

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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| UNITED STATES OF AMERICA                | : | CRIMINAL NO. <u>15-180</u>  |
| v.                                      | : | DATE FILED: _____   |
| KHALIL SMITH,<br>a/k/a "Lil,"           | : | VIOLATIONS:   |
| MARK WOODS,<br>a/k/a "Bundles,"         | : | 18 U.S.C. § 1951 (conspiracy to<br>commit robbery which interferes<br>with interstate commerce – 1<br>count)  |
| TERRANCE MUNDEN,<br>a/k/a "Boob,"       | : | 18 U.S.C. § 1951 (robbery which<br>interferes with interstate<br>commerce - 5 counts)   |
| ROBERT HARTLEY,<br>a/k/a "Do,"          | : | 18 U.S.C. § 1951 (attempted<br>robbery which interferes with<br>interstate commerce - 5 counts)   |
| HASAN CHANEY,<br>a/k/a "Has,"           | : | 18 U.S.C. § 2119 (carjacking – 3<br>counts)   |
| LEVERN JACKSON,<br>a/k/a "Bucket,"      | : | 18 U.S.C. § 1201(a)(1) (kidnapping<br>– 2 counts)   |
| BRAHEIM BALLARD,<br>a/k/a "Big Fellow," | : | 21 U.S.C. § 846 (attempted<br>possession with intent to distribute<br>cocaine - 1 count)  |
| WILLIAM JEFFERSON,<br>a/k/a "Money,"    | : | 18 U.S.C. § 924(c)(1)(A) (carrying<br>and using a firearm during and in<br>relation to a crime of violence and<br>to a drug trafficking crime – 13<br>counts) |
| JAMAL DOGGETT,<br>a/k/a "Jersey,"       | : | 18 U.S.C. § 2 (aiding and abetting)<br>Notice of forfeiture   |
| ROMEL ANTHONY,<br>a/k/a "Dame,"         | : |   |
| BRANDON SEGERS,<br>a/k/a "B,"           | : |   |
| SEI STONE,<br>a/k/a "Kareem Sweets,"    | : |   |
| EDWIN ROBINSON,<br>a/k/a "Kern,"        | : |   |
| a/k/a "Kerm,"                           | : |   |

**LOUIS MILLER,**  
a/k/a "Lou,"  
**JAMES HAINES,**  
a/k/a "Crack"

:  
:

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times relevant to this indictment:

1. The illegal sale, distribution, possession with intent to distribute, and trafficking of controlled substances are activities which affect interstate commerce as follows:
  - a. They have a substantial and detrimental effect on the health and general welfare of the American people;
  - b. A major portion of the traffic in illegal narcotics and controlled substances flows through interstate and foreign commerce. Incidents of the traffic which are not an integral part of the interstate or foreign flow, such as manufacture, local distribution, and possession, nonetheless have a substantial and direct effect upon interstate commerce because many illegal narcotics and controlled substances: (i) after manufacture, are transported in interstate commerce; (ii) that are distributed locally usually have been transported in interstate commerce immediately before their distribution; and (iii) immediately prior to the possession of such substances, commonly flow through interstate commerce.
  - c. Local distribution and possession of illegal narcotics and controlled substances contribute to swelling the interstate traffic in such substances.
  - d. Illegal narcotics and controlled substances manufactured and distributed intrastate cannot be differentiated from controlled substances manufactured and

distributed interstate.

All as set forth in Title 21, United States Code, Section 801.

2. C.W., H.H., M.M., G.T., S.P., J.B., T.H., A.C., O.T., L.T. and O.W.

(hereinafter "Victims"), persons known to the grand jury, were believed by defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, BRAHEIM BALLARD, WILLIAM JEFFERSON, JAMAL DOGGETT, BRANDON SEGERS, SEI STONE, EDWIN ROBINSON, LOUIS MILLER and JAMES HAINES, and Marcus Bowens, Michael Queen, Daniel Hayes, Jeffrey Bellamy, Eric Scott and Charles Wardlaw, charged elsewhere, to be engaged in the illegal sale, distribution, and trafficking of cocaine, marijuana and other illegal controlled substances in the Eastern District of Pennsylvania.

3. Platinum Jewelers (hereinafter "Victim Business"), located at 1136 Market Street, Philadelphia, PA was a business engaged in the sale of jewelry and watches which were manufactured outside the Commonwealth of Pennsylvania.

4. From at least in or around September 2012, through on or about April 29, 2014, in Philadelphia, Ambler, Hatfield, Cherry Hill, New Jersey and elsewhere in the Eastern District of Pennsylvania, and the District of New Jersey, defendants

**KHALIL SMITH,**  
a/k/a "Lil,"  
**MARK WOODS,**  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
**TERRANCE MUNDEN,**  
a/k/a "Boob,"  
a/k/a "Boo,"  
**ROBERT HARTLEY,**  
a/k/a "Do,"  
a/k/a "Doo,"

**a/k/a "Dooman,"  
HASAN CHANEY,  
a/k/a "Has,"  
a/k/a "Big Has,"  
LEVERN JACKSON,  
a/k/a "Bucket,"  
a/k/a "V,"  
BRAHEIM BALLARD,  
a/k/a "Big Fellow,"  
a/k/a "Big Homie,"  
a/k/a "Brian Moore,"  
WILLIAM JEFFERSON,  
a/k/a "Money,"  
a/k/a "Big Money,"  
JAMAL DOGGETT,  
a/k/a "Jersey,"  
BRANDON SEGERS,  
a/k/a "B,"  
SEI STONE,  
a/k/a "Kareem Sweets"  
a/k/a "Samuel Sneed"  
a/k/a "Buzz"  
EDWIN ROBINSON,  
a/k/a "Kern"  
a/k/a "Kerm"  
LOUIS MILLER,  
a/k/a "Lou" and  
JAMES HAINES,  
a/k/a "Crack,"**

and Marcus Bowens, Michael Queen, Daniel Hayes, Jeffrey Bellamy, Eric Scott and Charles Wardlaw, charged elsewhere, and A.M., a/k/a "Ant," a/k/a "Wax," a person known to the grand jury to be deceased, conspired and agreed, together and with other persons unknown to the grand jury, to commit robbery, which robbery would unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, in that defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, BRAHEIM BALLARD, WILLIAM JEFFERSON, JAMAL DOGGETT, BRANDON SEGERS, SEI STONE, EDWIN ROBINSON, LOUIS MILLER and JAMES

HAINES, and Marcus Bowens, Michael Queen, Daniel Hayes, Jeffrey Bellamy and Eric Scott, charged elsewhere, and A.M. conspired to unlawfully take and obtain illegal controlled substances, that is, cocaine, marijuana, and other controlled substances, the proceeds from the sale of controlled substances, and jewelry, money and other items of value, from the person and in the presence of other persons against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property in their possession, all in violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

