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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRIMINAL NO. 2:16-CR-20460

HON. MARK A. GOLDSMITH

D-1 EDWIN MILLS,
a/k/a "Ed Boy"
D-2 CARLO WILSON,
a/k/a "Los"
D-3 DONELL THOMPSON,
a/k/a "Dnell"
D-4 LOMNIL JACKSON,
a/k/a "Lomo"
D-5 PATRICK JOHNSON,
a/k/a "Cane"
D-6 DEVONTAE RUSSELL,
a/k/a "Tae Tae"
D-7 MARIO JACKSON,
a/k/a "Ugg"
D-8 COREY MILLS,
D-9 ROBERT BAYTOPS,
a/k/a "R.B."
D-10 MICHAEL RICHARDSON,
a/k/a "Mikey Made"
D-11 PHILLIP PEAKS,
a/k/a "Peezy"

Defendants.

18 U.S.C. § 1962(d)
18 U.S.C. § 1959(a)(1)
18 U.S.C. § 1959(a)(3)
18 U.S.C. § 924(j)
18 U.S.C. § 924(c)
18 U.S.C. § 2
18 U.S.C. § 922(g)
21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(d)
18 U.S.C. § 1963
21 U.S.C. § 853
28 U.S.C. § 2461

FILED
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SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(18 U.S.C. § 1962(d) – *Racketeering Conspiracy*)

D-1 EDWIN MILLS
D-2 CARLO WILSON
D-3 DONELL THOMPSON
D-4 LOMNIL JACKSON
D-5 PATRICK JOHNSON
D-6 DEVONTAE RUSSELL
D-7 MARIO JACKSON
D-8 COREY MILLS
D-9 ROBERT BAYTOPS
D-10 MICHAEL RICHARDSON
D-11 PHILLIP PEAKS

The Enterprise

1. "6 Mile Chedda Grove," commonly referred to as "6 Mile" (hereinafter "6 Mile"), is a street gang that operates primarily on the east side of Detroit, in the Eastern District of Michigan, within the area bordered roughly by East McNichols Road to the north, Kelly Road to the east, Houston-Whittier Street to the south, and Chalmers Street to the west. 6 Mile members and associates claim this area as their territory and mark it with the gang's graffiti. One of the main streets in that territory where 6 Mile conducts illegal narcotics distribution is Cedargrove Street, from which 6 Mile members and associates derive the words "Chedda Grove" as part of the gang's name. 6 Mile members and associates also use the term "chedda" to refer to the lucrative monetary profits they generate

through illegal narcotics distribution in that area. 6 Mile members and associates would congregate at particular locations such as members' houses, vacant houses, and the Hayes Troester Super Market.

2. 6 Mile members and associates gain position, status, and respect within the gang, and become leaders within the gang, by being loyal to the gang and fellow members and associates, and engaging in criminal activities such as murders, attempted murders, robberies, attempted robberies, and the distribution of illegal narcotics, which was sometimes referred to generally as "putting in work." 6 Mile members and associates will conduct criminal activities with non-members of the gang who are "cool" with 6 Mile.

3. 6 Mile consists of both female and male members and associates, and some of the 6 Mile members and associates are known as "OCB," which means "Original Chedda Boy." The relationships between 6 Mile members and associates vary with some being siblings or cousins, some who became friends with each other during their childhood upbringing and living in certain neighborhoods, or some who attended school together, including at Detroit's Denby High School. To join 6 Mile, members are "jumped in," an initiation process where current members of the gang physically fight and strike the new member.

4. When 6 Mile members and associates signify their affiliation with the gang, it is often referred to as "claiming" or "repping" 6 Mile. 6 Mile members or associates "claim" or "rep" in various ways including, but not limited to: tattoos including dice, bricks (a reference to sizeable quantities of heroin), the acronym "B.R.O.S." (an acronym for "Better Respect or Suffer"), and the street signs of the intersection of Cedargrove Street and Hayes Street; distinctive hand signs including forming the numeral "6" or the letter "E" (a reference to the gang's territory on the east side of Detroit), and holding and pointing imaginary handguns (a reference to the gang's willingness to use firearms and be "shooters"); and clothing such as t-shirts and hats that display phrases including "6 Mile" and "Chedda Grove" or seeking the release from prison of other 6 Mile members. 6 Mile members and associates also express respect or homage to deceased 6 Mile members and associates in their graffiti, social media postings, and clothing.

5. 6 Mile members and associates utilize internet social networking and media websites including Facebook, YouTube, and Instagram in the following ways: operating accounts with user names that begin with "SixMile" or "Chedda Grove"; posting "#OCB," "#bros," "#boyz," and "#cheddaGroveboyz"; and sharing photographs and videos of each other, including rap videos. 6 Mile members and associates often brandish firearms in photographs and videos to

intimidate rivals and the community, and showcase the gang's power and willingness to discharge firearms.

6. 6 Mile earns money predominantly through the sale and distribution of controlled substances including, but not limited to: cocaine base or "crack cocaine" which they often refer to as "girl"; heroin which they often refer to as "boy" or "dogfood"; oxycodone and morphine pills which they often refer to as "beans"; marijuana which they often refer to as "reggos" and "kush" depending on its quality; and codeine promethazine combined with soda in a liquid they often refer to as "lean." 6 Mile members and associates sell and distribute controlled substances in Michigan, and other states including Ohio, Kentucky, Tennessee, Alabama, and West Virginia. When a 6 Mile member or associate establishes a successful narcotics distribution territory outside of Michigan, that territory is known as a "lane" for which that person is now chiefly responsible.

