

SEALED

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AT CHARLOTTESVILLE, VA
FILED

MAY 14 2014

IN THE
UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION
MAY 2014 SESSION

JULIA C. DUDLEY, CLERK
BY: *[Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA)

v.)

Criminal Number: 3:14CR00016

DANIEL LAMONT MATHIS)

In Violation of:

a/k/a "Gunna")

18 U.S.C. § 2

a/k/a "Mooch")

18 U.S.C. § 924(c)(1)(A)

a/k/a "D-Man")

18 U.S.C. §§ 1512(a)(1)(C) and c)(1)

SHANTAI MONIQUE SHELTON)

18 U.S.C. § 1951(a)

a/k/a "Tai")

18 U.S.C. §§ 1959(a)(1) and (3)

a/k/a "Lady Blaze")

18 U.S.C. § 1962 (d)

a/k/a "Boss Lady")

21 U.S.C. §§ 841 and 846

MERSADIES LACHELLE SHELTON)

a/k/a "Lady Gunns")

TRAVIS LEON BELL)

a/k/a "Kweli Uhuru,")

a/k/a "K Gunns")

a/k/a "Black Wolf")

a/k/a "Babi")

ANTHONY LEE WHITE)

a/k/a "Ant")

a/k/a "Ant White")

a/k/a "YG Chop")

GERT ARTHUR LEE WRIGHT, III)

a/k/a "Halisi Uhuru")

a/k/a "Gritty")

a/k/a "Bones")

a/k/a "Big Homey")

ANTHONY DARNELL STOKES)
a/k/a "Face")
a/k/a "Black Face")
a/k/a "Kenyata Baraka")
LESLIE HOPE CASTERLOW)
a/k/a "White Girl")
DEVANTE O'BRIAN BELL)
a/k/a "Mook")
a/k/a "Mookie")
)

INDICTMENT

COUNT ONE

Racketeering Conspiracy
(December 2012 through April 2014)

The Grand Jury charges:

Introduction

1. "The Bloods" street gang was formed in the early 1970s in Los Angeles, California. The gang was initially composed of several smaller individual street gangs who unified as "The Bloods" to protect themselves from the larger Crips street gangs.
2. The Bloods street gang is comprised of individual units, or "sets," each identified or affiliated with a certain street, neighborhood, or geographic area. Despite the differing geographic regions, the sets maintain common tattoos, communication codes, language, and graffiti markings, and members of every set are easily identified as Bloods because they wear red, the gang signature color. The Crips gang signature color is blue.
3. Bloods gang members traditionally join together to enrich themselves by committing robberies, burglaries and trafficking in narcotics. Junior members of the gang are

expected to put in “work” and provide money and other things of valued to more senior gang members. Moreover, they traditionally commit acts of violence against individuals they perceived to be rivals of the organization, including rival gang members, economic competitors, and people they believe to have cooperated with law enforcement.

4. The 99 Goon Syndikate (a/k/a “Double Nine Goon Syndikate” or “DNGS”) is one of many sets of the Bloods street gang and was started on November 28, 2009.

5. During the period of the conspiracy which is the subject of this indictment, GERT ARTHUR LEE WRIGHT, III, a/k/a “Halisi Uhuru,” “Gritty,” “Bones,” and “Big Homey,” who became a member of the 99 Goon Syndikate set of the Bloods while incarcerated, has been the highest ranking member of the set in the Commonwealth of Virginia.

6. According to documents seized from the defendants, the members of 99 Goon Syndikate are governed by the same rules of the national Bloods organization. Those rules include, among others: (a) no snitching; (b) never put anything or anyone before a Blood or Blood business; (c) never deny a Blood shelter; and (d) always obey lawful orders from superiors.

7. According to those same seized documents, the gang has both a “Goon Oath” and a “99 Goon Oath.” The “Goon” oath reads:

I pledge myself, mind, body, and soul in the presence of sanctioned representatives to the Double Nine Goon Syndikate. I accept upon myself the sacred duty to honor uphold and defend the revolutionary Teflon ideology for which the Syndikate stands. In picking up these 9’s I renounce all former affiliations swearing an eternal oath in love, vigilance, strength, and sacrifice with no duplicity. Hence forth I shall be known as the Goon...I solemnly declare I live by my Goons die by my Goons.

The “99 Goon” oath reads:

I take this Oath in to the Double Nine Gangster family with full understanding that love, vigilance, strength, and sacrifice are our mottos and must never be forsaken. Overstanding (*sic*) that it is quality over quantity. Family over foe. But Double Nine Gangster over all. We are the chosen few who will forever remain Teflon coated. Hail an Praise!

According to the seized documents, the word “Teflon” for the 99 Goon Syndikate is an acronym that stands for “teaching and educating future leaders of our nation.”

8. In addition to an oath, documents seized from the defendants further disclose that the 99 Goon Syndikate also has a Constitution, which reads:

Loved by few, hated by many, but respected by all. When the wicked of the wicked oppress us we will make sure they taste and know death no matter how bad the odds are stacked up against us. Bloods always win.

9. During the period of this conspiracy, the 99 Goon Syndikate created and maintained an organizational hierarchical membership structure. GERT ARTHUR LEE WRIGHT, III, a/k/a “Halisi Uhuru,” “Gritty,” “Bones,” and “Big Homey,” along with ANTHONY DARNELL STOKES, a/k/a “Face,” and TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” managed, promoted, and further established the criminal enterprise and directed lower-ranking members to further the enterprise.

