

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

PERRY ROARK,
a/k/a Rock, "Pops," "Slim,"
"Saho the Ghost,"
JAMES SWEENEY,
NICKY CASH,
a/k/a "Mom,"
GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"
DANE SHIVES,
MICHAEL QUINN, a/k/a "Mikey,"
MICHAEL FORAME,
a/k/a "Skinny," "Skinny Pimp,"
BRIAN MITCHELL,
a/k/a "Carlito,"
RICHARD INGRAM,
a/k/a Ricky, "Hades,"
TIMOTHY MIXTER,
a/k/a "Fuhrer"
JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"
GREGORY COOK,
JEREMY RIDGEWAY,
a/k/a "J-Rock,"
JOHN ZION,
a/k/a "John John,"
RUSSELL HARTMAN,
a/k/a "Busy,"
BONNIE RICE,
KELLY WITTER,
CHARLES GRAY,
a/k/a "Bud," "Budrow"
EDWARD MUELLER,
a/k/a "Dusty,"
MELANIE HOLQUIST,
SCOTT JARRIEL,
a/k/a "Scotty J.,"

CRIMINAL NO. RDB-11-0547

(Racketeering Conspiracy, 18 U.S.C. §
1962(d); Murder in Aid of Racketeering,
18 U.S.C. § 1959(a)(1); Conspiracy to
Commit a Violent Crime in Aid of
Racketeering, 18 U.S.C. § 1959(a)(3),
(a)(5) & (a)(6); Conspiracy to Distribute
and Possess with Intent to Distribute
Drugs, 21 U.S.C. § 846; Distribution and
Possession with Intent to Distribute
Drugs, 21 U.S.C. § 841(a); Felon in
Possession, 18 U.S.C. § 922(g); Accessory
after the Fact, 18 U.S.C. § 3; Aiding and
Abetting, 18 U.S.C. § 2)

**GARY HORTON,
[Redacted]
Defendants**

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INDICTMENT (Redacted)

COUNT ONE

The Grand Jury for the District of Maryland charges that:

1. At various times relevant to this Indictment, **PERRY ROARK, a/k/a Rock, "Pops," "Slim," "Saho the Ghost;" JAMES SWEENEY; NICKY CASH, a/k/a "Mom;" GEORGE TREAS, a/k/a "Georgie," "Fat Boy;" DANE SHIVES; MICHAEL QUINN, a/k/a "Mikey;" MICHAEL FORAME, a/k/a "Skinny," Skinny Pimp;" BRIAN MITCHELL, a/k/a "Carlito;" RICHARD INGRAM, a/k/a Ricky, "Hades;" TIMOTHY MIXTER, a/k/a "Fuhrer," JOHN ADAMS, a/k/a "L.J.," "Little Johnny;" GREGORY COOK; JEREMY RIDGEWAY, a/k/a "J-Rock;" JOHN ZION, a/k/a "John John;" RUSSELL HARTMAN, a/k/a "Busy;" BONNIE RICE, KELLY WITTER, CHARLES GRAY, a/k/a "Bud," "Budrow;" EDWARD MUELLER, a/k/a "Dusty;" MELANIE HOLQUIST, SCOTT JARRIEL, a/k/a "Scotty J.;" GARY HORTON, [Redacted]** along with others known and unknown to the grand jury, were members and associates of Dead Man Incorporated, a/k/a DMI, a violent criminal organization, which operated inside and outside of prisons in Maryland and elsewhere, whose members committed acts of violence including conspiracy to commit murder, murder, murder-for-hire, assault and armed robbery, and whose members engaged in the distribution of controlled substances.

2. In or about 2000, DMI was created originally as a prison gang in Maryland. From the beginning, the “Supreme Commander” of DMI has been Perry Roark. DMI is hierarchically organized with approximately five “elders” located in various prisons. At its inception and for several years thereafter, DMI was closely allied to the Black Guerilla Family (BGF), another prison gang. DMI members often obtained controlled substances from BGF and performed services in exchange, such as assaulting prisoners with unpaid drug debts to BGF.

