digital scales;
- one digital scale;
- numerous new and unused plastic ziplock bags;
- one partially filled bottle of Superior Inositol; and
- one black Glock, .45 caliber magazine, loaded with nine live rounds.

6. On or about June 14, 2006, inside 1308 Perkins Street in Chester, members of The Cut-Off stored or “stashed” approximately 36.45 grams of cocaine, approximately 31.4 grams of marijuana, one Acculab digital scale, and numerous new and unused plastic ziplock bags.

7. On or about September 14, 2006, in front of 1310 Perkins Street in Chester, defendant GARY BENJAMIN HARRIS possessed with intent to distribute approximately 4.8 grams of cocaine.

8. On or about September 14, 2006, inside 1310 Perkins Street in Chester, defendant JAMAL B. HARRIS-MUHAMMAD possessed with intent to distribute approximately 7.26 grams of crack cocaine and approximately 3.4 grams of cocaine.

9. On or about September 22, 2006, inside 1310 Perkins Street in Chester, defendant GARY BENJAMIN HARRIS possessed with intent to distribute approximately 2.12 grams of crack cocaine.

10. On or about September 22, 2006, inside 1306 Perkins Street in Chester, members of The Cut-Off stored or “stashed” approximately .54 grams of crack cocaine, approximately .72 grams of cocaine, approximately 34.4 grams of marijuana, and numerous new and unused plastic ziplock bags.

11. On or about December 12, 2006, in front of 1304 Perkins Street in Chester, members of The Cut-Off stored or “stashed” approximately 1.5 grams of crack cocaine and approximately 1.4 grams of cocaine.

12. On or about March 12, 2007, at the intersection of 12th Street and Highland Avenue in Chester, defendant CLYDE THOMAS HULL distributed approximately 2.6 grams of crack cocaine to a Pennsylvania state trooper acting in an undercover capacity (“the undercover state trooper”) for \$230.

13. On or about March 14, 2007, at the intersection of 12th Street and Highland Avenue in Chester, defendants BRENT LAMAR HULL and CLYDE THOMAS HULL distributed approximately 1.2 grams of crack cocaine to the undercover state trooper for \$100.

14. On or about March 27, 2007, at the intersection of 12th Street and Highland Avenue in Chester, defendant CLYDE THOMAS HULL distributed approximately 4.9 grams of crack cocaine to the undercover state trooper for \$240.

15. On or about April 27, 2007, in the 2700 block of Nolan Street in Chester, defendant BRENT LAMAR HULL distributed approximately 2.0 grams of crack cocaine to the undercover state trooper for \$210.

16. On or about June 12, 2007, in the 1300 block of Perkins Street in Chester, police officers recovered a bag containing approximately 10.0 grams of crack cocaine.

17. On or about July 6, 2007, in front of 2724 Swarts Street in Chester, SHATAAN JINGLES ADAMS possessed a Taurus PT-25, .25 caliber semi-automatic firearm, serial #DXJ41000, loaded with seven live rounds of ammunition in the magazine and one live round of ammunition in the chamber.

18. On or about July 18, 2007, inside 2724 Kane Street in Chester, defendants SHATAAN JINGLES ADAMS and ALAALDIN ABDULLAH CREWS possessed with intent to distribute:

- approximately 2.0 grams of crack cocaine;
- approximately .46 grams of heroin;
- approximately 1.7 grams of marijuana;

and possessed:

- one Heckler & Koch, Model P2000, .357 Sig caliber semi-automatic firearm, serial #124-000151, and two 12-round magazines, each loaded with 12 live rounds of ammunition;
- one H. Schmidt Ostheim, Model 21S, .22 caliber magnum revolver, serial #618002;

- one Smith & Wesson, Military and Police Model, 38 Special revolver, serial #C109152, loaded with five live rounds of ammunition;
- one Hopkins & Allen, Model XL, .22 caliber revolver, serial #8898, loaded with five live rounds of ammunition; and
- one bulletproof vest carrier with one panel, two nylon holsters, one empty long gun case, one box containing 39 rounds of .357 Magnum ammunition, four boxes and one loose round of Wolf 7.62x39 ammunition (a total of 81 rounds), one box containing 45 rounds of .25 caliber automatic ammunition, one box of 16 rounds of .357 Sig ammunition, one white plastic bag containing five rounds of .22 caliber ammunition, two boxes containing 80 rounds of 9mm ammunition, one pellet gun with two magazines, and numerous new and unused plastic ziplock bags.