#### **MANNER AND MEANS**

It was part of the conspiracy that defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, BRAHEIM BALLARD, WILLIAM JEFFERSON, JAMAL DOGGETT, BRANDON SEGERS, SEI STONE, EDWIN ROBINSON, LOUIS MILLER and JAMES HAINES, and Marcus Bowens, Michael Queen, Daniel Hayes, Jeffrey Bellamy, Eric Scott and Charles Wardlaw, charged elsewhere, and A.M. and others unknown to the grand jury:

5. Planned to commit armed robberies of the Victims and Victim Business identified in paragraphs 2 and 3, and targeted them for that purpose;
6. Conducted surveillance of the Victims and Victim Business and tracked them using GPS devices;
7. Used cellular telephones and walkie talkies to communicate with each other before, during and after the planned armed robberies, and to otherwise facilitate the commission of their crimes;
8. Used police scanners to monitor police radio during the commission of the armed robberies to avoid detection and apprehension by law enforcement;

9. Used tools, including but not limited to, ladders, pry bars and screwdrivers to enter the Target Locations;

10. Wore disguises during the commission of the armed robberies, including but not limited to, police uniforms, police badges, bullet proof vests marked with the word "Police," wigs, glasses, masks, gloves, and facial makeup;

11. Used semiautomatic pistols and a shotgun to facilitate the commission of the robberies, specifically to threaten, intimidate, and subdue the Victims;

12. Abducted the Victims on the street, and entered the homes of the Victims identified in paragraph 2, and the Victim Business identified in paragraph 3 and pointed their firearms at the Victims and others who were present;

13. Physically assaulted, threatened, abused and intimidated the Victims and others who were present;

14. Shot and threatened to shoot the Victims and others present;

15. Physically restrained the Victims and others present with handcuffs, zip ties, electrical cords and shoelaces and held them captive;

16. Stole and attempted to steal the Victims' personal belongings, illegal narcotics which were in and affecting commerce, money, jewelry, vehicles and other items of value;

17. Fled from the residences of the Victims and the Victim Business in vehicles and met to divide the stolen items among themselves; and

18. Sold the illegal narcotics and other items stolen during the armed robberies.

## OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, LEVERN JACKSON, BRAHEIM BALLARD, WILLIAM JEFFERSON, JAMAL DOGGETT, BRANDON SEGERS, SEI STONE, EDWIN ROBINSON, LOUIS MILLER and JAMES HAINES, and Marcus Bowens, Michael Queen, Daniel Hayes, Jeffrey Bellamy, Eric Scott and Charles Wardlaw, charged elsewhere, and A.M., committed the following overt acts, among others, in the Eastern District of Pennsylvania:

**September 3, 2012**  
**Railroad Avenue, Ambler, PA**  
**Armed Home Invasion Robbery**

1. In or about August 2012, through on or about September 3, 2012, defendants KHALIL SMITH, WILLIAM JEFFERSON, and Eric Scott, charged elsewhere, met to discuss their plan to commit an armed home invasion robbery at Railroad Avenue, Ambler, PA, a residence.
2. On or about September 2, 2012, Eric Scott went to the residence and remained there as a guest of A.G., a person known to the grand jury.
3. On or about September 3, 2012:
  - a. Eric Scott contacted defendants KHALIL SMITH and WILLIAM JEFFERSON and notified them that they should enter the residence and commit the planned robbery.
  - b. Defendants KHALIL SMITH and WILLIAM JEFFERSON entered the residence along with two other persons, unknown to the grand jury, wearing masks and gloves, and armed with firearms.

c. Once inside, defendants KHALIL SMITH and WILLIAM JEFFERSON and the other persons, unknown to the grand jury, pointed their guns at C.W., A.G., D.W., T.H., and Eric Scott, directing them at gunpoint to lay on the floor and/or remain still.

d. Defendants KHALIL SMITH and WILLIAM JEFFERSON restrained C.W., A.G., and Eric Scott by tying their hands and wrists with shoelaces.

e. Defendants KHALIL SMITH and WILLIAM JEFFERSON and two others threatened C.W. to do as instructed or risk injury to others.

f. Defendants KHALIL SMITH and WILLIAM JEFFERSON, Eric Scott and the other persons, unknown to the grand jury, stole jewelry, approximately \$1,980 in U.S. currency, approximately a quarter ounce of cocaine, and an unknown number of Percocet pills.

g. Defendants KHALIL SMITH and WILLIAM JEFFERSON and the other persons, unknown to the grand jury, fled the residence.

**October 9, 2012**  
**Bishop's View Apartments, Cherry Hill, NJ**  
**Attempted Armed Home Invasion Robbery**

4. In or about late September 2012 to in or about early October 2012:

a. Defendant KHALIL SMITH obtained information to assist him and defendants MARK WOODS, WILLIAM JEFFERSON and JAMES HAINES, and Marcus Bowens, charged elsewhere, in locating the residence of H.H., a person known to the grand jury.

b. Defendants KHALIL SMITH and WILLIAM JEFFERSON and Marcus Bowens conducted surveillance at H.H.'s residence.



5. On or about October 9, 2012:

a. Defendants KHALIL SMITH, WILLIAM JEFFERSON and JAMES HAINES and Marcus Bowens, met to discuss their plan to rob H.H. at his home located at Bishops View Apartments, Cherry Hill, New Jersey.

b. Defendants KHALIL SMITH, WILLIAM JEFFERSON and JAMES HAINES drove to H.H.'s home to execute their plan to commit an armed robbery of H.H.

c. Defendant MARK WOODS drove to H.H.'s home to meet defendants KHALIL SMITH, WILLIAM JEFFERSON and JAMES HAINES to execute their plan to commit an armed robbery of H.H.

d. Defendants KHALIL SMITH, WILLIAM JEFFERSON, and JAMES HAINES approached H.H.'s home with guns, and attempted to enter H.H.'s home through a window, while defendant MARK WOODS acted as a lookout.

e. Defendant JAMES HAINES began entering H.H.'s home through the window but when H.H. entered the room, surprising J.H., who retreated back through the window. Defendants KHALIL SMITH, WILLIAM JEFFERSON, MARK WOODS and JAMES HAINES fled the scene, having lost the opportunity to catch H.H. off guard.

f. Defendants KHALIL SMITH, WILLIAM JEFFERSON and JAMES HAINES were apprehended by police while attempting to flee. Defendant MARK WOODS successfully fled the area.