3. At all times relevant to this Indictment, DMI has had “units” in prisons throughout the State of Maryland. These include, among others, Maryland Correctional Adjustment Center (Supermax) (MCAC), Baltimore City Detention Center (BCDC), Baltimore City Correctional Center, Maryland House of Correction (MHC), Maryland Reception Diagnostic and Classification Center (MRDCC), Eastern Correctional Institution (ECI), Metropolitan Transition Center (MTC), Roxbury Correctional Institute, Patuxent Correctional Institute, Maryland Correctional Institution - Hagerstown, Western Correctional Institute (WCI), Central Laundry Facility (CLF), Maryland House of Correction – Jessup (MCIJ), Maryland Pre-release – Jessup (JPRU), Brockbridge Correctional Facility; Maryland Correctional Training Center (MCTC); Anne Arundel County Detention Center; and Baltimore County Detention Center. DMI members are also housed in prisons in other states, including Pennsylvania, Louisiana and Texas.

4. At all times relevant to this Indictment, a unit consists of several “seats,” or leadership positions with their own names and roles. Typically, these are: a) Commander, “Capricorn” or “C”; b) Lieutenant Commander or “LC” or “LT”; c) Field General or “FG”; d) Accountant or “Finance”; e) Sergeant-at-Arms or “SOA”.

5. By 2006, DMI started to expand its membership by recruiting members and associates outside prison including women. These members and associates are also organized into units. Elders outside the prisons have been created to coordinate between the units, the Supreme Commander and other leaders. The total number of elders has grown well beyond the original number of five.

6. At all times relevant to this Indictment, units report to the Supreme Commander. Members of units who are not “seats” are called “dawgs.” “Dawg” stands for “DMI against world government.” Female members of DMI are called “diamonds.” Units outside the prisons are identified by the region they cover, such as Brooklyn, South Baltimore, Southwest Baltimore, Southeast Baltimore, Dundalk, Westminster, Glen Burnie, etc.

7. By 2006-08, the proliferation of cell phones inside of prisons enabled leaders of DMI to exercise some control over activities outside, to pass down decisions, and coordinate the smuggling of controlled substances and other contraband into prisons, often through the mediation of corrupt corrections officers who worked with DMI.

8. In 2006-08, DMI became independent of BGF, but the two organizations have continued to work in alliance in some prisons. DMI has gone through sporadic periods of open conflict with other gangs, including both the Bloods and BGF, both in prisons and on the streets.

9. At all times relevant to this Indictment, DMI members were required to follow a strict code of conduct. Members who violated this code or who disobeyed an order from a superior were subjected to disciplinary measures called “sanctions” which included physical beatings, stabbings and murders administered by other DMI members.

10. DMI including its leadership, members and associates constituted an “enterprise,” as defined by Sections 1961(4) and 1959(b)(2) of Title 18, United States Code, that is, a group of individuals, which engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of DMI

11. Among the purposes of the enterprise were the following:

a. Enriching the members and associates of the enterprise and promoting their activities through, among other things, murder, murder-for-hire, armed robbery, assault, extortion, distribution of controlled substances, and money laundering.

b. Preserving and protecting the power, territory and profits of the enterprise both inside prisons and outside and retaliating against individuals and organizations through the use of intimidation, bribery, assault, threats of violence, witness retaliation and murder.

c. Preventing and obstructing the arrest and prosecution of members and associates through obstruction of justice, witness intimidation, assault, threats of violence and murder.

d. Supporting incarcerated members by supplying them with money, controlled substances, cell phones and other contraband, and by carrying out various missions for incarcerated members.

12. **The Racketeering Violation**

From in or about 2000 through on or about the date of this Indictment, in the District of Maryland, and elsewhere,