19. On or about July 24, 2007, inside 2722 Kane Street in Chester, defendant EDDIE LEE WALKER possessed each of the following as part of his participation in the drug trafficking conspiracy:

- approximately 16.3 grams of crack cocaine;
- approximately 19.0 grams of marijuana;
- one Acculab digital scale;
- one bottle of Acetone;
- two bottles of Superior Inositol;

- numerous new and unused plastic ziplock bags;
- one box of Remington .38 caliber ammunition (38 rounds);
- one scanner; and
- one shoulder holster.

20. On or about August 10, 2007, at the intersection of 12th Street and Highland Avenue in Chester, defendant SHATAAN JINGLES ADAMS distributed approximately 3.2 grams of crack cocaine to the undercover state trooper for \$250.

21. On or about August 15, 2007, at the intersection of 12th Street and Highland Avenue in Chester, defendant SHATAAN JINGLES ADAMS distributed approximately 8.9 grams of cocaine to the undercover state trooper for \$500.

22. On or about November 4, 2007, in the 1300 block of Perkins Street in Chester, defendant BRANDON LAMONT TOWNES possessed with intent to distribute approximately 2.0 grams of crack cocaine.

23. On or about December 7, 2007, in the 1300 block of Perkins Street in Chester, members of The Cut-Off stored or “stashed” approximately 3.3 grams of crack cocaine.

24. On or about December 19, 2007, in the doorway of 2726 Swarts Street in Chester, members of The Cut-Off stored or “stashed” approximately 1.4 grams of crack cocaine.

25. On or about December 22, 2007, in the 1300 block of Perkins Street in Chester, defendant ANDRE LEE MOSLEY possessed with intent to distribute approximately 4.48 grams of cocaine.

26. On or about January 9, 2008, in the 1300 block of Perkins Street in Chester, defendant EDDIE LEE WALKER possessed with intent to distribute approximately 2.9 grams of cocaine and possessed approximately 1.0 gram of marijuana.

27. On or about March 6, 2008, in front of 2726 Swarts Street in Chester, members of The Cut-Off stored or “stashed” approximately 69.3 grams of marijuana.

28. On or about March 31, 2008, inside 1306 Perkins Street in Chester, members of The Cut-Off stored an Echave y Arizmendi, 20 gauge single shot shotgun, serial #50042NF, and a box of seven 20 gauge Remington shotgun shells.

29. On or about April 15, 2008, in the 1300 block of Perkins Street in Chester, defendant JAMES ERIC JONES distributed approximately 2.0 grams of crack cocaine to the undercover state trooper for \$200.

30. On or about May 1, 2008, in the 1400 block of Perkins Street in Chester, defendant BRENT LAMAR HULL distributed approximately 3.4 grams of crack cocaine to the undercover state trooper for \$300.

31. On or about May 15, 2008, in the 1300 block of Perkins Street in Chester, defendants EARL STEVENSON FULTON and BRENT LAMAR HULL distributed approximately 1.0 gram of crack cocaine to a confidential source acting at the direction of federal agents (“the CS”) for \$100.

32. On or about May 15, 2008, in the 1300 block of Perkins Street in Chester, defendant BRENT LAMAR HULL distributed approximately 1.0 gram of crack cocaine to the CS for \$100.

33. On or about May 19, 2008, in front of 1300 Perkins Street in Chester, members of The Cut-Off stored or “stashed” approximately .97 grams of crack cocaine and approximately .066 grams of cocaine.

34. On or about May 21, 2008, in 2702 Curran Street in Chester, defendant BRENT LAMAR HULL possessed approximately 2.0 grams of marijuana.

35. On or about May 22, 2008, in the 1300 block of Perkins Street in Chester, defendant GARY BENJAMIN HARRIS distributed approximately .85 grams of crack cocaine to the CS for \$100.

36. On or about May 22, 2008, in the 1300 block of Perkins Street in Chester, defendant GARY BENJAMIN HARRIS distributed approximately 1.1 grams of crack cocaine to the CS for \$200.

