

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on March 16, 2023

UNITED STATES OF AMERICA

v.

TREVOR WRIGHT,
also known as "Taliban Glizzy,"
WILLIAM HUNTER,
also known as "Ill Will,"
AVERY FULLER,
also known as "Deavry Cordell Fuller,"
also known as "Ace,"
also known as "Fully,"
also known as "Fully Ace,"
FRANKLIN HUNTER,
also known as "Gino,"
DAVON JOHNSON,
also known as "Yb,"
DECARLOS HILL,
also known as "Los,"
HESHAM GOMAA,
LAMONT MARABLE,
KEITH MCDUFFIE,
JAMEISE CHRISTIAN,
also known as "Safety,"
also known as "Safe,"
also known as "Safe Play,"
ANTONIO TATE,
also known as "Motion,"
also known as "T-Motion,"
ANDREW SMITH,
also known as "Drewso,"
also known as "Drew,"
ROBERT SHEFFIELD,
also known as "Real Lifaa,"
DELONTE MARTIN,
also known as "DD,"
JAYLAUN BROWN,
also known as "Lil Launy,"

CRIMINAL NO. 23-137 (CRC)

GRAND JURY ORIGINAL

VIOLATIONS:

18 U.S.C. § 1951

(Conspiracy to Interfere with Interstate
Commerce by Robbery)

18 U.S.C. § 1951

(Interference with Interstate Commerce
by Robbery)

18 U.S.C. § 924(c)(1)(A)(ii)

(Using, Carrying, Brandishing, and

Possessing a Firearm in Furtherance of
a Crime of Violence)

18 U.S.C. § 2

(Aiding and Abetting);

18 U.S.C. § 371

(Conspiracy to Commit Carjacking)

18 U.S.C. §§ 1956(h) and 1957

(Conspiracy to Engage in Monetary

Transaction in Property Derived from
Specified Unlawful Activity)

FORFEITURE:

18 U.S.C. § 981(a)(1)(C);

18 U.S.C. § 982(a);

18 U.S.C. § 924(d);

21 U.S.C. § 853(p);

28 U.S.C. § 2461(c)

Case: 1:23-cr-00137

Assigned To : Cooper, Christopher R.

Assign. Date : 8/17/2023

Description: Superseding Indictment (B)

Related Case: 23-cr-137 (CRC)

ECF DOCUMENT

I hereby attest and certify that this is
a printed copy of a document which
was electronically filed with the
United States District and Bankruptcy
Courts for the District of Columbia.



ANGELA D. CAESAR, CLERK

also known as "Launy," and :
TIMOTHY CONRAD, :
also known as "Twin," :

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT ONE

From on or about January 7, 2022 and continuing until January 27, 2023, in the District of Columbia and elsewhere, **TREVOR WRIGHT, also known as "Taliban Glizzy," WILLIAM HUNTER, also known as "Ill Will," AVERY FULLER, also known as "Deavry Cordell Fuller," also known as "Ace," also known as "Fully," also known as "Fully Ace," FRANKLIN HUNTER, also known as "Gino," DAVON JOHNSON, also known as "Yb," DECARLOS HILL, also known as "Los," HESHAM GOMAA, LAMONT MARABLE, KEITH MCDUFFIE, JAMEISE CHRISTIAN, also known as "Safety," also known as "Safe," also known as "Safe Play," ANTONIO TATE, also known as "Motion," also known as "T-Motion," ANDREW SMITH, also known as "Drewso," also known as "Drew," ROBERT SHEFFIELD, also known as "Real Lifaa," DELONTE MARTIN, also known as "DD," JAYLAUN BROWN, also known as "Lil Launy," also known as "Launy," and TIMOTHY CONRAD, also known as "Twin,"** did knowingly and willfully combine, conspire, confederate, and agree together with other persons both known and unknown to the Grand Jury, to commit an offense against the United States, namely, to knowingly and unlawfully obstruct, delay, and affect interstate commerce by robbery in violation of Title 18, United States Code, Section 1951, by agreeing to rob and by robbing employees of various retail establishments, including jewelry stores, which were engaged in and which affected interstate commerce.

