SUPERIOR COURT

OF THE

DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on November 3, 2023

THE UNITED STATES OF AMERICA

JAELEN JORDAN PDID: 755-263

WARREN MONTGOMERY

PDID: 755-262

BYRON GILLUM

Also Known As BRYON GILLUM

PDID: 764-464

ISAIAH FLOWERS

PDID: -DCTN: U23028678

JAHKAI GOFF

PDID: -

DCTN: U23028679

TAJ GILES PDID: -

DCTN: U23028680

IRSHAAD ELLIS-BEY PDID: 749-546

DCTN: U23028681

· Criminal Nos:

2023 CF3 003171 2023 CF3 007334

2023 CF3 007737 2023 CF3 009000

2023 CF3 009010

2023 CF3 009017

2023 CF3 009019

: Violations:

22 D.C. Code, Section 1805a; 22 D.C. Code, Section 3231;

22 D.C. Code, Section 3231; 22 D.C. Code, Section 3215 (d)(2)(A); 22 D.C. Code, Sections 3232(a), 3232(c)(1); 22 D.C. Code, Section 2803(b)(1); 22 D.C. Code, Section 4504(b); 22 D.C. Code, Sections 2801, 4502; 22 D.C. Code, Sections 2803(b)(1), 3601; 22 D.C. Code, Sections 28031, 3601, 4502 (2001 ed.)

: (Conspiracy; Trafficking In Stolen Property; : Unauthorized Use of a Vehicle-Crime of Violence;

Receiving Stolen Property; Armed Carjacking; Possession Of a Firearm During Crime Of Violence Or Dangerous Offense; Robbery While Armed;

Unauthorized Use of a Vehicle; Armed Carjacking of a Senior Citizen; Robbery of a Senior Citizen While

Armed)

The Grand Jury charges:

FIRST COUNT:

Between February 2023 and May 2023, within the District of Columbia and elsewhere, Jaelen Jordan, Isaiah Flowers, Jahkai Goff, Taj Giles, Irshaad Ellis-Bey, Byron Gillum also known as Bryon Gillum, and Warren Montgomery, and others whose identity are known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree together to steal and take motor vehicles, by force and violence, use those vehicles to commit other crimes of violence, and traffic those stolen motor vehicles in violation of Title 22, District of Columbia Code, Sections 1805a(a)(2); 3231; 3215(d)(2)(A); 2801, 4502; and 2803(b)(1).

Object of the Conspiracy

It was the object of the conspiracy to steal and take motor vehicles by force and violence in the District of Columbia and elsewhere, use those stolen vehicles to commit other armed crimes of violence, and sell those stolen vehicles.

Ways, Manner and Means

The ways, manner, and means by which Jaelen Jordan, Isaiah Flowers, Jahkai Goff, Taj Giles, Irshaad Ellis-Bey, Byron Gillum also known as Bryon Gillum, Warren Montgomery, and other persons whose identities are known and unknown to the Grand Jury, acted in order to steal and carjack vehicles, sell those vehicles, and prevent apprehension and prosecution by law enforcement include, but are not limited to:

- The members of the conspiracy used cellphones, social media, and other means, to coordinate, plan, and effectuate the theft, carjacking, storage, and sale of motor vehicles in and around Washington, DC.
- One or more members of the conspiracy stole and carjacked motor vehicles in and around, Washington DC, and used those stolen motor vehicles to steal and carjack other motor vehicles.
- 3. Members of the conspiracy used masks and gloves to conceal their identities.
- Members of the conspiracy used the parking garage at 1326 Florida Avenue NE,
 Washington, DC ("Florida Avenue garage") to clean, store, and sell the stolen motor vehicles.
- Members of the conspiracy used Apartment 01 at 1326 Florida Avenue NE, Washington,
 C ("Apartment 01") to store and conceal victims' property and firearms.