7. 6 Mile clashes with rival gangs including the Seven Mile Bloods, commonly known on Detroit's east side as "SMB," and the Knock Out Boys. 6 Mile has formed alliances at various times with other street gangs including, "Hustle Boys," "Chedda Ave," and "Gutta Hogg." Since July 2014, these rival gangs have been in an active gang war on Detroit's east side and have been violently attacking one another having posted respective "hit lists" on social media.

8. At all times relevant to this Second Superseding Indictment, in the Eastern District of Michigan and elsewhere, 6 Mile, including its leadership, members, and associates, constituted an enterprise, as defined in Title 18, United States Code, Section 1961(4), 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 functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. At various times relevant to this Second Superseding Indictment, EDWIN MILLS, CARLO WILSON, DONELL THOMPSON, LOMNIL JACKSON, PATRICK JOHNSON, DEVONTAE RUSSELL, MARIO JACKSON, COREY MILLS, ROBERT BAYTOPS, MICHAEL RICHARDSON, and PHILLIP PEAKS, and others known and unknown to the grand jury, were members and associates of 6 Mile.

Purposes of the Enterprise

9. The purposes of the 6 Mile enterprise include the following:

a. Preserving and protecting the power, territory, reputation, and profits of the enterprise through murder, robberies, intimidation, violence, and threats of violence;

b. Promoting, supporting, and enhancing the enterprise and its members' and associates' activities, including but not limited to murder, robberies, and narcotics distribution;

c. Enriching the enterprise's members and associates through criminal activities, including but not limited to murder, robberies, and narcotics distribution;

d. Sharing and disseminating information about the enterprise's plans and activities;

e. Keeping victims, potential witnesses, and community members in fear of the enterprise's members and associates, through violence, and threats of violence; and

f. Providing assistance to the enterprise's members and associates who committed crimes for, with, and on behalf of the gang, in order to hinder, obstruct, and prevent law enforcement authorities from identifying, apprehending, and successfully prosecuting and punishing the offenders.

Manner and Means

10. The manner and means by which 6 Mile members and associates conducted and participated in the conduct of the affairs of the enterprise included, but were not limited to, the following:

a. 6 Mile members and associates committed, conspired, attempted, and threatened to commit acts of violence including acts involving murder and assaults with dangerous weapons to protect and expand the enterprise's criminal activities;

b. 6 Mile members and associates met to discuss the gang's criminal activities, including but not limited to violence to retaliate against rivals and others who disrespected the gang and narcotics distribution;

c. 6 Mile members and associates communicated with each other in person and by cell phone to plan, discuss, and coordinate criminal activities, and to receive direction, support, and encouragement for carrying out criminal activities; and

d. 6 Mile members and associates distributed and shared firearms and other items to be used for committing crimes for the gang.

The Racketeering Conspiracy

11. Beginning on a date unknown, but starting no later than 2008, and continuing to November 30, 2016, in the Eastern District of Michigan and elsewhere,

EDWIN MILLS
CARLO WILSON
DONELL THOMPSON

LOMNIL JACKSON
PATRICK JOHNSON
DEVONTAE RUSSELL
MARIO JACKSON
COREY MILLS
ROBERT BAYTOPS
MICHAEL RICHARDSON
PHILLIP PEAKS

and others persons not named in this Second Superseding Indictment, known and unknown to the grand jury, being persons employed by and associated with 6 Mile, an enterprise, which engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with one another to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, as defined in Title 18, United States Code, Section 1961(1) and (5), which consisted of multiple:

a. Threats and acts involving murder, in violation of Michigan Compiled Laws, Sections 750.316(1), 750.83, 750.92, 750.157a, and 767.39;

b. Threats and acts involving robbery, in violation of Michigan Compiled Laws, Sections 750.529, 750.529a, 750.530, 750.92, 750.157a, and 767.39;

c. Offenses involving dealing in controlled substances under Title 21, United States Code, Sections 841 and 846; and

d. Acts indictable under Title 18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion).

12. It was further a part of the conspiracy that defendants, EDWIN MILLS, CARLO WILSON, DONELL THOMPSON, LOMNIL JACKSON, PATRICK JOHNSON, DEVONTAE RUSSELL, MARIO JACKSON, COREY MILLS, ROBERT BAYTOPS, MICHAEL RICHARDSON, and PHILLIP PEAKS, and others known and unknown to the grand jury, agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the enterprise's affairs.

Overt Acts

In furtherance of the conspiracy and to achieve the object and purposes of the conspiracy, the defendants and others known and unknown to the grand jury committed various overt acts, including but not limited to the following:

(1) On or about May 17, 2008, CARLO WILSON registered a Facebook account using the first name of "SixMile," last name of "Los," vanity name of "sixmile.los," and the email addresses of "carlowilson67@yahoo.com" and "sixmile.los@facebook.com."

