

"1090," and others were members and associates of Sex Money Murder.

3. As early as in or about 2007, Sex Money Murder controlled the distribution of heroin and crack cocaine in the area surrounding Spruce Street and Martin Luther King, Boulevard in Newark, New Jersey and other locations.

4. Sex Money Murder consisted mostly of individuals who had grown up in and around the area of Spruce Street and Martin Luther King, Boulevard in Newark. The gang maintained a base of operation for their drug trafficking activities at apartments located at 90 Spruce Street and 725 Martin Luther King Boulevard in Newark, New Jersey.

5. The members of Sex Money Murder followed the standard traditions and protocols of the Bloods street gang, including:

a. A system of rules and regulations governing admission to and membership in Sex Money Murder;

b. A hierarchical power structure in which members were given formal designations or ranks signifying their status within the gang, such as the top leadership rank of "OG," which is short for "Original Gangster," the lower-level leadership rank of "five star generals," "captains," or "shot callers," and the non-leadership rank of "soldier";

c. A system of discipline and punishment for those members who violated rules, failed to carry out orders from

higher-ups, or "disrespected" the gang, in which offending members could be stripped of rank, placed on probationary status, physically assaulted or killed; and,

d. Visible demonstrations of gang affiliation, such as tattoos signifying membership in Sex Money Murder.

6. Sex Money Murder, including its leadership, membership and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. Sex Money Murder constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. Sex Money Murder was engaged in, and its activities affected, interstate and foreign commerce.

7. Members and associates of this criminal organization engaged in various criminal activities, including murder, attempted murder, conspiracy to commit murder, robbery, auto theft, drug distribution, and other offenses.

Purposes of the Sex Money Murder Enterprise

8. The purposes of Sex Money Murder included the following:

a. enriching the members and associates of the enterprise by, among other things, acts in violation of the laws of the United States and the State of New Jersey involving

murder, attempted murder, conspiracy to commit murder, drug distribution, robbery and other offenses;

b. preserving and protecting the power, territory, reputation, and profits of the enterprise, and its members and associates, both in and out of prison, through the use of intimidation, violence, threats of violence, assaults and murder;

c. promoting and enhancing the enterprise and its members' and associates' activities, including, but not limited to, drug trafficking, robbery, and other criminal activities; and

d. providing financial support and information to gang members.

Roles of the Defendants

9. Under the leadership of defendant NARIK WILSON, a/k/a "Spaz," and with the assistance of defendant EMIL RUTLEDGE, a/k/a "Diddy," defendant LAQUAN REED, a/k/a, "Drama," and defendant RAJOHN WILSON, a/k/a "1090," the members and associates of Sex Money Murder participated in unlawful and other activities in furtherance of the conduct of Sex Money Murder's affairs, as further described below:

a. Defendant NARIK WILSON, a/k/a "Spaz," was the leader or "O.G." of Sex Money Murder. In furtherance of the conduct of Sex Money Murder's affairs, he, among other things,

committed and directed others to commit acts of murder, attempted murder, assault, robbery, auto theft, and drug distribution.

b. Defendant EMIL RUTLEDGE, a/k/a "Diddy," was a "captain" or "shot caller" of Sex Money Murder who participated in its affairs by, among other things, committing and directing others to commit acts of murder, attempted murder, assault, and drug distribution.

c. Defendant LAQUAN REED, a/k/a "Drama," was a "soldier" of Sex Money Murder who participated in its affairs by, among other things, committing acts of murder, attempted murder, robbery, carjacking, assault, and drug distribution.

d. Defendant RAJOHN WILSON, a/k/a "1090," was a "five star general" of Sex Money Murder who participated in its affairs by, among other things, committing and directing others to commit acts of murder, attempted murder, assault, and drug distribution.

Manner and Means of the Enterprise

10. It was part of the manner and means of the enterprise that the defendants, as members of Sex Money Murder, were required to and did attend regular meetings to discuss, among other things: the structure and organization of the gang; past criminal acts committed against rival gang members and others; members who were arrested or incarcerated; disciplining members;

enforcement of gang rules; the identities of individuals suspected of cooperating with law enforcement and proposed actions to be taken against them; and plans and agreements regarding the commission of future crimes, including murder, illegal possession of firearms, assault, and drug distribution, as well as ways to conceal these crimes.

11. It was further part of the manner and means of the enterprise that the defendants and other members and associates of Sex Money Murder purchased, maintained, and circulated a collection of firearms for use in criminal activity by Sex Money Murder members, which they stored in an apartment located at 725 Martin Luther King Boulevard, 90 Spruce Street, and elsewhere in Newark.