10. At all times relevant to this Indictment, the following Defendants were members and/or close associates of the 99 Goon Syndikate set of the Blood Street Gang:

- a. GERT ARTHUR LEE WRIGHT, III, a/k/a “Halisi Uhuru,” “Gritty,” “Bones,” and “Big Homey,”

- b. ANTHONY DARNELL STOKES, a/k/a “Face,” “Black Face,” and “Kenyata Baraka,”
- c. TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,”
- d. DANIEL LAMONT MATHIS, a/k/a “Gunna,” D-Man,” and “Mooch”
- e. SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,”
- f. MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,”
- g. DEVANTE O’BRIAN Bell a/k/a “Mook” and “Mookie,”
- h. ANTHONY LEE WHITE, a/k/a “Ant,” “YG Chop,” and “Ant White,”

11. According to documents seized from the members of the enterprise, and at all times relevant to this Indictment, the Defendants had been issued gang identification and titles, which, in part, reflect their role and stature in the gang and the gang hierarchy. The identification number and title for each of the gang members identified above are as follows:

a. GERT ARTHUR LEE WRIGHT, III,	(OOG)	101-0001
b. ANTHONY DARNELL STOKES,	(Original Gangster)	102-0001
c. TRAVIS LEON BELL	(Big Homie)	103-0001
d. DEVANTE O’BRIAN BELL	(Soldier)	103-0003
e. JUVENILE #1	(Soldier)	103-0004
f. ANTHONY LEE WHITE	(Soldier)	103-0005
g. SHANTAI MONIQUE SHELTON	(Sergeant)	103-0007
h. DANIEL LAMONT MATHIS	(Soldier)	103-0008
i. MERSADIES LACHELLE SHELTON	(Unknown)	unknown

12. At all times relevant to this Indictment, Bloods Street Gang members, including 99 Goons Syndikate, in the Western District of Virginia and elsewhere engaged in criminal activity, including but not limited to: assault resulting in bodily injury; assault with a dangerous weapon; robbery; larceny; burglary; obstruction of justice; kidnapping; carjacking; murder; drug trafficking; and conspiracy to commit those crimes. The 99 Goon Syndikate members committed criminal acts, including acts of violence, to maintain membership and discipline within the gang. The ability of a 99 Goon Syndikate member to earn money for the organization through the

commission of illegal acts, as well as his or her facility with Bloods street gang “knowledge,” are factors in determining whether a member should be promoted to a position of leadership within the gang.

The Racketeering Enterprise

13. At all times relevant to this Indictment, defendants DANIEL LAMONT MATHIS, a/k/a “Gunna,” D-Man,” and “Mooch” SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” ANTHONY LEE WHITE, a/k/a “Ant,” “YG Chop,” and “Ant White,” GERT ARTHUR LEE WRIGHT, III, a/k/a “Halisi Uhuru,” “Gritty,” “Bones,” and “Big Homey,” ANTHONY DARNELL STOKES, a/k/a “Face,” “Black Face,” and “Kenyata Baraka,” DEVANTE O’BRIAN BELL a/k/a “Mook” and “Mookie,” and a juvenile co-conspirator whose identity is known to the Grand Jury, and others known and unknown were members and associates of a criminal organization, the Bloods, which was engaged in, among other things, murder, robbery, kidnapping, carjacking, and the trafficking of controlled substances, including cocaine and cocaine base, also known as crack cocaine, within the Western District of Virginia and elsewhere.

14. This criminal organization, 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. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

Purposes of the Enterprise

15. The purposes of the enterprise included promoting and enhancing the enterprise, and enriching its members and associates through, among other things, acts of violence, including murder, robbery, burglary, abduction, trafficking in controlled substances and the enforcement of discipline among the members; to providing assistance to members of the enterprise who committed crimes for and on behalf of the enterprise, and thwarting efforts of law enforcement to apprehend members thereof.

Role of the Defendants

16. The roles of the defendants included, but were not limited to, the following:

a. GERT ARTHUR LEE WRIGHT, III, a/k/a “Halisi Uhuru,” “Gritty,” “Bones,” and “Big Homey,” was a leader of the enterprise who directed and guided other members of the enterprise in carrying out certain unlawful and other activities in furtherance of conducting the enterprise’s affairs. WRIGHT was identified in the gang’s writings as the OOG (“Double Original Gangster”), with the enterprise-issued identification number, 101-0001. WRIGHT has the word “Blood” tattooed on his face. WRIGHT was instrumental in directing the efforts of the enterprise to relocate those members of the enterprise who were involved in the robbery, abduction, and murder of Kevin Quick in order to avoid detection and apprehension. He was further involved in directing the efforts of the enterprise in the destruction of documents and evidence associated with the murder of Quick. Finally, WRIGHT was involved in the sale and distribution of narcotics for the benefit of the enterprise in the Northern Virginia area.

b. ANTHONY DARNELL STOKES, a/k/a “Face,” maintains a leadership position in the enterprise and is known as the “OG” (Original Gangster), which is one level

below GERT ARTHUR LEE WRIGHT, III, a/k/a “Halisi Uhuru,” “Gritty,” “Bones,” and “Big Homey.” STOKES is identified by his enterprise-issued identification number, 102-0001.

