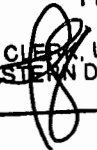


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10 IN THE UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

13 CASE NO. 1:16 CR 00069 LJO SKO

14 UNITED STATES OF AMERICA,)
)
15 Plaintiff,)
)
16 v.)
)
17 JAMES YORK, (1))
AKA, "YD," AKA, "YORK)
18 DOG," AKA, "JAMARI YORK;")
TRENELL MONSON, (2))
19 AKA, "NACHI," AKA, "NACHI)
CHEDDA," AKA, "CHEDDA;")
20 DEANDRE STANFILL, (3))
AKA, "DRE;")
21 DARRELL MAXEY, (4))
AKA, "DRE P;")
22 DAVON MILLRO, (5))
AKA, "PAE DAE;")
23 KENNETH WHARRY, (6))
AKA, "DOOK," AKA, "DK;")
24 KENNETH JOHNSON, (7))
AKA, "COO NUT;")
25 KIANDRE JOHNSON, (8))
AKA, "KEY DA P;")
26 ANTHONY WINDFIELD, (9))
AKA, "FREAKY ANT;")
27 WILLIAM LEE, (10))
AKA, "CHILL WILL," AKA;)
28 "CW;")
MARKEITH CANADY, (11))
AKA, "GOOBY;")

| | | |
|---|----------------------------|--------------------------------------|
| 1 | KEVIN PACKARD, (12) |) 21 U.S.C. § 841(a)(1), Possession |
| | AKA, "KAY PEE," AKA, "KP;" |) with Intent to Distribute |
| 2 | AQUILLA BAILEY, III (13) |) Marijuana (Count 25); |
| | AKA, "LIL QUILL;" |) |
| 3 | STEVEN BLACKMON, (14) |) 26 U.S.C. § 5861(d), Possession of |
| | AKA, "POOK DA MOST," AKA, |) an Unregistered Firearm (Count |
| 4 | "MOSES," AKA "MOSTEST;" |) 26); |
| | NASTASHA PARKS, (15) |) |
| | AKA, "STASHA;" |) 21 U.S.C. § 841(a)(1); and 18 |
| 5 | LUTHER NEWSOME; (16) |) U.S.C. § 924(d)(1), 981(a)(1)(C), |
| | SHARIKA GAINES; (17) and |) 982(a)(2)(B), 1029(c)(1)(C), |
| 6 | MARVIN LARRY, (18), |) 1594(d)(1), 1594(d)(2), 2428; 21 |
| | Defendants. |) U.S.C. § 853; and 28 U.S.C. § |
| 7 | |) 2461 - Criminal Forfeiture |

I N D I C T M E N T

COUNT ONE: [18 U.S.C. § 1959(a)(5) - Conspiracy to Commit Murder in Aid of Racketeering]

The Grand Jury charges:

THE ENTERPRISE

1. At various times material to this Indictment:

a. Defendants (collectively "Defendants"), and others known and unknown to the grand jury, were members and associates of an organization known as the "Dog Pound Gang" or "DPG."

b. At all relevant times, DPG operated in the Eastern District of California and elsewhere. The DPG organization was engaged in a variety of illegal activities, including but not limited to the prostitution of minor and adult females, and narcotics trafficking. The organization, including its leaders, members and associates constituted an "enterprise," as defined by Title 18, United States Code, Section 1959(b)(2) (hereinafter the "Enterprise"); that is, a group of individuals associated in fact, that engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization whose members

1 functioned as a continuing unit for the common purpose of
2 achieving the objectives of the Enterprise.

3 THE PURPOSES OF THE ENTERPRISE

4 2. The purposes of the Enterprise included, but were not
5 limited to, the following:

6 a. Enriching the members and associates of the
7 Enterprise through, among other things, murder, sex
8 trafficking, access device fraud, narcotics distribution, and
9 conducting other profit-driven illegal activities in Fresno
10 County and elsewhere;

11 b. Maintaining control over illegal activities occurring
12 in DPG "territory" within Fresno County, California, including
13 keeping the public-at-large in fear of the Enterprise, and in
14 fear of its members and associates through violence and threats
15 of violence;

16 c. Preserving, protecting and expanding the power of the
17 Enterprise through the use of intimidation, violence, threats
18 of violence, assaults, and other violent crimes as well as
19 through rap music and social media;

20 d. Protecting DPG members and associates who committed
21 crimes by hindering, obstructing, and preventing law
22 enforcement officers from identifying, apprehending, and
23 successfully prosecuting and punishing the offenders.

24 BACKGROUND ON DPG AND DEFENDANTS' ROLES WITHIN THE ENTERPRISE

25
26 3. The Dog Pound Gangsters (hereinafter referred to as,
27 "DPG") is primarily comprised of African American gang members. The
28 DPG criminal street gang formed in the early 1990's. It is made up
 primarily of African American males and is the largest African

1 American gang in Fresno. DPG gang members originally wore red
2 clothing to identify themselves as DPG - red being a traditional
3 "Blood" color. They are now like most Fresno area based African
4 American gangs and do not associate with or have a specific color
5 such as red or blue. DPG members do not follow a strict hierarchy
6 where one member reports to another or is directed by another
7 member. In all, DPG sees itself as a unit where all members work
8 together committing various criminal acts to make money and further
9 support the Enterprise. Members of DPG confer with each other on
10 how best to conduct their criminal activities and assist each other
11 with their criminal activity.

12 4. DPG's area or "Turf" is in Southwest Fresno in the area of
13 Jensen Avenue and Martin Luther King Blvd. This location is
14 commonly referred to as "The Pound," which is positioned between E.
15 Jensen Ave to the North, E. Annandale Ave. to the South, Elm Ave to
16 the East and Martin Luther King Blvd to the West. The Fresno County
17 Superior Court issued the Dog Pound Gang injunction in 2008, which
18 prohibits DPG gang members from gathering and associating within the
19 specified area. The injunction list consists of approximately 120
20 DPG gang members with many still needing to be served with the
21 injunction. As a result of the injunction and increased police
22 presence, DPG members can now be found residing throughout Fresno,
23 Clovis, Madera, Los Angeles, Sacramento, Las Vegas, and Texas.
24 Although the injunction and police presence have relocated some of
25 the DPG gang members from the area, it is still not uncommon to see
26 large groups of DPG gang members associating within the boundaries
27 of the gang injunction.

28 5. DPG and many African American based gangs began to

1 associate or align with one another in the mid 1990's. The two
2 rival alliances were formed in the mid-2000's, and still exist
3 today. These two rival alliances became known as "TWAMP" on the one
4 hand and "MUG/MURDER Squad" on the other. The name "MUG" is an
5 acronym comprised of the names of three of the gangs in the
6 alliance, that includes the following gangs: "Modoc Boys," "U-
7 Boys," "Garrett Street Boys," "Dog Pound Gangsters," "Northside
8 Pleasant and "East Lane."

9 6. "TWAMP" is slang for 20 and is mainly used for scoring 20
10 points when playing dominoes. Further, most of the gangs in "TWAMP"
11 lived in neighborhoods that have the twenty thousand blocks in their
12 addresses. "TWAMP" consist of the following gangs: "Muhammad
13 Family," Villa Posse," "Grove Street Posse," "Strother Boys,"
14 "Klette Mob," "Fink White," "West Roy," "Lee Street Posse," and
15 "Peach and Olive Boys." "Twamp" members also identify with the "Six
16 Deuce Diamond Crip" criminal street gang. The "Six" represents the
17 sixth letter of the alphabet, "F", which stands for Fresno. "Deuce"
18 stands for the second letter of the alphabet, "B" which stands for
19 Boyz. "Diamond Crip" is a known Los Angeles criminal street gang.
20 "TWAMP" members are involved in a series of criminal activities that
21 range from murder, shootings, drug sales, and human trafficking.

22 7. Both "TWAMP" and "MUG/Murder Squad" continue to feud.
23 This on-going feud has led to numerous prior and recent murders,
24 assaults with deadly weapons and drive-by shootings. Although this
25 feud has been on-going for many years, there has recently been an
26 increase in the level of violence between the two sides. DPG
27 members are actively engaged in the increasing violence.

28 8. There are currently approximately two hundred DPG gang

1 members and associates. The older members are now more involved in
2 narcotics sales, human trafficking, credit card fraud, and identity
3 theft, the younger members continue with street level criminal
4 activities, including armed robberies and drive-by shootings. DPG
5 has also now begun creating rap music videos, which are used to
6 promote DPG and intimidate victims and witnesses, as they discuss
7 their violence in the videos.