**July 15, 2013**  
**Platinum Jewelers**  
**Market Street, Philadelphia, PA**  
**Attempted Armed Robbery**

6. On or about July 15, 2013:

a. Defendants KHALIL SMITH, MARK WOODS and BRANDON SEGERS, and Marcus Bowens, Daniel Hayes, Jeffrey Bellamy, and Michael Queen, charged elsewhere, and A.M., a person known to the grand jury to be deceased, met to discuss their plan to commit an armed robbery at Platinum Jewelers, located on Market Street in Philadelphia, PA.

b. Defendants KHALIL SMITH, MARK WOODS, BRANDON SEGERS, and Marcus Bowens, Daniel Hayes, Jeffrey Bellamy, and Michael Queen, and A.M. went to Platinum Jewelers.

c. Defendant BRANDON SEGERS and Daniel Hayes entered the store wearing disguises and posing as customers.

d. Defendant KHALIL SMITH and Marcus Bowens entered the store posing as police officers, wearing bullet proof vests with the word "Police" on the front and carrying semiautomatic pistols in holsters on their legs, and wearing masks and gloves.

e. Defendant KHALIL SMITH drew his firearm, pointed it at the clerk and yelled "Police."

f. Defendant MARK WOODS, and Jeffrey Bellamy, and Michael Queen, and A.M. remained outside the store as lookouts, and/or getaway drivers.

g. Jeffrey Bellamy utilized a police scanner provided to him by defendant KHALIL SMITH to monitor police radio.

h. Defendants KHALIL SMITH and BRANDON SEGERS, and Marcus Bowens and Daniel Hayes fled the store after a clerk inside the store pushed an alarm button, notifying police of the robbery, and they, along with defendant MARK WOODS and Jeffrey Bellamy, and Michael Queen, and A.M., left the area.

**October 18-19, 2013**  
**Master Street, Philadelphia, PA**  
**Armed Kidnapping, Carjacking and Home Invasion Robbery**

7. In or about October 2013:

a. Defendants MARK WOODS and LOUIS MILLER obtained information from Charles Wardlaw, charged elsewhere, that G.T., a person known to the grand jury, was a cocaine seller and kept cocaine and cash inside his home.

b. Defendant MARK WOODS conducted surveillance of G.T., to gather information that would assist him and defendants MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, and LOUIS MILLER, and Charles Wardlaw in committing an armed robbery of G.T. for cocaine and proceeds from the sale of cocaine.

8. On or about October 18, 2013 and continuing into October 19, 2013:

a. Defendants MARK WOODS, TERRANCE MUNDEN, HASAN CHANEY, ROBERT HARTLEY and LOUIS MILLER went to the 3000 block of Master Street, Philadelphia, PA to locate G.T..

b. Upon seeing G.T. attempting to enter his vehicle, a 2005 Chrysler Pacifica, VIN 2C8GF78465R372631, defendants MARK WOODS, TERRANCE MUNDEN, HASAN CHANEY, ROBERT HARTLEY and LOUIS MILLER, wearing police badges around their necks and police jackets, and carrying guns, walkie talkies and handcuffs, confronted G.T.,

identified themselves as police officers, threw G.T. against a car, frisked G.T., and removed approximately \$22, G.T.'s identification and an iPhone from G.T.'s pocket, and demanded to know where G.T. secreted his drugs and drug proceeds, and also demanded G.T.'s car keys.

c. Defendants MARK WOODS, TERRANCE MUNDEN, HASAN CHANEY, ROBERT HARTLEY and LOUIS MILLER attempted to subdue G.T., and when G.T. struggled and attempted to flee, defendants assaulted, subdued, and then forced G.T. into a van restraining G.T.'s wrists with handcuffs, binding G.T.'s ankles and covering G.T.'s head with a skull cap. The defendants continued to assault G.T. as they drove G.T. from the area against G.T.'s will.

d. Defendants MARK WOODS, TERRANCE MUNDEN, HASAN CHANEY, ROBERT HARTLEY and LOUIS MILLER drove G.T. to defendant LOUIS MILLER's garage.

e. Defendant LOUIS MILLER called Charles Wardlaw, charged elsewhere, and directed that he come to MILLER's garage and bring duct tape.

f. Defendants MARK WOODS, TERRANCE MUNDEN, HASAN CHANEY, ROBERT HARTLEY and LOUIS MILLER and Charles Wardlaw held G.T. captive for several hours inside the garage, and continuing to threaten and assault G.T., demanding to know where they could obtain G.T.'s drugs and drug proceeds.

g. Defendants MARK WOODS, TERRANCE MUNDEN, HASAN CHANEY, ROBERT HARTLEY and LOUIS MILLER and Charles Wardlaw forced G.T. to use G.T.'s cellular telephone to contact S.P., to request that S.P. open his door and come outside, allowing defendants WOODS, MUNDEN, CHANEY, HARTLEY and MILLER and Charles

Wardlaw to capture S.P., and to gain entrance to S.P.'s residence, to steal cocaine and the proceeds from the sale of cocaine.

h. During G.T.'s captivity, G.T. was forced to remain in the rear of a vehicle inside of defendant LOUIS MILLER's garage, bound at the wrists and ankles and with G.T.'s head covered.

i. Defendants MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY and LOUIS MILLER and Charles Wardlaw drove to S.P.'s residence to commit the armed home invasion robbery, while defendant HASAN CHANEY remained at defendant LOUIS MILLER's garage and stood guard over G.T.

j. Upon arriving at S.P.'s residence, defendants MARK WOODS, TERRANCE MUNDEN and LOUIS MILLER and Charles Wardlaw grabbed S.P. as he opened the door to his residence, and entered S.P.'s apartment by force.

k. While forcing their way into S.P.'s apartment and once inside, defendants MARK WOODS, TERRANCE MUNDEN and LOUIS MILLER and Charles Wardlaw struck S.P. multiple times in the face and body and continually demanded drugs and money.

l. Defendants MARK WOODS, TERRANCE MUNDEN and LOUIS MILLER and Charles Wardlaw forced S.P. at gunpoint into a bedroom with his girlfriend and son where they were held at gunpoint. The defendants told S.P. repeatedly not to move, and continued to demand money and drugs.

m. Defendants MARK WOODS, TERRANCE MUNDEN and LOUIS MILLER and Charles Wardlaw searched S.P.'s apartment and stole cocaine, cash, and other items of value from S.P.'s residence.

n. Defendants MARK WOODS, TERRANCE MUNDEN and LOUIS MILLER and Charles Wardlaw met with defendants ROBERT HARTLEY and HASAN CHANEY at defendant MILLER's home and divided the proceeds of the robbery.

n. After the armed home invasion robbery of S.P. was complete, G.T. was removed from defendant LOUIS MILLER's garage and taken to defendant TERRANCE MUNDEN's garage, placed inside of G.T.'s vehicle and driven to 10<sup>th</sup> and 69<sup>th</sup> Streets in Philadelphia, PA, where the defendants left him handcuffed inside of the vehicle.

**November 7, 2013**  
**Leas Way, Hatfield, PA**  
**Armed Home Invasion Attempted Robbery**

9. In or about early November 2013 to on or about November 7, 2013:

a. Defendant KHALIL SMITH and Michael Queen placed GPS tracking devices on vehicles driven by M.M., a person known to the grand jury, to assist them in locating M.M.'s residence.

b. Defendants BRAHEIM BALLARD and JAMAL DOGGETT, using the GPS devices, tracked M.M. and learned the location of M.M.'s residence.

c. Defendants KHALIL SMITH, BRAHEIM BALLARD and JAMAL DOGGETT and Marcus Bowens and Michael Queen, met to discuss their plan to rob M.M. at M.M.'s home located on Leas Way, in Hatfield, PA.