PERRY ROARK,
a/k/a Rock, "Pops," "Slim,"
"Saho the Ghost,"
JAMES SWEENEY,
NICKY CASH,
a/k/a "Mom,"
GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"
DANE SHIVES,
MICHAEL QUINN,
a/k/a "Mikey,"
MICHAEL FORAME,
a/k/a "Skinny," "Skinny Pimp,"
BRIAN MITCHELL,
a/k/a "Carlito,"
RICHARD INGRAM,
a/k/a Ricky, "Hades,"
TIMOTHY MIXTER,
a/k/a "Fuhrer,"
JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"
GREGORY COOK,
JEREMY RIDGEWAY,
a/k/a "J-Rock,"
JOHN ZION,
a/k/a "John John,"
RUSSELL HARTMAN,
a/k/a "Busy,"
BONNIE RICE,
KELLY WITTER,
CHARLES GRAY,
a/k/a "Bud," "Budrow"
EDWARD MUELLER,
a/k/a "Dusty,"
MELANIE HOLQUIST,
SCOTT JARRIEL,
a/k/a "Scotty J.,"
GARY HORTON
[Redacted]
Defendants

defendants herein, being persons employed by and associated with DMI, an enterprise, which engaged in, and the activities of which affected, interstate and foreign commerce, together with persons known and unknown to the Grand Jury, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree to violate Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, multiple acts involving:

- A. 21 U.S.C. § 846 (conspiracy to distribute a controlled substance);
- B. 21 U.S.C. § 841 (distribution and possession with intent to distribute a controlled substance);
- C. Murder and threats to commit murder, chargeable under MD. CODE ANN., Crim. L. § 2-201 (Maryland first degree murder); § 2-204 (Maryland second degree murder); § 2-205 (Maryland attempt to commit murder in the first degree) and § 2-206 (Maryland attempt to commit murder in the second degree);
- D. Robbery, chargeable under MD. CODE ANN., Crim. L. § 3-402 (Maryland robbery) and § 3-403 (Maryland robbery with a dangerous weapon);
- E. Extortion, chargeable under MD. CODE ANN., Crim. L. § 3-701 (Maryland extortion).

Methods and Means of DMI

13. Among the means and methods by which the defendants and their associates conducted and participated in the affairs of the enterprise were the following:

- a. Members of the enterprise and their associates committed, attempted to commit and threatened to commit acts of violence including murder, assault, burglary, fraud,

extortion and armed robbery to protect and expand the enterprise's criminal operations, retaliate against other individuals and organizations, and to obstruct justice and law enforcement.

b. Members of the enterprise and their associates promoted a climate of fear in prisons and outside prisons through violence and threats of violence.

c. Members of the enterprise and their associates assaulted persons designated by the BGF in exchange for controlled substances and other things of value.

d. Members of the enterprise and their associates trafficked in controlled substances, including heroin, cocaine, cocaine base (crack), marijuana, and prescription drugs such as oxycodone products and buprenorphine, also known as Suboxone, to obtain money.

e. Members of the enterprise and their associates also raised money by committing robberies, burglaries, extortion, fraud and identity theft.

f. Members of the enterprise smuggled and arranged for the smuggling of controlled substances, tobacco, cell phones, and other contraband into prisons, by concealing them on the persons of visitors to the prisons [Redacted] to aid in smuggling contraband in exchange for money or other compensation.

g. Members of the enterprise and their associates used contraband cell phones in prisons to coordinate the smuggling of contraband into prisons, disseminate information about arrests and releases of members and associates, to warn of investigations, to publicize the identities of persons believed to be cooperating with law enforcement, to order assaults and murders of such persons, as well as enemies of the enterprise, and to impose sanctions on members and associates perceived to be in violation of the rules of the enterprise.

h. Members of the enterprise made decisions both by mutual consent and by direction from its leaders.

Overt Acts

1. On or about January 29, 2006, Gerald Smith was assaulted at MCTC in Hagerstown, Maryland, upon orders by DMI "C" **MICHAEL QUINN**, carried out by persons known and unknown to the Grand Jury.

2. In or about 2006, **PERRY ROARK** authorized an assault on Tyrone Miner at MCTC carried out on September 23, 2006 by **GARY HORTON**, who stabbed Miner repeatedly.

3. In or about October 2006, **PERRY ROARK** ordered an assault on BGF members, and, in response, DMI members known and unknown to the grand jury assaulted Jason Newkirk, a/k/a "Bones," at MCTC on October 18, 2006.