8 9. DPG continues to recruit young African American males into
9 the gang and continues to gain respect and reputation through
10 intimidation. Respect and reputation are the cornerstones for the
11 creation and sustainability of a gang. Respect and reputation of
12 the individual member and then collectively for the gang allows the
13 gang's influence to increase.

14 10. DPG appears to have no set procedure to join the
15 Enterprise. Most members are actual DPG members and have joined due
16 to their family connection or geographical location. Some members
17 have been able to join due to their contribution to the Enterprise,
18 such as committing acts of prostitution, committing fraud, selling
19 drugs, obtaining guns, and defending the DPG Enterprise by
20 committing acts of violence against rival gangs.

21 11. Several members of the DPG claim to be "rappers" and
22 produce rap music and rap videos. This music raises the
23 Enterprise's status making it a symbol of success and power within
24 the community, thus assisting in recruitment of other members of the
25 Enterprise and victims of prostitution. Members of the DPG have
26 created various rap groups and support each other in the promotion
27 of their music. The lyrics of the Enterprise's music primarily
28 focus on pimping activity and violence committed towards other rival

1 gang members in Fresno County. The lyrics also frequently contain
2 mentions of the gang lifestyle and their respective gang sets.

3 12. DPG has put much of its profit-driven focus on
4 prostituting adult females throughout Fresno County and the United
5 States:

6 a. Members and associates of the Enterprise act as
7 "pimps" (a person who befriends, recruits, trains and/or
8 panders a person for prostitution) and "bottoms" (a pimp's most
9 trusted/senior prostitute) to promote and manage prostitution
10 activities in Fresno, California, and elsewhere. Other
11 coconspirators facilitate the Enterprise's prostitution
12 activities, assisting Enterprise members and associates in
13 "pimping out" the adult prostitutes. DPG-controlled
14 prostitution has spawned a "pimping" subculture within the gang
15 with its own set of rules.

16 b. The DPG Enterprise adheres to the rules which a pimp
17 teaches females he is about to "turn out" or begin
18 prostituting. Prostitutes are expected to maintain absolute
19 loyalty to their pimp, and in fact are often considered the
20 property of the pimp. Prostitutes are not permitted to speak
21 with or even look at other pimps or even perform prostitution
22 acts with any African American male, and may be traded or sold
23 among the pimps. The rules also include instructions related
24 to interactions with other prostitutes ("wifey" or "wifey-in-
25 law"), and interactions with prostitution clients ("johns" or
26 "tricks").

27 c. A prostitute is expected to provide her pimp with the
28 money earned through her prostitution activities. In exchange,

1 the prostitute receives protection, clothing, housing, cars,
2 and food from her pimp. Prostitutes who attempt to carry out
3 their business without a pimp, known as "renegading," or
4 prostitutes who are suspected of cooperating with law
5 enforcement investigations may be subject to punishment by the
6 Enterprise and be labeled as "snitches" by the Enterprise.
7 This labeling is to encourage physical punishment to these
8 females. Enterprise members jointly enforce the rules on
9 prostitutes who ignore the rules with different techniques.
10 Most of the DPG Enterprise pimps would typically enforce the
11 rules through violence or threats of violence. Pimps known for
12 controlling their prostitutes through force are considered
13 "gorilla pimps," while those who convinced their prostitutes to
14 abide by the rules without violence are referred to as "finesse
15 pimps." "Finesse Pimps" usually use fraud and emotional
16 manipulation to get their prostitutes to follow their rules.

17 d. Enterprise members and associates cooperate to
18 promote the prostitution activities of the Enterprise,
19 primarily in and around low-cost motels in Fresno, Merced, San
20 Diego, Los Angeles, and Kern Counties in California.

21 e. Members frequently pool resources to further the
22 prostitution activities of the Enterprise by, for instance,
23 sharing vehicles used to transport prostitutes, accounts used
24 to post advertisements, and motel rooms in which the "dates"
25 occur as well as "Pimp" room where the DPG pimps congregate and
26 manage their prostitutes. Enterprise members also work
27 together to monitor law enforcement and monitor other pimps'
28 girls. Enterprise members share information on the best spots

1 and techniques in pimping their prostitutes including
2 prostituting females in other states.

3 f. Enterprise members and associates also work together
4 to recruit new prostitutes. Recruitment efforts generally
5 focused on vulnerable females, particularly those from a broken
6 home or runaways. Both pimps and their "bottoms" recruit new
7 prostitutes through social media, friendships, run aways, and
8 from other pimps. To "knock" or initiate a new prostitute,
9 pimps and bottoms utilized various methods to manipulate the
10 woman, including false promises of a luxurious lifestyle,
11 intimidation, and actual or threatened violence.

12 13. At various times material to this Indictment, the
13 Defendants had the following roles in the Enterprise.

14 a. DPG Members: Defendants TRENELL MONSON, AKA, "Nachi";
15 JAMES YORK, AKA, "York Dog," "YD," "Jamari York"; DARRELL
16 MAXEY, AKA, "Dre P"; DAVON MILRO, AKA, "Pae Dae"; KENNETH
17 WHARRY, AKA, "Dook," "DK"; KENNETH JOHNSON, AKA, "Coo Nut";
18 KIANDRE JOHNSON, AKA, "Key Da P," "Keke"; BRANDON TUCKER, AKA,
19 "B Tuck"; STEVEN BLACKMON, AKA, "Pook Da Most," "Moses,"
20 "Mostest"; AKILI FOSTER, AKA, "K Mac"; AQUILLA BAILEY, III,
21 "Lil Quill"; ANTHONY WINDFIELD, AKA, "Freaky Ant." Higher
22 ranking DPG members may be a "Big Homie" within the Enterprise.
23 Members were expected to "hustle" on behalf of the Enterprise,
24 with their efforts focused upon a variety of profit-making
25 illegal activity, including the prostitution of adult females,
26 narcotic trafficking, and fraud. To protect and expand these
27 illegal ventures, members defend Enterprise territory against
28

1 competing gangs, cooperate to detect and avoid law enforcement,
2 and intimidate members of the community.

3 b. DPG Enterprise Associates: SHARIKA GAINES is an
4 associate of DPG. She is a "bottom" or "bottom bitch" for
5 James YORK, who assists him in recruiting females to work as
6 prostitutes and maintaining other prostitutes.

7 MEANS AND METHODS OF THE ENTERPRISE

8 14. Among the means and methods by which the Defendants and
9 their associates conducted and participated in the conduct of the
10 affairs of the enterprise were the following:

11 a. Members of the enterprise and their associates
12 committed, attempted and threatened to commit acts of violence,
13 including murder and robbery, to protect and expand the
14 enterprise's criminal operations.

15 b. Members of the enterprise and their associates
16 promoted a climate of fear through violence and threats of
17 violence.

18 c. Members of the enterprise and their associates used
19 and threatened to use physical violence against various
20 individuals.

21 d. Members of the enterprise and their associates engage
22 in sex trafficking by force, fraud and coercion and of a minor.

23 e. Members of the enterprise and their associates engage
24 in access device fraud and conspiracy to commit access device
25 fraud.

26 f. Members of the enterprise and their associates
27 trafficked in various controlled substances, including
28 marijuana, and prescription drugs.

1 15. The above-described enterprise, through its members and
2 associates, engaged in racketeering activity as defined in Title 18,
3 United States Code, Sections 1959(b)(1) and 1961(1), namely, acts
4 involving murder and robbery in violation of California law, and
5 offenses indictable under Title 18, United States Code, Sections 1591
6 (sex trafficking of a minor or by force, fraud and coercion), 1952(a)
7 (use of a facility of interstate commerce to promote prostitution),
8 and 2421; and Title 21, United States Code, Section 841(a)(1)
9 (distribution and possession with intent to distribute a controlled
10 substance).

11 16. Beginning on a date no later than March 23, 2016 and
12 continuing until on or about April 21, 2016, in the County of Fresno,
13 State and Eastern District of California, for the purpose of gaining
14 entrance to and maintaining and increasing position in DPG, an
15 enterprise engaged in racketeering activity, the Defendants,

16
17 JAMES YORK,
18 AKA, "YD," AKA, "YORK DOG,"
19 AKA, "JAMARI YORK;"
20 TRENELL MONSON,
21 AKA, "NACHI," AKA, "NACHI
22 CHEDDA," AKA, "CHEDDA;"
23 DEANDRE STANFILL,
24 AKA, "DRE;"
25 DARRELL MAXEY,
26 AKA, "DRE P;"
27 DAVON MILLRO,
28 AKA, "PAE DAE;"
KENNETH WHARRY,
AKA, "DOOK," AKA, "DK;"
KENNETH JOHNSON,
AKA, "COO NUT;"
KIANDRE JOHNSON,
AKA, "KEY DA P;"
ANTHONY WINDFIELD,
AKA, "FREAKY ANT;"
WILLIAM LEE,
AKA, "CHILL WILL," AKA, "CW;"

and others known and unknown, unlawfully, and knowingly conspired to

1 murder a member of a rival gang, in violation of California Penal
2 Code, Sections §§ 182 and 187.