10. On or about November 7, 2013:

a. Defendants KHALIL SMITH, BRAHEIM BALLARD and JAMAL DOGGETT and Marcus Bowens and Michael Queen, drove to an area approximately one block from M.M.'s home where they met again to discuss their plan to rob M.M.

b. Defendants KHALIL SMITH and BRAHEIM BALLARD and Marcus Bowens and Michael Queen hid in the rear yard of M.M.'s home and awaited M.M.'s arrival as defendant JAMAL DOGGETT remained in a vehicle and acted as a lookout.

c. Defendants KHALIL SMITH and BRAHEIM BALLARD and Marcus Bowens and Michael Queen approached M.M., pointed their guns at M.M., threatened M.M., subdued M.M. and forced M.M. inside the home where M.M. was restrained, threatened and assaulted.

d. Defendant BRAHEIM BALLARD stood guard over M.M. as defendants KHALIL SMITH and JAMAL DOGGETT and Marcus Bowens and Michael Queen, searched M.M.'s home.

e. Defendants KHALIL SMITH, BRAHEIM BALLARD and JAMAL DOGGETT and Marcus Bowens and Michael Queen stole TVs, firearms, and M.M.'s BMW, after forcibly removing the keys from M.M., and a backpack containing a laptop computer, cellphones and \$600.

f. Defendants KHALIL SMITH, BRAHEIM BALLARD and JAMAL DOGGETT and Marcus Bowens and Michael Queen, fled the scene and later met to divide the proceeds of the robbery.

**December 28, 2013**  
**Lansford Street, Philadelphia, PA**  
**Armed Home Invasion Robbery**

11. On or about December 28, 2013:

a. Defendants KHALIL SMITH, MARK WOODS, SEI STONE, and EDWIN ROBINSON, and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, met to discuss their plan to rob T.H., a person known to the grand jury, at T.H.'s home located on

Lansford Street, in Philadelphia, PA.

b. Defendants KHALIL SMITH, MARK WOODS, SEI STONE, and EDWIN ROBINSON, and Marcus Bowens and Jeffrey Bellamy, drove to T.H.'s home.

c. Defendants KHALIL SMITH, MARK WOODS, SEI STONE, and EDWIN ROBINSON entered T.H.'s home, as defendant Marcus Bowens and Jeffrey Bellamy remained in a vehicle and acted as lookouts.

d. Defendants KHALIL SMITH, MARK WOODS, SEI STONE, and EDWIN ROBINSON confronted R.H., a person known to the grand jury, pointed their guns at R.H., threatened R.H., and forced R.H. to walk to the second floor of the residence and enter the apartment. Once inside the apartment, R.H. and R.H.2, a person known to the grand jury, were forced to strip down to their underwear and were held at gunpoint as the defendants searched the home.

e. Defendants KHALIL SMITH, MARK WOODS, SEI STONE, and EDWIN ROBINSON, and Marcus Bowens and Jeffrey Bellamy stole marijuana, cash and other items of value.

f. Defendants KHALIL SMITH, MARK WOODS, SEI STONE, and EDWIN ROBINSON, and Marcus Bowens and Jeffrey Bellamy, fled the scene and later met to divide the proceeds of the robbery.

**January 27, 2014**  
**Pulaski Avenue, Philadelphia, PA**  
**Armed Home Invasion Robbery**

12. On or about January 27, 2014:

a. Defendants KHALIL SMITH, MARK WOODS and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy met to discuss their plan to commit an armed



home invasion robbery of J.B., a person known to the grand jury, at a residence on Pulaski Avenue, Philadelphia, PA.

b. Defendants KHALIL SMITH, MARK WOODS and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy, drove to the residence and once there, defendants SMITH and WOODS and Marcus Bowens entered the residence as defendant JACKSON and Jeffrey Bellamy remained outside as lookouts.

c. Defendants KHALIL SMITH and MARK WOODS and Marcus Bowens subdued J.B., a person known to the grand jury, then restrained, threatened and assaulted him.

d. Defendants KHALIL SMITH, MARK WOODS, and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy stole approximately ½ kilogram of cocaine, approximately \$10,000 and other items of value.

e. Defendants KHALIL SMITH, MARK WOODS and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy fled the scene and later met to divide the proceeds of the robbery.

**March 19, 2014**  
**Mayfair Street, Philadelphia, PA**  
**Kidnapping**

13. In or about March 2014, defendants KHALIL SMITH and MARK WOODS tracked O.T. by placing a GPS tracking device on O.T.'s vehicle to learn where O.T. lived.

14. On or about March 19, 2014:

a. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, and LEVERN JACKSON and Marcus

Bowens and Jeffrey Bellamy planned to kidnap O.T., a person known to the grand jury, and hold O.T. for ransom.

b. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy drove to an area in close proximity to the 700 block of Mayfair street where they waited for O.T. to return to his home.

c. O.T. drove onto the 700 block of Mayfair Street, parked and got out of the vehicle. Defendants KHALIL SMITH, TERRANCE MUNDEN, ROBERT HARTLEY and HASAN CHANEY and Marcus Bowens, wearing police badges around their necks and carrying guns, confronted O.T., identified themselves as police officers, assaulted and subdued O.T., restrained O.T.'s wrists with handcuffs, and stole cash from O.T. Defendants MARK WOODS and LEVERN JACKSON and Jeffrey Bellamy remained inside vehicles, acting as lookouts.

d. Defendants KHALIL SMITH, TERRANCE MUNDEN, ROBERT HARTLEY and HASAN CHANEY and Marcus Bowens forced O.T. into a van driven by defendant MARK WOODS, where O.T. was repeatedly assaulted and driven against O.T.'s will from the scene to defendant MUNDEN's garage.

e. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy held O.T. captive for several hours inside defendant MUNDEN's garage. While inside defendant MUNDEN's garage, O.T. was forced to strip naked and repeatedly assaulted and threatened. Defendants tortured O.T. by "water boarding" him and

pouring boiling water on O.T. as the defendants continually demanded to know where they could find O.T.'s drugs and drug proceeds.

f. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy used, and forced O.T. to use, O.T.'s cellular telephone to contact O.T.'s family member, J.T., a person known to the grand jury.

g. In telephone calls to J.T., one or more of the defendants instructed J.T. to obtain \$50,000 ransom money for O.T.'s release. The defendants allowed O.T. to speak to J.T., and he advised her where she could obtain the ransom money.

h. One or more of the defendants told J.T. to obtain \$50,000 ransom and drive it to 12<sup>th</sup> and Wingohocking Streets, in Philadelphia, where J.T. was to place the money into a trash can.

i. Defendant KHALIL SMITH retrieved the ransom money from the trash can at 12<sup>th</sup> and Wingohocking Streets in Philadelphia, then contacted defendants TERRANCE MUNDEN and ROBERT HARTLEY and Marcus Bowens by telephone and directed them to release O.T.

j. Defendants TERRANCE MUNDEN and ROBERT HARTLEY and Marcus Bowens removed O.T. from defendant MUNDEN's garage and drove O.T. to an alleyway near 69<sup>th</sup> and Ogontz Avenue, where he was released.

k. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy met to divide the proceeds from the kidnapping.

