

KCC  
6-19-19

**SEALED**

MD\MG: 2018R00612

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

*[Handwritten Signature]*  
U.S. District Court  
District of Maryland  
2019 JUN 20 PM 2:45  
FILED  
U.S. District Court  
District of Maryland

**UNITED STATES OF AMERICA**

**v.**

**JUSTIN ANTOINE,  
a.k.a. "JUSTO,"  
RODNEY BASS,  
a.k.a. "BOO,"  
COREY BELL,  
a.k.a. "BELL,"  
DAVON BOYKIN,  
CALVIN CLAXTON  
a.k.a. "CAL,"  
CORTNEY CRAWLEY,  
a.k.a. "C MURDA,"  
ERYICA DAVIS,  
a.k.a. "MISS COOKIE,"  
CEDRIC HITE,  
a.k.a. "HECTOR,"  
WILLIAM JACKSON,  
RAEKWON JONES,  
a.k.a. "KWON,"  
RONALD JONES,  
SHELTON LEWIS,  
ADAM MARTIN,  
a.k.a. "FATS,"  
RODNEY MATTHEWS,  
a.k.a. "ROD,"  
NEAL PINKNEY,  
ROBERT WILLIAMS,  
a.k.a. "UNCLE ROB,"**

**Defendants.**

**CRIMINAL NO. PWG-19-140**

**(Conspiracy to Distribute Controlled  
Substances, 21 U.S.C. § 846;  
Possession of a Firearm in Relation to  
a Drug Trafficking Crime, 18 U.S.C.  
§ 924(c); Possession with Intent to  
Distribute Controlled Substances, 21  
U.S.C. § 841; Possession of a  
Firearm by a Prohibited Person, 18  
U.S.C. § 922(g)(1); Drug  
Paraphernalia, 21 U.S.C. § 863(a)(1);  
Aiding and Abetting, 18 U.S.C. § 2;  
and Forfeiture, 18 U.S.C. § 924(d))**

\*\*\*\*\*

**SUPERSEDING INDICTMENT**

**COUNT ONE**  
**Conspiracy to Distribute Controlled Substances**

The Grand Jury for the District of Maryland charges that:

From a time unknown to the Grand Jury, but no later than 2018 through the filing of this Superseding Indictment, in the District of Maryland, and elsewhere, the defendants:

**JUSTIN ANTOINE,**  
**a.k.a. "JUSTO,"**  
**RODNEY BASS,**  
**a.k.a. "BOO,"**  
**COREY BELL,**  
**a.k.a. "BELL,"**  
**DAVON BOYKIN,**  
**CALVIN CLAXTON**  
**a.k.a. "CAL,"**  
**CORTNEY CRAWLEY,**  
**a.k.a. "C MURDA,"**  
**ERYICA DAVIS,**  
**a.k.a. "MISS COOKIE,"**  
**CEDRIC HITE,**  
**a.k.a. "HECTOR,"**  
**WILLIAM JACKSON,**  
**RAEKWON JONES,**  
**a.k.a. "KWON,"**  
**RONALD JONES,**  
**SHELTON LEWIS,**  
**ADAM MARTIN,**  
**a.k.a. "FATS,"**  
**RODNEY MATTHEWS,**  
**a.k.a. "ROD,"**  
**NEAL PINKNEY,**  
**ROBERT WILLIAMS,**  
**a.k.a. "UNCLE ROB,"**

did knowingly combine, conspire, confederate, and agree with each other, and with persons known and unknown to the Grand Jury, to distribute and possess with the intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance,

and a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841.

21 U.S.C. § 846

**MANNER AND MEANS OF THE CONSPIRACY**

1. Among the manner and means by which the defendants and others conducted and participated in the conspiracy were the following:

2. Members and associates of the Adam Martin and Calvin Claxton Drug Trafficking Organization (the “Drug Trafficking Organization”) distributed narcotics in and around the Edmondson Village area in southwest Baltimore, Maryland.

3. Members of the conspiracy distributed heroin, cocaine base, and cocaine to drug users and drug redistributors.

4. Members of the conspiracy conducted narcotics sales on a daily basis, operating in rotating shifts to ensure continuous distribution.

5. Members of the conspiracy sold bulk quantities of narcotics to other drug traffickers who, in turn, redistributed the narcotics in and around Baltimore.