3 All in violation of Title 18, United States Code, Section
4 1959(a)(5).

5 COUNT TWO: [18 U.S.C. §1591(a)(1) and (b)(1), and (e)(2) - Sex
6 Trafficking by Force, Fraud or Coercion]

7 The Grand Jury further charges: T H A T

8 JAMES YORK,

9 defendant herein, beginning on or about February 15, 2016, and
10 continuing until on or about April 21, 2016 in the County of Fresno,
11 State and Eastern District of California and elsewhere, knowingly, in
12 and affecting interstate and foreign commerce, recruited, enticed,
13 harbored, transported, provided, obtained, and maintained N.P., an
14 adult female, knowing that means of force, threats of force, fraud,
15 and coercion would be used to cause N.P. to engage in a commercial
16 sex act.

17 It is further alleged that the offense was effected by means of
18 force, threats of force, fraud, and coercion described in subsection
19 (e)(2).

20 All in violation of Title 18, United States Code, Section
21 1591(a)(1) and (b)(1), and (c).

22 COUNT THREE: [18 U.S.C. §1591(a)(1) and (b)(1) - Sex Trafficking by
23 Force, Fraud or Coercion]

24 The Grand Jury further charges: T H A T

25 JAMES YORK,

26 defendant herein, beginning on or about February 15, 2016, and
27 continuing until on or about April 21, 2016 in the County of Fresno,
28 State and Eastern District of California and elsewhere, knowingly, in

1 and affecting interstate and foreign commerce, recruited, enticed,
2 harbored, transported, provided, obtained, and maintained N.B., an
3 adult female, knowing that means of force, threats of force, fraud,
4 and coercion would be used to cause N.B. to engage in a commercial
5 sex act.

6 It is further alleged that the offense was effected by means of
7 force, threats of force, fraud, and coercion described in subsection
8 (e) (2).

9 All in violation of Title 18, United States Code, Section
10 1591(a) (1) and (b) (1).

11 COUNT FOUR: [18 U.S.C. §1591(a) and (b) (1) - Sex Trafficking by
12 Force, Fraud or Coercion]

13 The Grand Jury further charges: T H A T

14 TRENELL MONSON,

15 defendant herein, beginning on or about February 15, 2016, and
16 continuing until on or about April 21, 2016 in the County of Fresno,
17 State and Eastern District of California and elsewhere, knowingly, in
18 and affecting interstate and foreign commerce, recruited, enticed,
19 harbored, transported, provided, obtained, and maintained M.V., an
20 adult female, that means of force, threats of force, fraud, and
21 coercion would be used to cause M.V. to engage in a commercial sex
22 act.

23 It is further alleged that the offense was effected by means of
24 force, threats of force, fraud, and coercion described in subsection
25 (e) (2).

26 All in violation of Title 18, United States Code, Section
27 1591(a) (1) and (b) (1).

28 COUNT FIVE: [18 U.S.C. §1591(a) and (b) (1) - Sex Trafficking by
Force, Fraud or Coercion]

1 The Grand Jury further charges: T H A T

2 TRENELL MONSON,

3 defendant herein, beginning on or about February 15, 2016, and
4 continuing until on or about April 21, 2016 in the County of Fresno,
5 State and Eastern District of California and elsewhere, knowingly, in
6 and affecting interstate and foreign commerce, recruited, enticed,
7 harbored, transported, provided, obtained, and maintained L.G., an
8 adult female, knowing that means of force, threats of force, fraud,
9 and coercion would be used to cause L.G. to engage in a commercial
10 sex act.

11 It is further alleged that the offense was effected by means of
12 force, threats of force, fraud, and coercion described in subsection
13 (e) (2).

14 All in violation of Title 18, United States Code, Section
15 1591(a) (1) and (b) (1).

16 COUNT SIX: [18 U.S.C. §1591(a) and (b) (1) - Sex Trafficking by
17 Force, Fraud or Coercion]

18 The Grand Jury further charges: T H A T

19 TRENELL MONSON,

20 defendant herein, beginning on or about February 15, 2016, and
21 continuing until on or about April 21, 2016 in the County of Fresno,
22 State and Eastern District of California and elsewhere, knowingly, in
23 and affecting interstate and foreign commerce, recruited, enticed,
24 harbored, transported, provided, obtained, and maintained S.S., an
25 adult female, knowing that means of force, threats of force, fraud,
26 and coercion would be used to cause S.S. to engage in a commercial
27 sex act.

28 It is further alleged that the offense was effected by means of

1 force, threats of force, fraud, and coercion described in subsection
2 (e) (2).

3 All in violation of Title 18, United States Code, Section
4 1591(a) (1) and (b) (1).

5 COUNT SEVEN: [18 U.S.C. §1591(a) and (b) (1) - Sex Trafficking by
6 Force, Fraud or Coercion]

7 The Grand Jury further charges: T H A T

8 DARRELL MAXEY,

9 defendant herein, beginning on or about February 15, 2016, and
10 continuing until on or about April 21, 2016 in the County of Fresno,
11 State and Eastern District of California and elsewhere, knowingly, in
12 and affecting interstate and foreign commerce, recruited, enticed,
13 harbored, transported, provided, obtained, and maintained D.M., an
14 adult female, knowing that means of force, threats of force, fraud,
15 and coercion would be used to cause D.M. to engage in a commercial
16 sex act.

17 It is further alleged that the offense was effected by means of
18 force, threats of force, fraud, and coercion described in subsection
19 (e) (2).

20 All in violation of Title 18, United States Code, Section
21 1591(a) (1) and (b) (1).

22 COUNT EIGHT: [18 U.S.C. §1591(a) and (b) (1) - Sex Trafficking by
23 Force, Fraud or Coercion]

24 The Grand Jury further charges: T H A T

25 DARRELL MAXEY,

26 defendant herein, beginning on or about February 15, 2016, and
27 continuing until on or about April 21, 2016 in the County of Fresno,
28 State and Eastern District of California and elsewhere, knowingly, in

1 and affecting interstate and foreign commerce, recruited, enticed,
2 harbored, transported, provided, obtained, and maintained J.F., an
3 adult female, knowing that means of force, threats of force, fraud,
4 and coercion would be used to cause J.F. to engage in a commercial
5 sex act.

6 It is further alleged that the offense was effected by means of
7 force, threats of force, fraud, and coercion described in subsection
8 (e) (2).

9 All in violation of Title 18, United States Code, Section
10 1591(a) (1) and (b) (1).

11 COUNT NINE: [18 U.S.C. §1591(a) (1), (b) (2), and (c) - Sex
12 Trafficking of a Minor]

13 The Grand Jury further charges: T H A T

14 AQUILLA BAILEY,
15 defendant herein, beginning on or about February 15, 2016, and
16 continuing until on or about April 21, 2016 in the County of Fresno,
17 State and Eastern District of California and elsewhere, knowingly
18 enticed, harbored, transported, provided, and maintained by any
19 means, and benefited financially from participation in a venture
20 which enticed, harbored, transported, provided, and maintained in and
21 affecting interstate and foreign commerce "Jane Doe," who had not
22 attained the age of 18 years, and that "Jane Doe" would be caused to
23 engage in a commercial sex act.

24 It is further alleged that AQUILLA BAILEY did the foregoing
25 after having had a reasonable opportunity to observe "Jane Doe."

26 All in violation of Title 18, United States Code, Section
27 1591(a) (1), (b) (2) and (c).

28 COUNT TEN: [18 U.S.C. §2421 - Interstate Transportation for
Prostitution]

1 The Grand Jury further charges: T H A T

2 KENNETH WHARRY,

3 defendant herein, beginning on or about March 31, 2016, and
4 continuing until on or about April 21, 2016 in the County of Fresno,
5 State and Eastern District of California and elsewhere, knowingly
6 transported in interstate commerce from Nevada to California and
7 California to Maryland, with the intent that C.A., an adult female,
8 engage in prostitution and sexual activity for which a person can be
9 charged with a criminal offense, and aided and abetted such conduct.

10 All in violation of Title 18, United States Code, Sections 2(a)
11 and 2421.

12 COUNT ELEVEN: [18 U.S.C. §2421 - Interstate Transportation for
13 Prostitution]

14 The Grand Jury charges: T H A T

15 MARKEITH CANADY,

16 defendant herein, beginning on or about April 16, 2016, and
17 continuing until on or about April 21, 2016 in the County of Fresno,
18 State and Eastern District of California and elsewhere, knowingly
19 transported in interstate commerce from California to Texas, with the
20 intent that "UF915," an unidentified female, engage in prostitution
21 and sexual activity for which a person can be charged with a criminal
22 offense, and aided and abetted such conduct.