12. It was further part of the manner and means of the enterprise that the defendants and other members and associates of Sex Money Murder generated money by, among other things, committing robberies, committing carjackings, and distributing controlled substances in and around 90 Spruce Street, 725 Martin Luther King Boulevard, and elsewhere in Newark, New Jersey.

13. It was further part of the manner and means of the enterprise that the defendants and other members and associates of Sex Money Murder committed and threatened to commit violent acts to, among other things: (a) retaliate against rival gang members and other persons who "disrespected" Sex Money Murder

members, or who threatened or who were perceived to pose a threat to the gang's authority, power, or control of a neighborhood; (b) punish enterprise members and associates who had been disloyal or broken gang rules; and (c) silence persons, including other enterprise members, who they believed were cooperating or potentially would cooperate with law enforcement.

14. It was part of the manner and means of the enterprise that the defendants and other members and associates of Sex Money Murder robbed and stole vehicles for the purpose of using those vehicles in connection with the commission other crimes.

15. It was part of the manner and means of the enterprise that defendants and other members and associates of Sex Money Murder concealed their criminal activities by obstructing justice, threatening and intimidating witnesses, and other means.

The Racketeering Violation

16. From at least as early as in or about January 2007 through in or about March 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants

NARIK WILSON,
a/k/a "Spaz,"
EMIL RUTLEDGE,
a/k/a "Diddy,"
LAQUAN REED,
a/k/a "Drama," and
RAJOHN WILSON,
a/k/a "1090,"

together with others known and unknown, being persons employed by and associated with Sex Money Murder, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully and knowingly conducted and participated, directly and indirectly, in the conduct of the affairs of Sex Money Murder through a pattern of racketeering activity, that is, through the commission of Racketeering Acts One through Eight as set forth below.

The Pattern of Racketeering Activity

17. The pattern of racketeering activity as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisted of the following acts:

18. Racketeering Act One: Attempted Murder and Conspiracy to Commit Murder - Victim 1

Defendants NARIK WILSON, a/k/a "Spaz," and RAJOHN WILSON, a/k/a "1090," committed the following acts, any one of which alone constitutes the commission of Racketeering Act One:

a. Attempted Murder

On or about February 4, 2007, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," and RAJOHN WILSON, a/k/a "1090," did attempt to cause the death and serious bodily injury resulting in death of another person, namely Victim 1, contrary to N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2), in violation of N.J.S.A. Sections 2C:5-1 and 2C:2-6.

b. Conspiracy to Commit Murder

On or about February 4, 2007, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," and RAJOHN WILSON, a/k/a "1090," did purposely and knowingly conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, namely Victim 1, contrary to N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2), in violation of N.J.S.A. Sections 2C:5-2 and 2C:2-6.

19. Racketeering Act Two: Attempted Murder and Conspiracy to Commit Murder - Victim 2

Defendants NARIK WILSON, a/k/a "Spaz," and RAJOHN WILSON, a/k/a "1090," committed the following acts, any one of which alone constitutes the commission of Racketeering Act Two:

a. Attempted Murder

On or about February 16, 2007, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," and RAJOHN WILSON, a/k/a "1090," did attempt to cause the death and serious bodily injury resulting in death of another person, namely Victim 2, contrary to N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2), in violation of N.J.S.A. Sections 2C:5-1 and 2C:2-6.

b. Conspiracy to Commit Murder

On or about February 16, 2007, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," and RAJOHN WILSON, a/k/a "1090," did purposely and knowingly conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, namely Victim 2, contrary to N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2), in violation of N.J.S.A. Sections 2C:5-2 and 2C:2-6.

20. Racketeering Act Three: Attempted Murder and Conspiracy to Commit Murder - Victim 3

Defendants NARIK WILSON, a/k/a "Spaz," and EMIL RUTLEDGE, a/k/a "Diddy," committed the following acts, any one of which alone constitutes the commission of Racketeering Act Three:

a. Attempted Murder

On or about October 29, 2010, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," and EMIL RUTLEDGE, a/k/a "Diddy," did attempt to cause the death and serious bodily injury resulting in death of another person, namely Victim 3, contrary to N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2), in violation of N.J.S.A. Sections 2C:5-1 and 2C:2-6.

b. Conspiracy to Commit Murder

On or about October 29, 2010, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," and EMIL RUTLEDGE, a/k/a "Diddy," did purposely and knowingly conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, namely Victim 3, contrary to N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2), in violation of N.J.S.A. Sections 2C:5-2 and 2C:2-6.