(2) On or about October 12, 2008, 6 Mile member A registered a Facebook account using the first name of "Sixmile," last name of "Freebooda," vanity name of "vonskeeno1," the email address of "yung_chedda087@yahoo.com," and the street address of "6mile48205."

(3) On or about April 25, 2009, LOMNIL JACKSON and 6 Mile member B were together in a car in which a loaded firearm was found in Detroit, Michigan.

(4) On or about December 14, 2009, 6 Mile member C registered a Facebook account using the first name of "Sixmilepoopie," last name of "Rip Tae," and the email address of "beenoneofthemboys@yahoo.com."

(5) On or about December 16, 2009, DONELL THOMPSON, while accompanied by 6 Mile member D, distributed heroin in Warren, Michigan.

(6) On or about December 22, 2009, DONELL THOMPSON arranged a heroin transaction in Warren, Michigan, which was completed by 6 Mile members D and E.

(7) On or about December 30, 2009, DONELL THOMPSON distributed heroin in Detroit, Michigan.

(8) On or about January 6, 2010, DONELL THOMPSON arranged a heroin transaction in Warren, Michigan, which was completed by PHILLIP PEAKS and 6 Mile member E.

(9) On or about January 7, 2010, EDWIN MILLS and 6 Mile member D were together in a car, which was used on prior occasions to conduct heroin transactions, in Detroit, Michigan.

(10) On or about August 21, 2010, MICHAEL RICHARDSON possessed marijuana in Detroit, Michigan.

(11) On or about December 18, 2010, EDWIN MILLS possessed heroin in Detroit, Michigan.

(12) On or about December 31, 2011, MARIO JACKSON and 6 Mile member C were together in a car in which two firearms, ammunition, and ammunition magazines were found in Detroit, Michigan.

(13) On or about January 9, 2012, MICHAEL RICHARDSON was present inside of a residence in which heroin and cocaine were found in Detroit, Michigan.

(14) On or about January 9, 2012, MICHAEL RICHARDSON possessed marijuana in Detroit, Michigan.

(15) On or about January 6, 2013, LOMNIL JACKSON and 6 Mile member C argued with a group of unknown females in Detroit, Michigan.

(16) On or about January 6, 2013, LOMNIL JACKSON possessed a loaded firearm in Detroit, Michigan.

(17) On or about March 7, 2013, LOMNIL JACKSON and 6 Mile member C were together in a car in which marijuana was found in Warren, Michigan.

(18) On or about May 4, 2013, PATRICK JOHNSON and MARIO JACKSON were together in a car in which marijuana was found in Troy, Michigan.

(19) On or about May 9, 2013, MARIO JACKSON possessed cocaine and a firearm in Detroit, Michigan.

(20) On or about July 16, 2013, DONELL THOMPSON and 6 Mile members D and E were together in a car in which three loaded firearms and marijuana were found in Detroit, Michigan.

(21) On or about November 7, 2013, EDWIN MILLS, MARIO JACKSON, COREY MILLS, and 6 Mile member F were present on the premises of a residence in which three firearms, an ammunition magazine, and marijuana were found in Detroit, Michigan.

(22) On or about February 23, 2014, ROBERT BAYTOPS committed an armed robbery in Detroit, Michigan.

(23) On or about March 21, 2014, COREY MILLS possessed marijuana in Detroit, Michigan.

(24) On or about June 13, 2014, COREY MILLS possessed marijuana in Detroit, Michigan.

(25) On or about June 29, 2014, CARLO WILSON uploaded to Facebook a photograph of CARLO WILSON and 6 Mile member C, with a title that stated, "#6mile #CheddaGrove coming 2 da hood near you and we keep dat wood."

(26) On or about July 9, 2014, PHILLIP PEAKS and 6 Mile member D were together in a car in Harper Woods, Michigan.

(27) On or about July 31, 2014, COREY MILLS distributed marijuana in Detroit, Michigan.

(28) On or about August 17, 2014, CARLO WILSON uploaded to Facebook a photograph of LOMNIL JACKSON and PATRICK JOHNSON, with a graphic that stated, ".B.R.O.S.FOR.LIFE.," and with a title that stated, "BROS FOR LIFE !!!! #CheddaGroveBoys."

(29) On or about September 11, 2014, DEVONTAE RUSSELL and MARIO JACKSON were together in a car in which oxycodone and morphine were found in Tennessee.

(30) On or about September 23, 2014, DEVONTAE RUSSELL was in a car in which oxycodone and morphine were found in Ohio.

(31) On or about December 16, 2014, CARLO WILSON, PATRICK JOHNSON, MARIO JACKSON, and 6 Mile member G confronted an unknown person, and during the confrontation PATRICK JOHNSON and MARIO JACKSON brandished firearms in Harper Woods, Michigan.

(32) On or about December 16, 2014, CARLO WILSON, PATRICK JOHNSON, MARIO JACKSON, and 6 Mile member G were together in a car in which two loaded firearms and marijuana were found in Harper Woods, Michigan.

(33) On or about January 4, 2015, CARLO WILSON wrote a status update on Facebook that stated, "Dez fuck niggas just got my nigga RONNELL man I'm mad asf."

(34) On or about January 5, 2015, 6 Mile member A uploaded to Facebook a photograph of LOMNIL JACKSON and 6 Mile member C displaying 6 Mile hand signs, with a title that stated, "Told Yall my brother out welcome home my baby."