**April 16, 2014**  
**Regent Street, Philadelphia, PA**  
**Armed Home Invasion Attempted Robbery**

15. In or about the beginning of April, to on or about April 16, 2014:

a. Defendant KHALIL SMITH and Marcus Bowens and Jeffrey Bellamy conducted surveillance at the home of A.C., a person known to the grand jury, located on Regent Street, Philadelphia, PA, a residence.

b. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy, and A.M., met to discuss their plan to rob A.C.

16. On or about April 16, 2014:

a. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy, and A.M. drove to A.C.'s residence.

b. Defendants KHALIL SMITH, TERRANCE MUNDEN, HASAN CHANEY and LEVERN JACKSON and Marcus Bowens and A.M. entered the residence as defendants MARK WOODS and ROBERT HARTLEY and Jeffrey Bellamy remained outside as lookouts.

c. Defendants KHALIL SMITH, TERRANCE MUNDEN, HASAN CHANEY and LEVERN JACKSON and Marcus Bowens and A.M. subdued A.C. and I.C., a person known to the grand jury, forced them to strip naked, restrained them, threatened to sodomize them with a broom stick and kill them, and assaulted A.C. by striking A.C. in the head with a shotgun, and water boarding and pouring boiling water on A.C.

d. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERTH HARTLEY, HASAN CHANEY and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy, and A.M. stole jewelry, an iPad, and a 2009 Toyota Camry.

e. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERTH HARTLEY, HASAN CHANEY and LEVERN JACKSON and Marcus Bowens and Jeffrey Bellamy, and A.M. fled the scene and later met to divide the proceeds of the robbery.

**April 24, 2014**  
**Ridge Avenue, Philadelphia, PA**  
**Armed Home Invasion Robbery**

17. On or about April 24, 2014:

a. Marcus Bowens and Jeffery Bellamy conducted surveillance outside the residence of O.W., a person known to the grand jury.

b. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN and ROBERT HARTLEY met Marcus Bowens and Jeffrey Bellamy across the street from O.W.'s home and discussed their plan to enter O.W.'s home.

c. Defendant KHALIL SMITH and Marcus Bowens entered O.W.'s home armed with firearms and stole approximately \$5,000 and other items of value and left O.W.'s home, rejoining defendants MARK WOODS, TERRANCE MUNDEN and ROBERT HARTLEY and Jeffrey Bellamy who remained outside as lookouts.

d. Defendant KHALIL SMITH reentered O.W.'s home with defendants TERRANCE MUNDEN and ROBERT HARTLEY, armed with firearms, as defendant MARK WOODS and Marcus Bowens and Jeffrey Bellamy remained outside as lookouts.

e. Defendant MARK WOODS and Jeffrey Bellamy observed O.W. return home and they notified defendants KHALIL SMITH, TERRANCE MUNDEN and ROBERT HARTLEY.

f. Defendants KHALIL SMITH, TERRANCE MUNDEN and ROBERT HARTLEY, confronted O.W. at gunpoint, restrained O.W. by tying O.W. at the wrists and ankles with electrical cords, then forced O.W. into the bathroom, and demanded that O.W. tell them where the money and drugs were.

g. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN and ROBERT HARTLEY and Marcus Bowens and Jeffrey Bellamy stole approximately \$60,000, fled the area and met at defendant MARK WOODS' home to divide the proceeds of the robbery.

**April 29, 2014**  
**Wyndale Avenue, Philadelphia, PA**  
**Armed Home Invasion Attempted Robbery**

18. On or about April 24, 2014:

a. Defendant KHALIL SMITH and Marcus Bowens placed GPS tracking devices on vehicles driven by L.T., a person known to the grand jury, to assist them in locating L.T.'s residence.

b. Defendant MARK WOODS tracked L.T. using a GPS tracking device and Jeffrey Bellamy conducted surveillance at L.T.'s home located at Wyndale Avenue, Philadelphia, PA.

c. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN and ROBERT HARTLEY and Marcus Bowens and Jeffrey Bellamy, and A.M. burglarized L.T.'s home and stole jewelry, bags, including a Louis Vuitton bag and a custom book

bag, belts, an iPad, and a laptop computer.

19. On or about April 29, 2014:

a. Believing that they missed cocaine and proceeds from the sale of cocaine during the April 24, 2014 burglary, defendant KHALIL SMITH and Marcus Bowens discussed a plan to return to L.T.'s residence and commit a home invasion robbery.

b. Defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN and ROBERT HARTLEY and Jeffrey Bellamy and A.M. returned to L.T.'s home to commit an armed home invasion robbery.

c. Defendants KHALIL SMITH and TERRANCE MUNDEN, and A.M. entered the residence to commit the robbery as defendants MARK WOODS and ROBERT HARTLEY and Jeffrey Bellamy remained outside as lookouts.

d. Defendant MARK WOODS continued to track L.T.'s vehicle using a GPS tracking device and notified defendants KHALIL SMITH and TERRANCE MUNDEN and A.M. that L.T. was driving toward his home in Philadelphia.

e. Jeffrey Bellamy observed L.T.'s vehicle and notified defendant MARK WOODS that L.T. had arrived at his residence.

f. Defendants KHALIL SMITH and TERRANCE MUNDEN and A.M. hid inside L.T.'s home and awaited his arrival.

g. Defendants KHALIL SMITH and TERRANCE MUNDEN and A.M. subdued L.T. and S.L., a person known to the grand jury, held them at gunpoint, and shot L.T.

h. Defendants KHALIL SMITH, MARK WOODS, TERRANCE

MUNDEN and ROBERT HARTLEY and Jeffrey Bellamy fled the scene.

All in violation of Title 18, United States Code, Section 1951(a).



**COUNT TWO**

**September 3, 2012, Railroad Avenue, Ambler, PA**  
**Armed Home Invasion Robbery**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18 and Overt Acts 1 through 3 of Count One of this indictment are incorporated here.

2. On or about September 3, 2012, in Ambler, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil," and  
WILLIAM JEFFERSON,  
a/k/a "Money,"  
a/k/a "Big Money,"**

and Eric Scott, charged elsewhere, and others unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH and WILLIAM JEFFERSON, Eric Scott, and others unknown to the grand jury, unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, controlled substances, from other persons against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, that is, by using loaded firearms to threaten and control the victims and steal controlled substances from them.