Overt Acts in Furtherance of the Conspiracy

During the course of and in furtherance of the conspiracy, and to effect the objects thereof, the co-conspirators did commit, between February 2023, and May 2023, the following overt acts, among others:

- During the afternoon and evening hours of February 25, 2023, Taj Giles, Jahkai Goff, Isaiah Flowers, Jaelen Jordan, Irshaad Ellis-Bey, and Byron Gillum also known as Bryon Gillum exchanged phone calls.
- 2. During the evening hours of February 25, 2023, Jahkai Goff traveled from the area of Isaiah Flowers's residence in Bowie, MD, to the area of his own residence in Largo, MD.
- 3. During the evening hours of February 25, 2023, Isaiah Flowers traveled from Bowie, MD, to the area of Jahkai Goff's residence in Largo, MD.
- 4. During the evening hours of February 25, 2023, Irshaad Ellis-Bey traveled from Temple Hills, MD, to the area of Jahkai Goff's residence.
- 5. On February 25, 2023, Jahkai Goff, Isaiah Flowers, and Irshaad Ellis-Bey armed themselves with firearms or imitation firearms.
- 6. On February 25, 2023, Jahkai Goff, Isaiah Flowers, and Irshaad Ellis-Bey put on ski masks and blue latex gloves.
- On February 25, 2023, Jahkai Goff, Isaiah Flowers, and Irshaad Ellis-Bey traveled from Largo, MD to the Royal Farms Gas Station at 6210 Allentown Road, Camp Springs, MD ("Royal Farms").
- On February 25, 2023, Isaiah Flowers videoed himself in the back seat of I
 Charger.
- In the early morning hours of February 26, 2023, Isaiah Flowers sent Jaelen Jordan a video that he took of himself riding in the backseat of Charger.
- 11. On or about February 26, 2023, Isaiah Flowers sent a photo of individual unknown to the Grand Jury for the purpose of marketing Charger for sale.
- 12. From February 26, 2023 to the early morning hours of February 27, 2023, Taj Giles, Jahkai Goff, Isaiah Flowers, Jaelen Jordan, Irshaad Ellis-Bey, and Byron Gillum also known as Bryon Gillum, exchanged phone calls.
- 13. During the evening hours of February 26, 2023, Taj Giles traveled from Springfield, MD

to the area of Jahkai Goff's residence in Largo, MD.

- 14. During the evening hours of February 26, 2023, Byron Gillum also known as Bryon Gillum traveled from the area of his grandmother's residence in North Englewood, MD, to the area of Jahkai Goff's residence in Largo, MD.
- 15. During the evening hours of February 26, 2023, Isaiah Flowers traveled from the area of his residence in Bowie, MD, to the area of Jahkai Goff's residence in Largo, MD.
- 16. Between the evening of February 26, 2023 and the early morning hours of February 27, 2023, Taj Giles, Jahkai Goff, Isaiah Flowers, Bryon Gillum also known as Bryon Gillum, and Irshaad Ellis-Bey armed themselves with firearms or imitations thereof.
- 17. Between the evening of February 26, 2023 and the early morning hours of February 27, 2023, Taj Giles, Jahkai Goff, Isaiah Flowers, Byron Gillum also known as Bryon Gillum, and Irshaad Ellis-Bey put on ski masks.
- 18. During the evening of February 26, 2023, Taj Giles, Jahkai Goff, Isaiah Flowers, Byron Gillum also known as Bryon Gillum, and Irshaad Ellis-Bey traveled from Baltimore, MD, to the District of Columbia in Charger and a silver/grey van ("the grey van"), and used Charger and the grey van to carjack and rob
- 19. In the early morning hours of February 27, 2023, Taj Giles, Jahkai Goff, Isaiah Flowers, Byron Gillum also known as Bryon Gillum, and Irshaad Ellis-Bey used Charger and the grey van to block. and 2013 Porsche Cayenne at the intersection of 20th St NW and Sunderland Pl NW in Washington, DC.
- 20. In the early morning hours of February 27, 2023, Taj Giles, Jahkai Goff, Isaiah Flowers,
 Byron Gillum also known as Bryon Gillum, and Irshaad Ellis-Bey, armed with firearms or
 imitations thereof, got out of Charger and the grey van, surrounded Porsche,
 and ordered Dut of his vehicle.
- On February 27, 2023, one of the co-conspirators, whose identity is unknown to the
 Grand Jury, took.
- 22. On or about February 27, 2023, two co-conspirators, whose identities are unknown to the Grand Jury, drove Porsche away from 20th St NW and Sunderland PI NW, and into the Florida Avenue garage, where they parked the vehicle.
- 23. On or about March 1, 2023, Jaelen Jordan showed Porsche to two individuals whose identities are unknown to the Grand Jury.