Under direction of the leader of the enterprise, STOKES was involved in the efforts to relocate those members of the enterprise involved in the robbery and murder of Kevin Quick. He was further involved in the efforts of the enterprise to destroy documents and evidence associated with the murder of Quick. Finally, STOKES was involved in the sale and distribution of narcotics for the benefit of the enterprise in the Northern Virginia area.

c. TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” is identified as a “Big Homie” in the enterprise, with the enterprise-issued identification number, 103-0001. BELL has a number of Blood street gang tattoos on his person. BELL was involved in a number of robberies committed by the enterprise and was directly involved in the robbery, abduction, and murder of Kevin Quick.

d. DANIEL LAMONT MATHIS, a/k/a “Gunna,” “D-Man,” and “Mooch” is a “soldier” for the enterprise. MATHIS has a “99 Goon” tattoo on his hand and is identified by his enterprise-issued identification number, 103-0008. MATHIS was involved in a number of robberies and the sale of narcotics, all on behalf of the enterprise. Further, he was directly involved in the robbery, abduction, and murder of Kevin Quick.

e. SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” is a “Sergeant” for the enterprise. SHELTON has a “East Side,” “est. 2013,” and numerous five-point stars tattooed on her person and is identified by her enterprise-issued identification number, 103-0007. SHELTON was involved in a number of robberies on behalf of

the enterprise. Further, she was directly involved in the robbery, abduction, and murder of Kevin Quick.

f. MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” is a “soldier” for the enterprise. SHELTON has a “99 Diva” tattoo on her person located under a tattoo of a five-pointed crown (a common Bloods Street Gang symbol). Her enterprise-issued identification number is unknown. SHELTON was involved in robberies committed by the enterprise, including the robbery, kidnapping, and murder of Kevin Quick.

g. DEVANTE O'BRIAN BELL a/k/a “Mook” and “Mookie,” is a “soldier” for the enterprise. BELL is identified by his enterprise-issued identification number, 103-0003. He is the brother of fellow enterprise member TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” and “Black Wolf.” DEVANTE BELL was involved in robberies committed by the enterprise, as well as the sale and distribution of narcotics on behalf of the enterprise.

h. ANTHONY LEE WHITE, a/k/a “Ant,” “YG Chop,” and “Ant White,” is a “soldier” for the enterprise. WHITE is identified by his enterprise-issued identification number, 103-0005. WHITE has a number of Bloods street gang tattoos on his person. WHITE was involved in robberies committed by the enterprise, as well as the sale and distribution of narcotics on behalf of the enterprise.

Manner and Means of the Enterprise

17. Among the manner and means by which the members and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:

a. Members of the enterprise and their associates robbed numerous businesses through the use of force, threat, and intimidation.

b. Members of the enterprise and their associates robbed individuals at their residences and elsewhere through the use of force, threat, and intimidation.

c. Members of the enterprise and their associates burglarized or otherwise committed larcenies, which included the theft of firearms, U.S. currency and personal property.

d. Members of the enterprise engaged in the crimes of carjacking and abduction.

e. Members of the enterprise murdered a witness in order to prevent him from communicating with law enforcement regarding the commission of a federal offense.

f. Members of the enterprise and their associates obstructed justice by hiding members of the enterprise to avoid detection and apprehension by law enforcement and by destroying documents and firearms with the intent to impair their availability for use in an official proceeding.

g. Members of the enterprise and their associates distributed controlled substances, including cocaine and cocaine base (commonly known as “crack” cocaine), and used the proceeds of those drug transactions to benefit gang members and to help finance their enterprise. Some members of the enterprise focused their drug distribution activities in the Central Virginia area while others were focused in the Northern Virginia region.

The Racketeering Conspiracy

18. From within or about sometime in December 2012, the exact date being unknown to the Grand Jury, and continuing through the date of this Indictment, in the Western District of Virginia and elsewhere, the defendants, DANIEL LAMONT MATHIS, a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,”

MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” ANTHONY LEE WHITE, a/k/a “Ant,” “YG Chop,” and “Ant White,” GERT ARTHUR LEE WRIGHT, III, a/k/a “Halisi Uhuru,” “Gritty,” “Bones,” and “Big Homey,” ANTHONY DARNELL STOKES, a/k/a “Face,” “Black Face,” and “Kenyata Baraka,” DEVANTE O’BRIAN BELL a/k/a “Mook” and “Mookie,” and a juvenile co-conspirator whose identity is known to the Grand Jury, together with each other and other persons known and unknown, being persons employed by and associated with the enterprise described above, which enterprise was engaged in, and the activities of which affected interstate and foreign commerce, knowingly and intentionally did combine, conspire, confederate and agree with each other, and with diverse persons known and unknown to the Grand Jury, 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 the enterprise through a pattern of racketeering activity, as that term is defined by Title 18, United States Code, section 1961(1) and 1961(5), consisting of multiple acts involving:

- a. Murder, chargeable under Virginia Code, Sections 18.2-32;
- b. Kidnapping, chargeable under Virginia Code, Section 18.2-47;
- c. Robbery, chargeable under Virginia Code, Sections 18.2-58;

multiple acts indictable under

- d. 18 U.S.C. § 1512 (obstruction of justice);
- e. 18 U.S.C. § 1951 (interference with commerce by threats or violence);

and, multiple acts involving:

f. conspiracy to distribute controlled substances, in violation of 21 U.S.C. §§ 841 and 846.