6. Members of the conspiracy adulterated heroin and cocaine to maximize their profits, cutting the drugs with other substances.

7. Members of the conspiracy used residences in and around Baltimore, Maryland to process, cut, repackage, and prepare heroin, cocaine, and cocaine base for distribution.

8. Members of the conspiracy frequently changed cell phones to prevent the interception of drug-trafficking communications by law enforcement.

9. Members of the conspiracy possessed firearms in furtherance of their drug trafficking activities, including this conspiracy.



10. Members of the conspiracy used violence to retaliate against those seeking to rob or cheat the Drug Trafficking Organization.

**OVERT ACTS**

11. The defendants and members and associates of the Drug Trafficking Organization committed acts in furtherance of the organization's objectives, which include, but are not limited to, the following:

12. From at least the beginning of 2018 until the dates of their arrests, **ANTOINE, BASS, BELL, CLAXTON, DAVIS, HITE, JACKSON, RAEKWON JONES, RONALD JONES, LEWIS, MARTIN, MATTHEWS, PINKNEY, WILLIAMS**, and other members of the Drug Trafficking Organization collectively distributed, intended to distribute, and assisted in the distribution of heroin, cocaine, and cocaine base throughout the Baltimore metropolitan area.

13. On or about April 27, 2018, **RAEKWON JONES** possessed with intent to distribute cocaine base and heroin.

14. On or about May 5, 2018, **ANTOINE** shot and killed J.D.

15. On or about May 17, 2018, **RAEKWON JONES** possessed with intent to distribute cocaine base and heroin.

16. On or about June 8, 2018, **MATTHEWS** possessed with intent to distribute cocaine base and heroin.

17. On or about July 2, 2018, **MATTHEWS** possessed with intent to distribute cocaine and heroin, and a loaded firearm.

18. On or about July 18, 2018, **BELL** sold cocaine base to an undercover officer.

19. On or about July 18, 2018, **CRAWLEY** sold cocaine base to an undercover officer.

20. On or about July 25, 2018, **BELL** sold cocaine base to an undercover officer.

21. On or about July 31, 2018, **PINKNEY** sold cocaine base to an undercover officer.
22. On or about August 2, 2018, **PINKNEY** and **RONALD JONES** sold cocaine base to an undercover officer.
23. On or about August 8, 2018, **BELL** sold cocaine base to an undercover officer.
24. On or about August 16, 2018, **BELL** sold cocaine base to an undercover officer.
25. On or about August 23, 2018, **BELL** sold cocaine base to an undercover officer.
26. On or about September 13, 2018, **BELL** sold cocaine base to an undercover officer.
27. On or about September 13, 2018, **CRAWLEY** sold cocaine base to an undercover officer.
28. On or about September 19, 2018, **BELL** sold cocaine base to an undercover officer.
29. On or about October 3, 2018, **CRAWLEY** sold cocaine base to an undercover officer.
30. On or about October 4, 2018, **BELL** sold cocaine base to an undercover officer.
31. On or about October 16, 2018, **CRAWLEY** sold cocaine base to an undercover officer.
32. On or about October 16, 2018, **ANTOINE** engaged in a gunfight with associates of J.D. **ANTOINE** fired his gun in the exchange and an unarmed victim, S.J., was struck in the crossfire on Edgewood Street.
33. On or about October 17, 2018, **BELL** sold cocaine base to an undercover officer.
34. On or about October 24, 2018, **CRAWLEY** sold cocaine base and heroin to an undercover officer.
35. On or about October 24, 2018, **CRAWLEY** called **BELL** and asked for a supply of drugs. **BELL** responded that he was presently out of drugs.

36. On or about October 24, 2018, **CRAWLEY** spoke to **BOYKIN** by telephone to obtain a resupply of drugs. During the call, **BOYKIN** asked, “YEAH, YOU STILL WANTED WHAT YOU WANTED EARLIER?” **CRAWLEY** stated, “YEAH, the ... the 2-0.” **BOYKIN** confirmed the quantity of drugs but **CRAWLEY** then said, “NAH, MATTER OF FACT, GIVE ME 15 OF ‘EM, BRO.”