37. On or about June 3, 2008, in the 1300 block of Perkins Street in Chester, on behalf of The Cut-Off, D.J., a juvenile known to the grand jury, distributed approximately 2.7 grams of crack cocaine to the CS for \$300.

38. On or about July 13, 2008, inside and around the abandoned house located at 2726 Swarts Street in Chester, members of The Cut-Off stored or “stashed”:

- approximately 2.7 grams of crack cocaine;
- approximately .02 grams of heroin;
- approximately 1.8 grams of marijuana;
- one bottle of inositol;
- one digital scale;
- one Ruger P-95, 9mm Luger handgun, serial #315-9708;

- one Davis, .22 caliber Derringer handgun, serial #466106; and
- one Mossberg, Model 500B, 12 gauge shotgun, serial #G008804.

39. On or about July 14, 2008, in the 2700 block of Nolan Street in Chester, defendant EDDIE LEE WALKER distributed approximately 2.6 grams of crack cocaine to the CS for \$250.

40. On or about July 16, 2008, in the 2700 block of Nolan Street in Chester, defendant EDDIE LEE WALKER distributed approximately 2.8 grams of crack cocaine to the CS for \$300.

41. On or about July 21, 2008, in the 1300 block of Perkins Street in Chester, defendants EDDIE LEE WALKER and EARL STEVENSON FULTON distributed approximately 2.1 grams of crack cocaine to the CS for \$250.

42. On or about July 24, 2008, in the 1300 block of Perkins Street in Chester, defendant EDDIE LEE WALKER distributed approximately 4.2 grams of crack cocaine to the CS for \$250.

43. On or about July 24, 2008, in the 1300 block of Perkins Street in Chester, defendant CRAIG ANDRE EVANS attempted to distribute crack cocaine to the CS.

44. On or about July 24, 2008, in the 1300 block of Perkins Street in Chester, defendants EARL STEVENSON FULTON and THOMAS EDWARD JONES distributed approximately 4.3 grams of crack cocaine to the CS for \$300.

45. On or about July 29, 2008, in the 1300 block of Perkins Street in Chester, defendant JAMES ERIC JONES distributed approximately 2.2 grams of crack cocaine to the CS for \$300.

46. On or about July 29, 2008, in the 1300 block of Perkins Street in Chester, defendant JAMES ERIC JONES distributed approximately 2.5 grams of crack cocaine to the CS for \$300.

47. On or about July 31, 2008, in the 1300 block of Perkins Street in Chester, defendant EDDIE LEE WALKER distributed approximately 5.0 grams of crack cocaine to the CS for \$300.

48. On or about July 31, 2008, in the 1300 block of Perkins Street in Chester, defendant EDDIE LEE WALKER distributed approximately 3.4 grams of crack cocaine to the CS for \$300.

49. On or about August 5, 2008, in the 1300 block of Perkins Street in Chester, defendant EDDIE LEE WALKER distributed approximately 5.5 grams of crack cocaine to the CS for \$550.

50. On or about August 8, 2008, in the 1300 block of Perkins Street in Chester, defendant EDDIE LEE WALKER distributed approximately 3.3 grams of crack cocaine to the CS for \$300.

51. On or about August 8, 2008, in the 1300 block of Perkins Street in Chester, defendant EDDIE LEE WALKER distributed approximately 4.3 grams of crack cocaine to the CS for \$300.

52. On or about August 13, 2008, in the 1300 block of Perkins Street in Chester, defendant THOMAS EDWARD JONES distributed approximately 3.0 grams of crack cocaine to the CS for \$300.

53. On or about August 13, 2008, in the 1300 block of Perkins Street in Chester, defendant THOMAS EDWARD JONES distributed approximately 4.4 grams of crack cocaine to the CS for \$550.

54. On or about August 27, 2008, inside the abandoned house located at 1306 Perkins Street in Chester, members of The Cut-Off stored or “stashed” approximately 9.1 grams of crack cocaine.

55. On or about August 28, 2008, in the 1300 block of Perkins Street in Chester, defendants THOMAS EDWARD JONES and JAMES ERIC JONES distributed approximately 2.6 grams of crack cocaine to the CS for \$300.

56. On or about August 28, 2008, in the 1300 block of Perkins Street in Chester, defendant JAMES ERIC JONES distributed approximately 2.5 grams of crack cocaine to the CS for \$290.