19. It was further 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.

Overt Acts

20. In furtherance of the conspiracy and to achieve the objective thereof, the defendants, and others known and unknown to the Grand Jury, performed and caused to be performed a number of overt acts in the Western District of Virginia and elsewhere. The overt acts performed by the conspirators included, but are not limited to:

a. *Robbery of 7-Eleven*

On or about October 2, 2013, in Gordonsville, Virginia, DANIEL LAMONT MATHIS a/k/a "Gunna," D-Man," and "Mooch," SHANTAI MONIQUE SHELTON a/k/a "Tai," "Lady Blaze," and "Boss Lady," ANTHONY LEE WHITE a/k/a "Ant" and "Ant White," and DEVANTE O'BRIAN BELL a/k/a "Mook" and "Mookie," robbed the store clerk at the 7-Eleven at gunpoint.

b. *Robbery of D.S.*

On or about October 4, 2013, in Bumpass, Virginia, SHANTAI MONIQUE SHELTON a/k/a "Tai," "Lady Blaze," and "Boss Lady," TRAVIS LEON BELL a/k/a "Kweli Uhuru," "K Gunns," "Babi," and "Black Wolf," ANTHONY LEE WHITE a/k/a "Ant" and "Ant White," and DEVANTE O'BRIAN BELL a/k/a "Mook," and "Mookie," robbed D.S.

c. *Robbery of the Columbia Market*

On or about October 9, 2013, in Fluvanna County, Virginia, DANIEL LAMONT MATHIS a/k/a "Gunna," D-Man," and "Mooch," SHANTAI MONIQUE SHELTON a/k/a "Tai," "Lady Blaze," and "Boss Lady," and another known to the Grand Jury, robbed the clerk of the Columbia Market at gunpoint.

d. *Robbery of J.S.*

On or about October 11, 2013, in Louisa County, Virginia, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” ANTHONY LEE WHITE a/k/a “Ant” and “Ant White,” and DEVANTE O’BRIAN BELL a/k/a “Mook” and “Mookie,” robbed J.S. at gunpoint.

e. *Burglary of Residence of M.S.*

On or about October 24, 2013, in Bumpass, Virginia, SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” and ANTHONY LEE WHITE a/k/a “Ant” and “Ant White,” burglarized the residence of M.S., stealing a Colt .45 handgun, a .38 Taurus handgun, ammunition, and other personal property.

f. *Robbery of Barracks Road Market*

On or about November 5, 2013, in Albemarle County, Virginia, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” robbed the clerk of the Barracks Road Market at gunpoint.

g. *Robbery of the Joy Food Store*

On or about November 18, 2013, in Charlottesville, Virginia, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” robbed the clerk of the Joy Food Store at gunpoint.

h. *Larceny of Property Belonging to C.B.*

On or between November 30, 2013 and December 2, 2013, SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” ANTHONY LEE WHITE a/k/a “Ant” and “Ant White,” and DEVANTE O’BRIAN BELL a/k/a “Mook” and “Mookie,” stole jewelry belonging to C.B.

i. *Robbery of MacQueens Store*

On or about December 16, 2013, in Louisa, Virginia, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” and another co-conspirator known to the Grand Jury, robbed the clerk of the MacQueens Store at gunpoint.

j. *Robbery of the Ferncliff Exxon*

On or about January 3, 2014, in Charlottesville, Virginia, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” robbed the clerk of the Ferncliff Exxon at gunpoint.

k. *Robbery of the Food Master Store*

On or about January 26, 2014, in Charlottesville, Virginia, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” robbed the clerk of the Food Master Store at gunpoint.

l. *Carjacking and Kidnapping of Kevin Quick and his Vehicle*

On or about January 31, 2014, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” MERSADIES LACHELLE SHELTON a/k/a “Lady Gunns,” and TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” carjacked a vehicle belonging to Kevin Quick and then kidnapped him.

m. *Withdrawal of funds from Kevin Quick’s Bank Accounts*

On or about January 31, 2014, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” MERSADIES LACHELLE SHELTON a/k/a “Lady Gunns,” and TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” drove around to various banks in Virginia, in Quick’s vehicle, and made, or attempted to make, withdrawals from Kevin Quick’s bank accounts. During some of these attempts, Quick was still in the vehicle being held against his will.

n. *Murder of Kevin Quick*

On or about January 31, 2014, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” MERSADIES LACHELLE SHELTON a/k/a “Lady Gunns,” and TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” murdered Kevin Quick and left his body in a wooded area in Goochland County, Virginia.

o. *Robbery of D.C., E.C. and L.B.*

On or about February 2, 2014, in Mineral, Virginia, DANIEL LAMONT MATHIS a/k/a "Gunna," D-Man," and "Mooch," MERSADIES LACHELLE SHELTON a/k/a "Lady Gunns," and others, robbed D.C., E.C. and L.B. at gunpoint.

p. *Malicious Wounding of D.C.*

On or about February 2, 2014, in Mineral, Virginia, DANIEL LAMONT MATHIS a/k/a "Gunna," D-Man," and "Mooch," MERSADIES LACHELLE SHELTON a/k/a "Lady Gunns," during a robbery, shot D.C. and pistol-whipped L.B.

q. *Obstruction of Justice - Destruction and Disposal of Documents*

On or between January 2014, and April 2014, GERT ARTHUR LEE WRIGHT, III a/k/a "Halisi Uhuru," "Gritty," "Bones," and "Big Homey," ANTHONY DARNELL STOKES a/k/a "Face," "Black Face," and "Kenyata Baraka," ANTHONY LEE WHITE a/k/a "Ant" and "Ant White," a co-conspirator known to the Grand Jury, and others, both known and unknown to the Grand Jury, obstructed justice by altering, destroying and concealing documents and property belonging to Kevin Quick in order to prevent their discovery by law enforcement.