(35) On or about February 7, 2015, DONELL THOMPSON and other 6 Mile members shot and killed E.H. in Detroit, Michigan.

(36) On or about March 16, 2015, CARLO WILSON uploaded to Facebook a photograph of EDWIN MILLS, CARLO WILSON, DONELL THOMPSON, and MICHAEL RICHARDSON displaying 6 Mile hand signs, with a title that stated, "In dem trenches daily."

(37) On or about March 17, 2015, DONELL THOMPSON and MICHAEL RICHARDSON were together in a car in Detroit, Michigan.

(38) On or about March 30, 2015, PHILLIP PEAKS published on YouTube a rap video titled, "Young Nigga World," that depicted EDWIN MILLS, CARLO WILSON, DONELL THOMPSON, LOMNIL JACKSON, and PHILLIP PEAKS, and included oral statements by PHILLIP PEAKS about narcotics possession and retaliation.

(39) On or about March 31, 2015, CARLO WILSON uploaded to Facebook a photograph of PHILLIP PEAKS, with a title that stated, "Young nigga video on YouTube go look in see #DemBoyz."

(40) On or about June 8, 2015, LOMNIL JACKSON was present inside of a residence in which two firearms, cocaine, and oxycodone were found in Huntington, West Virginia.

(41) On or about June 8, 2015, LOMNIL JACKSON possessed marijuana in Huntington, West Virginia.

(42) On or about June 29, 2015, CARLO WILSON uploaded to Facebook a photograph of CARLO WILSON, LOMNIL JACKSON, and PHILLIP PEAKS displaying 6 Mile hand signs.

(43) On or about July 17, 2015, CARLO WILSON uploaded to Facebook a photograph of CARLO WILSON and other 6 Mile members, with a title that stated, "Riding threw da trenches wit da same niggas dat would smoke yo hoe ass . . . #WeDemBoyz #6mile #RIP #YOUNGTWIN."

(44) On or about July 20, 2015, PATRICK JOHNSON possessed oxycodone in Alabama.

(45) On or about August 20, 2015, LOMNIL JACKSON, aided by DONELL THOMPSON, shot and killed S.B. and shot and injured E.C. in Detroit, Michigan.

(46) On or about August 20, 2015, DONELL THOMPSON, LOMNIL JACKSON, and MARIO JACKSON were together in a car in Harper Woods, Michigan.

(47) On or about September 10, 2015, DONELL THOMPSON was in a car in which a loaded firearm and an ammunition magazine were found in Shelby Township, Michigan.

(48) On or about September 12, 2015, 6 Mile member A uploaded to Facebook a photograph of PATRICK JOHNSON and DEVONTAE RUSSELL displaying 6 Mile hand signs, with a title that stated, "Everytime I look at this picture I be like Damn I wish my #BROS was here Free #TAE #CANE #CHUCK."

(49) On or about September 17, 2015, 6 Mile member A uploaded to Facebook a photograph of CARLO WILSON, DONELL THOMPSON, LOMNIL JACKSON, COREY MILLS, and 6 Mile member C displaying 6 Mile hand signs, with a title that stated "#boyz."

(50) On or about October 26, 2015, a rap video was published on YouTube titled, "B4 RAP," that depicted EDWIN MILLS, CARLO WILSON, LOMNIL JACKSON, COREY MILLS, ROBERT BAYTOPS, MICHAEL RICHARDSON, PHILLIP PEAKS, and 6 Mile member C, and included oral statements by PHILLIP PEAKS about crimes of violence and narcotics possession.

(51) On or about December 1, 2015, EDWIN MILLS and CARLO WILSON shot and killed A.T. and S.H. in Detroit, Michigan.

(52) On or about January 6, 2016, LOMNIL JACKSON and 6 Mile associate H were together in a car from which a firearm was thrown in Huntington, West Virginia.

(53) On or about January 28, 2016, COREY MILLS possessed marijuana and a loaded firearm in Detroit, Michigan.

(54) On or about January 28, 2016, PHILLIP PEAKS possessed marijuana, ecstasy, and codeine in Warren, Michigan.

(55) On or about January 29, 2016, ROBERT BAYTOPS was present inside of a residence in which two firearms were found in Detroit, Michigan.

(56) On or about March 3, 2016, PHILLIP PEAKS was in a car in which codeine was found in Ohio.

(57) On or about March 3, 2016, PHILLIP PEAKS possessed marijuana in Ohio.

(58) On or about May 22, 2016, CARLO WILSON wrote a status update on Facebook that stated, "One thing abt is eastside niggas we anit got no time to be fighting alday we to worried abt our cheese but wen we do catch a nigga it's on sight u better be ready."

(59) On or about October 26, 2016, ROBERT BAYTOPS and MICHAEL RICHARDSON were present inside of a residence in which three firearms, ammunition, ammunition magazines, heroin, cocaine, and marijuana were found in Detroit, Michigan.