The Conspiracy

Beginning on or about January 7, 2022, and continuing through January 27, 2023, in the District of Columbia, the State of New Jersey, the State of Pennsylvania, the State of Florida, and the State of Virginia, the defendants, **TREVOR WRIGHT, also known as "Taliban Glizzy," WILLIAM HUNTER, also known as "Ill Will," AVERY FULLER, also known as "Deavry Cordell Fuller," also known as "Ace," also known as "Fully," also known as "Fully Ace," FRANKLIN HUNTER, also known as "Gino," DAVON JOHNSON, also known as "Yb," DECARLOS HILL, also known as "Los," HESHAM GOMAA, LAMONT MARABLE, KEITH MCDUFFIE, JAMEISE CHRISTIAN, also known as "Safety," also known as "Safe," also known as "Safe Play," ANTONIO TATE, also known as "Motion," also known as "T-Motion," ANDREW SMITH, also known as "Drewso," also known as "Drew," ROBERT SHEFFIELD, also known as "Real Lifaa," DELONTE MARTIN, also known as "DD," JAYLAUN BROWN, also known as "Lil Launy," also known as "Launy," and TIMOTHY CONRAD, also known as "Twin," did knowingly and intentionally combine, conspire, confederate and agree to commit the following offenses against the United States, that is, Hobbs Act, in violation of Title 18, United States Code, Section 1951.**

Goal of the Conspiracy

It was the goal of the conspiracy that the conspirators would acquire jewelry and money, by way of robbery, belonging to and in the care, custody, control, management, and possession of various retail and commercial establishments, including South Asian jewelry stores.

Manner and Means of the Conspiracy

The defendants, both known and unknown to the grand jury, used the following manner and means to accomplish the object of the conspiracy:

1. It was part of the conspiracy that the defendants would engage in planning and other preparation in the District of Columbia and play different roles in the conspiracy, taking upon themselves different tasks and participating in the conduct of the conspiracy through various criminal acts. The defendants wore dark clothing and often wore masks or other clothing over their faces as well as gloves. One or more of the defendants was armed with a firearm, and in some instances, a hammer. Some of the actions carried out by the defendants included, among others, identifying, traveling to, and going into South Asian jewelry stores with the intent to rob those establishments of jewelry and money.

2. It was further a part of the conspiracy that the defendants, both known and unknown to the grand jury, used various vehicles, including stolen vehicles, often outfitted with wrong and/or stolen tags, to commit the robberies and flee from the establishments back to the District of Columbia.

3. It was further a part of the conspiracy that the defendants, both known and unknown to the grand jury, took steps and made efforts to avoid detection by law enforcement authorities.

Overt Acts

1. On or about January 7, 2022, one or more of the defendants entered and robbed Yasini Jewelers, located at 1120 W. Broad St., E. Falls Church, Virginia while armed with a firearm.

2. On or about June 10, 2022, one or more of the defendants entered and robbed Virani Jewelers, located at 1394 Oak Tree Road, Iselin, New Jersey while armed with a firearm.

3. On or about September 20, 2022, one or more of the defendants entered and robbed Sonia Jewelers & Boutique, located at 6681 Backlick Road, Springfield, Virginia while armed with a firearm.

4. On or about October 25, 2022, one or more of the defendants entered and robbed Paradise Jewelry Store, located at 1069 Main Street, Paterson, New Jersey while armed with a firearm.

5. On or about November 10, 2022, one or more of the defendants entered and robbed Baral Jewelers and Gift Center, located at 5450 Derry St., #3, Harrisburg, Pennsylvania while armed with a firearm.

6. On or about November 27, 2022, one or more of the defendants entered and robbed Sara Emporium Jewelry, located at 787 Newark Ave., Jersey City, New Jersey while armed with a firearm.