r. *Obstruction of Justice - Destruction and Disposal of a Firearm*

On or between January 2014, and April 2014, GERT ARTHUR LEE WRIGHT, III a/k/a "Halisi Uhuru," "Gritty," "Bones," and "Big Homey," ANTHONY DARNELL STOKES a/k/a "Face," "Black Face," and "Kenyata Baraka," a co-conspirator known to the Grand Jury, and others, obstructed justice by altering, destroying and concealing a .40 caliber firearm, in order to prevent its discovery from law enforcement.

s. *Narcotics Distribution – Central Virginia*

On or between December of 2013, and February 2014, DANIEL LAMONT MATHIS a/k/a "Gunna," D-Man," and "Mooch," ANTHONY LEE WHITE a/k/a "Ant" and "Ant White," and others known and unknown to the Grand Jury, conspired to distribute cocaine hydrochloride throughout the Central Virginia region.

t. *Narcotics Distribution – Northern Virginia*

On or between November 30, 2013 and February 1, 2014, GERT ARTHUR LEE WRIGHT, III a/k/a “Halisi Uhuru,” “Gitty,” “Bones,” and “Big Homey,” ANTHONY DARNELL STOKES a/k/a “Face,” “Black Face,” and others known and unknown to the Grand Jury, conspired to distribute crack cocaine and powder cocaine throughout the Northern Virginia region and elsewhere.

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

NOTICE OF SPECIAL SENTENCING FACTORS

The allegations and facts set forth in this Notice of Special Sentencing Factors relate to Count One of this Indictment.

1. From on or between January 31, 2014, and February 1, 2014, in the Western District of Virginia, defendants DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” did, by force, intimidation or deception, and without legal justification or excuse, seize, take, transport, detain or secrete Kevin Quick with the intent to deprive him of his liberty or to withhold or conceal him from any person, authority or institution lawfully entitled to his charge, in violation of Virginia Code, Section 18.2-47.

2. From on or between January 31, 2014, and February 1, 2014, in the Western District of Virginia, defendants DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,”

MERSADIES LACHELLE SHELTON, a/k/a "Lady Gunns," TRAVIS LEON BELL a/k/a "Kweli Uhuru," "K Gunns," "Babi," and "Black Wolf," did willfully, deliberately and with premeditation, kill Kevin Quick, in violation of Virginia Code Section 18.2-32.

3. On or between January 31, 2014 and February 1, 2014, in the Western District of Virginia, DANIEL LAMONT MATHIS a/k/a "Gunna," D-Man," and "Mooch," SHANTAI MONIQUE SHELTON, a/k/a "Tai," "Lady Blaze," and "Boss Lady," MERSADIES LACHELLE SHELTON, a/k/a "Lady Gunns," and TRAVIS LEON BELL a/k/a "Kweli Uhuru," "K Gunns," "Babi," and "Black Wolf," did as principals or as aiders and abettors, kill Kevin Quick, with the intent to prevent the communication by Kevin Quick to a law enforcement officer information relating to the commission of or possible commission of a federal offense, to-wit: carjacking, in violation of Title 18, United States Code, Section 2119, all in violation of Title 18, United States Code, Sections 2 and 1512(a)(1)(C).

COUNT TWO
Narcotics Conspiracy
(December 2013 through February 2014)

The Grand Jury further charges:

1. That beginning sometime in or about December 6, 2013, and continuing through February of 2014, in the Western District of Virginia and elsewhere, the defendants, DANIEL LAMONT MATHIS, a/k/a "Gunna," D-Man," and "Mooch," and ANTHONY LEE WHITE, a/k/a "Ant," "YG Chop," and "Ant White," and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree, together, and with

diverse other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with intent to distribute a mixtures and substances containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a).

2. All in violation of Title 21, United States Code, Section 846.

COUNT THREE

Conspiracy to Commit Hobbs Act Robberies
(October 2, 2013 through February 2, 2014)

The Grand Jury further charges that:

1. On or about and between October 2, 2013, and February 2, 2014, within the Western District of Virginia and elsewhere, the defendants DANIEL LAMONT MATHIS, a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” ANTHONY LEE WHITE a/k/a “Ant” and “Ant White,” DEVANTE O’BRIAN BELL a/k/a “Mook” and “Mookie,” and a juvenile co-conspirator whose identity is known to the Grand Jury, did knowingly and willfully conspire and agree, together with each other and other persons, known and unknown to the Grand Jury, to unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendants did knowingly and willfully conspire and agree to take and obtain cash and other goods from store clerks and others, against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to each of their persons

and property in their custody and possession, that is the defendants used, carried, displayed, possessed, brandished, and pointed firearms at store clerks and others, and demanded cash and other goods.

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

COUNT FOUR
Hobbs Act Robbery of 7-Eleven
(October 2, 2013)

The Grand Jury further charges that:

1. On or about October 2, 2013, SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” ANTHONY LEE WHITE a/k/a “Ant” and “Ant White,” DEVANTE O’BRIAN BELL a/k/a “Mook” and “Mookie,” and two juvenile co-conspirators, whose identities are known to the Grand Jury, in the Western District of Virginia, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendants did unlawfully take and obtain cash and other goods from the clerk at the 7-Eleven store located in Gordonsville, Virginia, against his or her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to each of their person and property in their custody and possession, that is the defendants used, carried, displayed, possessed, brandished, and pointed firearms at the clerk and others, and demanded cash and other goods.