57. On or about August 28, 2008, in a mailbox on the side of the house located at 1307 Perkins Street in Chester, members of The Cut-Off stored or “stashed” approximately 9.0 grams of crack cocaine and approximately 5.0 grams of marijuana.

58. On or about August 28, 2008, inside 1306 Perkins Street in Chester, members of The Cut-Off stored or “stashed”:

- approximately 29.5 grams of crack cocaine;
- one pink straw;
- one razor;
- numerous new and unused plastic ziplock bags;

- one Colt, Gold Cup Trophy Model, .45 caliber firearm, serial #GCT07603;
- one Colt .45 caliber magazine, loaded with five live rounds of ammunition;
- one Colt .45 caliber magazine, loaded with seven live rounds of ammunition; and
- 13 .45 caliber ACP cartridges.

59. On or about September 4, 2008, in the 1300 block of Perkins Street in Chester, defendants JAMES ERIC JONES, BRENT LAMAR HULL, and KAREEM SHAHEER distributed approximately 2.5 grams of crack cocaine to the CS for \$300.

60. On or about September 4, 2008, in the 1300 block of Perkins Street in Chester, defendants EDDIE LEE WALKER and THOMAS EDWARD JONES distributed approximately 2.8 grams of crack cocaine to the CS for \$300.

61. On or about September 4, 2008, inside 1306 Perkins Street in Chester, members of The Cut-Off stored one Smith & Wesson, Model 39, 9mm firearm, serial #32810, with a magazine loaded with four live rounds of ammunition, one My Weigh digital scale, one Proscale digital scale, and numerous new and unused plastic ziplock bags.

62. On or about September 8, 2008, in the 1300 block of Perkins Street in Chester, defendant EDDIE LEE WALKER distributed approximately 2.5 grams of crack cocaine to the CS for \$300.

63. On or about September 8, 2008, in the 1300 block of Perkins Street in Chester, defendants EDDIE LEE WALKER and EARL STEVENSON FULTON distributed approximately 5.3 grams of crack cocaine to the CS for \$550.

64. On or about October 10, 2008, in the rear yard of 1300 Perkins Street in Chester, members of The Cut-Off stored or “stashed”:

- approximately .61 grams of crack cocaine;
- approximately 7.4 grams of marijuana;
- one Digiweigh digital scale;
- one Marlin Lever Action 30-30 rifle, no serial number, with scope and sling, inside a black gun case; and
- one box containing numerous rifle rounds.

65. On or about October 10, 2008, in the area of the 2700 block of Nolan Street in Chester, members of The Cut-Off stored or “stashed” approximately 6.4 grams of crack cocaine and numerous new and unused plastic ziplock bags.

66. On or about October 17, 2008, in the 2700 block of Swarts Street in Chester, D.J. distributed approximately .49 grams of cocaine to a police officer acting in an undercover capacity (“the undercover police officer”) for \$60.

67. On or about October 29, 2008, in the 2700 block of Swarts Street in Chester, D.J. distributed approximately .22 grams of cocaine to the undercover police officer for \$40.

68. On or about November 5, 2008, in the 2700 block of Swarts Street in Chester, D.J. distributed approximately .31 grams of cocaine to the undercover police officer for \$40.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 12, 2007, in Chester, in the Eastern District of Pennsylvania,
defendant

**CLYDE THOMAS HULL,
a/k/a “Clyde Hall,”
a/k/a “Banks,”**

knowingly and intentionally distributed approximately 2.6 grams of a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 29, 2006, in Chester, in the Eastern District of Pennsylvania,
the defendant,

**CRAIG ANDRE EVANS,
a/k/a “Craig Hodges,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a black Sig Sauer semi-automatic pistol, model: P220, caliber .45 auto, serial number G326400, with a loaded magazine of seven rounds of ammunition, and one round of ammunition in the chamber.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 14, 2007, in Chester, in the Eastern District of Pennsylvania,
defendants

**BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,” and
CLYDE THOMAS HULL,
a/k/a “Clyde Hall,”
a/k/a “Banks,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.2 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 27, 2007, in Chester, in the Eastern District of Pennsylvania,
defendant