7. On or about December 6, 2022, one or more of the defendants entered and robbed Kishkek Jewelers, located at 3546 St. Johns Bluff Road S., Suite 101, Jacksonville, Florida while armed with a firearm.

8. On or about December 22, 2022, one or more of the defendants entered and robbed Chintamanis Inc., located at 3191 NJ-27, Franklin Park, New Jersey while armed with a firearm.

9. On or about January 27, 2023, one or more of the defendants entered and robbed Princess Diamonds, located at 6757 Wilson Blvd # 12, Falls Church, Virginia while armed with a firearm.

(Conspiracy to Interfere with Interstate Commerce by Robbery, in violation of Title 18, United States Code, Section 1951)

COUNT TWO

On or about January 7, 2022, in the District of Columbia and elsewhere, **WILLIAM HUNTER, also known as "Ill Will,"** did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as the term is defined in Title 18, United States Code, Section 1951, and movement of articles and commodities in such commerce, by robbery as that term is

defined in Title 18, United States Code, Section 1951, in that the defendant, **WILLIAM HUNTER, also known as "Ill Will,"** did unlawfully take and obtain personal property consisting of jewelry, from the presence of employees of Yasini Jewelers, located at 1120 W. Broad St., E. Falls Church, Virginia, against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person, while the employees were engaged in commercial activities as employees of Yasini Jewelers, a business that was engaged in and that affects interstate commerce.

(Interference with Interstate Commerce by Robbery, in violation of Title 18, United States Code, Section 1951)

COUNT THREE

On or about January 7, 2022, within the District of Columbia and elsewhere, **WILLIAM HUNTER, also known as "Ill Will,"** did unlawfully and knowingly use, carry, and brandish during and in relation to, and possess in furtherance of, a crime of violence, for which he may be prosecuted in a court of the United States, that is Count Two of this Indictment which is incorporated herein, a firearm.

(Using, Carrying, Brandishing, and Possessing a Firearm in Furtherance of a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and (2))

COUNT FOUR

On or about June 10, 2022, in the District of Columbia and elsewhere, **TREVOR WRIGHT, also known as "Taliban Glizzy," AVERY FULLER, also known as "Deavry Cordell Fuller," also known as "Ace," also known as "Fully," also known as "Fully Ace," FRANKLIN HUNTER, also known as "Gino," DAVON JOHNSON, also known as "Yb," DECARLOS HILL, also known as "Los," and HESHAM GOMAA,** did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as the term is defined in Title

18, United States Code, Section 1951, and movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **TREVOR WRIGHT, also known as “Taliban Glizzy,” AVERY FULLER, also known as “Deavry Cordell Fuller,” also known as “Ace,” also known as “Fully,” also known as “Fully Ace,” FRANKLIN HUNTER, also known as “Gino,” DAVON JOHNSON, also known as “Yb,” DECARLOS HILL, also known as “Los,” and HESHAM GOMAA,** did unlawfully take and obtain personal property consisting of jewelry, from the presence of employees of Virani Jewelers, located at 1394 Oak Tree Road, Iselin, New Jersey, against the employees’ will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person, while the employees were engaged in commercial activities as employees of Virani Jewelers, a business that was engaged in and that affects interstate commerce.

(Interference with Interstate Commerce by Robbery, in violation of Title 18, United States Code, Section 1951)

COUNT FIVE

On or about June 10, 2022, within the District of Columbia and elsewhere, **TREVOR WRIGHT, also known as “Taliban Glizzy,” AVERY FULLER, also known as “Deavry Cordell Fuller,” also known as “Ace,” also known as “Fully,” also known as “Fully Ace,” FRANKLIN HUNTER, also known as “Gino,” DAVON JOHNSON, also known as “Yb,” DECARLOS HILL, also known as “Los,” and HESHAM GOMAA,** did unlawfully and knowingly use, carry, and brandish during and in relation to, and possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is Count Four of this Indictment which is incorporated herein, a firearm.