23 All in violation of Title 18, United States Code, Sections 2(a)
24 and 2421.

25 COUNT TWELVE: [18 U.S.C. §2421 - Interstate Transportation for
26 Prostitution]

27 The Grand Jury further charges: T H A T

28 KEVIN PACKARD,

defendant herein, beginning on or about March 1, 2016, and continuing

1 until on or about April 21, 2016 in the County of Fresno, State and
 2 Eastern District of California and elsewhere, knowingly transported
 3 in interstate commerce from California to Washington with the intent
 4 that R.D., an adult female, engage in prostitution and sexual
 5 activity for which a person can be charged with a criminal offense,
 6 and aided and abetted such conduct.

7 All in violation of Title 18, United States Code, Sections
 8 2(a) and 2421.

9 COUNTS THIRTEEN through TWENTY-TWO: [18 U.S.C. §1952(a) - Use of a
 10 Facility of Interstate Commerce
 to Promote Prostitution]

11 The Grand Jury further charges: T H A T
 12 beginning on or about February 15, 2016, and continuing until on or
 13 about April 21, 2016 in the County of Fresno, State and Eastern
 14 District of California and elsewhere, each defendant named below used
 15 a facility in interstate/foreign commerce, namely a cellular
 16 telephone, with the intent to promote, manage, establish, carry on
 17 and facilitate the promotion, management, establishment and carrying
 18 on of an unlawful activity, that is, prostitution in violation of
 19 California Penal Code, Sections 647 and 653.20-653.28, and thereafter
 20 performed and attempted to perform an act to promote, manage,
 21 establish and carry on, and to facilitate the promotion, management,
 22 establishment and carrying on of such unlawful activity:

| <u>COUNT</u> | <u>DEFENDANT</u> | <u>CALLS/ TEXT MESSAGES</u> |
|--------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| THIRTEEN | JAMES YORK, AKA, "YD," AKA, "YORK DOG," AKA, "JAMARI YORK;" | On or about March 23, 2016 13:36 through the text exchange starting at 17:32 on (702)480- 4270 (TT14) |
| FOURTEEN | TRENELL MONSON, AKA, "NACHI," AKA, "NACHI CHEDDA," AKA, "CHEDDA;" | On or about April 11, 2016 at 10:05:48 on (559)248-6050 (TT7) |

| | | | |
|---|------------|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| 1 | FIFTEEN | DARRELL MAXEY, AKA, "DRE P;" | On or about April 10, 2016 at 15:31:29 on (559)885-9977 (TT9) |
| 2 | SIXTEEN | DAVON MILLRO, AKA, "PAE DAE;" | On or about March 2, 2016 at 23:20 through March 3, 2016 at 00:46 intercepted on (559)548- 5570 (TT16) |
| 3 | SEVENTEEN | KENNETH WHARRY, AKA, "DOOK," AKA, "DK" | On or about March 31, 2016 at 10:19 through 16:28 on (559)430-6871 (TT12) |
| 4 | EIGHTEEN | KIANDRE JOHNSON, AKA, "KEY DA P" | On or about February 26, 2016 at 18:13 through 23:59 on (559)943-0572 (TT11) |
| 5 | NINETEEN | MARKEITH CANADY, AKA, "GOOBY" | On or about April 16, 2016 at 17:50 on (559)387-0718 (TT21) |
| 6 | TWENTY | KEVIN PACKARD, AKA, "KAY PEE," AKA, "KP" | On or about March 12, 2016 in a call with (559)476-0147 on Fresno County Jail phone. |
| 7 | TWENTY-ONE | AQUILLA BAILEY, III, AKA, "LIL QUILL" | On or about March 23, 2016 at 15:54 on (559) 548-5570 (TT16) |
| 8 | TWENTY-TWO | SHARIKA GAINES | On or about March 12, 2016 at 17:36 using (559)975-9660, intercepted on (559)909- 9941 (TT15) |

17 All in violation of Title 18, United States Code, section
18 1952(a)(3).

19 COUNT TWENTY-THREE: [18 U.S.C. § 1029(a)(5) and (b)(2) - Conspiracy
20 to Effect Transactions with Access Devices Issued
21 to Other Persons]

22 The Grand Jury further charges: T H A T

23 KENNETH WHARRY,
24 AKA, "DOOK," AKA, "DK;"
25 KENNETH JOHNSON,
26 AKA, "COO NUT;"
27 ANTHONY WINDFIELD,
28 AKA, "FREAKY ANT;"
NASTASHA PARKS,
AKA, "STASHA;"
LUTHER NEWSOME; and
MARVIN LARRY,

defendants herein, as follows:

1
2 I. The Conspiracy and Its Object

3 17. Beginning at a time unknown to the Grand Jury, but no
4 later than in or about April 2013, and continuing through on or
5 about April 21, 2016, in the State and Eastern District of
6 California and elsewhere, defendants KENNETH WHARRY, KENNETH
7 JOHNSON, ANTHONY WINDFIELD, NASTASHA PARKS, LUTHER NEWSOME and
8 MARVIN LARRY, did unlawfully combine, conspire, confederate, and
9 agree with each other and with other co-conspirators, known and
10 unknown to the Grand Jury (defendants and co-conspirators
11 hereinafter referred to as "Members of the Conspiracy") to knowingly
12 and with intent to defraud effect transactions with one or more
13 access devices issued to another person or persons, and thereby to
14 receive payment or any other thing of value during any 1-year
15 period, the aggregate value of which was equal to or greater than
16 \$1,000, affecting interstate and foreign commerce, in violation of
17 Title 18, United States Code, Section 1029(a)(5).

18 II. Manner and Means of the Conspiracy

19 18. Among the manner and means by which Members of the
20 Conspiracy carried out said conspiracy were the following:

21 a. Members of the Conspiracy would obtain stolen credit card
22 account numbers and other access devices without the knowledge
23 or permission of the legal owner.

24 b. Members of the Conspiracy would obtain prepaid credit
25 cards. Members of the Conspiracy would then manufacture
26 counterfeit credit cards by encoding the stolen credit card
27 account numbers onto the prepaid credit cards.

28 c. Members of the Conspiracy would conduct transactions using

1 the counterfeit credit cards and access devices at banks,
2 casinos, merchants, gas stations, and other locations
3 throughout the United States, including in California, Nevada,
4 Oregon, Minnesota, Illinois, and Missouri, to obtain money,
5 goods, services, and other things of value.

6 III. Overt Acts

7 19. In furtherance of the conspiracy, the Members of the
8 Conspiracy committed, among others, the following overt acts in the
9 Eastern District of California, and elsewhere:

10 a. On or about April 20, 2013, at the Spirit Mountain Casino,
11 Grande Ronde Indian Reservation, Oregon, defendant LARRY and
12 other Members of the Conspiracy obtained cash advances using
13 access devices issued to other persons.

14 b. On or about May 18, 2013, at the Lumiere Place Casino, St.
15 Louis, Missouri, defendant NEWSOME and another Member of the
16 Conspiracy attempted to enter the casino in possession of
17 counterfeit credit cards.

18 c. On or about May 20, 2013, at the Hollywood Casino, Aurora,
19 Illinois, defendants NEWSOME and LARRY obtained cash advances
20 using access devices issued to other persons.

21 d. On or about July 1, 2013, near Blythe, California,
22 defendant LUTHER and other Members of the Conspiracy were in
23 possession of counterfeit credit cards, and LUTHER was in
24 possession of approximately 2,204 stolen credit card account
25 numbers.

26 e. On or about October 25, 2013, at the Spirit Mountain
27 Casino, Grand Ronde Indian Reservation, Oregon, defendant PARKS
28 and other Members of the Conspiracy attempted to conduct

1 transactions using access devices issued to other persons.

2 f. On or about October 9, 2015, at the Chumash Casino, Santa
3 Ynez, California, defendants PARKS, LUTHER and other Members of
4 the Conspiracy entered the casino in possession of counterfeit
5 credit cards and attempted to obtain cash advances using access
6 devices issued to other persons.

7 g. On February 24, 2016, in Fresno, California, defendants
8 KENNETH JOHNSON, WHARRY, and NEWSOME travelled to Wells Fargo
9 Banks in possession of counterfeit credit cards and obtained
10 cash using access devices issued to other persons.