**CLYDE THOMAS HULL,
a/k/a “Clyde Hall,”
a/k/a “Banks,”**

knowingly and intentionally distributed approximately 4.9 grams of a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 27, 2007, in Chester, in the Eastern District of Pennsylvania,
defendant

**BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,”**

knowingly and intentionally distributed approximately 2.0 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 27, 2007, in Chester, in the Eastern District of Pennsylvania,
defendant

**BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 6, 2007, in Chester, in the Eastern District of Pennsylvania,
defendant

**SHATAAN JINGLES ADAMS,
a/k/a “Shady,”
a/k/a “Green Eyes,”
a/k/a “Jingles,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm and ammunition, that is, a Taurus PT-25, .25 caliber handgun, serial number DXJ-41000, with one round of ammunition in the chamber, and with a loaded magazine containing seven rounds of ammunition.

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2007, in Chester, in the Eastern District of Pennsylvania,
defendants

**SHATAAN JINGLES ADAMS,
a/k/a “Shady,”
a/k/a “Green Eyes,”
a/k/a “Jingles,” and
ALAALDIN ABDULLAH CREWS,
a/k/a “La-La,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, approximately 2.0 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and approximately .46 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

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

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2007, in Chester, in the Eastern District of Pennsylvania,
defendants

**SHATAAN JINGLES ADAMS,
a/k/a “Shady,”
a/k/a “Green Eyes,”
a/k/a “Jingles,” and
ALAALDIN ABDULLAH CREWS,
a/k/a “La-La,”**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, and a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

All in violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2007, in Chester, in the Eastern District of Pennsylvania,
defendants

**SHATAAN JINGLES ADAMS,
a/k/a “Shady,”
a/k/a “Green Eyes,”
a/k/a “Jingles,” and
ALAALDIN ABDULLAH CREWS,
a/k/a “La-La,”**

knowingly possessed, and aided and abetted the possession of, a firearm, that is:

- (1) a Heckler & Koch, Model P2000, .357 Sig caliber semi-automatic firearm, serial #124-000151, and two 12-round magazines, each loaded with 12 live rounds of ammunition,
- (2) an H. Schmidt Ostheim, Model 21S, .22 caliber magnum revolver, serial #618002,
- (3) a Smith & Wesson, Military and Police Model, 38 Special revolver, serial #C109152, loaded with five live rounds of ammunition, and
- (4) a Hopkins & Allen, Model XL, .22 caliber revolver, serial #8898, loaded with five live rounds of ammunition,

all in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 846, and possession with intent to distribute cocaine base (“crack”) and heroin, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

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

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2007, in Chester, in the Eastern District of Pennsylvania,
defendants

**SHATAAN JINGLES ADAMS,
a/k/a “Shady,”
a/k/a “Green Eyes,”
a/k/a “Jingles,” and
ALAALDIN ABDULLAH CREWS,
a/k/a “La-La,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm and ammunition, that is:

- (1) a Heckler & Koch, Model P2000, .357 Sig caliber semi-automatic firearm, serial #124-000151, and two 12-round magazines, each loaded with 12 live rounds of ammunition;
- (2) an H. Schmidt Ostheim, Model 21S, .22 caliber magnum revolver, serial #618002;
- (3) a Smith & Wesson, Military and Police Model, 38 Special revolver, serial #C109152, loaded with five live rounds of ammunition; and
- (4) a Hopkins & Allen, Model XL, .22 caliber revolver, serial #8898, loaded with five live rounds of ammunition.

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

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 10, 2007, in Chester, in the Eastern District of Pennsylvania,
defendant

**SHATAAN JINGLES ADAMS,
a/k/a “Shady,”
a/k/a “Green Eyes,”
a/k/a “Jingles,”**

knowingly and intentionally distributed approximately 3.2 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 15, 2007, in Chester, in the Eastern District of Pennsylvania,
defendant

**SHATAAN JINGLES ADAMS,
a/k/a “Shady,”
a/k/a “Green Eyes,”
a/k/a “Jingles,”**

knowingly and intentionally distributed approximately 8.9 grams of a mixture and substance
containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 22, 2007, in Chester, in the Eastern District of Pennsylvania, defendant