37. On or about October 26, 2018, **BOYKIN** and **CRAWLEY** spoke by phone. **CRAWLEY** told **BOYKIN**, “GIVE ME, GIVE ME EIGHT OF ‘EM, EIGHT NICE ONES BRO THAT I CAN FLIP.” **BOYKIN** and **CRAWLEY** agreed to meet, so **BOYKIN** could supply **CRAWLEY** with drugs to sell to a customer who was traveling to Baltimore to buy drugs. Later that day, **CRAWLEY** told **BOYKIN** that he needed to get the drugs as soon as possible because a person had put “MONEY ON MY HEAD AND ALL THAT SON, I GOTTA HURRY UP AND MOVE BRO.”

38. On November 1, 2018, **CRAWLEY** asked for drugs on credit from **BOYKIN**, who hesitated to do so. **CRAWLEY** explained he had multiple drug customers lined up already. **BOYKIN** and **CRAWLEY** then met for the drug transaction.

39. From on or about August 2018 through November 1, 2018, **BELL** used his residence on Tolley Street in Baltimore, MD to store narcotics and narcotics sale proceeds. On or about November 1, 2018, investigators recovered from **BELL**'s residence in Baltimore two boxes containing spent ammunition casings, one scale used to weigh narcotics for distribution, over \$7,000 in United States currency, and drug packaging and distribution paraphernalia.

40. From on or about September 2018 through November 1, 2018, the Drug Trafficking Organization operated a stash house on Grantley Street that was used to store narcotics. On November 1, 2018, **PINKNEY** was inside the stash house and in possession of approximately 161



bags of cocaine base, approximately 4.1 grams of loose cocaine base, and approximately 2.2 grams of loose heroin.

41. On or about November 1, 2018, **CRAWLEY** spoke to an associate about his suspicions that he and **BELL** were under investigation due to selling drugs to an undercover officer. During the call, **CRAWLEY** told the associate, "IF THAT'S THE CASE, THE FEDS, CAUSE THE FEDS NOT GOING TO PULL UP JUST FOR NOTHING. LIKE THEY KNOW SOMETHING. THERE MUST BE MORE INVESTIGATION ON Y'ALL."

42. On or about November 1, 2018, **CRAWLEY** observed investigators executing a search warrant at the Grantley Street stash house. **CRAWLEY** then called an associate and told him, "THE FEDS GOT THEIR HOUSE."

43. On or about November 19, 2018, **ANTOINE** spoke to **BASS** by telephone. During the call, **ANTOINE** asked **BASS**, "HOW MANY, LIKE HOW MUCH, MUCH YOU GOT LEFT?" **BASS** replied, "AH SHI\*. I GOT A LITTLE BIT OF THIS LEFT. I JUST CAME OUT HERE CAUSE IT'S BEEN HOT AND ALL. THEY LOCKED C-MURDA AND ALL THEM UP." **ANTOINE** asked **BASS** to confirm this, and when **BASS** did, **ANTOINE** exclaimed, "DAMN. THAT MEAN...MEAN THAT'S MORE MONEY FOR YOU!"

44. On or about November 26, 2018, **ANTOINE** called a co-conspirator to plan the robbery of an unlicensed taxi driver because he believed the taxi driver had refused to return a firearm that **ANTOINE** had left in the vehicle. **ANTOINE** explained that he planned to confront the driver, stating that if the driver gave him any issues that he was "SPLATTING THAT SHI\*."

45. On or about November 28, 2018, **ANTOINE** called a co-conspirator and told him that a drug customer was traveling to **ANTOINE**'s house to buy drugs. **ANTOINE** then told the

co-conspirator where to find the drugs in his house and how much to sell to the customer. The co-conspirator acknowledged, obtained the drugs, and then sold them to the drug customer.

46. On or about December 13, 2018, **BOYKIN** distributed cocaine base

47. On or about December 16, 2018, **ANTOINE** spoke to **MARTIN** about how he was thinking about buying a long gun from someone in the neighborhood because he could use the firearm. **MARTIN** told **ANTOINE** not to sell his other firearm. **ANTOINE** acknowledged that he would still keep his current gun but also obtain the new gun, stating, "THAT, THAT WILL PUT SOME SHI\* DOWN THOUGH."

48. On or about December 28, 2018, **HITE** called **MARTIN** and asked, "ALRIGHT, ALRIGHT, SO WE ON, WE ON HOLD FOR A MINUTE?" **MARTIN** confirmed that drug sales at the shop should stop and told **HITE** to be careful because the police were in the area.