11 h. On or about March 12, 2016, in South Lake Tahoe,
12 California, and in Nevada, defendants KENNETH JOHNSON,
13 WINDFIELD, AND WHARRY and other Members of the Conspiracy
14 entered banks in possession of counterfeit credit cards and
15 obtained cash using access devices issued to other persons.

16 i. On or about March 18, 2016, defendants PARKS and LARRY
17 discussed by telephone the use and manufacture of counterfeit
18 credit cards.

19 j. On or about March 19, 2016, defendants PARKS and LARRY
20 discussed by telephone ordering a new batch of stolen credit
21 card numbers.

22 k. On or about March 21, 2016, defendants PARKS and LARRY
23 discussed by telephone the use of unauthorized access devices
24 to obtain money from a casino.

25 l. On or about March 26, 2016, defendants PARKS and LARRY
26 discussed in several telephone calls the manufacture of
27 counterfeit credit card, the payment for stolen credit card
28 account numbers, and the ordering of stolen credit card numbers

1 from the "supplier."

2 m. On or about March 26, 2016, defendants PARKS, WHARRY,
3 NEWSOME and other Members of the Conspiracy, drove to the
4 Gilroy Premium Outlets shopping mall in Gilroy, California,
5 from Madera, California.

6 n. On or about March 26, 2016, defendants PARKS, WHARRY,
7 NEWSOME and other Members of the Conspiracy entered several
8 merchants in the Gilroy Premium Outlets shopping mall in
9 Gilroy, California, including Timberland, Vans, Polo Ralph
10 Lauren, Adidas, Justice, Nike, and Chili's Restaurant and
11 obtained goods and services using access devices issued to
12 other persons.

13 o. On or about March 30, 2016, defendants PARKS and LARRY
14 discussed in text messages ordering credit card account numbers
15 from a source in the Ukraine.

16 p. On or about April 2, 2016, defendant PARKS and another
17 Member of the Conspiracy discussed by telephone attempts to
18 make purchases with fraudulent credit cards at a McDonald's
19 Restaurant and at gas stations

20 q. On or about April 4, 2016, defendants PARKS and LARRY
21 discussed by telephone the use and manufacture of counterfeit
22 credit cards.

23 r. On or about April 5, 2016, defendants PARKS and LARRY
24 discussed by telephone ordering of credit card account numbers
25 All in violation of Title 18, United States Code, Section

26 1029(a)(5) and (b)(2).

27 ///

28 ///

1 COUNT TWENTY-FOUR: [18 U.S.C. §922(g) (1) - Felon in Possession of a
2 Firearm]

3 The Grand Jury further charges: T H A T

4 STEVEN BLACKMON,
5 defendant herein, from on or about February 24, 2016 through March 21
6 2016, in the County of Fresno, State and Eastern District of
7 California and elsewhere, having been convicted of a crime punishable
8 by more than a year imprisonment, to wit:

9 A 2009 Fresno County Superior Court conviction for a
10 violation of California Penal Code, Section 245(a)(1),
11 Assault with a deadly weapon (not a firearm)/great bodily
injury likely

12 did knowingly and intentionally possess a firearm, to wit, Model 21,
13 .45 semi-automatic handgun which had been shipped and transported in
14 interstate and foreign commerce.

15 All in violation of Title 18, United States Code, Section
16 922(g)(1).

17 COUNT TWENTY-FIVE: [21 U.S.C. § 841(a)(1) - Possession With Intent
18 to Distribute a Controlled Substance]

19 The Grand Jury further charges: T H A T

20 STEVEN BLACKMON,
21 defendant herein, beginning on or about February 15, 2016 and
22 continuing until March 21, 2016 in the County of Fresno, State and
23 Eastern District of California, did knowingly and intentionally
24 possess with intent to distribute a mixture containing a detectable
25 amount of marijuana, a schedule I controlled substance.

26 All in violation of Title 21, United States Code, Section
27 841(a)(1).

28 ///

1 COUNT TWENTY SIX: [26 U.S.C. § 5861(d) - Possession of an
2 Unregistered Firearm]

3 The Grand Jury further charges: T H A T

4 JAMES YORK,

5 defendant herein, on or about March 5, 2016, in the County of Fresno,
6 State and Eastern District of California, did knowingly possess a
7 firearm, as defined in Title 26, United States Code, Section 5845, to
8 wit, an AR-Style, caliber .223 rifle having a barrel or barrels of
9 less than 16 inches in length and an overall length of less than 26
10 inches in length and a weapon made from a rifle with an overall
11 length of less than 26 inches and a barrel or barrels of less than 16
12 inches in length, which was not registered to him in the National
13 Firearm Registration and Transfer Record.

14 All in violation of Title 26, United States Code, Section §
15 5861(d).

16 FORFEITURE ALLEGATION: [18 U.S.C. § 924(d)(1), 981(a)(1)(C),
17 982(a)(2)(B), 1029(c)(1)(C), 1594(d)(1)
18 1594(d)(2), 2428; 21 U.S.C. § 853; and 28
U.S.C. § 2461 - Criminal Forfeiture]

19 20. The allegations in the Indictment are hereby realleged and
20 incorporated by reference for the purpose of alleging forfeiture
21 pursuant to Title 18, United States Code, §§ 924(d)(1), 981(a)(1)(C),
22 982(a)(2)(B), 1029(c)(1)(C), 1594(d)(1), 1594(d)(2), 2428; and Title
23 28, United States Code, § 2461.

24 21. Upon conviction of one or more of the offenses alleged in
25 Counts 2-9 (Sex trafficking of a minor or by force, fraud and
26 coercion), defendants James YORK, Trenell MONSON, Darrell MAXEY and
27 Aquilla BAILEY shall forfeit to the United States pursuant to 18
28 U.S.C. § 1594(d)(1), (2), any property, real or personal, which

1 constitutes or is derived from proceeds traceable to such
2 violation(s), and any property, real or personal, that was involved
3 in, used or intended to be used to commit or to facilitate the
4 commission of such violation(s), and any property traceable to such
5 property.

6 22. Upon conviction of one or more of the offenses alleged in
7 Counts 10-12 (Transportation in interstate commerce for
8 prostitution), defendants Kenneth WHARRY, Markeith CANADY, and Kevin
9 PACKARD, shall forfeit to the United States pursuant to 18 U.S.C.
10 § 2428 any property, real or personal, which constitutes or is
11 derived from proceeds traceable to such violation(s), and any
12 property, real or personal, that was involved in, used or intended to
13 be used to commit or to facilitate the commission of such
14 violation(s).

15 23. Upon conviction of one or more of the offenses alleged in
16 Count 13-22 (Use of a facility of interstate commerce to promote
17 prostitution), defendants James YORK, Trenell MONSON, Darrell MAXEY,
18 Davon MILLRO, Kenneth WHARRY, Kiandre JOHNSON, Markeith CANADY,
19 Aquilla BAILEY, Kevin PACKARD and Sharika GAINES shall forfeit to the
20 United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C.
21 § 2461(c) any property, real or personal, which constitutes or is
22 derived from proceeds traceable to such violation(s).

23 24. Upon conviction of one or more of the offenses alleged in
24 Count 23 (Conspiracy to commit access device fraud), defendants
25 Kenneth WHARRY, Kenneth JOHNSON, Anthony WINDFIELD, Nastasha PARKS,
26 Luther NEWSOME, and Marvin LARRY shall forfeit to the United States
27 pursuant to 18 U.S.C. §§ 982(a)(2)(B), 1029(c)(1)(C) and 28 U.S.C.
28 § 2461(c) any property, real or personal, which constitutes or is

1 derived from proceeds traceable to such violation(s) and any
2 property, real or personal, that was involved in, used or intended to
3 be used to commit or to facilitate the commission of such
4 violation(s).

5 25. Upon conviction of one or more of the offenses alleged in
6 Count 24 (Felon in possession of a firearm), defendant Steven
7 BLACKMON shall forfeit to the United States pursuant to 18 U.S.C.
8 § 924(d)(1) and 28 U.S.C. § 2461(c) any firearm or ammunition
9 involved in said violation.

10 26. Upon conviction of one or more of the offenses alleged in
11 Count 25 (Possession with Intent to Distribute a Controlled
12 Substance), defendant Steven BLACKMON shall forfeit to the United
13 States pursuant to 21 U.S.C. § 853 any property, real or personal,
14 which constitutes or is derived from proceeds traceable to such
15 violation and any property, real or personal, that was involved in,
16 used or intended to be used to commit or to facilitate the commission
17 of such violation.