**ANDRE LEE MOSLEY,
a/k/a "Fat Dre,"**

knowingly and intentionally possessed with intent to distribute approximately 4.48 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 22, 2007, in Chester, in the Eastern District of Pennsylvania, defendant

**ANDRE LEE MOSLEY,
a/k/a “Fat Dre,”**

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMES ERIC JONES,
a/k/a “Bird,”**

knowingly and intentionally distributed approximately 2.0 grams of a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 15, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMES ERIC JONES,
a/k/a “Bird,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 1, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,”**

knowingly and intentionally distributed approximately 3.4 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 1, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2008, in Chester, in the Eastern District of Pennsylvania,
defendants

**EARL STEVENSON FULTON,
a/k/a “Butch,”
a/k/a “Big Man,” and
BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 1.0 gram of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2008, in Chester, in the Eastern District of Pennsylvania,
defendants

**EARL STEVENSON FULTON,
a/k/a “Butch,”
a/k/a “Big Man,” and
BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c), and Title 18, United States Code, Section 2.

In violation of Title 21, United States Code, Section 860(a) and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,”**

knowingly and intentionally distributed approximately 1.0 gram of a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 15, 2008, in Chester, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 22, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**GARY BENJAMIN HARRIS,
a/k/a “Rizzy,”
a/k/a “Gauge,”**

knowingly and intentionally distributed approximately .85 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 22, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**GARY BENJAMIN HARRIS,
a/k/a “Rizzy,”
a/k/a “Gauge,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 22, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**GARY BENJAMIN HARRIS,
a/k/a “Rizzy,”
a/k/a “Gauge,”**

knowingly and intentionally distributed approximately 1.1 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 22, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**GARY BENJAMIN HARRIS,
a/k/a “Rizzy,”
a/k/a “Gauge,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT TWENTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 14, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed approximately 2.6 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT THIRTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 14, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 16, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed approximately 2.8 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT THIRTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 16, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT THIRTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 21, 2008, in Chester, in the Eastern District of Pennsylvania,
defendants

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,” and
EARL STEVENSON FULTON,
a/k/a “Butch,”
a/k/a “Big Man,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 2.1 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT THIRTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 21, 2008, in Chester, in the Eastern District of Pennsylvania,
defendants

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,” and
EARL STEVENSON FULTON,
a/k/a “Butch,”
a/k/a “Big Man,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a) and Title 18, United States Code, Section 2.

COUNT THIRTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 24, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed approximately 4.2 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT THIRTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 24, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT THIRTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 24, 2008, in Chester, Pennsylvania, in the Eastern District of Pennsylvania, defendant

**CRAIG ANDRE EVANS,
a/k/a “Craig Hodges,”**

knowingly and intentionally attempted to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 846.

COUNT THIRTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 24, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**CRAIG ANDRE EVANS,
a/k/a “Craig Hodges,”**

knowingly and intentionally attempted to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(c) and 846.

In violation of Title 21, United States Code, Section 860(a).

COUNT THIRTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 24, 2008, in Chester, in the Eastern District of Pennsylvania,
defendants

**EARL STEVENSON FULTON,
a/k/a “Butch,”
a/k/a “Big Man,” and
THOMAS EDWARD JONES,
a/k/a “Eddie,”
a/k/a “Eddie Kane,”
a/k/a “Chris,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 4.3 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 24, 2008, in Chester, in the Eastern District of Pennsylvania,
defendants

**EARL STEVENSON FULTON,
a/k/a “Butch,”
a/k/a “Big Man,” and
THOMAS EDWARD JONES,
a/k/a “Eddie,”
a/k/a “Eddie Kane,”
a/k/a “Chris,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

All in violation of Title 21, United States Code, Section 860(a), and Title 18, United States Code, Section 2.

COUNT FORTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 29, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMES ERIC JONES,
a/k/a “Bird,”**

knowingly and intentionally distributed approximately 2.2 grams of a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 29, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMES ERIC JONES,
a/k/a “Bird,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT FORTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 29, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMES ERIC JONES,
a/k/a “Bird,”**

knowingly and intentionally distributed approximately 2.5 grams of a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FORTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 29, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMES ERIC JONES,
a/k/a “Bird,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT FORTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 31, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 5.0 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FORTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 31, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed 5 grams or more of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

In violation of Title 21, United States Code, Section 860(a).