21. Racketeering Act Four: Attempted Murder and Conspiracy to Commit Murder - Victims 4, 5, 6 and 7

Defendants NARIK WILSON, a/k/a "Spaz," and EMIL RUTLEDGE, a/k/a "Diddy," committed the following acts, any one of which alone constitutes the commission of Racketeering Act Four:

a. Attempted Murder

On or about June 16, 2011, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," and EMIL RUTLEDGE, a/k/a "Diddy," did attempt to cause the death and serious bodily injury resulting in death of another person, namely Victim 4, Victim 5, Victim 6, and Victim 7, contrary to N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2), in violation of N.J.S.A. Sections 2C:5-1 and 2C:2-6.

b. Conspiracy to Commit Murder

On or about June 16, 2011, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," and EMIL RUTLEDGE, a/k/a "Diddy," did purposely and knowingly conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, namely Victim 4, Victim 5, Victim 6, and Victim 7, contrary to N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2), in violation of N.J.S.A. Sections 2C:5-2 and 2C:2-6.

22. Racketeering Act Five: Murder - Victim 8

On or about July 14, 2011, in Essex County, in the District of New Jersey, and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," and EMIL RUTLEDGE, a/k/a "Diddy," did purposely and knowingly cause the death and serious bodily injury resulting in death of another person, namely, Victim 8, in violation of N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2) and 2C:2-6.

a. Racketeering Act Six: Attempted Robbery, Conspiracy to Commit Robbery, and Felony Murder - Victim 9

Defendant LAQUAN REED, a/k/a "Drama," committed the following acts, any one of which alone constitutes the commission of Racketeering Act Six:

b. Attempted Robbery

On or about July 31, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant LAQUAN REED, a/k/a "Drama," in the course of committing a theft of a 2005 black, two-door BMW 325IS (the "BMW"), did attempt to purposely and knowingly inflict bodily injury and use force upon another, namely, Victim 9, and did threaten Victim 9 and put her in fear of immediate bodily injury, in violation of N.J.S.A. Sections 2C:15-1(a)(1) and (a)(2), 2C:5-1, and 2C:2-6.

c. Conspiracy to Commit Robbery

On or about July 31, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant LAQUAN REED, a/k/a "Drama," did knowingly and intentionally conspire and agree with others to unlawfully take the BMW and in the course of committing that theft to inflict bodily injury and use force upon Victim 9, and to threaten Victim 9 and put her in fear of immediate bodily injury, contrary to N.J.S.A. Sections 2C:15-1(a)(1) and (a)(2), in violation of N.J.S.A. Section 2C:5-2.

d. Felony Murder

On or about July 31, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant LAQUAN REED, a/k/a "Drama," acting either alone or with one or more other persons, engaged in an attempt to commit robbery, and in the course of such crime, caused the death of a person other than one of the participants, namely Victim 9, in violation of N.J.S.A. Section 2C:11-3(a)(3).

23. Racketeering Act Seven: Attempted Murder and Conspiracy to Commit Murder - Victim 6

Defendants NARIK WILSON, a/k/a "Spaz," and LAQUAN REED, a/k/a "Drama," committed the following acts, any one of which alone constitutes the commission of Racketeering Act Seven:

a. Attempted Murder

On or about August 3, 2011, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz" and LAQUAN REED, a/k/a "Drama," did attempt to cause the death and serious bodily injury resulting in death of another person, namely, the individual identified as Victim 6, contrary to N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2), in violation of N.J.S.A. Sections 2C:5-1 and 2C:2-6.

b. Conspiracy to Commit Murder

On or about August 3, 2011, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz" and LAQUAN REED, a/k/a "Drama," did purposely and knowingly conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, namely, the individual identified as Victim 6, contrary to N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2), in violation of N.J.S.A. Sections 2C:5-2 and 2C:2-6.

25. Racketeering Act Eight: Conspiracy to Distribute One Kilogram or More of Heroin

From a date not later than January 2007 through on or about March 2013, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," EMIL RUTLEDGE, a/k/a "Diddy," LAQUAN REED, a/k/a "Drama," and RAJOHN WILSON, a/k/a "1090," did knowingly and intentionally conspire and agree

with each other and with others to distribute and possess with intent to distribute one kilogram or more of a mixture and substance containing a detectable amount of heroin, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), in violation of Title 21, United States Code, Section 846.