18 27. If any of the property described above, as a result of any
19 act or omission of defendant(s) or agents of the defendant(s) or upon
20 direction by the defendant(s):

- 21 a. cannot be located upon the exercise of due diligence;
- 22 b. has been transferred or sold to, or deposited with, a
23 third party;
- 24 c. has been placed beyond the jurisdiction of the Court;
- 25 d. has been substantially diminished in value; or
- 26 e. has been commingled with other property which cannot
27 be divided without difficulty,

28 the United States of America shall be entitled to forfeiture of

1 substitute property, including but not limited to a personal
2 forfeiture money judgment, pursuant to Title 21, United States Code,
3 § 853(p), as incorporated by Title 18, United States Code, §§
4 982(b)(1), and Title 28, United States Code, § 2461(c).

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6 A TRUE BILL,

/s/ Signature on file w/AUSA

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FOREPERSON

9 PHILLIP A. TALBERT
Acting United States Attorney

10 By **KEVIN P. ROONEY** for

11 Kirk E. Sherriff
12 Assistant U.S. Attorney
13 Chief, Fresno Office
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No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

FILED

MAY 05 2016

CLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY CLERK

1:16 CR 00069 LJO SKO

THE UNITED STATES OF AMERICA

vs.

JAMES YORK, (1)
AKA, "YD," AKA, "YORK DOG,"
AKA, "JAMARI YORK;"
TRENELL MONSON, (2)
AKA, "NACHI," AKA, "NACHI
CHEDDA," AKA, "CHEDDA;"
DEANDRE STANFILL, (3)
AKA, "DRE;"
DARRELL MAXEY, (4)
AKA, "DRE P;"
DAVON MILLRO, (5)
AKA, "PAE DAE;"
KENNETH WHARRY, (6)
AKA, "DOOK," AKA, "DK;"
KENNETH JOHNSON, (7)
AKA, "COO NUT;"
KIANDRE JOHNSON, (8)
AKA, "KEY DA P;"
ANTHONY WINDFIELD, (9)
AKA, "FREAKY ANT;"
WILLIAM LEE, (10)
AKA, "CHILL WILL," AKA, "CW;"
MARKEITH CANADY, (11)
AKA, "GOOBY;"
KEVIN PACKARD, (12)
AKA, "KAY PEE," AKA, "KP;"
AQUILLA BAILEY, III (13)
AKA, "LIL QUILL;"
STEVEN BLACKMON, (14)
AKA, "POOK DA MOST," AKA,
"MOSES," AKA "MOSTEST;"
NASTASHA PARKS, (15)
AKA, "STASHA;"
LUTHER NEWSOME; (16)
SHARIKA GAINES; (17)
MARVIN LARRY, (18)

INDICTMENT

VIOLATION(S): 18 U.S.C. § 1959(a)(5) – Conspiracy to Commit Murder in Aid of Racketeering (Count 1);
 18 U.S.C. § 1591(a)(1), (b)(1) and (c), Sex Trafficking by Force, Fraud, and Coercion (Counts 2-8);
 18 U.S.C. § 1591(a)(1), (b)(1) and (c), Sex Trafficking of a Minor (Count 9);
 18 U.S.C. § 2421, Transportation in Interstate Commerce for Prostitution (Counts 10-12);
 18 U.S.C. § 1952(a), Use of a Facility of Interstate Commerce to Promote Prostitution (Counts 13-22);
 18 U.S.C. § 1029(a)(5) and (b)(2), Conspiracy to Effect Transactions With
 Access Devices Issued to Other Persons (Count 23);
 18 U.S.C. § 922(g)(1), Felon in Possession of a Firearm (Count 24);
 21 U.S.C. § 841(a)(1), Possession with Intent to Distribute Marijuana (Count 25);
 26 U.S.C. § 5861(d), Possession of an Unregistered Firearm (Count 26);
 21 U.S.C. § 841(a)(1); and 18 U.S.C. § 924(d)(1), 981(a)(1)(C), 982(a)(2)(B), 1029(c)(1)(C),
 1594(d)(1), 1594(d)(2), 2428; 21 U.S.C. § 853; and 28 U.S.C. § 2461 - Criminal Forfeiture

A true bill,

151

Foreman.

Filed in open court this _____ day

of _____, A.D. 20 _____

Clerk.

Bail, \$

AS PREVIOUSLY SET

NO BAIL WARRANT AS TO Δ

[Handwritten signature]

AQUILLA Bailey
 DEANDE STANFILL
 Kenneth Johnson
 MARVIN Larry

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Madera

U.S.C. Citation
Please see Indictment

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

DEFENDANT -- U.S. vs.
JAMES YORK, aka "YD", "York Dog" "Jamari York"

Address {

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

- person is awaiting trial in another Federal or State Court, give name of court
- this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District
- this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 - U.S. Att'y Defense
- this prosecution relates to a pending case involving this same defendant
- prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

- U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution

Fresno County Jail

Has detainer been filed?

- Yes
 - No
- If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

- This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KASL
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: James York

COUNT ONE

VIOLATION: 18 U.S.C. § 1959(a)(5) - Conspiracy To Commit
Murder in Aid of Racketeering

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNTS TWO and THREE

VIOLATION: 18 U.S.C. § 1591(a)1) - Sex Trafficking By
Force, Fraud and Coercion

PENALTY: 15 years imprisonment minimum
life imprisonment maximum
\$250,000 fine
5 years supervised release
\$100 special assessment

COUNT THIRTEEN

VIOLATION: 18 U.S.C. § 1952(a) - use of a facility of
Interstate commerce to promote prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNT TWENTY-SIX

VIOLATION: 26 U.S.C. § 5861(d) - possession of an
unregistered firearm

PENALTY: 10 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

DEFENDANT -- U.S. vs.
DEANDRE STANFILL, aka "Dre"

Address

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

Name and Office of Person Furnishing Information on

THIS FORM

Maria G. Robles

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State

If answer to (6) is "Yes," show name of institution

Fresno County Jail

Has detainer been filed?

- Yes
- No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KAS
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Deandre Stanfill

COUNT ONE

VIOLATION: 18 U.S.C. § 1959(a)(5) - Conspiracy To Commit
Murder in Aid of Racketeering

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

DEFENDANT -- U.S. vs.

TRENELL MONSON, aka "Nachi" "Nachi Chedda"

Address

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO. 1:16-mj-044 BAM

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State

If answer to (6) is "Yes," show name of institution

Fresno County Jail

Has detainer been filed? Yes No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on

THIS FORM Maria G. Robles

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KAS
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Trenell Monson

COUNT ONE

VIOLATION: 18 U.S.C. § 1959(a)(5) - Conspiracy To Commit
Murder in Aid of Racketeering

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNTS FOUR THROUGH SIX

VIOLATION: 18 U.S.C. § 1591(a)1) - Sex Trafficking By
Force, Fraud and Coercion

PENALTY: 15 years imprisonment minimum
life imprisonment maximum
\$250,000 fine
5 years supervised release
\$100 special assessment

COUNT FOURTEEN

VIOLATION: 18 U.S.C. § 1952(a) - use of a facility of
Interstate commerce to promote prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

OFFENSE CHARGED
Please see Indictment

PLEASE SEE INDICTMENT Petty
 Minor
 Misdemeanor
 Felony

DEFENDANT -- U.S. vs.
DARRELL MAXEY, aka "Dre P"

Place of offense: Fresno
U.S.C. Citation: Please see Indictment

Address: {
Birth Date: {
 Male Alien
 Female (if applicable)
(Optional unless a juvenile)

PROCEEDING

DEFENDANT

Name of Complainant Agency, or Person (& Title, if any)
SA Volk-FBI
 person is awaiting trial in another Federal or State Court, give name of court
 this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District
 this is a reprosecution of charges previously dismissed which were dismissed on motion of:
 U.S. Att'y Defense } SHOW DOCKET NO.
 this prosecution relates to a pending case involving this same defendant }
 prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under
MAGISTRATE JUDGE CASE NO. 1:16-mj-044 BAM

IS NOT IN CUSTODY
1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges {
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY
4) On this charge
5) On another conviction
6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution
Fresno County Jail

Has detainer been filed? Yes No
If "Yes," give date filed: Mo. Day Year

DATE OF ARREST {
Or ... if Arresting Agency & Warrant were not Federal
Mo. Day Year

Name and Office of Person Furnishing Information on THIS FORM
Maria G. Robles

DATE TRANSFERRED TO U.S. CUSTODY {

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned): KIMBERLY A. SANCHEZ
 FORFEITURE ALLEGATION

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KASz
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Darrell Maxey

COUNT ONE

VIOLATION: 18 U.S.C. § 1959(a)(5) - Conspiracy To Commit
Murder in Aid of Racketeering

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNTS SEVEN AND EIGHT

VIOLATION: 18 U.S.C. § 1591(a)1) - Sex Trafficking By
Force, Fraud and Coercion

PENALTY: 15 years imprisonment minimum
life imprisonment maximum
\$250,000 fine
5 years supervised release
\$100 special assessment

COUNT FIFTEEN

VIOLATION: 18 U.S.C. § 1952(a) - use of a facility of
Interstate commerce to promote prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

DEFENDANT -- U.S. vs.
DAVON MILLRO, aka "Pae Dae"

Address

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State

If answer to (6) is "Yes," show name of institution
Fresno County Jail

Has detainer been filed?