COUNT FORTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 31, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed approximately 3.4 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FORTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 31, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance, within 1,000 feet of the real property comprising a playground, known as the “Highland Gardens Playground #1,” located at the 1400 block of Culhane Street, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

In violation of Title 21, United States Code, Section 860(a).

COUNT FORTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 5, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed 5 grams or more, that is, approximately 5.5 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FIFTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 8, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed approximately 3.3 grams of a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FIFTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 8, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed approximately 4.3 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FIFTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 13, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**THOMAS EDWARD JONES,
a/k/a “Eddie,”
a/k/a “Eddie Kane,”
a/k/a “Chris,”**

knowingly and intentionally distributed approximately 3.0 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FIFTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 13, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**THOMAS EDWARD JONES,
a/k/a “Eddie,”
a/k/a “Eddie Kane,”
a/k/a “Chris,”**

knowingly and intentionally distributed approximately 4.4 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FIFTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 28, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**THOMAS EDWARD JONES,
a/k/a “Eddie,”
a/k/a “Eddie Kane,”
a/k/a “Chris,” and
JAMES ERIC JONES,
a/k/a “Bird,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 2.6 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 28, 2008, in Chester, in the Eastern District of Pennsylvania,
defendant

**JAMES ERIC JONES,
a/k/a “Bird,”**

knowingly and intentionally distributed approximately 2.5 grams of a mixture and substance
containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FIFTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 4, 2008, in Chester, in the Eastern District of Pennsylvania, defendants

**JAMES ERIC JONES,
a/k/a “Bird,”
BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,” and
KAREEM SHAHEER,
a/k/a “Scooby,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 2.5 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 4, 2008, in Chester, in the Eastern District of Pennsylvania, defendants

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,” and
THOMAS EDWARD JONES,
a/k/a “Eddie,”
a/k/a “Eddie Kane,”
a/k/a “Chris,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, approximately 2.8 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT FIFTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 8, 2008, in Chester, in the Eastern District of Pennsylvania, defendant

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”**

knowingly and intentionally distributed approximately 2.5 grams of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(c).

COUNT FIFTY-NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 8, 2008, in Chester, in the Eastern District of Pennsylvania, defendants

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,” and
EARL STEVENSON FULTON,
a/k/a “Butch,”
a/k/a “Big Man,”**

knowingly and intentionally distributed, and aided and abetted the distribution of, 5 or more grams, that is, approximately 5.3 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

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

COUNT SIXTY

THE GRAND JURY FURTHER CHARGES THAT:

From at least in or about December 23, 2006, to on or about January 1, 2009, in Chester, in the Eastern District of Pennsylvania, defendants

**NAJEE NAIM HARPER and
MATHIS MCMICKLE,
a/k/a “Mathis Avery,”
a/k/a “Mac,”**

knowingly and intentionally made available for use, and aided and abetted the making available for use of, the building located at 1303 Perkins Street in Chester, for the purpose of unlawfully storing, manufacturing, distributing, or using controlled substances, that is, cocaine and cocaine base (“crack”), Schedule II controlled substances.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in this indictment, defendants

**EDDIE LEE WALKER,
a/k/a “Mo,”
a/k/a “Mike,”
COREY NATHANIEL HUSBANDS
a/k/a “New York,”
a/k/a “NY,”
RONNELLE MCMILLIAN,
a/k/a “Michael Hampton,”
REGINALD FREEMAN,
a/k/a “Reggie,”
EARL STEVENSON FULTON,
a/k/a “Butch,”
a/k/a “Big Man,”
JAMES ERIC JONES,
a/k/a “Bird,”
RONIER ROBERT KENNEDY,
a/k/a “Nier,”
a/k/a “Black,”
NAJEE NAIM HARPER,
SHATAAN JINGLES ADAMS,
a/k/a “Shady,”
a/k/a “Green Eyes,”
a/k/a “Jingles,”
ALAALDIN ABDULLAH CREWS,
a/k/a “La-La,”
CRAIG ANDRE EVANS,
a/k/a “Craig Hodges,”
JAVILLE LAMONT GORDON,
GARY BENJAMIN HARRIS,
a/k/a “Rizzy,”
a/k/a “Gauge,”
JAMAL B. HARRIS-MUHAMMAD,
a/k/a “Jamal Harris,”
a/k/a “Mal,”
BRENT LAMAR HULL,
a/k/a “Brent Hall,”
a/k/a “B,”
a/k/a “EZ,”**