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

COUNT FIVE

Use of Firearm in the Commission of the
Hobbs Act Robbery of the 7-Eleven
(October 2, 2013)

The Grand Jury further charges that:

1. On or about October 2, 2013, SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” ANTHONY LEE WHITE a/k/a “Ant” and “Ant White,” DEVANTE O’BRIAN BELL a/k/a “Mook” and “Mookie,” and two juvenile co-conspirators whose identities are known to the Grand Jury, in the Western District of Virginia, did knowingly carry and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery.
2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT SIX

Violent Crime in Aid of Racketeering, to-wit:
Assault with a Dangerous Weapon at the 7-Eleven.
(October 2, 2013)

The Grand Jury further charges that:

1. At all times relevant to this Indictment, the Bloods, as more fully described in paragraph One through Seventeen of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was 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.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), to-wit: offenses involving robbery, in violation of Title 18, United States Code, Section 1951; kidnapping, in violation of Virginia Code, Section 18.2-47; robbery, in violation of Virginia Code, Sections 18.2-58; and murder, in violation of Virginia Code, Sections 18.2-32.

3. On or about October 2, 2013, in the Western District of Virginia and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” ANTHONY LEE WHITE a/k/a “Ant” and “Ant White,” DEVANTE O’BRIAN BELL a/k/a “Mook” and “Mookie,” and two juvenile co-conspirators, whose identities are known to the Grand Jury, did assault the clerk of the 7-Eleven Store in Gordonsville, Virginia, with a dangerous weapon, in violation of Virginia Code, Section 18.2-282.

4. All a Violent Crime in Aid of Racketeering Activity and Aiding and Abetting, in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNT SEVEN

Use of Firearm During a Violence Crime in Aid of
Racketeering, to-wit: Assault with a Dangerous Weapon
(October 2, 2013)

The Grand Jury further charges that:

1. On or about October 2, 2013, SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” ANTHONY LEE WHITE a/k/a “Ant” and “Ant White,” DEVANTE O’BRIAN BELL a/k/a “Mook” and “Mookie,” and two juvenile co-conspirator, whose identities are known to the Grand Jury, in the Western District of Virginia, did knowingly carry and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, assault with a dangerous weapon.
2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT EIGHT

Violent Crime in Aid of Racketeering, to-wit:
Assault J.S. with a Dangerous Weapon
(October 11, 2013)

The Grand Jury further charges that:

1. At all times relevant to this Indictment, the Bloods, as more fully described in paragraph One through Seventeen of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was 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.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), to-wit: offenses involving robbery, in violation of Title 18, United States Code, Section 1951; kidnapping, in violation of Virginia Code, Section 18.2-47; robbery, in violation of Virginia Code, Sections 18.2-58; and murder, in violation of Virginia Code, Sections 18.2-32.

3. On or about October 11, 2013, in the Western District of Virginia and elsewhere, and for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, SHANTAI MONIQUE SHELTON, a/k/a "Tai," "Lady Blaze," and "Boss Lady," ANTHONY LEE WHITE, a/k/a "Ant," "YG Chop," and "Ant White," DEVANTE O'BRIAN BELL a/k/a "Mook" and "Mookie," and two juvenile co-conspirators whose identities are known to the Grand Jury, as principals or as aiders and abettors, did assault J.S. with a dangerous weapon, in violation of Virginia Code, Section 18.2-282.

4. All a Violent Crime in Aid of Racketeering Activity and Aiding and Abetting, in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNTY NINE

Use of Firearm During the Assault of J.S.
with a Dangerous Weapon
(October 11, 2013)

The Grand Jury further charges that:

1. On or about October 11, 2013, SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” ANTHONY LEE WHITE, a/k/a “Ant,” “YG Chop,” and “Ant White,” DEVANTE O’BRIAN BELL a/k/a “Mook” and “Mookie,” and two juvenile co-conspirators whose identities are known to the Grand Jury, in the Western District of Virginia, did knowingly carry, brandish and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, assault with a dangerous weapon.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT TEN

Hobbs Act Robbery of MacQueens Store
(December 16, 2013)

The Grand Jury further charges that:

1. On or about December 16, 2013, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” and a juvenile co-conspirator whose identity is known to the Grand Jury, in the Western District of Virginia, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain cash and other goods from the clerk at the MacQueens

store located in Louisa, Virginia, against his or her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to each of their person and property in their custody and possession, that is, the defendant used, carried, displayed, possessed, brandished, and pointed firearms at the clerk and others, and demanded cash and other goods.

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

COUNT ELEVEN

Use of Firearm in the Commission of the Hobbs Act Robbery
of MacQueens Store
(December 16, 2013)

The Grand Jury further charges that:

1. On or about December 16, 2013, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” and a juvenile whose identity is known to the Grand Jury, in the Western District of Virginia, did knowingly carry and brandish, a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT TWELVE

Violent Crime in Aid of Racketeering, to-wit:
Assault with a Dangerous Weapon at the MacQueens Store.
(December 16, 2013)

The Grand Jury further charges that:

1. At all times relevant to this Indictment, the Bloods, as more fully described in paragraph One through Seventeen of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in

Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was 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.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), to-wit: offenses involving robbery, in violation of Title 18, United States Code, Section 1951; kidnapping, in violation of Virginia Code, Section 18.2-47; robbery, in violation of Virginia Code, Sections 18.2-58; and murder, in violation of Virginia Code, Sections 18.2-32.