24. On or about March 1, 2023, the two individuals, whose identities are unknown to the Grand Jury, took possession of Porsche and drove it out of the Florida Avenue garage.

The Carjacking and Sale

- During the afternoon on April 26, 2023, Jaelen Jordan traveled from the area of his
 residence in Washington, DC to the area of the Florida Avenue garage in Northeast, Washington,
 DC.
- During the evening of April 26, 2023, Taj Giles, Byron Gillum also known as Bryon
 Gillum, Jaelen Jordan, Jahkai Goff, Irshaad Ellis-Bey, and Isaiah Flowers exchanged phone calls.
- During the evening on April 26, 2023, Taj Giles traveled from the area of Jahkai Goff's residence in Largo, MD to the area of the Florida Avenue garage in Northeast, Washington, DC.
- 28. On April 26, 2023, during the evening hours, Byron Gillum also known as Bryon Gillum traveled from the area of his grandmother's residence in North Englewood, MD to the area of the Florida Avenue garage in Northeast, Washington, DC.
- 29. Between April 26, 2023 and the morning hours of April 27, 2023, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, and Taj Giles armed themselves with firearms or imitations thereof.
- On April 26, 2023 Jaelen Jordan provided Byron Gillum also known as Bryon Gillum with latex gloves.
- 31. On April 26, 2023, Byron Gillum also known as Bryon Gillum put on the latex gloves and a ski mask.
- 32. On April 26, 2023, Jaelen Jordan provided Taj Giles with latex gloves.
- 33. On April 26, 2023, Taj Giles put on the latex gloves and a ski mask.
- 34. On April 26, 2023, Jaelen Jordan put on the latex gloves and a ski mask.
- 35. On April 26, 2023, after putting on latex gloves and ski masks, Jaelen Jordan, Taj Giles, and Byron Gillum also known as Bryon Gillum got into a black BMW sedan ("suspect BMW") that was parked in the Florida Avenue garage.
- 36. On April 26, 2023, Jaelen Jordan, Taj Giles, and Byron Gillum also known as Bryon Gillum drove the suspect BMW out of the Florida Avenue garage.
- 37. Between the evening hours of April 26, 2023 and the morning of April 27, 2023, Warren

Montgomery joined Jaelen Jordan, Byron Gillum also known as Bryon Gillum, and Taj Giles.

- 38. Between the evening hours on April 26, 2023 and the morning hours on April 27, 2023, Warren Montgomery armed himself with a firearm or imitation thereof.
- 39. On April 27, 2023, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Taj Giles, and Warren Montgomery drove to the intersection of 8th Street NE and K Street NE in Washington, DC.
- 40. On April 27, 2023, at approximately 7:20 AM, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Taj Giles, and Warren Montgomery, carjacked and robbed Washington DC.
- 41. On April 27, 2023, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Taj Giles, and Warren Montgomery stopped the suspect BMW in front of BMW X6

 (BMW") at the intersection of 8th Street NE and K Street NE in Washington, DC, blocking BMW.
- 42. On April 27, 2023, Warren Montgomery and Taj Giles got out of the suspect BMW, armed with firearms or imitations thereof, and walked to BMW.
- 43. On April 27, 2023, Warren Montgomery and Taj Giles ordered out of his BMW at gunpoint.
- 44. On April 27, 2023, Warren Montgomery got into the driver's seat of
- 45. On April 27, 2023, Taj Giles got into the front passenger seat of
- 46. On April 27, 2023, Warren Montgomery drove BMW away from the intersection of 8th Street NE and K Street NE in Washington, DC, to the Florida Avenue garage, and got out of BMW.
- On April 27, 2023, Jaelen Jordan drove the suspect BMW away from the intersection of
 8th Street NE and K Street NE in Washington, DC, to the Florida Avenue garage.
- 48. On April 27, 2023, Jaelen Jordan parked the suspect BMW in the Florida Avenue garage.
- 49. On April 27, 2023, Jaelen Jordan got into BMW in the Florida Avenue garage, and parked it.
- 50. On April 27, 2023, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Taj Giles, and Warren Montgomery inspected and wiped dowr
- On April 27, 2023, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Taj Giles,
 and Warren Montgomery entered Apartment 01.