49. On or about January 28, 2019, **HITE** engaged in a drug sale, but was robbed by the purported customers. **RAEKWON JONES** then called **MARTIN** and reported the robbery and described the person who robbed **HITE**.

50. On or about January 2, 2019, **HITE** called **MARTIN** to tell him he had drug proceeds to turn over to **MARTIN**. During the call, **MARTIN** accused **HITE** of losing drug proceeds. Later that day, **HITE** spoke to **MARTIN** and admitted to losing the drug proceeds and owing **MARTIN** money.

51. On or about January 10, 2019, **ANTOINE** possessed a loaded HK P30L .40 caliber pistol bearing serial number 221-004080, heroin, and cocaine base with intent to distribute the drugs.

52. On or about February 1, 2019, **MARTIN** called **RAEKWON JONES** to check on the status of drug sales. **RAEKWON JONES** told **MARTIN**, in substance, that heroin and



cocaine sales had started increasing lately and that customers particularly liked the heroin. **MARTIN** responded, "OH YEAH, I KNOW. I COOKED LAST NIGHT," meaning he had processed the current supply of heroin.

53. On February 3, 2019, **MARTIN** called **MATTHEWS** to ask if **RAEKWON JONES** was with **MATTHEWS** selling drugs. **MATTHEWS** reported that **RAEKWON JONES** was not, and explained that a co-conspirator had heroin and cocaine stolen recently.

54. On or about February 4, 2019, **MARTIN** sold approximately 32 grams of cocaine base to **JACKSON**. An FBI investigator stopped **JACKSON** shortly thereafter and recovered the cocaine base from **JACKSON**. **JACKSON** then called **MARTIN** and told **MARTIN** that law enforcement had seized the drugs from him but did not arrest him. During the call, **JACKSON** stated, "SO I'M STILL GOOD, BUT THEY TOOK THAT BUT I AIN'T GO NOTHING NEW. I GOTTA START ALL OVER AGAIN. WHOLE SHIT GONE. I CAN'T BELIEVE THIS S\*\*\* MAN. CAN'T BELIEVE THIS SHI\*." **MARTIN** then told **JACKSON** that he would call him back to discuss further.

55. On or about February 6, 2019, **MATTHEWS** sold heroin and cocaine base to an undercover officer.

56. On or about February 8, 2019, **MARTIN** and **DAVIS** spoke by telephone. During the call, **DAVIS** stated, in substance, that an associate stole drugs from her. **DAVIS** stated that she could not stop the theft because her weapon was out of reach in a pocketbook. **MARTIN** then stated, "ALRIGHT, WE SAID THAT WE GONNA BEAT THE FUC\* OUT OF THIS BITC\*."

57. On or about February 14, 2019, **RONALD JONES** sold cocaine base to an undercover officer.

58. On or about February 17, 2019, **MATTHEWS** told **MARTIN** that he had run out of heroin and was helping **RAEKWON JONES** sell the last amount of heroin that he possessed.

59. On or about February 19, 2019, Baltimore City Police Department officers on patrol recovered multiple bags and containers of heroin, cocaine base, and marijuana that were hidden near the drug shop operated by the Drug Trafficking Organization. Shortly thereafter, **RAEKWON JONES** spoke to **MARTIN** by phone and told him, "THE POLICE TOOK ME AND BRO PACK."

60. On or about February 19, 2019, **MARTIN** supplied **BASS** with a quantity of narcotics in a bag that **BASS** then hid in an alley. As **BASS** and a co-conspirator engaged in drug sales, investigators approached the location and recovered the bag, which contained multiple gel capsules of heroin, small bags of cocaine base, and small plastic jugs of cocaine base. Following this seizure, **BASS**, **MARTIN**, and the co-conspirator searched the area, looking for the narcotics that investigators had seized.

61. On or about February 28, 2019, **HITE** possessed with intent to distribute heroin, which an investigator recovered from his person. Following recovery of the heroin, **MATTHEWS** called **MARTIN** and reported that the police had taken drugs from **HITE**. **MATTHEWS** also complained that members of the Drug Trafficking Organization were carrying all of their drugs on their persons, including **BELL**. **MARTIN** then said he would speak to **BELL**.