4. In or about 2006, **PERRY ROARK** authorized the assault on Michael Ringley by DMI members.

5. In or about 2007, **PERRY ROARK** authorized an assault on Charles Crew.

6. On or about February 16, 2008, **MICHAEL QUINN** and others known and unknown to the grand jury assaulted Michael Thompson at Victory House in South Baltimore.

7. From in or about November, 2008, to in or about May, 2009, **PERRY ROARK, JOHN ADAMS and BRIAN MITCHELL** conspired to murder Charles Crew.

8. [Redacted]

9. From in or about November, 2008, to in or about May, 2009, **PERRY ROARK, JOHN ADAMS, and BRIAN MITCHELL** planned and took steps to carry out the murder Michael Quinn.

10. On or about February 16, 2009, **PERRY ROARK, MICHAEL FORAME, JOHN ADAMS, BRIAN MITCHELL, and CHARLES GRAY** assaulted and conspired to assault James Flanary.

11. On or about February 16, 2009, **MICHAEL FORAME, and JOHN ADAMS** killed and murdered James Flanary

12. On or about March 3, 2009, **MICHAEL FORAME, BRIAN MITCHELL, JOHN ADAMS, and EDWARD MUELLER** fired weapons into a house and wounded Christopher Santana.

13. From in or about November, 2008, to on or about June 2, 2009, **PERRY ROARK, NICKY CASH, DANE SHIVES, and JOHN ADAMS** planned and took steps to carry out the murder of Tony Geiger.

14. On or about June 2, 2009, **PERRY ROARK, NICKY CASH, DANE SHIVES, and JOHN ADAMS** killed and murdered Tony Geiger.

15. From in or about August, 2009 to in or about September, 2009, in the State and District of Maryland, **GEORGE TREAS, TIMOTHY MIXTER, JOHN ADAMS, GREGORY COOK and JOHN ZION** planned and took steps to carry out the murder of Jeremy Ridgeway.

16. On or about September 18, 2009, in the District of Maryland, **GEORGE TREAS, TIMOTHY MIXTER, JOHN ADAMS, GREGORY COOK, and JOHN ZION** did kill and murder Eugene Chambers.

17. On or about September 19, 2009, in the District of Maryland, **GEORGE TREAS, JOHN ADAMS, and GREGORY COOK** did kill and murder Walter Milewski.

18. In or about 2009, in the District of Maryland, **CHARLES GRAY** and another DMI member did conspire to assault Daniel Dubbs in BCDC.

19. From in or about the summer of 2009 to in or about July, 2010, in the District of Maryland, **PERRY ROARK, JOHN ADAMS, RICHARD INGRAM** and **RUSSELL HARTMAN** planned and took steps to carry out the murder of Shawn Novak.

20. On or about January 19, 2010, **GREGORY COOK** and others known and unknown to the grand jury committed a home invasion robbery of 6405 Cedar Furnace Circle, Glen Burnie, Maryland and assaulted the occupants.

21. On or about February 17, 2010, in the District of Maryland, **KELLY WITTER** distributed cocaine base also known as crack cocaine.

22. On or about February 19, 2010, in the District of Maryland, **MELANIE HOLQUIST** distributed cocaine base, also known as crack cocaine.

23. On or about March 2, 2010, in the District of Maryland, **KELLY WITTER** distributed and possessed with intent to distribute cocaine base, also known as crack cocaine.

24. On or about March 12, 2010, in the District of Maryland, **KELLY WITTER** distributed and possessed with intent to distribute cocaine base, also known as crack cocaine.

25. On or about May 22, 2010, in the District of Maryland, **PERRY ROARK, MICHAEL FORAME,** and **SCOTT JARRIEL** planned and took steps to carry out the assault on Charles Ravenscroft.

26. In 2010, **PERRY ROARK** and **TIMOTHY MIXTER** ordered an assault on Richard Brooks at MCIH, and this was carried out on August 10, 2010.

27. On or about October 27, 2010, in the District of Maryland, **JOHN ZION** distributed and possessed with intent to distribute cocaine base, also known as crack cocaine.

28. On or about January 21, 2011, in the District of Maryland, **GEORGE TREAS** distributed and possessed with intent to distribute cocaine base, also known as crack cocaine.