Notice of Acts with Enhanced Sentencing

1. On or about February 7, 2015, in the Eastern District of Michigan, Southern Division, enterprise member DONELL THOMPSON, and others known and unknown to the grand jury, aided and abetted by others known and unknown to the grand jury, did commit an act involving murder, that is, murdering E.H., perpetrated by means of lying in wait, and any other willful, deliberate, and premeditated killing, all in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

2. On or about August 20, 2015, in the Eastern District of Michigan, Southern Division, enterprise members DONELL THOMPSON and LOMNIL JACKSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did commit an act involving murder, that is, murdering S.B., perpetrated by means of lying in wait, and any other willful, deliberate, and premeditated killing, all in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

3. On or about August 20, 2015, in the Eastern District of Michigan, Southern Division, enterprise members DONELL THOMPSON and LOMNIL JACKSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did commit an act involving murder, that is, assaulting E.C. with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

4. On or about December 1, 2015, in the Eastern District of Michigan, Southern Division, enterprise members EDWIN MILLS and CARLO WILSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did commit an act involving murder, that is, murdering A.T., perpetrated by means of lying in wait, and any other willful, deliberate, and premeditated killing, in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

5. On or about December 1, 2015, in the Eastern District of Michigan, Southern Division, enterprise members EDWIN MILLS and CARLO WILSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did commit an act involving murder, that is, murdering S.H., perpetrated by means of lying in wait, and any

other willful, deliberate, and premeditated killing, in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

6. On or about December 1, 2015, in the Eastern District of Michigan, Southern Division, enterprise members EDWIN MILLS and CARLO WILSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did commit an act involving murder, that is, assaulting M.A. and T.M. with intent to commit murder, all in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

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

COUNT TWO

(18 U.S.C. §§ 1959(a)(1); 2 – *Murder in Aid of Racketeering*)

D-3 DONELL THOMPSON

1. At all times relevant to this Second Superseding Indictment, there existed an enterprise, 6 Mile, as more fully described in Paragraphs One through Ten of Count One of this Second Superseding Indictment, which are re-alleged herein and incorporated by reference as if fully stated in this Count. 6 Mile, including its leadership, members, and associates, 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 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 Second Superseding Indictment, the 6 Mile 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), which consisted of: acts involving murder and robbery in violation of Michigan State Law; offenses involving dealing in controlled substances under Title 21, United States Code, Sections 841 and 846; and acts indictable under Title

18, United States Code, Section 1951 (relating to interference with commerce, robbery, or extortion).

3. On or about February 7, 2015, in the Eastern District of Michigan, Southern Division, defendant DONELL THOMPSON, and others known and unknown to the grand jury, aided and abetted by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in 6 Mile, an enterprise engaged in racketeering activity, did murder E.H., in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

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

COUNT THREE

(18 U.S.C. §§ 924(c); 924(j); 2 – *Using and Carrying a Firearm During and in Relation to a Crime of Violence Causing Death)*

D-3 DONELL THOMPSON

On or about February 7, 2015, in the Eastern District of Michigan, Southern Division, defendant DONELL THOMPSON, and others known and unknown to the grand jury, aided and abetted by others known and unknown to the grand jury, did knowingly, intentionally, and unlawfully use and carry a firearm, and through the use of a firearm caused the death of a person, to wit: the murder of E.H., and the killing constituted murder, as defined in Title 18, United States Code, Section 1111 in that the killing was committed with premeditation and malice

aforethought, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Murder in Aid of Racketeering as alleged in Count Two of this Second Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c); 924(j); and 2.

COUNT FOUR

(18 U.S.C. §§ 1959(a)(1); 2 – *Murder in Aid of Racketeering*)

D-4 LOMNIL JACKSON

1. Paragraphs One through Two of Count Two of this Second Superseding Indictment are re-alleged herein as if fully stated in this Count.

2. On or about August 20, 2015, in the Eastern District of Michigan, Southern Division, defendant LOMNIL JACKSON, and others known and unknown to the grand jury, aided and abetted by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in 6 Mile, an enterprise engaged in racketeering activity, did murder S.B., in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

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

COUNT FIVE

(18 U.S.C. §§ 924(c); 924(j); 2 – *Using and Carrying a Firearm During and in Relation to a Crime of Violence Causing Death)*

D-4 LOMNIL JACKSON

On or about August 20, 2015, in the Eastern District of Michigan, Southern Division, defendant LOMNIL JACKSON, and others known and unknown to the grand jury, aided and abetted by others known and unknown to the grand jury, did knowingly, intentionally, and unlawfully use and carry a firearm, and through the use of a firearm caused the death of a person, to wit: the murder of S.B., and the killing constituted murder, as defined in Title 18, United States Code, Section 1111 in that the killing was committed with premeditation and malice aforethought, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Murder in Aid of Racketeering as alleged in Count Four of this Second Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c); 924(j); and 2.

COUNT SIX

(18 U.S.C. §§ 1959(a)(3); 2 – *Assault with a Dangerous Weapon in Aid of Racketeering*)

D-4 LOMNIL JACKSON

1. Paragraphs One through Two of Count Two of this Second Superseding Indictment are re-alleged herein as if fully stated in this Count.