- 52. On April 24, 2023, Jaelen Jordan offered a vehicle for sale to Undercover Police Officer ("UC") 1.
- 53. On April 25, 2023, Jaelen Jordan offered to sell UC 1 and UC 2
 Toyota for \$3,800.
- 54. On or about April 27, 2023, Jaelen Jordan sold BMW and a Toyota to UC 1 and UC 2.
- 55. On or about April 27, 2023, after receiving U.S. currency from UC 1 and UC 2, Jaelen Jordan handed the key card to BMW to UC 1.

The Carjacking and Attempted Sale

- 56. On May 16, 2023, Jaelen Jordan, Isaiah Flowers, Taj Giles, and Warren Montgomery exchanged phone calls.
- On May 16, 2023, Jaelen Jordan traveled from the area of his residence in Washington,
 DC to the area of Union Station in Washington,
- 58. On May 16, 2023, Isaiah Flowers traveled from the area of his residence in Bowie, MD, to the area of the L'Enfant Plaza Metro Station in Washington, DC.
- During the evening hours on May 16, 2023, Warren Montgomery met Jaelen Jordan and Isaiah Flowers.
- 60. On May 16, 2023, Jaelen Jordan, Warren Montgomery and Isaiah Flowers armed themselves with firearms or imitations thereof.
- 61. On May 16, 2023, Jaelen Jordan put on a ski mask and latex gloves.
- 62. On May 16, 2023, Warren Montgomery put on a ski mask and latex gloves.
- 63. On May 16, 2023, Isaiah Flowers, Jaelen Jordan, and Warren Montgomery drove the

suspect BMW to the 600 block of Butternut Street NW, Washington, DC, and carjacked and robbed

- 64. On May 16, 2023, Isaiah Flowers made a u-turn and stopped the suspect BMW behind a fence.
- 65. On May 16, 2023, Jaelen Jordan, armed with a firearm or imitation thereof, exited the suspect BMW and ran up a driveway control of GTS Porsche Cayenne Porsche").

- 66. On May 16, 2023, Warren Montgomery, armed with a firearm or imitation thereof, exited the suspect BMW and ran up a driveway in the passenger side of Porsche.
- 67. On May 16, 2023, Jaelen Jordan opened the driver's side door of ordered out of wehicle at gunpoint.
- 68. On May 16, 2023, Warren Montgomery attempted to open the front passenger door of Porsche.
- 69. On May 16, 2023, Jaelen Jordan got into the driver's seat of
- 70. On May 16, 2023, Warren Montgomery got into the passenger side of
- 71. On May 16, 2023, Jaelen Jordan drove Porsche away from
- 72. On May 16, 2023, Isaiah Flowers drove the suspect BMW away from the Porsche.
- 73. On May 16, 2023, an unindicted co-conspirator, whose identity is known to the Grand Jury ("unindicted co-conspirator 1"), opened the garage door to the Florida Avenue garage.
- 74. On May 16, 2023, Isaiah Flowers drove the suspect BMW to the Florida Avenue garage and parked it.
- 75. On May 16, 2023, Jaelen Jordan drove Porsche to the Florida Avenue garage and parked it.
- 76. On or about May 17, 2023, Jaelen Jordan, Warren Montgomery, Isaiah Flowers, and unindicted co-conspirator 1 took out items from Porsche and put them into a white trash bag.
- 77. On or about May 17, 2023, Jaelen Jordan carried the white trash bag to the suspect BMW.
- 78. On or about May 17, 2023, Jaelen Jordan, Warren Montgomery, and Isaiah Flowers got into the suspect BMW.
- 79. On or about May 17, 2023, Isaiah Flowers drove the suspect vehicle out of the Florida Avenue garage.
- 80. On or about May 17, 2023, unindicted co-conspirator 1 opened the garage door to the Florida Avenue garage.
- 81. On or about May 17, 2023, Isaiah Flowers drove the suspect BMW back into the Florida

Avenue garage and parked it.