29. On or about January 25, 2011, in the District of Maryland, **GEORGE TREAS** distributed and possessed with intent to distribute cocaine base, also known as crack cocaine.

30. On or about January 31, 2011, in the District of Maryland, **GEORGE TREAS** distributed and possessed with intent to distribute cocaine base, also known as crack cocaine.

31. On or about February 2, 2011, in the District of Maryland, **GEORGE TREAS** distributed and possessed with intent to distribute cocaine base, also known as crack cocaine.

32. On or about March 1, 2011, in the District of Maryland, **GEORGE TREAS** and **TIMOTHY MIXTER** distributed and possessed with intent to distribute cocaine base also known as crack cocaine.

33. On or about March 9, 2011, in the District of Maryland, **GEORGE TREAS** and **TIMOTHY MIXTER** distributed and possessed with intent to distribute cocaine base, also known as crack cocaine.

34. On or about March 9, 2011, in the District of Maryland, **GEORGE TREAS** and **TIMOTHY MIXTER** did possess a Norinco 7.62x39mm caliber semi-automatic rifle, model SKS, serial number 10454795.

35. On or about March 24, 2011, in the District of Maryland, **GEORGE TREAS** possessed a Smith & Wesson .38 Special caliber revolver, model MOD-38 Airweight, serial # J536529 and a Walther 9mm Luger caliber pistol, model P38, serial #1878 C.

Notice of Special Sentencing Characteristics

On or about February 16, 2009, in the State and District of Maryland, **JOHN ADAMS, a/k/a "L.J.," "Little Johnny,"** and **MICHAEL FORAME, a/k/a "Skinny," Skinny Pimp;** the defendants herein, feloniously, willfully and of deliberately premeditated malice aforethought did kill and murder James Flanary against the peace, government and dignity of the State, in violation of Maryland common law and Md. Code Ann. Crim. Law § 2-201.

On or about June 2, 2009, in the State and District of Maryland, **PERRY ROARK, a/k/a Rock, "Pops," "Slim," "Saho the Ghost;" NICKY CASH, a/k/a "Mom;" DANE SHIVES;** and **JOHN ADAMS, a/k/a "L.J.," "Little Johnny,"** the defendants herein, feloniously, willfully and of deliberately premeditated malice aforethought did kill and murder Tony Geiger against the peace, government and dignity of the State, in violation of Maryland common law and Md. Code Ann. Crim. Law § 2-201.

On or about September 19, 2009, in the State and District of Maryland, **GEORGE TREAS, a/k/a "Georgie," "Fat Boy," GREGORY COOK, and JOHN ADAMS, a/k/a "L.J.," "Little Johnny;"** the defendants herein, feloniously, willfully and of deliberately premeditated malice aforethought did kill and murder Walter Milewski against the peace, government and dignity of the State, in violation of Maryland common law and Md. Code Ann. Crim. Law § 2-201.

From in or about 2000, up to on or about the date of this Indictment, in the State and District of Maryland and elsewhere, **PERRY ROARK, a/k/a Rock, "Pops," "Slim," "Saho the Ghost;" JAMES SWEENEY; NICKY CASH, a/k/a "Mom;" GEORGE TREAS, a/k/a "Georgie," "Fat Boy;" DANE SHIVES; MICHAEL QUINN, a/k/a "Mikey;" MICHAEL FORAME, a/k/a "Skinny," Skinny Pimp;" BRIAN MITCHELL, a/k/a "Carlito;" RICHARD INGRAM, a/k/a Ricky, "Hades;" TIMOTHY MIXTER, a/k/a "Fuhrer;" JOHN ADAMS, a/k/a "L.J.," "Little Johnny;" GREGORY COOK; JEREMY RIDGEWAY, a/k/a "J-Rock;" JOHN ZION, a/k/a "John John;" RUSSELL HARTMAN, a/k/a "Busy;" BONNIE RICE, KELLY WITTER, CHARLES GRAY, a/k/a "Bud," "Budrow;" EDWARD MUELLER, a/k/a "Dusty;" MELANIE HOLQUIST, SCOTT JARRIEL, a/k/a**

“Scotty J.; GARY HORTON [Redacted], defendants herein, did knowingly, willfully and unlawfully conspire with each other and with others known and unknown to the Grand Jury to knowingly, intentionally and unlawfully distribute more than 280 grams of a mixture or substance containing cocaine base, commonly known as “crack,” a Schedule II controlled substance; and one kilogram or more of a quantity of a mixture or substance containing heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, §§ 841(a), 846 .