2. On or about August 20, 2015, in the Eastern District of Michigan, Southern Division, defendant LOMNIL JACKSON, and others known and unknown to the grand jury, aided and abetted by others known and unknown to the grand jury, for the purpose of maintaining and increasing position in 6 Mile, an enterprise engaged in racketeering activity, did knowingly and unlawfully assault E.C. with a dangerous weapon, in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

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

COUNT SEVEN

(18 U.S.C. §§ 924(c); 2 – *Using, Carrying, and Discharging a Firearm During and in Relation to a Crime of Violence*)

D-4 LOMNIL JACKSON

On or about August 20, 2015, in the Eastern District of Michigan, Southern Division, defendant LOMNIL JACKSON, and others known and unknown to the

grand jury, aided and abetted by others known and unknown to the grand jury, did knowingly, intentionally, and unlawfully use and carry 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, Assault with a Dangerous Weapon in Aid of Racketeering, as alleged in Count Six of this Second Superseding Indictment, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

COUNT EIGHT

(18 U.S.C. §§ 1959(a)(1); 2 – *Murder in Aid of Racketeering*)

D-1 EDWIN MILLS
D-2 CARLO WILSON

1. Paragraphs One through Two of Count Two of this Second Superseding Indictment are re-alleged herein as if fully stated in this Count.

2. On or about December 1, 2015, in the Eastern District of Michigan, Southern Division, defendants EDWIN MILLS and CARLO WILSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, for the purpose of maintaining and increasing position in 6 Mile, an enterprise engaged in racketeering activity, did murder A.T., in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

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

COUNT NINE

(18 U.S.C. §§ 924(c); 924(j); 2 – *Using and Carrying a Firearm During and in Relation to a Crime of Violence Causing Death)*

D-1 EDWIN MILLS
D-2 CARLO WILSON

On or about December 1, 2015, in the Eastern District of Michigan, Southern Division, defendants EDWIN MILLS and CARLO WILSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did knowingly, intentionally, and unlawfully use and carry a firearm, and through the use of a firearm caused the death of a person, to wit: the murder of A.T., and the killing constituted murder, as defined in Title 18, United States Code, Section 1111 in that the killing was committed with premeditation and malice aforethought, 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 in Aid of Racketeering as alleged in Count Eight of this Second Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c); 924(j); and 2.

COUNT TEN

(18 U.S.C. §§ 1959(a)(1); 2 – *Murder in Aid of Racketeering*)

D-1 EDWIN MILLS
D-2 CARLO WILSON

1. Paragraphs One through Two of Count Two of this Second Superseding Indictment are re-alleged herein as if fully stated in this Count.

2. On or about December 1, 2015, in the Eastern District of Michigan, Southern Division, defendants EDWIN MILLS and CARLO WILSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, for the purpose of maintaining and increasing position in 6 Mile, an enterprise engaged in racketeering activity, did murder S.H., in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

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

COUNT ELEVEN

(18 U.S.C. §§ 924(c); 924(j); 2 – *Using and Carrying a Firearm During and in Relation to a Crime of Violence Causing Death)*

D-1 EDWIN MILLS
D-2 CARLO WILSON

On or about December 1, 2015, in the Eastern District of Michigan, Southern Division, defendants EDWIN MILLS and CARLO WILSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did knowingly, intentionally, and unlawfully use and carry a firearm, and through the use of a firearm caused the death of a person, to wit: the murder of S.H., and the killing constituted murder, as defined in Title 18, United States Code, Section 1111 in that the killing was committed with premeditation and malice aforethought, 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 in Aid of Racketeering as alleged in Count Ten of this Second Superseding Indictment, in violation of Title 18, United States Code, Sections 924(c); 924(j); and 2.

COUNT TWELVE

(18 U.S.C. §§ 1959(a)(3); 2 – *Assault with a Dangerous Weapon in Aid of Racketeering*)

D-1 EDWIN MILLS
D-2 CARLO WILSON

1. Paragraphs One through Two of Count Two of this Second Superseding Indictment are re-alleged herein as if fully stated in this Count.

2. On or about December 1, 2015, in the Eastern District of Michigan, Southern Division, defendants EDWIN MILLS and CARLO WILSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, for the purpose of maintaining and increasing position in 6 Mile, an enterprise engaged in racketeering activity, did knowingly and unlawfully assault M.A. with a dangerous weapon, in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

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

COUNT THIRTEEN

(18 U.S.C. §§ 1959(a)(3); 2 – *Assault with a Dangerous Weapon in Aid of Racketeering*)

D-1 EDWIN MILLS
D-2 CARLO WILSON

1. Paragraphs One through Two of Count Two of this Second Superseding Indictment are re-alleged herein as if fully stated in this Count.

2. On or about December 1, 2015, in the Eastern District of Michigan, Southern Division, defendants EDWIN MILLS and CARLO WILSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, for the purpose of maintaining and increasing position in 6 Mile, an enterprise engaged in racketeering activity, did knowingly and unlawfully assault T.M. with a dangerous weapon, in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

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

COUNT FOURTEEN

(18 U.S.C. §§ 924(c); 2 – *Using, Carrying, and Discharging a Firearm During and in Relation to a Crime of Violence*)

D-1 EDWIN MILLS
D-2 CARLO WILSON

On or about December 1, 2015, in the Eastern District of Michigan, Southern Division, defendants EDWIN MILLS and CARLO WILSON, and others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did knowingly, intentionally, and unlawfully use and carry 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 in Aid of Racketeering, as alleged in Counts Twelve and Thirteen of this Second Superseding Indictment, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