(Using, Carrying, Brandishing, and Possessing a Firearm in Furtherance of a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and (2))

COUNT SIX

On or about September 20, 2022, in the District of Columbia and elsewhere, **WILLIAM HUNTER, also known as "Ill Will,"** and **LAMONT MARABLE**, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as the term is defined in Title 18, United States Code, Section 1951, and movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **WILLIAM HUNTER, also known as "Ill Will,"** and **LAMONT MARABLE**, did unlawfully take and obtain personal property consisting of jewelry, from the presence of employees of Sonia Jewelers & Boutique, located at 6681 Backlick Road, Springfield, Virginia, against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person, while the employees were engaged in commercial activities as employees of Sonia Jewelers & Boutique, a business that was engaged in and that affects interstate commerce.

(Interference with Interstate Commerce by Robbery, in violation of Title 18; United States Code, Section 1951)

COUNT SEVEN

On or about September 20, 2022, within the District of Columbia and elsewhere, **WILLIAM HUNTER, also known as "Ill Will,"** and **LAMONT MARABLE**, did unlawfully and knowingly use, carry, and brandish during and in relation to, and possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is Count Six of this Indictment which is incorporated herein, a firearm.

(Using, Carrying, Brandishing, and Possessing a Firearm in Furtherance of a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and (2))

COUNT EIGHT

On or about October 25, 2022, in the District of Columbia and elsewhere, **TREVOR WRIGHT, also known as “Taliban Glizzy,” WILLIAM HUNTER, also known as “Ill Will,” KEITH MCDUFFIE, and JAMEISE CHRISTIAN, also known as “Safety,” also known as “Safe,” also known as “Safe Play,”** did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as the term is defined in Title 18, United States Code, Section 1951, and movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **TREVOR WRIGHT, also known as “Taliban Glizzy,” WILLIAM HUNTER, also known as “Ill Will,” KEITH MCDUFFIE, and JAMEISE CHRISTIAN, also known as “Safety,” also known as “Safe,” also known as “Safe Play,”** did unlawfully take and obtain personal property consisting of jewelry, from the presence of employees of Paradise Jewelry, located at 1069 Main St. Paterson, New Jersey, against the employees’ will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person, while the employees were engaged in commercial activities as employees of Paradise Jewelry, a business that was engaged in and that affects interstate commerce.

(**Interference with Interstate Commerce by Robbery**, in violation of Title 18, United States Code, Section 1951)

COUNT NINE

On or about October 25, 2022, within the District of Columbia and elsewhere, **TREVOR WRIGHT, also known as “Taliban Glizzy,” WILLIAM HUNTER, also known as “Ill Will,” KEITH MCDUFFIE, and JAMEISE CHRISTIAN, also known as “Safety,” also known as “Safe,” also known as “Safe Play,”** did unlawfully and knowingly use, carry, and brandish during and in relation to, and possess in furtherance of, a crime of violence, for which they may be

prosecuted in a court of the United States, that is Count Eight of this Indictment which is incorporated herein, a firearm.

(Using, Carrying, Brandishing, and Possessing a Firearm in Furtherance of a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2)

COUNT TEN

On or about November 10, 2022, in the District of Columbia and elsewhere, **WILLIAM HUNTER, also known as "Ill Will," FRANKLIN HUNTER, also known as "Gino," ANDREW SMITH, also known as "Drewso," also known as "Drew," ROBERT SHEFFIELD, also known as "Real Lifaa," and TIMOTHY CONRAD, also known as "Twin,"** did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as the term is defined in Title 18, United States Code, Section 1951, and movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **WILLIAM HUNTER, also known as "Ill Will," FRANKLIN HUNTER, also known as "Gino," ANDREW SMITH, also known as "Drewso," also known as "Drew," ROBERT SHEFFIELD, also known as "Real Lifaa," and TIMOTHY CONRAD, also known as "Twin,"** did unlawfully take and obtain personal property consisting of jewelry, from the presence of employees of Baral Jewelers and Gift Center, located at 5450 Derry St., #3, Harrisburg, Pennsylvania, against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person, while the employees were engaged in commercial activities as employees of Baral Jewelers and Gift Center, a business that was engaged in and that affects interstate commerce.