**CLYDE THOMAS HULL,
a/k/a “Clyde Hall,”
a/k/a “Banks,”
THOMAS EDWARD JONES,
a/k/a “Eddie,”
a/k/a “Eddie Kane,”
a/k/a “Chris,”
MATHIS MCMICKLE,
a/k/a “Mathis Avery,”
a/k/a “Mac,”
ANDRE LEE MOSLEY,
a/k/a “Fat Dre,”
KAREEM SHAHEER,
a/k/a “Scooby,” and
BRANDON LAMONT TOWNES,**

shall forfeit to the United States of America:

- a. Any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, including the following:
 1. One replica submachine gun, M.P. Uzi IMI, serial # 820119;
 2. one Smith & Wesson, Model 457, .45 caliber semi-automatic firearm, serial #VJN6959, loaded with four live rounds of ammunition;
 3. one black Glock, .45 caliber magazine, loaded with nine live rounds;
 4. one box of Remington .38 caliber ammunition (38 rounds);
 5. one Echave y Arizmendi, 20 gauge single shot shotgun, serial #50042NF, and a box of seven 20 gauge Remington shotgun shells;
 6. one Ruger P-95, 9mm Luger, serial #315-9708;
 7. one Davis, .22 caliber Derringer, serial #466106;
 8. one Mossberg, Model 500B, 12 gauge shotgun, serial #G008804;

9. one Colt, Gold Cup Trophy Model, .45 caliber firearm, serial #GCT07603;
 10. one Colt .45 caliber magazine, loaded with five live rounds of ammunition;
 11. one Colt .45 caliber magazine, loaded with seven live rounds of ammunition;
 12. thirteen .45 caliber ACP cartridges;
 13. one Smith & Wesson, Model 39, 9mm firearm, serial #32810, with a magazine loaded with four live rounds of ammunition;
 14. one Marlin Lever Action 30-30 rifle, no serial number, with scope and sling, inside a black gun case; and
 15. one box containing numerous rifle rounds.
- b. Any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including the following:
1. \$2,000,000 U.S. currency.
2. If any of the property subject to forfeiture, 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;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c)(1), set forth in this superseding indictment, defendants

**SHATAAN JINGLES ADAMS,
a/k/a “Shady,”
a/k/a “Green Eyes,”
a/k/a “Jingles,”
ALAALDIN ABDULLAH CREWS,
a/k/a “La-La,” and
CRAIG ANDRE EVANS,
a/k/a “Craig Hodges,”**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of such offenses, including, but not limited to:

- (a) one black Sig Sauer semi-automatic pistol, model: P220, caliber: .45 auto, serial number: G326400, with a loaded magazine of seven rounds of ammunition, and one round of ammunition in the chamber;
- (b) one Taurus PT-25, .25 caliber handgun, serial number DXJ-41000, with one round of ammunition in the chamber, and with a loaded magazine containing seven rounds of ammunition;
- (c) one a Heckler & Koch, Model P2000, .357 Sig caliber semi-automatic firearm, serial #124-000151, and two 12-round magazines, each loaded with 12 live rounds of ammunition;
- (d) one H. Schmidt Ostheim, Model 21S, .22 caliber magnum revolver, serial #618002;
- (e) one Smith & Wesson, Military and Police Model, 38 Special revolver, serial #C109152, loaded with five live rounds of ammunition;
- (f) one Hopkins & Allen, Model XL, .22 caliber revolver, serial #8898, loaded with five live rounds of ammunition;
- (g) one box containing 39 rounds of .357 Magnum ammunition;

- (h) four boxes and one loose round of Wolf 7.62x39 ammunition (a total of 81 rounds);
- (i) one box containing 45 rounds of .25 caliber automatic ammunition;
- (j) one box of 16 rounds of .357 Sig ammunition;
- (k) one white plastic bag containing five rounds of .22 caliber ammunition;
- (l) two boxes containing 80 rounds of 9mm ammunition; and
- (m) one pellet gun with two magazines.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON

LAURIE MAGID
United States Attorney