3. On or about December 16, 2013, in the Western District of Virginia and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, DANIEL LAMONT MATHIS a/k/a "Gunna," D-Man," and "Mooch," and a juvenile whose identity is known to the Grand Jury, did assault the clerk of the MacQueens Store in Louisa, Virginia, with a dangerous weapon in violation of Virginia Code, Section 18.2-282.

4. All a Violent Crime in Aid of Racketeering Activity and Aiding and Abetting, in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNT THIRTEEN

Use of Firearm During a Violence Crime in Aid of
Racketeering, to-wit: Robbery of the MacQueens Store
(December 16, 2013)

The Grand Jury further charges that:

1. On or about October 1, 2013, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” and a juvenile whose identity is known to the Grand Jury, in the Western District of Virginia, did knowingly carry and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, assault with a dangerous weapon.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT FOURTEEN

Hobbs Act Robbery of Food Master Store
(January 26, 2014)

The Grand Jury further charges that:

1. On or about January 26, 2014, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” in the Western District of Virginia, did unlawfully obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that the defendant did unlawfully take and obtain cash and other goods from the clerk at the Food Master Store located in Charlottesville, Virginia, against his or her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to each

of their person and property in their custody and possession, that is, the defendant used, carried, displayed, possessed, brandished, and pointed firearms at the clerk and others, and demanded cash and other goods.

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

COUNT FIFTEEN

Use of Firearm in the Commission of the Hobbs Act
Robbery of the Food Master Store
(January 26, 2014)

The Grand Jury further charges that:

1. On or about January 26, 2013, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” in the Western District of Virginia, did knowingly carry and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, robbery.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT SIXTEEN

Violent Crime in Aid of Racketeering, to-wit: Assault with a Dangerous Weapon
at the Food Master Store
(January 26, 2014)

The Grand Jury further charges that:

1. At all times relevant to this Indictment, the Bloods, as more fully described in paragraph One through Seventeen of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact

that was 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.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), to-wit: offenses involving robbery, in violation of Title 18, United States Code, Section 1951; kidnapping, in violation of Virginia Code, Section 18.2-47; robbery, in violation of Virginia Code, Sections 18.2-58; and murder, in violation of Virginia Code, Sections 18.2-32.

3. On or about January 26, 2014, in the Western District of Virginia and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” did assault the clerk of the Food Master store located in Charlottesville, Virginia, with a dangerous weapon, in violation of Virginia Code, Sections 18.2-282.

4. All a Violent Crime in Aid of Racketeering Activity and Aiding and Abetting, in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNT SEVENTEEN

Use of Firearm During a Violence Crime in Aid of
Racketeering, to-wit: Assault with a Dangerous Weapon
at the Food Master Store
(January 26, 2014)

The Grand Jury further charges that:

1. On or about January 26, 2014, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” in the Western District of Virginia, did knowingly carry and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, assault with a dangerous weapon.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT EIGHTEEN

Violent Crime in Aid of Racketeering, to-wit:
Kidnapping of Kevin Quick
(January 31, 2014)

The Grand Jury further charges that:

1. At all times relevant to this Indictment, the Bloods, as more fully described in paragraph One through Seventeen of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was 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.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), to-wit: offenses involving robbery, in violation of Title 18, United States Code, Section 1951; kidnapping, in violation of Virginia Code, Section 18.2-47; robbery, in violation of Virginia Code, Sections 18.2-58; and murder, in violation of Virginia Code, Sections 18.2-32.

3. On or between January 31, 2014, and February 1, 2014, in the Western District of Virginia, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” did kidnap Kevin Quick, in violation of Virginia Code Sections, 18.2-47.

4. All a Violent Crime in Aid of Racketeering Activity and Aiding and Abetting, in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

COUNT NINETEEN

Use of Firearm During a Violence Crime in Aid of
Racketeering, to-wit: Kidnapping of Kevin Quick
(January 31, 2014)

The Grand Jury further charges that:

1. On or about January 31, 2014, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and

“Boss Lady,” MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” in the Western District of Virginia, did knowingly carry, brandish and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, abduction of Kevin Quick.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT TWENTY

Violent Crime in Aid of Racketeering, to-wit:
Murder of Kevin Quick
(January 31, 2014-February 1, 2014)

The Grand Jury further charges that:

1. At all times relevant to this Indictment, the Bloods, as more fully described in paragraph One through Seventeen of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was 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.
2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), to-wit: offenses involving robbery, in violation of Title 18, United States Code, Section 1951; kidnapping, in violation of Virginia Code, Section

18.2-47; robbery, in violation of Virginia Code, Sections 18.2-58; and murder, in violation of Virginia Code, Sections 18.2-32.

3. On or between January 31, 2014, and February 1, 2014, in the Western District of Virginia, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” did murder Kevin Quick, in violation of Virginia Code Sections, 18.2-32.

4. All a Violent Crime in Aid of Racketeering Activity and Aiding and Abetting, in violation of Title 18, United States Code, Sections 2 and 1959(a)(1).