COUNT FIFTEEN

(18 U.S.C. § 922(g)(1) – *Felon in Possession of Firearms*)

D-9 ROBERT BAYTOPS

On or about October 26, 2016, in the Eastern District of Michigan, Southern Division, the defendant, ROBERT BAYTOPS, having previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess firearms, to wit: a Glock, Model 30, .45 caliber pistol, serial number TVX 513; and a Remington 870 shotgun, with an obliterated serial number, said firearms having previously traveled in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIXTEEN

(18 U.S.C. § 922(g)(1) – *Felon in Possession of a Firearm*)

D-10 MICHAEL RICHARDSON

On or about October 26, 2016, in the Eastern District of Michigan, Southern Division, the defendant, MICHAEL RICHARDSON, having previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess a firearm, to wit: a Glock, Model 30, .45 caliber pistol, serial number YWK 825, said firearm having previously

traveled in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVENTEEN

(21 U.S.C. § 841(a)(1) – *Possession With Intent to Distribute Heroin*)

D-10 MICHAEL RICHARDSON

On or about October 26, 2016, in the Eastern District of Michigan, Southern Division, the defendant, MICHAEL RICHARDSON, knowingly and intentionally possessed, with the intent to distribute, a controlled substance; namely, a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTEEN

(18 U.S.C. § 924(c) – *Possession of a Firearm in Furtherance of a Drug Trafficking Crime*)

D-10 MICHAEL RICHARDSON

On or about October 26, 2016, in the Eastern District of Michigan, Southern Division, the defendant, MICHAEL RICHARDSON, did knowingly, intentionally, and unlawfully possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, Possession With Intent to Distribute Heroin, as alleged in Count Seventeen of this Second

Superseding Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

NOTICE OF SPECIAL FINDINGS

(18 U.S.C. §§ 3591; 3592)

D-1 EDWIN MILLS
D-2 CARLO WILSON
D-3 DONELL THOMPSON
D-4 LOMNIL JACKSON

1. The allegations set forth in Counts One through Eighteen of this Second Superseding Indictment are re-alleged and incorporated by reference as if fully stated herein.

2. As to Counts Eight, Nine, Ten, and Eleven, the defendant, EDWIN MILLS:

a. was 18 years of age or older at the time of the offenses (Title 18, United States Code, Section 3591(a));

b. intentionally killed A.T. (Counts Eight and Nine) and S.H. (Counts Ten and Eleven) (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of A.T. (Counts Eight and Nine) and S.H. (Counts Ten and Eleven) (Title 18, United States Code, Section 3591(a)(2)(B));

d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and A.T. (Counts Eight and Nine) and S.H. (Counts Ten and Eleven) died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and A.T. (Counts Eight and Nine) and S.H. (Counts Ten and Eleven) died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. in the commission of the offenses, knowingly created a grave risk of death to 1 or more persons in addition to A.T. (Counts Eight and Nine) and S.H. (Counts Ten and Eleven) (Title 18, United States Code, Section 3592(c)(5));

g. committed the offenses after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9));

h. A.T. (Counts Eight and Nine) was particularly vulnerable due to youth (Title 18, United States Code, Section 3592(c)(11)); and

i. intentionally killed and attempted to kill more than one person in a single criminal episode (Title 18, United States Code, Section 3592(c)(16)).

3. As to Counts Eight, Nine, Ten, and Eleven, the defendant, CARLO WILSON:

a. was 18 years of age or older at the time of the offenses (Title 18, United States Code, Section 3591(a));

b. intentionally killed A.T. (Counts Eight and Nine) and S.H. (Counts Ten and Eleven) (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of A.T. (Counts Eight and Nine) and S.H. (Counts Ten and Eleven) (Title 18, United States Code, Section 3591(a)(2)(B));

d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and A.T. (Counts Eight and Nine) and S.H. (Counts Ten and

Eleven) died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and A.T. (Counts Eight and Nine) and S.H. (Counts Ten and Eleven) died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. in the commission of the offenses, knowingly created a grave risk of death to 1 or more persons in addition to A.T. (Counts Eight and Nine) and S.H. (Counts Ten and Eleven) (Title 18, United States Code, Section 3592(c)(5));

g. committed the offenses after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9));

h. A.T. (Counts Eight and Nine) was particularly vulnerable due to youth (Title 18, United States Code, Section 3592(c)(11)); and

i. intentionally killed and attempted to kill more than one person in a single criminal episode (Title 18, United States Code, Section 3592(c)(16)).