62. On or about March 2, 2019, **DAVIS** called **MARTIN** to obtain a supply of drugs. **MARTIN** said he would travel to meet **DAVIS**. **DAVIS** then told **MARTIN** to meet with **LEWIS** because she had left money with him.

63. Beginning in 2018 and continuing through April 10, 2019, **MARTIN** regularly stored narcotics at a residence on West Franklin Street. On or about April 10, 2019, investigators

recovered, among other property, the following at the residence: (a) one Taurus PT 709 pistol bearing serial number TEZ15711, one Taurus PT 111 G2 pistol bearing serial number TJM43479, one Polymero P-809MM pistol bearing serial number PF9400, one CW 45 Kahr pistol bearing serial number SF4811; (b) gel capsules of heroin packaged for sale; (c) vials of cocaine base packaged for sale; and (d) drug distribution paraphernalia.

64. Beginning in 2018 and continuing through April 10, 2019, **CLAXTON** and **MARTIN** used a residence located on Walbrook Avenue to process and store narcotics. On or about April 10, 2019, investigators recovered from the location: (a) one Smith & Wesson MP Shield 9 mm pistol bearing serial number HMM3149 and ammunition; (b) over 200 grams of cocaine base; (c) multiple bags of heroin; and (d) drug processing and distribution paraphernalia.

65. On or about April 10, 2019, **CLAXTON** possessed over \$20,000 in United States currency in drug proceeds and ammunition his house.

66. On or about April 10, 2019, **RODNEY MATTHEWS** possessed one Winchester model 37A shotgun bearing serial number C621666.

67. On or about April 11, 2019, **JACKSON** possessed with intent to distribute over 28 grams of cocaine base in his house.

68. On or about April 12, 2019, **DAVIS** received a consensually-recorded jail call from an inmate at a Maryland correctional facility. During the call, **DAVIS** began arguing with another person in her presence over drug territory, stating: "I'M 45 YEARS OLD. AND I'VE NEVER, I'VE NEVER SEEN YOU HUSTLING DOWN HERE EVER. WHEN I YOUNG, I DON'T CARE WHERE YOU LIVE. I'M TALKING ABOUT HUSTLING, SWEETIE. I'VE NEVER SEEN YOU DOWN HERE. I MEAN, I UNDERSTAND YOU GOT YOUR WAY ON THE STREETS, BUT YOU DIDN'T EARN IT RIGHT HERE BOO." **DAVIS** further stated that she



was by herself with “BIG BROTHER...AND I’M TALKING ABOUT THAT, NOT THE 8, THE NUMBER 9,” referring to a 9 mm firearm.

69. On or about March 5, 2019, **BOYKIN** possessed with intent to distribute cocaine base.

70. On or about May 9, 2019, **LEWIS** and **DAVIS** possessed with intent to distribute heroin and two loaded firearms in their house.

71. From on or about November 2018 to May 9, 2019, **WILLIAMS** regularly sold narcotics cutting agents to **MARTIN**. During this time, **WILLIAMS** stored these cutting agents within his antiques business located in the Hollins Market.

72. On or about May 9, 2019, **WILLIAMS** possessed multiple boxes of cutting agents and one Stevens shotgun bearing serial number 2377 inside his business at the Hollins Market.

**Quantity of Controlled Substances Distributed in the Conspiracy**

73. With respect to **BASS, BELL, CLAXTON, HITE, RAEKWON JONES, MARTIN, and MATTHEWS**, the amount involved in the conspiracy attributable to each of them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is one kilogram or more of a mixture or substance containing a detectable amount of heroin, 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, and a quantity of a mixture or substance containing a detectable amount of cocaine.

74. With respect to **ANTOINE, CRAWLEY, RONALD JONES, and PINKNEY**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 28 grams of a mixture or substance containing a detectable amount of cocaine base, 100 grams or more of a mixture or

substance containing a detectable amount of heroin, and a quantity of a mixture or substance containing a detectable amount of cocaine.

75. With respect to **BOYKIN** and **JACKSON**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 28 grams of a mixture or substance containing a detectable amount of cocaine base and a quantity of a mixture or substance containing a detectable amount of cocaine.

76. With respect to **DAVIS**, **LEWIS**, and **WILLIAMS**, the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a quantity of a mixture or substance containing a detectable amount of heroin, a quantity of a mixture or substance containing a detectable amount of cocaine base, and a quantity of a mixture or substance containing a detectable amount of cocaine.