Yes No } If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KASz
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Davon Millro

COUNT ONE

VIOLATION: 18 U.S.C. § 1959(a)(5) - Conspiracy To Commit
Murder in Aid of Racketeering

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNT SIXTEEN

VIOLATION: 18 U.S.C. § 1952(a) - use of a facility of
Interstate commerce to promote prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

OFFENSE CHARGED
Please see Indictment

PLEASE SEE INDICTMENT Petty
 Minor
 Misdemeanor
 Felony

DEFENDANT -- U.S. vs.
KENNETH WHARRY, aka "Dook" "DK"

Place of offense: Fresno
U.S.C. Citation: Please see Indictment

Address: {
Birth Date: {
 Male Alien
 Female (if applicable)
(Optional unless a juvenile)

PROCEEDING

DEFENDANT

Name of Complainant Agency, or Person (& Title, if any)
SA Volk-FBI
 person is awaiting trial in another Federal or State Court, give name of court
 this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District
 this is a reprosecution of charges previously dismissed which were dismissed on motion of:
 U.S. Att'y Defense } SHOW DOCKET NO.
 this prosecution relates to a pending case involving this same defendant }
 prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under
MAGISTRATE JUDGE CASE NO. 1:16-mj-044 BAM

IS NOT IN CUSTODY
1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges {
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY
4) On this charge
5) On another conviction
6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution
Fresno County Jail

Has detainer been filed? Yes No
If "Yes," give date filed: Mo. Day Year

DATE OF ARREST {
Or ... if Arresting Agency & Warrant were not Federal
Mo. Day Year

Name and Office of Person Furnishing Information on THIS FORM: Maria G. Robles

DATE TRANSFERRED TO U.S. CUSTODY {

Name of Asst. U.S. Att'y (if assigned): KIMBERLY A. SANCHEZ
 FORFEITURE ALLEGATION

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KAS
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Kenneth Wharry

COUNT ONE

VIOLATION: 18 U.S.C. § 1959(a)(5) - Conspiracy To Commit
Murder in Aid of Racketeering

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release

COUNT TEN

VIOLATION: 18 U.S.C. § 2421 - Transport In Interstate
Commerce For Prostitution

PENALTY: 10 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNT SEVENTEEN

VIOLATION: 18 U.S.C. § 1952(a) - Use of a Facility of
Interstate Commerce to Promote Prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNT TWENTY-THREE

VIOLATION: 18 U.S.C. § 1029(a)(5) and (b)(2) - Conspiracy
To Commit Access Device Fraud

PENALTY: 7.5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

OFFENSE CHARGED
Please see Indictment

DEFENDANT -- U.S. vs.
KENNETH JOHNSON, aka "Coo Nut"

PLEASE SEE INDICTMENT Petty
 Minor
 Misdemeanor
 Felony

Address {
Birth Date { Male Alien
 Female (if applicable)

Place of offense: Fresno
U.S.C. Citation: Please see Indictment

(Optional unless a juvenile)

PROCEEDING

DEFENDANT

Name of Complainant Agency, or Person (& Title, if any)
SA Volk-FBI
 person is awaiting trial in another Federal or State Court, give name of court
 this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District
 this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 U.S. Att'y Defense } SHOW DOCKET NO.
 this prosecution relates to a pending case involving this same defendant }
 prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under
MAGISTRATE JUDGE CASE NO. 1:16-mj-044 BAM

IS NOT IN CUSTODY
1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY
4) On this charge
5) On another conviction
6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution
Fresno County Jail

Has detainer been filed? Yes No } If "Yes," give date filed
Mo. Day Year

DATE OF ARREST
Or ... if Arresting Agency & Warrant were not Federal
Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM
Maria G. Robles

Name of Asst. U.S. Att'y (if assigned)
KIMBERLY A. SANCHEZ
 FORFEITURE ALLEGATION

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS
Defendant in custody; next court date May 6, 2016

KAS
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Kenneth Johnson

COUNT ONE

VIOLATION: 18 U.S.C. § 1959(a)(5) - Conspiracy To Commit
Murder in Aid of Racketeering

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNT TWENTY-THREE

VIOLATION: 18 U.S.C. § 1029(a)(5) and (b)(2) - Conspiracy
to Commit Access Device Fraud

PENALTY: 7.5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

DEFENDANT -- U.S. vs.
KIANDRE JOHNSON, aka Key DA P"

Address {

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

Name and Office of Person Furnishing Information on

THIS FORM

Maria G. Robles

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State

If answer to (6) is "Yes," show name of institution

Fresno County Jail

Has detainer been filed?

- Yes
- No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KAS
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Kiandre Johnson

COUNT ONE

VIOLATION: 18 U.S.C. § 1959(a)(5) - Conspiracy To Commit
Murder in Aid of Racketeering

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNT EIGHTEEN

VIOLATION: 18 U.S.C. § 1952(a) - use of a facility of
Interstate commerce to promote prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

DEFENDANT -- U.S. vs.
ANTHONY WINDFIELD, aka "Freaky Ant"

Address {

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

- person is awaiting trial in another Federal or State Court, give name of court
- this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District
- this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 - U.S. Att'y
 - Defense
- this prosecution relates to a pending case involving this same defendant
- prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution
Fresno County Jail

Has detainer been filed?

- Yes
- No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

- U.S. Att'y
- Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

ICASz
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Anthony Windfield

COUNT ONE

VIOLATION: 18 U.S.C. § 1959(a)(5) - Conspiracy To Commit
Murder in Aid of Racketeering

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNT TWENTY-THREE

VIOLATION: 18 U.S.C. § 1029(a)(5) and (b)(2) - Conspiracy
to Commit Access Device Fraud

PENALTY: 7.5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

DEFENDANT -- U.S. vs.
WILLIAM LEE, aka "Chill Will" "CW"

Address {

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

- person is awaiting trial in another Federal or State Court, give name of court
- this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District
- this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 - U.S. Att'y Defense
- this prosecution relates to a pending case involving this same defendant
- prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

Name and Office of Person Furnishing Information on

THIS FORM

Maria G. Robles

- U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution

Fresno County Jail

Has detainer been filed?

- Yes
- No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KAS
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: William Lee

COUNT ONE

VIOLATION: 18 U.S.C. § 1959(a)(5) - Conspiracy To Commit
Murder in Aid of Racketeering

PENALTY: 10 years imprisonment
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

DEFENDANT -- U.S. vs.
MARKEITH CANADY, aka "Gooby"

Address {

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

- person is awaiting trial in another Federal or State Court, give name of court
- this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District
- this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 - U.S. Att'y Defense
- this prosecution relates to a pending case involving this same defendant
- prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution
Fresno County Jail

Has detainer been filed?

- Yes
- No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

- U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KASz
AUSA INITIALS

1:16-MJ-00044

PENALTY SLIP

DEFENDANT: Markeith Canady

COUNT ELEVEN

VIOLATION: 18 U.S.C. § 2421 - transport in interstate
commerce for prostitution

PENALTY: 10 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNT NINETEEN

VIOLATION: 18 U.S.C. § 1952(a) - use of a facility of
Interstate commerce to promote prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

OFFENSE CHARGED
Please see Indictment

PLEASE SEE INDICTMENT Petty
 Minor
 Misdemeanor
 Felony

DEFENDANT -- U.S. vs.
KEVIN PACKARD, aka "Kay Pee" "KP"

Place of offense: Fresno
U.S.C. Citation: Please see Indictment

Address: {
Birth Date: { Male Alien
 Female (if applicable)
(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)
SA Volk-FBI
 person is awaiting trial in another Federal or State Court, give name of court
 this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District
 this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 U.S. Att'y Defense } SHOW DOCKET NO.
 this prosecution relates to a pending case involving this same defendant }
 prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under
MAGISTRATE JUDGE CASE NO. 1:16-mj-044 BAM

DEFENDANT

IS NOT IN CUSTODY
1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges {
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY
4) On this charge
5) On another conviction
6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution
Fresno County Jail

Has detainer been filed? Yes No
If "Yes," give date filed
Mo. Day Year

DATE OF ARREST {
Or ... if Arresting Agency & Warrant were not Federal
Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY {

Name and Office of Person Furnishing Information on THIS FORM
Maria G. Robles
 U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)
KIMBERLY A. SANCHEZ
 FORFEITURE ALLEGATION

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KASz
AUSA INITIALS

1:16-MJ-00044
PENALTY SLIP

DEFENDANT: Kevin Packard

COUNT TWELVE

VIOLATION: 18 U.S.C. § 1952(a) - use of a facility of
Interstate commerce to promote prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNT TWENTY

VIOLATION: 18 U.S.C. § 1952(a) - use of a facility of
Interstate commerce to promote prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

DEFENDANT -- U.S. vs.
AQUILLA BAILEY III, aka "Lil Quill"

Address {

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District

this is a re prosecution of charges previously dismissed which were dismissed on motion of:

U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

Name and Office of Person Furnishing Information on

THIS FORM

Maria G. Robles

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution

Fresno County Jail

Has detainer been filed? Yes No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KAS₂
AUSA INITIALS

1:16-MJ-044 SAB
PENALTY SLIP

DEFENDANT: Aquilla Bailey, III

COUNT NINE

VIOLATION: 18 U.S.C. § 1591(a)1) - Sex Trafficking of a
Minor

PENALTY: 15 years imprisonment minimum
life imprisonment maximum
\$250,000 fine
5 years supervised release
\$100 special assessment

COUNT TWENTY-ONE

VIOLATION: 18 U.S.C. § 1952(a) - use of a facility of
Interstate commerce to promote prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

OFFENSE CHARGED
Please see Indictment

DEFENDANT -- U.S. vs.
STEVEN BLACKMON, aka Pook Da Most "Moses"

PLEASE SEE INDICTMENT Petty
 Minor
 Misdemeanor
 Felony

Address {
Birth Date { Male Alien
 Female (if applicable)
(Optional unless a juvenile)

Place of offense: Fresno U.S.C. Citation: Please see Indictment

PROCEEDING

DEFENDANT

Name of Complainant Agency, or Person (& Title, if any)
SA Volk-FBI
 person is awaiting trial in another Federal or State Court, give name of court
 this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District
 this is a re prosecution of charges previously dismissed which were dismissed on motion of: U.S. Att'y Defense } SHOW DOCKET NO.
 this prosecution relates to a pending case involving this same defendant }
 prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under
MAGISTRATE JUDGE CASE NO. 1:16-mj-044 BAM

IS NOT IN CUSTODY
1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
2) Is a Fugitive
3) Is on Bail or Release from (show District)

IS IN CUSTODY
4) On this charge
5) On another conviction
6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution
Fresno County Jail

Has detainer been filed? Yes No } If "Yes," give date filed
Mo. Day Year

DATE OF ARREST
Or ... if Arresting Agency & Warrant were not Federal
Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY
Mo. Day Year

Name and Office of Person Furnishing Information on THIS FORM
Maria G. Robles

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)
KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KASz
AUSA INITIALS

1:16-MJ-044 SAB
PENALTY SLIP

DEFENDANT: Steven Blackmon

COUNT TWENTY-FOUR

VIOLATION: 18 U.S.C. § 922(g)1) - Felon in Possession of
A Firearm

PENALTY: 10 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

COUNT TWENTY-FIVE

VIOLATION: 21 U.S.C. § 841(a)(1) - Distribution and
Possession With Intent to Distribute Marijuana

PENALTY: 5 years imprisonment maximum
\$250,000 fine
2 years supervised release minimum
Life supervised release maximum
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

DEFENDANT -- U.S. vs.
NATASHA PARKS, aka "Stasha"

Address {

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

- person is awaiting trial in another Federal or State Court, give name of court
- this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District
- this is a re prosecution of charges previously dismissed which were dismissed on motion of:
 - U.S. Att'y
 - Defense
- this prosecution relates to a pending case involving this same defendant
- prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

Name and Office of Person Furnishing Information on

THIS FORM

Maria G. Robles

- U.S. Att'y
- Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
If not detained, give date any prior summons was served on above charges
- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution

Fresno County Jail

Has detainer been filed?

- Yes
- No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KAS₂
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Nastasha Parks

COUNT TWENTY-THREE

VIOLATION: 18 U.S.C. § 1029(a)(5) and (b)(2) - Conspiracy
to Commit Access Device Fraud

PENALTY: 7.5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

DEFENDANT -- U.S. vs.
LUTHER NEWSOME

Address {

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

- person is awaiting trial in another Federal or State Court, give name of court
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 - U.S. Att'y Defense
- this prosecution relates to a pending case involving this same defendant
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SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

Name and Office of Person
Furnishing Information on

THIS FORM

Maria G. Robles

- U.S. Att'y Other U.S. Agency

Name of Asst. U.S.
Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

DEFENDANT

IS NOT IN CUSTODY

- 1) Has not been arrested, pending outcome of this proceeding
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- 2) Is a Fugitive
- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution

Fresno County Jail

Has detainer been filed?

- Yes
- No

If "Yes," give date filed

Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

ICAS₂
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Luther Newsome - charged with two counts

COUNT TWENTY-THREE

VIOLATION: 18 U.S.C. § 1029(a)(5) and (b)(2) - Conspiracy
to Commit Access Device Fraud

PENALTY: 7.5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)
 EDCA

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
 Fresno

U.S.C. Citation
 Please see Indictment

DEFENDANT -- U.S. vs.
SHARIKA GAINES

Address {

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

person is awaiting trial in another Federal or State Court, give name of court

this person/proceeding is transferred from another district per FRCrP 20 21 40. Show District

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U.S. Att'y Defense

this prosecution relates to a pending case involving this same defendant

SHOW DOCKET NO.

prior proceedings or appearance(s) before U.S. Magistrate Judge regarding this defendant were recorded under

MAGISTRATE JUDGE CASE NO.
 1:16-mj-044 BAM

DEFENDANT

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IS IN CUSTODY

- 4) On this charge
- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State
 If answer to (6) is "Yes," show name of institution

Fresno County Jail

Has detainer been filed?

Yes No } If "Yes," give date filed
 Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

Mo. Day Year

DATE TRANSFERRED TO U.S. CUSTODY

This report amends AO 257 previously submitted

Name and Office of Person Furnishing Information on

THIS FORM

Maria G. Robles

U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KASz
AUSA INITIALS

1:16-MJ-044 SAB
PENALTY SLIP

DEFENDANT: Sharika Gaines

COUNT TWENTY-TWO

VIOLATION: 18 U.S.C. § 1952(a) - use of a facility of
Interstate commerce to promote prostitution

PENALTY: 5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION -- IN U.S. DISTRICT COURT

BY COMPLAINT INFORMATION INDICTMENT
 SUPERSEDING: Case No.

Name of District Court, and/or Judge/Magistrate Judge Location (City)
EDCA

OFFENSE CHARGED

Please see Indictment

PLEASE SEE INDICTMENT

- Petty
- Minor
- Misdemeanor
- Felony

Place of offense
Fresno

U.S.C. Citation
Please see Indictment

DEFENDANT -- U.S. vs.
MARVIN LARRY

Address {

Birth Date

- Male Alien
- Female (if applicable)

(Optional unless a juvenile)

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

SA Volk-FBI

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- this prosecution relates to a pending case involving this same defendant
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SHOW DOCKET NO.

MAGISTRATE JUDGE CASE NO.
1:16-mj-044 BAM

DEFENDANT

IS NOT IN CUSTODY

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- 3) Is on Bail or Release from (show District)

IS IN CUSTODY

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- 5) On another conviction
- 6) Awaiting trial on other charges } Fed'l State
If answer to (6) is "Yes," show name of institution
Fresno County Jail

Has detainer been filed? Yes No
If "Yes," give date filed
Mo. Day Year

DATE OF ARREST

Or ... if Arresting Agency & Warrant were not Federal

DATE TRANSFERRED TO U.S. CUSTODY

Name and Office of Person Furnishing Information on THIS FORM

Maria G. Robles

- U.S. Att'y Other U.S. Agency

Name of Asst. U.S. Att'y (if assigned)

KIMBERLY A. SANCHEZ

FORFEITURE ALLEGATION

This report amends AO 257 previously submitted

ADDITIONAL INFORMATION OR COMMENTS

Defendant in custody; next court date May 6, 2016

KAS₂
AUSA INITIALS

1:16-MJ-044 SAB

PENALTY SLIP

DEFENDANT: Marvin Larry

COUNT TWENTY-THREE

VIOLATION: 18 U.S.C. § 1029(a)(5) and (b)(2) - Conspiracy
to Commit Access Device Fraud

PENALTY: 7.5 years imprisonment maximum
\$250,000 fine
3 years supervised release
\$100 special assessment