(Interference with Interstate Commerce by Robbery, in violation of Title 18, United States Code, Section 1951)

COUNT ELEVEN

On or about November 10, 2022, within the District of Columbia and elsewhere, **WILLIAM HUNTER, also known as "Ill Will," FRANKLIN HUNTER, also known as "Gino," ANDREW SMITH, also known as "Drewso," also known as "Drew," ROBERT SHEFFIELD, also known as "Real Lifaa," and TIMOTHY CONRAD, also known as "Twin,"** did unlawfully and knowingly use, carry, and brandish during and in relation to, and possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is Count Ten of this Indictment which is incorporated herein, a firearm.

(Using, Carrying, Brandishing, and Possessing a Firearm in Furtherance of a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and (2))

COUNT TWELVE

On or about November 27, 2022, in the District of Columbia and elsewhere, **WILLIAM HUNTER, also known as "Ill Will," FRANKLIN HUNTER, also known as "Gino," ANDREW SMITH, also known as "Drewso," also known as "Drew," and TIMOTHY CONRAD, also known as "Twin,"** did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as the term is defined in Title 18, United States Code, Section 1951, and movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **WILLIAM HUNTER, also known as "Ill Will," FRANKLIN HUNTER, also known as "Gino," ANDREW SMITH, also known as "Drewso," also known as "Drew," and TIMOTHY CONRAD, also known as "Twin,"** did unlawfully take and obtain personal property consisting of jewelry, from the presence of employees of Sara Emporium Jewelry, located at 787 Newark Ave., Jersey City, New Jersey, against the employees' will by means of actual and threatened

force, violence, and fear of injury, immediate and future, to his/her person, while the employees were engaged in commercial activities as employees of Sara Emporium Jewelry, a business that was engaged in and that affects interstate commerce.

(Interference with Interstate Commerce by Robbery, in violation of Title 18, United States Code, Section 1951)

COUNT THIRTEEN

On or about November 27, 2022, within the District of Columbia and elsewhere, **WILLIAM HUNTER, also known as "Ill Will," FRANKLIN HUNTER, also known as "Gino," ANDREW SMITH, also known as "Drewso," also known as "Drew," and TIMOTHY CONRAD, also known as "Twin,"** did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is Count Twelve of this Indictment which is incorporated herein, a firearm.

(Using, Carrying, Brandishing, and Possessing a Firearm in Furtherance of a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and (2))

COUNT FOURTEEN

On or about December 22, 2022, in the District of Columbia and elsewhere, **FRANKLIN HUNTER, also known as "Gino," and TIMOTHY CONRAD, also known as "Twin,"** did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as the term is defined in Title 18, United States Code, Section 1951, and movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendant, **FRANKLIN HUNTER, also known as "Gino," and TIMOTHY CONRAD, also known as "Twin,"** did unlawfully take and obtain personal property consisting of jewelry, from the presence of employees of Chintamanis Inc., located at 3191 NJ-27,

Franklin Park, New Jersey, against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person, while the employees were engaged in commercial activities as employees of Chintamanis Inc., a business that was engaged in and that affects interstate commerce.

(Interference with Interstate Commerce by Robbery, in violation of Title 18, United States Code, Section 1951)

COUNT FIFTEEN

On or about December 22, 2022, within the District of Columbia and elsewhere, **FRANKLIN HUNTER, also known as "Gino," and TIMOTHY CONRAD, also known as "Twin,"** did unlawfully and knowingly use, carry, and brandish during and in relation to, and possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is Count Fourteen of this Indictment which is incorporated herein, a firearm.