COUNT TWENTY-ONE

Use of Firearm During a Violence Crime in Aid of
Racketeering, to-wit: Murder of Kevin Quick
(January 31, 2014-February 1, 2014)

The Grand Jury further charges that:

1. On or between January 31, 2014, and February 1, 2014, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” in the Western District of Virginia, did knowingly carry, brandish and discharge a firearm during

and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, murder of Kevin Quick.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT TWENTY-TWO
Tampering with a Witness, to-wit:
Murder of Kevin Quick
(January 31, 2014-February 1, 2014)

The Grand Jury further charges that:

1. On or between January 31, 2014 and February 1, 2014, in the Western District of Virginia, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON, a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” and TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” did as principals or as aiders and abettors, kill Kevin Quick, with the intent to prevent the communication by Kevin Quick to a law enforcement officer information relating to the commission of or possible commission of a federal offense, to-wit: carjacking, in violation of Title 18, United States Code, Section 2119.

2. All in violation of Title 18, United States Code, Sections 2 and 1512(a)(1)(C).

COUNT TWENTY-THREE

Use of Firearm During the
Tampering of a Witness, to-wit: Murder of Kevin Quick
(January 31, 2014-February 1, 2014)

The Grand Jury further charges that:

1. On or between January 31, 2014, and February 1, 2014, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” SHANTAI MONIQUE SHELTON a/k/a “Tai,” “Lady Blaze,” and “Boss Lady,” MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” and TRAVIS LEON BELL a/k/a “Kweli Uhuru,” “K Gunns,” “Babi,” and “Black Wolf,” in the Western District of Virginia, did knowingly carry, brandish, and discharge a firearm 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 tampering of a witness resulting in death.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT TWENTY-FOUR

Violent Crime in Aid of Racketeering, to-wit:
Assault D.C. with a Dangerous Weapon
(February 2, 2014)

The Grand Jury further charges that:

1. At all times relevant to this Indictment, the Bloods, as more fully described in paragraph One through Seventeen of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was 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.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), to-wit: offenses involving robbery, in violation of Title 18, United States Code, Section 1951; kidnapping, in violation of Virginia Code, Section 18.2-47; robbery, in violation of Virginia Code, Sections 18.2-58; and murder, in violation of Virginia Code, Sections 18.2-32.

3. On or about February 2, 2014, in the Western District of Virginia and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” and MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” did, as principals or as aiders and abettors, assault D.C. with a dangerous weapon, in violation of Virginia Code, Section 18.2-282.

4. All a Violent Crime in Aid of Racketeering Activity and Aiding and Abetting, in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNT TWENTY-FIVE

Use of a Firearm in the Commission of an Assault of D.C. with a
Dangerous Weapon
(February 2, 2014)

The Grand Jury further charges that:

1. On or about February 2, 2014, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” and MERSADIES LACHELLE SHELTON a/k/a “Lady Gunns,” in the Western District of Virginia, did knowingly carry, brandish, and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, assault with a dangerous weapon.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

COUNT TWENTY-SIX

Violent Crime in Aid of Racketeering, to-wit:
Assault of L.B. with a Dangerous Weapon
(February 2, 2014)

The Grand Jury further charges that:

1. At all times relevant to this Indictment, the Bloods, as more fully described in paragraph One through Seventeen of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was 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.

2. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), to-wit: offenses involving robbery, in violation of Title 18, United States Code, Section 1951; kidnapping, in violation of Virginia Code, Section 18.2-47; robbery, in violation of Virginia Code, Sections 18.2-58; and murder, in violation of Virginia Code, Sections 18.2-32.

3. On or about February 2, 2014, in the Western District of Virginia and elsewhere, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” and MERSADIES LACHELLE SHELTON, a/k/a “Lady Gunns,” did assault L.B. with a dangerous weapon, in violation of Virginia Code, Section 18.2-282.

4. All a Violent Crime in Aid of Racketeering Activity and Aiding and Abetting, in violation of Title 18, United States Code, Sections 2 and 1959(a)(3).

COUNT TWENTY-SEVEN

Use of a Firearm in the Commission of the Assault of L.B. with a Dangerous Weapon
(February 2, 2014)

The Grand Jury further charges that:

1. On or about February 2, 2014, DANIEL LAMONT MATHIS a/k/a “Gunna,” D-Man,” and “Mooch,” and MERSADIES LACHELLE SHELTON a/k/a “Lady Gunns,” in the Western District of Virginia, did knowingly carry and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, assault with a dangerous weapon.

2. All in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

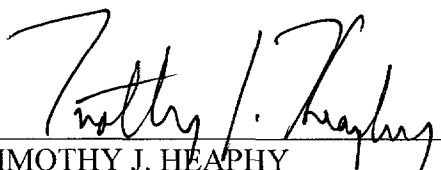
COUNT TWENTY-EIGHT

Obstruction of Justice - Destruction and Disposal of Documents
And Other Objects
(January 31, 2014-April 2014)

The Grand Jury further charges that:

1. On or about January 31, 2014, through the date of this Indictment, GERT ARTHUR LEE WRIGHT, III, a/k/a "Halisi Uhuru," "Gritty," "Bones," and "Big Homey," ANTHONY DARNELL STOKES, a/k/a "Face," ANTHONY LEE WHITE a/k/a "Ant" and "Ant White," LESLIE HOPE CASTERLOW a/k/a "White girl," in the Western District of Virginia, did corruptly alter, destroy, mutilate, and conceal documents and other objects, or attempt to do so, with the intent to impair their integrity and availability for use in an official proceeding.
2. All in violation of Title 18, United States Code, Section 1512(c)(1).

A TRUE BILL this 14th day of May, 2014.


TIMOTHY J. HEAPHY
UNITED STATES ATTORNEY


FOREPERSON