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 3, 2012, in Ambler, in the Eastern District of Pennsylvania,  
defendants

**KHALIL SMITH,  
a/k/a "Lil," and  
WILLIAM JEFFERSON,  
a/k/a "Money,"  
a/k/a "Big Money,"**

and Eric Scott, charged elsewhere, and others unknown to the grand jury, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Two of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

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

**COUNT FOUR**

**September 11, 2012, Bristol Street, Philadelphia, PA**  
**Attempted Possession with Intent to Distribute Cocaine**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 11, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,**  
**a/k/a "Lil,"**  
**WILLIAM JEFFERSON,**  
**a/k/a "Money,"**  
**a/k/a "Big Money," and**  
**ROMEL ANTHONY,**  
**a/k/a "Dame,"**

and Marcus Bowens and Eric Scott, charged elsewhere, knowingly and intentionally attempted to possess with the intent to distribute, and aided and abetted the attempted possession with intent to distribute 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).

In violation of Title 21, United States Code, Section 846, 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 11, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
WILLIAM JEFFERSON,  
a/k/a "Money,"  
a/k/a "Big Money," and  
ROMEL ANTHONY,  
a/k/a "Dame,"**

and Marcus Bowens, charged elsewhere, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a drug trafficking crime, for which they may be prosecuted in a court of the United States, that is, attempted possession with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 846, as charged in Count Four of this indictment.

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

**COUNT SIX**

**October 9, 2012, Bishop's View Apartments, Cherry Hill, NJ**  
**Attempted Armed Home Invasion Robbery**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18 and Overt Acts 4 and 5 of Count One of this indictment are incorporated here.

2. On or about October 9, 2012, in Philadelphia, in the Eastern District of Pennsylvania, and Cherry Hill, in the District of New Jersey, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
WILLIAM JEFFERSON,  
a/k/a "Money,"  
a/k/a "Big Money," and  
JAMES HAINES,  
a/k/a "Crack,"**

and Marcus Bowens, charged elsewhere, attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS, WILLIAM JEFFERSON and JAMES HAINES, and Marcus Bowens unlawfully attempted to take and obtain, and aided and abetted the attempted unlawful taking and obtaining of, property, that is, cocaine and proceeds from the sale of cocaine, from H.H. against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, that is, by attempting to enter H.H.'s home with semiautomatic pistols and attempting to steal cocaine and proceeds from the sale of cocaine from H.H.

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

**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 9, 2012, in Philadelphia, in the Eastern District of Pennsylvania, and Cherry Hill, in the District of New Jersey, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
WILLIAM JEFFERSON,  
a/k/a "Money,"  
a/k/a "Big Money,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket," and  
JAMES HAINES,  
a/k/a "Crack,"**

and Marcus Bowens, charged elsewhere, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, conspiracy to commit robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count One of this indictment.

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

**COUNT EIGHT**

**July 15, 2013, Platinum Jewelers, Market Street, Philadelphia, PA**  
**Attempted Armed Robbery**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 3 and 5 through 18 and Overt Act 6 of Count One of this indictment are incorporated here.

2. On or about July 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket," and  
BRANDON SEGERS,  
a/k/a "B,"**

and Marcus Bowens, Michael Queen, Daniel Hayes and Jeffery Bellamy, charged elsewhere, and A.M., a person known to the grand jury to be deceased, attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS and BRANDON SEGERS, and Marcus Bowens, Michael Queen, Daniel Hayes and Jeffrey Bellamy, and A.M. unlawfully attempted to take and obtain, and aided and abetted the attempted unlawful taking and obtaining of, property, that is, jewelry and cash, from other persons against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their persons and property, that is, by using semiautomatic pistols to threaten and control the victims and attempt to steal jewelry and cash from them.

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

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket," and  
BRANDON SEGERS,  
a/k/a "B,"**

and Marcus Bowens, Michael Queen, Daniel Hayes and Jeffery Bellamy, charged elsewhere, and A.M., a person known to the grand jury to be deceased, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Eight of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

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



**COUNT TEN**

**October 18, 2013, Master Street, Philadelphia, PA**  
**Kidnapping and Carjacking**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18, and Overt Acts 7 and 8 of Count One of this indictment are incorporated here.

2. On or about October 18, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MARK WOODS,**  
**a/k/a "Bundles,"**  
**a/k/a "Brian Bosket,"**  
**TERRANCE MUNDEN,**  
**a/k/a "Boob,"**  
**a/k/a "Boo,"**  
**ROBERT HARTLEY,**  
**a/k/a "Do,"**  
**a/k/a "Doo,"**  
**a/k/a "Dooman,"**  
**HASAN CHANEY,**  
**a/k/a "Has,"**  
**a/k/a "Big Has," and**  
**LOUIS MILLER,**  
**a/k/a "Lou,"**

and Charles Wardlaw, charged elsewhere, knowingly, willfully, and unlawfully seized, confined, kidnapped, abducted, carried away, and held, and aided and abetted the unlawful seizing, confining, kidnapping, abducting, carrying away, and holding of, G.T., a person known to the grand jury, for ransom, reward, and otherwise, that is, for the purpose of locating and gaining access to S.P., to rob S.P. of cocaine and the proceeds from the sale of cocaine, and, in committing

the offense, used G.T.'s cellular telephone and used vehicles, means, facilities, and instrumentalities of interstate commerce.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

**COUNT ELEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18, and Overt Acts 7 and 8 of Count One of this indictment are incorporated here.
2. On or about October 18, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo,"  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"  
HASAN CHANEY,  
a/k/a "Has,"  
a/k/a "Big Has," and  
LOUIS MILLER,  
a/k/a "Lou,"**

and Charles Wardlaw, charged elsewhere, with intent to cause death and serious bodily harm, took, and aided and abetted the taking of, from the person and presence of another, by force and violence, and by intimidation, a motor vehicle, that is, a 2005 Chrysler Pacifica, VIN 2C8GF78465R372631, that had been transported, shipped, and received in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

**COUNT TWELVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 18, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo,"  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"  
HASAN CHANEY,  
a/k/a "Has,"  
a/k/a "Big Has," and  
LOUIS MILLER,  
a/k/a "Lou,"**

and Charles Wardlaw, charged elsewhere, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, kidnapping, in violation of Title 18, United States Code, Section 1201(a)(1), as charged in Count Ten of this indictment, and carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count Eleven of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

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

**COUNT THIRTEEN**

**October 19, 2013, Master Street, Philadelphia, PA**  
**Armed Home Invasion Robbery**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18, and Overt Acts 7 and 8 of Count One of this indictment are incorporated here.

2. On or about October 19, 2013, in Philadelphia, and Hatfield, in the Eastern District of Pennsylvania, defendants

**MARK WOODS,**  
**a/k/a "Bundles,"**  
**a/k/a "Brian Bosket,"**  
**TERRANCE MUNDEN,**  
**a/k/a "Boob,"**  
**a/k/a "Boo,"**  
**ROBERT HARTLEY,**  
**a/k/a "Do,"**  
**a/k/a "Doo,"**  
**a/k/a "Dooman,"**  
**HASAN CHANEY,**  
**a/k/a "Has,"**  
**a/k/a "Big Has," and**  
**LOUIS MILLER,**  
**a/k/a "Lou,"**

and Charles Wardlaw, charged elsewhere, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendants MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY, and LOUIS MILLER, and Charles Wardlaw, took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, cocaine and proceeds from the sale of cocaine, from S.P. against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by using semiautomatic pistols to threaten and control S.P.,

assaulting S.P. and stealing cocaine and the proceeds from the sale of cocaine from S.P.