21 U.S.C. § 846

**COUNT TWO**

**Possession with Intent to Distribute Controlled Substances**

The Grand Jury for the District of Maryland further charges that:

On or about January 10, 2019, in the District of Maryland, the defendant,

**JUSTIN ANTOINE,**

did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)



**COUNT THREE**

**Possession of a Firearm in Relation to a Drug Trafficking Crime**

The Grand Jury for the District of Maryland further charges that:

On or about January 10, 2019, in the District of Maryland, the defendant,

**JUSTIN ANTOINE,**

did knowingly possess a firearm in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute a Controlled Substance, in violation of 21 U.S.C. § 846, as charged in Count One, and Possession with Intent to Distribute a Controlled Substance, in violation of 21 U.S.C. § 841(a)(1), as charged in Count Two.

18 U.S.C. § 924(c)(1)(A)

**COUNT FOUR**

**Possession of a Firearm by a Prohibited Person**

The Grand Jury for the District of Maryland further charges that:

On or about May 9, 2019, in the District of Maryland, the defendant,

**SHELTON LEWIS**

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce a firearm and ammunition, that is, one Glock 19 9mm pistol bearing serial number BCCV023, one ISSC M22 .22 caliber pistol bearing serial number VAA012, and ammunition,

18 U.S.C. § 922(g)(1)

**COUNT FIVE**

**Possession of a Firearm in Relation to a Drug Trafficking Crime**

The Grand Jury for the District of Maryland further charges that:

On or about May 9, 2019, in the District of Maryland, the defendants,

**ERYICA DAVIS,  
a.k.a. "MISS COOKIE,"  
SHELTON LEWIS,**

did knowingly possess a firearm in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute a Controlled Substance, in violation of 21 U.S.C. § 846, as charged in Count One.

18 U.S.C. § 924(c)(1)(A)

18 U.S.C. § 2



**COUNT SIX**  
**Drug Paraphernalia**

The Grand Jury for the District of Maryland further charges that:

From a time unknown to the Grand Jury, but no later than 2018 and continuing through May 9, 2019, in the District of Maryland, and elsewhere, the defendant:

**ROBERT WILLIAMS,**  
**a.k.a. "UNCLE ROB,"**

did knowingly sell and offer to sell drug paraphernalia.

21 U.S.C. § 863(a)(1)

**FORFEITURE**

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., and Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendants:

**JUSTIN ANTOINE,  
a.k.a. "JUSTO,"  
RODNEY BASS,  
a.k.a. "BOO,"  
COREY BELL,  
a.k.a. "BELL,"  
DAVON BOYKIN,  
CALVIN CLAXTON  
a.k.a. "CAL,"  
CORTNEY CRAWLEY,  
a.k.a. "C MURDA"  
ERYICA DAVIS,  
a.k.a. "MISS COOKIE,"  
CEDRIC HITE,  
a.k.a. "HECTOR,"  
WILLIAM JACKSON,  
RAEKWON JONES,  
a.k.a. "KWON,"  
RONALD JONES,  
SHELTON LEWIS,  
ADAM MARTIN,  
a.k.a. "FATS,"  
RODNEY MATTHEWS,  
a.k.a. "ROD,"  
NEAL PINKNEY,  
ROBERT WILLIAMS,  
a.k.a. "UNCLE ROB,"**

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s), including the following: one HK P30L pistol bearing serial number 221-004080, one

Glock 19 9mm pistol bearing serial number BCCV023, one ISSC M22 .22 caliber pistol bearing serial number VAA012, one Winchester Model 37A shotgun bearing serial number C621666, one Stevens shotgun bearing serial number 2037, one Smith & Wesson MP Shield 9 mm pistol bearing serial number HMM3149, one Taurus PT 709 pistol bearing serial number TEZ15711, one Taurus PT 111 G2 pistol bearing serial number TJM43479, one Polymero P-809MM pistol bearing serial number PF9400, one CW 45 Kahr pistol bearing serial number SF4811, and ammunition.

2. If any of the property, as a result of any act or omission of the defendants:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

21 U.S.C. § 853  
28 U.S.C. § 2461(c)

  
ROBERT K. HUR  
United States Attorney

A TRUE BILL:

**SIGNATURE REDACTED**

6/20/19  
Date