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

COUNT TWO
(Racketeering Conspiracy)
(All defendants)

1. The allegations set forth in paragraphs 1 through 15 of Count One of this Indictment are re-alleged and incorporated as if fully set forth herein.

The Racketeering Conspiracy

2. From at least as early as in or about January 2007 through in or about March 2013, in Essex County, in the District of New Jersey, and elsewhere, defendants

NARIK WILSON,
a/k/a "Spaz,"
EMIL RUTLEDGE,
a/k/a "Diddy,"
LAQUAN REED,
a/k/a "Drama," and
RAJOHN WILSON,
a/k/a "1090,"

together with others known and unknown, being persons employed by and associated with Sex Money Murder, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired and agreed to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of Sex Money Murder through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), which pattern of racketeering activity consisted of:

- a. multiple acts involving murder, in violation of N.J.S.A. Sections 2C:5-1, 2C:5-2, 2C:2-6, and 2C:11-3(a);
- b. multiple acts involving robbery, in violation of N.J.S.A. Section 2C:15-1; 2C:5-1, 2C:5-2, and 2C:2-6 and
- c. multiple offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 843 and 846.

3. It was part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

All in violation of Title 18, United States Code, Sections 1962(d) and 1963.

Notice of Special Sentencing Findings as to Count Two

The Grand Jury further alleges that:

4. On or about July 14, 2011, in Essex County, in the District of New Jersey, and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," and EMIL RUTLEDGE, a/k/a "Diddy," did purposely and knowingly cause the death and serious bodily injury resulting in death of another person, namely, Victim 8, in violation of N.J.S.A. Sections 2C:11-3(a)(1) and (a)(2) and 2C:2-6.

5. From in or about January 2007 through in or about March 2013, in Essex County, in the District of New Jersey and elsewhere, defendants NARIK WILSON, a/k/a "Spaz," EMIL RUTLEDGE, a/k/a "Diddy," LAQUAN REED, a/k/a "Drama," and RAJOHN WILSON, a/k/a "1090," did knowingly and intentionally conspire and agree with each other and with others to distribute and to possess with intent to distribute 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), in violation of Title 21, United States Code, Section 846.

6. On or about July 31, 2011, in Essex County, in the District of New Jersey and elsewhere, defendant LAQUAN REED, a/k/a "Drama," acting either alone or with one or more other persons, engaged in an attempt to commit robbery, and in the course of such crime, caused the death of a person other than one of the participants, namely Victim 9, in violation of N.J.S.A. Section 2C:11-3(a)(3).

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

COUNT THREE

(Attempted Murder in Aid of Racketeering)
(Defendants Narik Wilson and Rutledge)

1. The allegations contained in paragraphs 1 through 15 of Count One of this Indictment are hereby realleged and incorporated by reference.

2. At all times relevant this Indictment, in the District of New Jersey and elsewhere, Sex Money Murder constituted an enterprise as defined in Title 18, United States Code, Section 1959(b), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate and foreign commerce.

3. At all times relevant to this Indictment, Sex Money Murder, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving murder and robbery in violation of New Jersey Code of Criminal Justice and offenses involving the felonious manufacture, importation, receiving, concealment, buying, selling, and otherwise dealing in a controlled substance, in violation of Title 21, United States Codes, Sections 841(a)(1), 843, and 846.

4. On or about October 29, 2010, in Essex County, in the District of New Jersey and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in Sex Money

Murder, an enterprise engaged in racketeering activity,
defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
EMIL RUTLEDGE,
a/k/a "Diddy,"

unlawfully, knowingly, and intentionally did attempt to murder
Victim 3, in violation of N.J.S.A. Sections 2C:5-1, 2C:11-
3(a)a(1) and (a)(2), and 2C:2-6.

All in violation of Title 18, United States Code, Section
1959(a)(5) and Section 2.

COUNT FOUR

(Assault with a Dangerous Weapon in Aid of Racketeering)
(Defendants Narik Wilson and Rutledge)

1. The allegations contained in paragraphs 1 through 15 of Count One of this Indictment and paragraphs 2 and 3 of Count Three are hereby realleged and incorporated by reference.

2. On or about October 29, 2010, in Essex County, in the District of New Jersey and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in Sex Money Murder, an enterprise engaged in racketeering activity, defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
EMIL RUTLEDGE,
a/k/a "Diddy,"

unlawfully, knowingly, and intentionally committed, and aided and abetted the commission of an assault with a dangerous weapon against Victim 3, in violation of N.J.S.A. Section 2C:12-1(b)(2).