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

**COUNT FOURTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about October 18, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo,"  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"  
HASAN CHANEY,  
a/k/a "Has,"  
a/k/a "Big Has," and  
LOUIS MILLER,  
a/k/a "Lou,"**

and Charles Wardlaw, charged elsewhere, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, Hobbs Act robbery, in violation of Title 18, United States Code, Section 1951, as charged in Count Thirteen of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

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

**COUNT FIFTEEN**

**November 7, 2013, Leas Way, Hatfield, PA**  
**Armed Home Invasion Attempted Robbery**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18 and Overt Acts 9 and 10 of Count One of this indictment are incorporated here.

2. On or about November 7, 2013, in Philadelphia, and Hatfield, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,**  
**a/k/a "Lil,"**  
**BRAHEIM BALLARD,**  
**a/k/a "Big Fellow,"**  
**a/k/a "Big Homie,"**  
**a/k/a "Brian Moore," and**  
**JAMAL DOGGETT,**  
**a/k/a "Jersey,"**

and Marcus Bowens and Michael Queen, charged elsewhere, attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, BRAHEIM BALLARD and JAMAL DOGGETT, and Marcus Bowens and Michael Queen, attempted to take and obtain, and aided and abetted the attempted unlawful taking and obtaining of, property, that is, marijuana and proceeds from the sale of marijuana, from M.M. against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by using semiautomatic pistols to threaten and control M.M. and attempt to steal marijuana and proceeds from the sale of marijuana from M.M..

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



**COUNT SIXTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 5 through 18 and Overt Acts 9 and 10 of Count One of this indictment are incorporated here.

2. On or about November 7, 2013, in Philadelphia, and Hatfield, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
BRAHEIM BALLARD,  
a/k/a "Big Fellow,"  
a/k/a "Big Homie,"  
a/k/a "Brian Moore," and  
JAMAL DOGGETT,  
a/k/a "Jersey,"**

and Marcus Bowens and Michael Queen, charged elsewhere, with intent to cause death and serious bodily harm, took, and aided and abetted the taking of, from the person and presence of another, by force and violence, and by intimidation, a motor vehicle, that is, a 2003 BMW 525, VIN WBADS43483GE11191, that had been transported, shipped, and received in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

**COUNT SEVENTEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 7, 2013, in Philadelphia, and Hatfield, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
BRAHEIM BALLARD,  
a/k/a "Big Fellow,"  
a/k/a "Big Homie,"  
a/k/a "Brian Moore," and  
JAMAL DOGGETT,  
a/k/a "Jersey,"**

and Marcus Bowens and Michael Queen, charged elsewhere, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Fifteen of this indictment, and carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count Sixteen of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

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

**COUNT EIGHTEEN**

**December 28, 2013, Lansford Street, Philadelphia, PA**  
**Armed Home Invasion Robbery**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18 and Overt Act 11 of Count One of this indictment are incorporated here.
2. On or about December 28, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
SEI STONE,  
a/k/a "Kareem Sweets"  
a/k/a "Samuel Sneed"  
a/k/a "Buzz" and  
EDWIN ROBINSON,  
a/k/a "Kern"  
a/k/a "Kerm,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS, SEI STONE and EDWIN ROBINSON, and Marcus Bowens and Jeffrey Bellamy, took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, marijuana and proceeds from the sale of marijuana, belonging to T.H., from R.H. 1 and R.H. 2, against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by using semiautomatic pistols to threaten and control R.H. 1 and R.H. 2, and stealing marijuana and

proceeds from the sale of marijuana, belonging to T.H..

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

**COUNT NINETEEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 28, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
SEI STONE,  
a/k/a "Kareem Sweets"  
a/k/a "Samuel Sneed"  
a/k/a "Buzz" and  
EDWIN ROBINSON,  
a/k/a "Kern"  
a/k/a "Kerm,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Eighteen of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

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

**COUNT TWENTY**

**January 27, 2014, Pulaski Avenue, Philadelphia, PA**  
**Armed Home Invasion Robbery**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18 and Overt Act 12 of Count One of this indictment are incorporated here.

2. On or about January 27, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket," and  
LEVERN JACKSON,  
a/k/a "Bucket,"  
a/k/a "V,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS and LEVERN JACKSON, and Marcus Bowens and Jeffrey Bellamy unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, property, that is, cocaine and the proceeds from the sale of cocaine, from J.B. against J.B.'s will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by using semiautomatic pistols to threaten and control J.B. and steal cocaine and the proceeds from the sale of cocaine from J.B.

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

**COUNT TWENTY-ONE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 27, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket," and  
LEVERN JACKSON,  
a/k/a "Bucket,"  
a/k/a "V,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Twenty of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

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

**COUNT TWENTY-TWO**

**March 19, 2014, Mayfair Street, Philadelphia, PA**  
**Kidnapping**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18, and Overt Acts 13 and 14 of Count One of this indictment are incorporated here.

2. On or about March 19, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo,"  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"  
HASAN CHANEY,  
a/k/a "Has,"  
a/k/a "Big Has," and  
LEVERN JACKSON,  
a/k/a "Bucket,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, knowingly, willfully, and unlawfully seized, confined, kidnapped, abducted, carried away, and held, and aided and abetted the unlawful seizing, confining, kidnapping, abducting, carrying away, and holding of, O.T., a person known to the grand jury, for ransom, reward, that is, approximately \$50,000, and, in committing the offense, used O.T.'s cellular telephone and used vehicles, means, facilities, and



instrumentalities of interstate commerce.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

**COUNT TWENTY-THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about March 19, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo,"  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"  
HASAN CHANEY,  
a/k/a "Has,"  
a/k/a "Big Has," and  
LEVERN JACKSON,  
a/k/a "Bucket,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, kidnapping, in violation of Title 18, United States Code, Section 1201(a)(1), as charged in Count Twenty-Two of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

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

**COUNT TWENTY-FOUR**

**April 16, 2014, Regent Street, Philadelphia, PA**  
**Armed Home Invasion Attempted Robbery**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18 and Overt Acts 15 and 16 of Count One of this indictment are incorporated here.

2. On or about April 16, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo,"  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"  
HASAN CHANEY,  
a/k/a "Has,"  
a/k/a "Big Has," and  
LEVERN JACKSON,  
a/k/a "Bucket,"  
a/k/a "V,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, and A.M., a person known to the grand jury to be deceased, attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN, ROBERT HARTLEY, HASAN CHANEY and LEVERN JACKSON, and Marcus Bowens and Jeffrey Bellamy, and A.M. attempted to take and obtain, and

aided and abetted the attempted unlawful taking and obtaining of, property, that is, cocaine and proceeds from the sale of cocaine, from A.C. and I.C. against their will by means of actual and threatened force, violence, and fear of injury, immediate and future, to their person and property, that is, by using semiautomatic pistols to threaten and control A.C. and I.C. and attempting to steal cocaine and proceeds from the sale of cocaine from A.C. and I.C.