- 82. On or about May 17, 2023, Jaelen Jordan and Warren Montgomery got out of the suspect BMW.
- 83. On or about May 17, 2023, Warren Montgomery took the white trash bag out of the trunk of the suspect BMW and brought the white trash bag to
- 84. On or about May 17, 2023, a co-conspirator, whose identity is unknown to the Grand

 Jury, started Porsche.
- 85. On or about May 17, 2023, Jaelen Jordan locked
- 86. On or about May 17, 2023, Jaelen Jordan took the white trash bag and key into Apartment 01.
- 87. On or about May 17, 2023, Jaelen Jordan took photographs of
- 88. On or about May 17, 2023, Jaelen Jordan took a video of.
- 89. During the afternoon on May 17, 2023, Jaelen Jordan offered to sell Porsche to UC 1.
- 90. On May 17, 2023, Jaelen Jordan sent UC 1 a video of

(Conspiracy in violation of 22 D.C. Code, Section 1805a(a)(2) (2001 ed.))

violation of 22 D.C. Code, Section 3231 (2001 ed.))

SECOND COUNT:

On two or more occasions, that is, between on or about February 25, 2023, and on or about May 17, 2023, within the District of Columbia, Jaelen Jordan, Warren Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles, and Irshaad Ellis-Bey did traffic in property, stolen or otherwise, while knowing and having reason to believe that the property was stolen, in that they bought, received, possessed, and obtained control of property belonging to consisting of vehicles, with the intent to sell, pledge, transfer, distribute, dispense, and otherwise dispose of said property as consideration for property of value, that is, U.S. currency. (Trafficking In Stolen Property, in

THIRD COUNT:

On or about February 27, 2023, within the District of Columbia, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles and Irshaad Ellis-Bey, feloniously did take, use and operate a motor vehicle, property of course of and to facilitate a crime of violence, without the consent of the owner of that motor vehicle. (Unauthorized Use of a Vehicle-Crime of Violence, in violation of 22 D.C. Code, Section 3215 (d)(2)(A) (2001 ed.))

FOURTH COUNT:

On or about February 27, 2023, within the District of Columbia, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles, and Irshaad Ellis-Bey bought, received, possessed, and obtained control of property of a value of \$1000 or more, belonging to consisting of a motor vehicle, which had been stolen, knowing and having reason to believe it was stolen, with the intent to defraud and to deprive of a right to and benefit of the property. (Receiving Stolen Property, in violation of 22 D.C. Code, Sections 3232(a), 3232(c)(1) (2001 ed.))

FIFTH COUNT:

On or about February 27, 2023, within the District of Columbia, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles, and Irshaad Ellis-Bey, while armed with and having readily available a firearm or imitation thereof, by force and violence, against resistance, by sudden and stealthy seizure, and by putting in fear, stole and took, and attempted to steal and take, a motor vehicle from the person and from the immediate actual possession of (Armed Carjacking, in violation of 22 D.C. Code, Section 2803(b)(1) (2001 ed.))

SIXTH COUNT:

On or about February 27, 2023, within the District of Columbia, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles and Irshaad Ellis-Bey did possess a firearm, or imitation thereof, while committing the crime of Armed Carjacking as set forth in the Fifth Count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SEVENTH COUNT:

On or about February 27, 2023, within the District of Columbia, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles and Irshaad Ellis-Bey, while armed with and having readily available a firearm, or imitation thereof, by force and violence, against resistance and by means of sudden and stealthy seizure and snatching, and by putting in fear, stole and took from the person and from the immediate actual possession of property of value belonging to consisting of a cellphone. (Robbery While Armed, in violation of 22 D.C. Code, Section 2801, 4502 (2001 ed.))

EIGHTH COUNT:

On or about February 27, 2023, within the District of Columbia, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles and Irshaad Ellis-Bey did possess a firearm, or imitation thereof, while committing the crime of Armed Robbery as set forth in the Seventh Count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

NINTH COUNT:

On or about February 27, 2023, within the District of Columbia, Jaelen Jordan, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles, and Irshaad Ellis-Bey, feloniously did take, use and operate a motor vehicle, property of and did take, use and operate that motor vehicle for their own purpose, without the consent of the owner of that motor vehicle. (Unauthorized Use of a Vehicle, in violation of 22 D.C. Code, Section 3215 (2001 ed.))