18 U.S.C. § 1962(d)

18 U.S.C. § 1963

COUNT TWO

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

1. Paragraphs 1 through 11 set forth in Count One are incorporated herein by reference.
2. From in or about 2000, through on about the date of this Indictment, DMI, an enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, §§ 1959(b)(1) and 1961(1), namely acts involving distribution of controlled substances, robbery, extortion and murder.
3. From in or about November, 2008 to in or about May, 2009, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

PERRY ROARK,
a/k/a Rock, "Pops," "Slim," "Saho the Ghost,"
JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"
and
BRIAN MITCHELL,
a/k/a "Carlito,"

defendants herein, did conspire with one another and with other persons known and unknown to the grand jury to murder Charles Crew and Rebecca Crew in violation of Maryland common law and Md. Code Ann. Crim. Law §§ 1-202, 2-201, 2-204.

18 U.S.C. § 1959(a)(5)

COUNT THREE

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 set forth in Count Two are incorporated herein by reference.

2. From in or about November, 2008, to in or about May, 2009, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

**PERRY ROARK,
a/k/a Rock, "Pops," "Slim," "Sabo the Ghost,"
JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"
and
BRIAN MITCHELL,
a/k/a "Carlito,"**

defendants herein, did conspire with one another and with other persons known and unknown to the grand jury to murder Michael Quinn in violation of Md. Code Ann. Crim. Law §§ 1-202, 2-201, 2-204.

18 U.S.C. § 1959(a)(5)

COUNT FOUR

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 set forth in Count Two are incorporated herein by reference.

2. On or about February 16, 2009, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

**PERRY ROARK,
a/k/a Rock, "Pops," "Slim," "Saho the Ghost,"
MICHAEL FORAME,
a/k/a "Skinny," "Skinny Pimp,"
JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"
BRIAN MITCHELL,
a/k/a "Carlito,"
and
CHARLES GRAY,
a/k/a "Bud," "Budrow"**

defendants herein, did intentionally assault James Flanary with a dangerous weapon and assault James Flanary resulting in serious bodily injury in violation of Maryland common law and Md. Code Ann. Crim. Law § 3-202.

18 U.S.C. § 1959(a)(3)
18 U.S.C. § 2

COUNT FIVE

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 in Count Two are incorporated herein by reference.

2. On or about February 16, 2009, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

**JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"**

the defendant herein, did murder James Flanary in violation of Maryland common law and Md. Code Ann. Crim. Law §§ 2-201, 2-204.

18 U.S.C. § 1959(a)(1)
18 U.S.C. § 2

COUNT SIX

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 in Count Two are incorporated herein by reference.

2. On or about February 16, 2009, in the State and District of Maryland, the defendants,

**NICKY CASH,
a/k/a "Mom,"
and
MELANIE HOLQUIST,**

knowing that an offense against the United States had been committed, to wit, the assault of James Flanary, as charged in Count Four of this Indictment, did receive, comfort and assist the offenders, **MICHAEL FORAME, a/k/a "Skinny," Skinny Pimp," JOHN ADAMS, a/k/a "L.J.," "Little Johnny," and CHARLES GRAY,** in order to prevent the offenders' apprehension, trial, and punishment.

18 U.S.C. § 3

COUNT SEVEN

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 in Count Two are incorporated herein by reference.
2. On or about March 3, 2009, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

**MICHAEL FORAME,
a/k/a "Skinny," Skinny Pimp,"
BRIAN MITCHELL,
a/k/a "Carlito,"
JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"
and
EDWARD MUELLER,
a/k/a "Dusty,"**

defendants herein, did intentionally assault Christopher Santana with a dangerous weapon and assault Christopher Santana resulting in serious bodily injury in violation of Maryland common law and Md. Code Ann. Crim. Law § 3-202.