All in violation of Title 18, United States Code, Section 1959(a)(3) and Section 2.

COUNT FIVE

(Use of a Firearm During a Crime of Violence)
(Defendants Narik Wilson and Rutledge)

On or about October 29, 2010, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
EMIL RUTLEDGE,
a/k/a "Diddy,"

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, the attempted murder of, and assault with a dangerous weapon, Victim 3, in violation of 18 U.S.C. §§ 1959(a)(3) and (a)(5) as charged in Counts Three and Four of this Indictment, did knowingly use and carry a firearm, which firearm was discharged, and did aid and abet the same.

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

COUNT SIX

(Attempted Murder in Aid of Racketeering
(Defendants Narik Wilson and Rutledge)

1. The allegations contained in paragraphs 1 through 15 of Count One and paragraphs 2 and 3 of Count Three of this Indictment are hereby realleged and incorporated by reference

2. On or about June 16, 2011, in Essex County, in the District of New Jersey and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in Sex Money Murder, an enterprise engaged in racketeering activity, defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
EMIL RUTLEDGE,
a/k/a "Diddy,"

together with others unlawfully, knowingly, and intentionally did attempt to murder, Victim 4, Victim 5, Victim 6 and Victim 7, all rival gang members, in violation of N.J.S.A. 2C:5-1, 2C:11-3(a)(1) and (a)(2), and 2C:2-6.

All in violation of Title 18, United States Code, Section 1959(a)(5) and Section 2.

COUNT SEVEN

(Assault with a Dangerous Weapon in Aid of Racketeering
(Defendants Narik Wilson and Rutledge)

1. The allegations contained in 1 through 15 of Count One and paragraphs 2 and 3 of Count Three of this Indictment are hereby realleged and incorporated by reference

2. On or about June 16, 2011, in Essex County, in the District of New Jersey and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in Sex Money Murder, an enterprise engaged in racketeering activity, defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
EMIL RUTLEDGE,
a/k/a "Diddy,"

together with others unlawfully, knowingly, and intentionally committed, and aided and abetted the commission of an assault with a dangerous weapon, against Victim 4, Victim 5, Victim 6 and Victim 7, in violation of N.J.S.A. Section 2C:12-1b(2).

All in violation of Title 18, United States Code, Section 1959(a)(3) and Section 2.

COUNT EIGHT

(Use of a Firearm During a Violent Crime)
(Defendants Narik Wilson and Rutledge)

On or about June 16, 2011, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
EMIL RUTLEDGE,
a/k/a "Diddy,"

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, the attempted murder of, and assault with a dangerous weapon, Victim 4, Victim 5, Victim 6 and Victim 7, in violation of 18 U.S.C. §§ 1959(a) (3) and (a) (5) as charged in Counts Six and Seven of this Indictment, did knowingly use and carry a firearm, which firearm was discharged, and did aid and abet the same.

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

COUNT NINE

(Murder in Aid of Racketeering)
(Defendants Wilson and Rutledge)

1. The allegations contained in paragraphs 1 through 15 of Count One and paragraphs 2 and 3 of Count Three of this Indictment are hereby realleged and incorporated by reference

2. On or about July 14, 2011, in Essex County, in the District of New Jersey, and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in Sex Money Murder, which enterprise was engaged in racketeering activity, defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
EMIL RUTLEDGE,
a/k/a "Diddy,"

Sex Money Murder did knowingly and intentionally murder Victim 8, contrary to N.J.S.A. 2C:11-3 (a)(1) & (2).

All in violation of Title 18, United States Code, Section 1959(a)(1) and Section 2.

COUNT TEN

(Use of a Firearm During a Violent Crime)
(Defendants Wilson and Rutledge)

On or about July 14, 2011, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
EMIL RUTLEDGE,
a/k/a "Diddy,"

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, the murder of Victim 8, in violation of 18 U.S.C. § 1959(a)(1) as charged in Count Nine of this Indictment, did knowingly use and carry a firearm, which firearm was discharged, and did aid and abet the same.