(Using, Carrying, Brandishing, and Possessing a Firearm in Furtherance of a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and (2))

COUNT SIXTEEN

On or about January 27, 2023, in the District of Columbia and elsewhere, **WILLIAM HUNTER, also known as "Ill Will," and ANDREW SMITH, also known as "Drewso," also known as "Drew,"** did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as the term is defined in Title 18, United States Code, Section 1951, and movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **WILLIAM HUNTER, also known as "Ill Will," and ANDREW SMITH, also known as "Drewso," also known as "Drew,"** did unlawfully take and obtain personal property consisting of jewelry, from the presence of employees of Princess Diamonds, located at 6757 Wilson Blvd., #12, Falls Church, Virginia,

against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his/her person, while the employees were engaged in commercial activities as employees of Princess Diamonds, a business that was engaged in and that affects interstate commerce.

(Interference with Interstate Commerce by Robbery, in violation of Title 18, United States Code, Section 1951)

COUNT SEVENTEEN

On or about January 27, 2023, within the District of Columbia and elsewhere, **WILLIAM HUNTER, also known as "Ill Will,"** and **ANDREW SMITH, also known as "Drewso," also known as "Drew,"** did unlawfully and knowingly use, carry, and brandish during and in relation to, and possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is Count Sixteen of this Indictment which is incorporated herein, a firearm.

(Using, Carrying, Brandishing, Possessing a Firearm in Furtherance of a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and (2))

COUNT EIGHTEEN

From on or about September 11, 2022 until on or about October 22, 2022, in the District of Columbia and elsewhere, **WILLIAM HUNTER also known as "Ill Will,"** did knowingly and willfully combine, conspire, confederate, and agree together with other persons both known and unknown to the Grand Jury, to commit the offense of Carjacking, in violation of Title 18, United States Code, Section 2119, by knowingly taking motor vehicles, to wit: a black 2018 Lexus GX460 SUV, a white 2020 Lexus GX460 SUV, and a BMW X6, that had been transported, shipped, and received in interstate and foreign commerce from, and in the presence of the operators and/or

owners of those vehicles, by force, violence, and intimidation, with the intent to cause death and serious bodily harm.

(Conspiracy to Commit Carjacking, in violation of Title 18, United States Code, Section 371)

COUNT NINETEEN

From on or about July 2022, until on or about March 6, 2023, in the District of Columbia and elsewhere, **TREVOR WRIGHT, also known as “Taliban Glizzy,” AVERY FULLER, also known as “Deavry Cordell Fuller,” also known as “Ace,” also known as “Fully,” also known as “Fully Ace,” WILLIAM HUNTER, also known as “Ill Will,” and FRANKLIN HUNTER, also known as “Gino,”** did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree together, with each other, and with others known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956 and 1957, to wit: did knowingly engage and attempt to engage in monetary transactions by, through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is, jewelry, such property having been derived from a specified unlawful activity, that is, armed robbery, in violation of United States Code, Section 1957.

(Conspiracy to Engage in Monetary Transactions in Property Derived from Specified Unlawful Activity, in violation of Title 18, United States Code, Sections 1956(h) and 1957)

FORFEITURE ALLEGATION

1. Upon conviction of the offenses alleged in Counts One and Two, Four, Six, Eight, Ten, Twelve, Fourteen, and Sixteen of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from

proceeds traceable to this offense, to include, a Rolex wristwatch, bearing serial number A5V95601.

2. Upon conviction of any of the offenses alleged in Counts Three, Five, Seven, Nine, Eleven, Thirteen, Fifteen, and Seventeen of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in the willful commission of these offenses.

3. Upon conviction of the offense alleged in Count Nineteen of this Indictment, the defendants shall forfeit to the United States any property, real or personal, involved in this offense, or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1). The United States will also seek a forfeiture money judgment against the defendant(s) equal to the value of any property, real or personal, involved in this offense, or any property traceable to such property.

4. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or 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 that cannot be divided without difficulty;

the defendants shall forfeit to the United States any other property of the defendants, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 924(d), and 982(a), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p))

A TRUE BILL:

FOREPERSON.

Matthew M. Graves/CCW
Attorney of the United States in
and for the District of Columbia