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

**COUNT TWENTY-FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 5 through 18 and Overt Acts 15 and 16 of Count One of this indictment are incorporated here.
2. On or about April 16, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo,"  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"  
HASAN CHANEY,  
a/k/a "Has,"  
a/k/a "Big Has," and  
LEVERN JACKSON,  
a/k/a "Bucket,"  
a/k/a "V,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, and A.M., a person known to the grand jury to be deceased, with intent to cause death and serious bodily harm, took, and aided and abetted the taking of, from the person and presence of another, by force and violence, and by intimidation, a motor vehicle, that is, a 2009 Toyota Camry, VIN 4T1BE46K19U805047, that had been transported, shipped, and received in interstate commerce.

In violation of Title 18, United States Code, Sections 2119 and 2.

**COUNT TWENTY-SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 16, 2014, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo,"  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"  
HASAN CHANEY,  
a/k/a "Has,"  
a/k/a "Big Has," and  
LEVERN JACKSON,  
a/k/a "Bucket,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, and A.M., a person known to the grand jury to be deceased, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Twenty-four of this indictment, and carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count Twenty-Five, and brandished, and aided and abetted the brandishing of, those firearms.

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

**COUNT TWENTY-SEVEN**

**April 24, 2014, Ridge Avenue, Philadelphia, PA**  
**Armed Home Invasion Robbery**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18 and Overt Act 17 of Count One of this indictment are incorporated here.

2. On or about April 24, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo," and  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN and ROBERT HARTLEY, and Marcus Bowens and Jeffrey Bellamy, took and obtained, and attempted to take and obtain, and aided and abetted the unlawful taking and obtaining and attempted unlawful taking and obtaining of, property, that is, marijuana and proceeds from the sale of marijuana, from O.W. against O.W.'s will by means of actual and threatened force, violence, and fear of injury, immediate and future, to O.W.'s person and property, that is, by using semiautomatic pistols to threaten and control O.W. and attempting to steal marijuana and stealing the proceeds from the

sale of marijuana from O.W..

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



**COUNT TWENTY-EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 24, 2014, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo," and  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Twenty-Seven of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

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

**COUNT TWENTY-NINE**

**April 29, 2014, Wyndale Avenue, Philadelphia, PA**  
**Armed Home Invasion Attempted Robbery**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1, 2 and 5 through 18 and Overt Acts 18 and 19 of Count One of this indictment are incorporated here.

2. On or about April 29, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo," and  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, and A.M., a person known to the grand jury to be deceased, attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that defendants KHALIL SMITH, MARK WOODS, TERRANCE MUNDEN and ROBERT HARTLEY, and Marcus Bowens and Jeffrey Bellamy, and A.M. attempted to take and obtain, and aided and abetted the attempted unlawful taking and obtaining of, property, that is, cocaine and proceeds from the sale of cocaine, from L.T. against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by using semiautomatic pistols to threaten and

control L.T. and attempt to steal cocaine and proceeds from the sale of cocaine from L.T..

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

**COUNT THIRTY**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 29, 2014, in Philadelphia, in the Eastern District of Pennsylvania,  
defendants

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo," and  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"**

and Marcus Bowens and Jeffrey Bellamy, charged elsewhere, and A.M., a person known to the grand jury to be deceased, knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, semiautomatic pistols, during and in relation to a crime of violence, for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951(a), as charged in Count Twenty-Nine of this indictment, and brandished, and aided and abetted the brandishing of, those firearms.

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

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

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

**KHALIL SMITH,  
a/k/a "Lil,"  
MARK WOODS,  
a/k/a "Bundles,"  
a/k/a "Brian Bosket,"  
TERRANCE MUNDEN,  
a/k/a "Boob,"  
a/k/a "Boo,"  
ROBERT HARTLEY,  
a/k/a "Do,"  
a/k/a "Doo,"  
a/k/a "Dooman,"  
HASAN CHANEY,  
a/k/a "Has,"  
a/k/a "Big Has,"  
LEVERN JACKSON,  
a/k/a "Bucket,"  
a/k/a "V,"  
BRAHEIM BALLARD,  
a/k/a "Big Fellow,"  
a/k/a "Big Homie,"  
a/k/a "Brian Moore,"  
WILLIAM JEFFERSON,  
a/k/a "Money,"  
a/k/a "Big Money,"  
JAMAL DOGGETT,  
a/k/a "Jersey,"  
ROMEL ANTHONY,  
a/k/a "Dame,"  
BRANDON SEGERS,  
a/k/a "B,"  
SEI STONE,  
a/k/a "Kareem Sweets"  
a/k/a "Samuel Sneed"  
a/k/a "Buzz"  
EDWIN ROBINSON,  
a/k/a "Kern"**

**a/k/a “Kerm”  
LOUIS MILLER,  
a/k/a “Lou” and  
JAMES HAINES,  
a/k/a “Crack”**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of these offenses, that is,

1. A Smith & Wesson, Model SW40VE, .40 caliber semi-automatic pistol, serial number PBE4270 and 14 rounds of .40 caliber ammunition;
2. A Taurus, Model Millennium Pro, 9mm semi-automatic pistol, serial number TIX25370 and 12 rounds of 9mm ammunition;
3. A Smith & Wesson, Model M&P357C, .357 Sig caliber semi-automatic pistol, serial number DUK4677 and four rounds of .357 Sig caliber ammunition;
4. A Smith & Wesson, Model SW40VE, .40 caliber semi-automatic pistol, serial number DSD0048;
5. A Ruger, Model P97DC, .45 caliber semi-automatic pistol, serial number 663-03080;
6. A Glock, Model 19, 9mm semi-automatic pistol, serial number KNM631 (restored) and 15 rounds of assorted 9mm ammunition;
7. A Glock, Model 27, .40 caliber, semi-automatic pistol, serial number CXZ804US and 14 rounds of assorted .40 caliber ammunition;
8. A Glock .40 caliber magazine with nine rounds of assorted .40 caliber ammunition;
9. A Smith and Wesson, Model 686, revolver, serial number CFT5651 and two rounds of .357 caliber ammunition;
10. A Leinad, Model PM11, 9MM caliber, pistol, serial number obliterated with seven rounds of assorted 9MM ammunition;
11. A Remington Arms, Model 700, .270 caliber, bolt-action rifle, serial number 6862848;
12. Seventy-one rounds of assorted .357 caliber ammunition;
13. Thirty-six rounds of assorted manufacturer and assorted caliber ammunition;
14. One round of .45 caliber ammunition; and

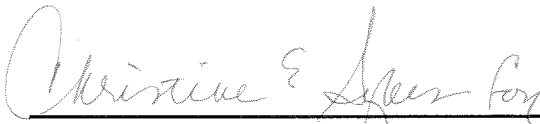
15. Five Hundred and Ninety-Two rounds of assorted manufacturer and assorted caliber ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**