18 U.S.C. § 1959(a)(3)
18 U.S.C. § 2

COUNT EIGHT

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 set forth in Count Two are incorporated herein by reference.

2. On or about March 3, 2009, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

**MICHAEL FORAME,
a/k/a "Skinny," Skinny Pimp,"
JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"
and
EDWARD MUELLER,
a/k/a "Dusty,"**

defendants herein, did conspire with one another and with other persons known and unknown to the grand jury to murder David King and his associates, in violation of Maryland common law and Md. Code Ann. Crim. Law §§ 1-202, 2-201, 2-204.

18 U.S.C. § 1959(a)(5)

COUNT NINE

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 in Count Two are incorporated herein by reference.

2. On or about June 2, 2009, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

**JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"**

the defendant herein, did murder Tony Geiger in violation of Maryland common law and Md. Code Ann. Crim. Law §§ 2-201, 2-204.

18 U.S.C. § 1959(a)(1)

COUNT TEN

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 set forth in Count Two are incorporated herein by reference.

2. From in or about August, 2009 to in or about September, 2009, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

GEORGE TREAS, a/k/a "Georgie," "Fat Boy;"
TIMOTHY MIXTER, a/k/a "Fuhrer,"
JOHN ADAMS, a/k/a "L.J.," "Little Johnny,"
GREGORY COOK,
and
JOHN ZION, a/k/a "John John,"

defendants herein, did conspire with one another and with other persons known and unknown to the grand jury to murder Jeremy Ridgeway in violation of Maryland common law and Md. Code Ann. Crim. Law §§ 1-202, 2-201, 2-204.

18 U.S.C. § 1959(a)(5)

COUNT ELEVEN

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 of Count Two are incorporated herein by reference.

2. On or about September 19, 2009, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

**JOHN ADAMS,
a/k/a "L.J.," "Little Johnny;"**

the defendant herein did murder Walter Milewski in violation of Maryland common law and Md. Code Ann. Crim. Law §§ 2-201, 2-204.

18 U.S.C. § 1959(a)(1)
18 U.S.C. § 2

COUNT TWELVE

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 set forth in Count Two are incorporated herein by reference.

2. From in or about the summer of 2009 to in or about July, 2010, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

**PERRY ROARK,
a/k/a Rock, "Pops," "Slim," "Saho the Ghost,"
JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"
RICHARD INGRAM,
a/k/a Ricky, "Hades,"
and
RUSSELL HARTMAN,
a/k/a "Busy;"**

defendants herein, did conspire with one another and with other persons known and unknown to the grand jury to murder Shawn Novak, in violation of Maryland common law and Md. Code Ann. Crim. Law §§ 1-202, 2-201, 2-204.

18 U.S.C. § 1959(a)(5)
18 U.S.C. § 2

COUNT THIRTEEN

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

On or about February 17, 2010, in the District of Maryland, the defendant,

KELLY WITTER,

did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT FOURTEEN

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

On or about February 19, 2010, in the District of Maryland, the defendant,

MELANIE HOLQUIST,

did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT FIFTEEN

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

On or about March 2, 2010, in the District of Maryland, the defendant,

KELLY WITTER,

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT SIXTEEN

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

On or about March 12, 2010, in the District of Maryland, the defendant,

KELLY WITTER,

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT SEVENTEEN

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

1. Paragraphs 1 through 11 set forth in Count One and paragraph 2 in Count Two are incorporated herein by reference.
2. On or about May 22, 2010, in the State and District of Maryland, for the purpose of gaining entrance to and maintaining and increasing position in DMI, an enterprise engaged in racketeering activity,

**PERRY ROARK,
a/k/a Rock, "Pops," "Slim," "Saho the Ghost,"
MICHAEL FORAME,
a/k/a "Skinny," Skinny Pimp,"
and
SCOTT JARRIEL,
a/k/a "Scotty J.;"**

defendants herein, did intentionally assault Charles Ravenscroft with a dangerous weapon and assault Charles Ravenscroft resulting in serious bodily injury in violation of Maryland common law and Md. Code Ann. Crim. Law § 3-202.