TENTH COUNT:

On or about April 27, 2023, within the District of Columbia, Jaelen Jordan, Warren Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles, and Irshaad Ellis-Bey while armed with and having readily available a firearm or imitation thereof, by force and violence, against resistance, by sudden and stealthy seizure, and by putting in fear, stole and took, and attempted to steal and take, a motor vehicle from the person and from the immediate actual possession of (Armed Carjacking, in violation of 22 D.C. Code, Section 2803(b)(1) (2001 ed.))

ELEVENTH COUNT:

On or about April 27, 2023, within the District of Columbia, Jaelen Jordan, Warren Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles and Irshaad Ellis-Bey did possess a firearm, or imitation thereof, while committing the crime of Armed Carjacking as set forth in the Tenth Count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

TWELFTH COUNT:

On or about April 27, 2023, within the District of Columbia, Jaelen Jordan, Warren Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles, and Irshaad Ellis-Bey while armed with and having readily available a firearm, or imitation thereof, by force and violence, against resistance and by means of sudden and stealthy seizure and snatching, and by putting in fear, stole and took from the person and from the immediate actual possession of property of value belonging to consisting of a motor vehicle and its contents. (Robbery While Armed, in violation of 22 D.C. Code, Section 2801, 4502 (2001 ed.))

THIRTEENTH COUNT:

On or about April 27, 2023, within the District of Columbia, Jaelen Jordan, Warren Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles and Irshaad Ellis-Bey did possess a firearm, or imitation thereof, while committing the crime of Armed Robbery as set forth in the Twelfth Count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FOURTEENTH COUNT:

On or about April 27, 2023, within the District of Columbia, Jaelen Jordan, Warren

Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles,
and Irshaad Ellis-Bey, feloniously did take, use and operate a motor vehicle, property of
and did take, use and operate that motor vehicle for their own purpose, without the
consent of the owner of that motor vehicle. (Unauthorized Use of a Vehicle, in
violation of 22 D.C. Code, Section 3215 (2001 ed.))

FIFTEENTH COUNT:

On or about May 16, 2023, within the District of Columbia, Jaelen Jordan, Warren Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles, and Irshaad Ellis-Bey, while armed with and having readily available a firearm or imitation thereof, by force and violence, against resistance, by sudden and stealthy seizure, and by putting in fear, stole and took, and attempted to steal and take, a motor vehicle from the person and from the immediate actual possession of a person (Armed Carjacking of a Senior Citizen, in violation of 22 D.C. Code, Section 2803(b)(1), 3601 (2001 ed.))

SIXTEENTH COUNT:

On or about May 16, 2023, within the District of Columbia, Jaelen Jordan, Warren Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles and Irshaad Ellis-Bey did possess a firearm, or imitation thereof, while committing the crime of Armed Carjacking as set forth in the Fifteenth Count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SEVENTEENTH COUNT:

On or about May 16, 2023, within the District of Columbia, Jaelen Jordan, Warren

Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles,
and Irshaad Ellis-Bey, while armed with and having readily available a firearm, or imitation
thereof, by force and violence, against resistance and by means of sudden and stealthy seizure
and snatching, and by putting in fear, stole and took from the person and from the immediate
actual possession of a person property of value
belonging to consisting of a motor vehicle
and its contents. (Robbery While Armed of a Senior Citizen, in violation of 22 D.C. Code, Section
2801, 4502, 3601 (2001 ed.))

EIGHTEENTH COUNT:

On or about May 16, 2023, within the District of Columbia, Jaelen Jordan, Warren Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles and Irshaad Ellis-Bey did possess a firearm, or imitation thereof, while committing the crime of Armed Robbery as set forth in the Seventeenth Count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

NINETEENTH COUNT:

On or about May 16, 2023, within the District of Columbia, Jaelen Jordan, Warren

Montgomery, Byron Gillum also known as Bryon Gillum, Isaiah Flowers, Jahkai Goff, Taj Giles,
and Irshaad Ellis-Bey, feloniously did take, use and operate a motor vehicle, property of
and did take, use and operate that motor vehicle for their own purpose, without the
consent of the owner of that motor vehicle. (Unauthorized Use of a Vehicle, in
violation of 22 D.C. Code, Section 3215 (2001 ed.))

matthew M. graves (cdw MATTHEW M. GRAVES

MATTHEW M. GRAVES
United States Attorney
in and for the District of Columbia