4. As to Counts Two and Three, the defendant, DONELL THOMPSON:

a. was 18 years of age or older at the time of the offenses (Title 18, United States Code, Section 3591(a));

b. intentionally killed E.H. (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of E.H. (Title 18, United States Code, Section 3591(a)(2)(B));

d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and E.H. died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and E.H. died as a

direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. for Count Two, has previously been convicted of a State offense punishable by a term of imprisonment of more than 1 year, involving the use and attempted and threatened use of a firearm against another person, that is, Assault With Intent to Commit Murder, in violation of Michigan Compiled Laws, Section 750.83 (Title 18, United States Code, Section 3592(c)(2));

g. has previously been convicted of another State offense resulting in the death of a person, for which a sentence of life imprisonment was authorized by statute, that is, Second Degree Murder, in violation of Michigan Compiled Laws, Section 750.317 (Title 18, United States Code, Section 3592(c)(3)); and

h. committed the offenses after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

5. As to Counts Four and Five, the defendant, LOMNIL JACKSON:

a. was 18 years of age or older at the time of the offenses (Title 18, United States Code, Section 3591(a));

b. intentionally killed S.B. (Title 18, United States Code, Section 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of S.B. (Title 18, United States Code, Section 3591(a)(2)(B));

d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offenses, and S.B. died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));

e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offenses, such that participation in the act constituted a reckless disregard for human life and S.B. died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));

f. in the commission of the offenses, knowingly created a grave risk of death to 1 or more persons in addition to S.B. (Title 18, United States Code, Section 3592(c)(5));

g. committed the offenses as consideration for the receipt, and in the expectation of the receipt, of anything of pecuniary value (Title 18, United States Code, Section 3592(c)(8));

h. committed the offenses after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)); and

i. intentionally killed and attempted to kill more than one person in a single criminal episode (Title 18, United States Code, Section 3592(c)(16)).

FORFEITURE ALLEGATIONS

(18 U.S.C. §§ 924(d) and 1963, 21 U.S.C. § 853, and 28 U.S.C. § 2461 – *Criminal Forfeiture*)

1. Each and every allegation contained in this Second Superseding Indictment is hereby incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Federal Rules of Criminal Procedure 32.2; Title 18, United States Code, Sections 924(d) and 1963(a)(1)-(3); Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461(c).

2. Upon conviction of Count One Racketeering Conspiracy, in violation of Title 18, United States Code, Section 1962(d), as alleged in this Second

Superseding Indictment, the convicted defendant(s) shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963(a)(1)-(3):

a. any and all interests defendants have acquired or maintained in violation of 18 U.S.C. § 1962;

b. any and all interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any Enterprise named and described herein which defendants established, operated, controlled, conducted or participated in the conduct of, in violation of 18 U.S.C. § 1962; and

c. any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity in violation of 18 U.S.C. § 1962.

3. Property subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1)-(3) includes, but is not limited to, all money and property which represents the value of the interests acquired and the gross proceeds obtained through the violation of Title 18, United States Code, Section 1962, as alleged in this Second Superseding Indictment.

4. Upon conviction of any of the firearms offenses in violation of Title 18, United States Code, Sections 924(c), 924(j), 922(g)(1), and 2, as alleged in this

Second Superseding Indictment, the convicted defendant(s) shall forfeit to the United States, any firearm and ammunition involved in or used in the knowing commission of such violation(s), pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

5. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of Count Seventeen Possession With Intent to Distribute Heroin, in violation of Title 21, United States Code, Section 841, as alleged in this Second Superseding Indictment, the defendant, MICHAEL RICHARDSON, shall forfeit to the United States: (a) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violations; and (b) any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

6. Substitute Assets: Pursuant to Title 18, United States Code, Section 1963(m), Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), defendants shall forfeit any of their other property, real or personal, up to the value of property described above, if, by any act or omission of the defendant, the property subject to forfeiture:

a. cannot be located upon the exercise of due diligence;

b. has been transferred, sold to or deposited with a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty.

All in accordance with Title 18, United States Code, Section 1963; Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c); and Rule 32.2, Federal Rules of Criminal Procedure.

7. Money Judgment. Upon conviction of one or more of the offenses alleged in this Second Superseding Indictment, the United States will seek a forfeiture money judgment against the convicted defendants in an amount representing the total amount of proceeds obtained as a result of defendants' offenses, for which defendants shall be jointly and severally liable.

Dated: February 28, 2018

THIS IS A TRUE BILL.

s/ *Grand Jury Foreperson*
Grand Jury Foreperson

MATTHEW SCHNEIDER
United States Attorney

s/ *Christopher Graveline*
CHRISTOPHER GRAVELINE
Chief, Violent and Organized Crime Unit

s/ *Louis Crisostomo*
LOUIS CRISOSTOMO
Assistant U.S. Attorney

s/ *Brant Cook*
BRANT COOK
Assistant U.S. Attorney

United States District Court Eastern District of Michigan	**Criminal Case Cover Sheet**	**Case Number** 16-cr-20460

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	**Companion Case Number:**
This may be a companion case based upon **LCrR 57.10 (b)(4)[1]:**	**Judge Assigned:**
☐ **Yes** ☒ **No**	**AUSA's Initials:** LAC

Case Title: USA v. Edwin Mills, et al.

County where offense occurred : Wayne County and Elsewhere

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

____Indictment/____Information --- **no** prior complaint.
____Indictment/____Information --- based upon prior complaint [**Case number:**]
__✓__Indictment/____Information --- based upon **LCrR 57.10 (d)** ***[Complete Superseding section below].***

2018 FEB 28 1:29

Superseding Case Information

Superseding to Case No: 16-cr-20460 **Judge:** Mark A. Goldsmith

☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☒ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name	**Charges**	**Prior Complaint (if applicable)**
	18 U.S.C. §§ 3591 and 3592	

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

February 28, 2018
Date

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Assistant United States Attorney
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[1] Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.