18 U.S.C. § 1959(a)(3)
18 U.S.C. § 2

COUNT EIGHTEEN

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

On or about October 27, 2010, in the District of Maryland, the defendant,

**JOHN ZION,
a/k/a "John John,"**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT NINETEEN

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

On or about January 21, 2011, in the District of Maryland, the defendant,

**GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"**

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

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT TWENTY

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

On or about January 25, 2011, in the District of Maryland, the defendant,

**GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT TWENTY-ONE

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

On or about January 31, 2011, in the District of Maryland, the defendant,

**GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT TWENTY-TWO

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

On or about February 2, 2011, in the District of Maryland, the defendant,

**GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT TWENTY-THREE

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

On or about March 1, 2011, in the District of Maryland, the defendant,

**GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"**

did knowingly and intentionally distribute and possess with intent to distribute more than 28 grams of a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT TWENTY-FOUR

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

On or about March 9, 2011, in the District of Maryland, the defendants,

**GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"
and
TIMOTHY MIXTER, a/k/a "Fuhrer,"**

did knowingly and intentionally distribute and possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1)
18 U.S.C. § 2.

COUNT TWENTY-FIVE

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

On or about March 9, 2011, in the District of Maryland, the defendants,

**GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"
and
TIMOTHY MIXTER, a/k/a "Fuhrer,"**

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit, one Norinco 7.62x39mm caliber semi-automatic rifle, model SKS, serial number 10454795, in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT TWENTY-SIX

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

On or about March 24, 2011, in the District of Maryland, the defendant,

**GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"**

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms, to wit, one Smith & Wesson .38 Special caliber revolver, model MOD-38 Airweight, serial # J536529, and one Walther 9mm Luger caliber pistol, model P38, serial #1878 C, and ammunition in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT TWENTY-SEVEN

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

From in or about 2000, up to on or about the date of this Indictment, in the District of Maryland, and elsewhere,

**PERRY ROARK,
a/k/a Rock, "Pops," "Slim,"
"Saho the Ghost,"
JAMES SWEENEY,
NICKY CASH,
a/k/a "Mom,"
GEORGE TREAS,
a/k/a "Georgie," "Fat Boy,"
DANE SHIVES,
MICHAEL QUINN,
a/k/a "Mikey,"
MICHAEL FORAME,
a/k/a "Skinny," "Skinny Pimp,"
BRIAN MITCHELL,
a/k/a "Carlito,"
RICHARD INGRAM,
a/k/a Ricky, "Hades;"
TIMOTHY MIXTER,
a/k/a "Fuhrer,"
JOHN ADAMS,
a/k/a "L.J.," "Little Johnny,"
GREGORY COOK,
JEREMY RIDGEWAY,
a/k/a "J-Rock,"
JOHN ZION,
a/k/a "John John,"
RUSSELL HARTMAN,
a/k/a "Busy,"
BONNIE RICE,
KELLY WITTER,
CHARLES GRAY,
a/k/a "Bud," "Budrow"
EDWARD MUELLER,
a/k/a "Dusty,"
MELANIE HOLQUIST,
SCOTT JARRIEL,**

a/k/a "Scotty J.,"
[Redacted]

defendants herein, did knowingly, willfully and unlawfully conspire with each other and with others known and unknown to the Grand Jury to knowingly, intentionally and unlawfully distribute and possess with intent to distribute a quantity of a mixture or substance containing cocaine and more than 280 grams of a mixture or substance containing cocaine base, commonly known as "crack," both Schedule II controlled substances; a quantity of a mixture or substance containing oxycodone, also known as Percocet and OxyContin, a Schedule II controlled substance; a quantity of a mixture or substance containing buprenorphine, also known as Suboxone, a schedule III controlled substance; and one kilogram or more of a mixture or substance containing heroin, and a quantity of a mixture or substance containing marijuana, both Schedule I controlled substances, in violation of Title 21, United States Code § 841(a).

21 U.S.C. § 846
18 U.S.C. § 2

ROD J. ROSENSTEIN
UNITED STATES ATTORNEY

A TRUE BILL:

FOREPERSON

DATE