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

COUNT ELEVEN

(Attempted Murder in Aid of Racketeering)
(Defendants Narik Wilson and Reed)

1. The allegations contained in paragraphs 1 through 15 of Count One and paragraphs 2 and 3 of Count Three of this Indictment are hereby realleged and incorporated by reference

2. On or about August 3, 2011, in Essex County, in the District of New Jersey and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in Sex Money Murder, an enterprise engaged in racketeering activity, defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
LAQUAN REED,
a/k/a "Drama,"

together with others unlawfully, knowingly, and intentionally did attempt to murder Victim 6, in violation of N.J.S.A. Sections 2C:5-1 and 2C:12-1b(2).

All in violation of Title 18, United States Code, Section 1959(a)(5) and Section 2.

COUNT TWELVE

(Assault with a Dangerous Weapon in Aid of Racketeering)
(Defendants Narik Wilson and Reed)

1. The allegations contained in 1 through 15 of Count One and paragraphs 2 and 3 of Count Three of this Indictment are hereby realleged and incorporated by reference

2. On or about August 3, 2011, in Essex County, in the District of New Jersey and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in Sex Money Murder, an enterprise engaged in racketeering activity, defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
LAQUAN REED,
a/k/a "Drama,"

together with others unlawfully, knowingly, and intentionally committed, and aided and abetted the commission of an assault with a dangerous weapon, against the individual identified as Victim 6, in violation of N.J.S.A. Section 2C:12-1b(2).

All in violation of Title 18, United States Code, Section 1959(a)(3) and Section 2.

COUNT THIRTEEN

(Use of a Firearm During a Violent Crime)
(Defendants Narik Wilson and Reed)

On or about August 3, 2011, in Essex County, in the District of New Jersey, and elsewhere, the defendants,

NARIK WILSON,
a/k/a "Spaz,"
and
LAQUAN REED,
a/k/a "Drama,"

during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, the attempted murder of, and assault with a dangerous weapon against, the individual identified as Victim 6 in Racketeering Act Four, in violation of 18 U.S.C. §§ 1959(a)(3) and (a)(5) as charged in Counts Eleven and Twelve of this Indictment, did knowingly use and carry a firearm, which firearm was discharged, and did aid and abet the same.

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

COUNT FOURTEEN

(Conspiracy to Use a Firearm During a Crime of Violence or a
Drug Trafficking Crime)

(All defendants)

1. The allegations contained in paragraphs 1 through 25 of Count One of this Indictment are hereby realleged and incorporated by reference as though set forth fully herein.

2. The allegations contained in paragraphs 1 through 2 of Count Two of this Indictment are hereby realleged and incorporated by reference as though set forth fully herein.

3. From at least as early as in or around January 2007 through in or around August 2011, in Essex County, in the District of New Jersey, and elsewhere, defendants

NARIK WILSON,
a/k/a "Spaz,"
EMIL RUTLEDGE,
a/k/a "Diddy,"
LAQUAN REED,
a/k/a "Drama," and
RAJOHN WILSON,
a/k/a "1090"

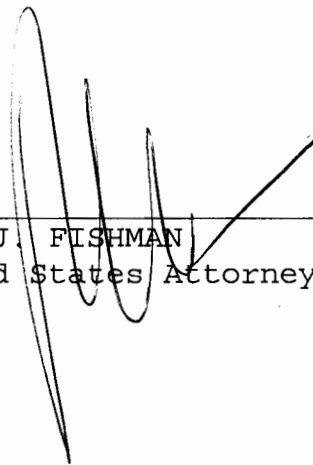
together with others, knowingly and intentionally conspired and agreed to use and carry firearms during and in relation to a crime of violence, that is the Racketeering and Racketeering conspiracy as charged in Counts One and Two respectively, and to possess firearms in furtherance

of said crimes, contrary to Title 18, United States Code,
Section 924(c).

In violation of Title 18, United States Code, Section
924(o).

A TRUE BILL.

FOREPERSON _____



PAUL J. FISHMAN
United States Attorney

CASE NUMBER: 13-CR-787-SDW

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

NARIK WILSON, a/k/a "Spaz,"
EMIL RUTLEDGE, a/k/a "Diddy,"
LAQUAN REED, a/k/a "DRAMA," and
RAJOHN WILSON, a/k/a "1090"

INDICTMENT FOR

18 U.S.C. §§ 1959(a)(5), 1962(c), 1962(d), 1963
922(g), 924(o) and 21 U.S.C. § 846

A True Bill,

Foreperson

PAUL J. FISHMAN
U.S. ATTORNEY
NEWARK, NEW JERSEY

MICHAEL H. ROBERTSON
ASSISTANT U.S. ATTORNEY
(973) 645-2779
