

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on November 12, 2010

UNITED STATES OF AMERICA	:	CRIMINAL NO. 11-129 (CKK)
	:	
v.	:	GRAND JURY ORIGINAL
	:	
GEZO GOEONG EDWARDS,	:	
also known as "Zo";	:	VIOLATIONS: 21 U.S.C. § 846
WILLIAM MARTIN BOWMAN,	:	(Conspiracy to Distribute and Possess
also known as "Bone"	:	with Intent to Distribute Five Kilograms
and "Bones";	:	or More of Cocaine)
ROBERT CARL RICHARDS,	:	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
also known as "Bob," "B-Love"	:	(Unlawful Distribution of Cocaine Base)
and "Beano";	:	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
WILLIE SHAWN MOORER;	:	(Unlawful Distribution of Cocaine)
NATHANIEL HARRISON	:	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii)
also known as "Nate," "Nathaniel	:	(Unlawful Distribution of 5 Grams or
Harrison, Jr.," "Nathan" and	:	More of Cocaine Base)
"Anthony Newman";	:	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii)
OMAR AHMAD ISMAEEL,	:	(Unlawful Distribution of 28 Grams or
also known as "Omar Ahmed";	:	More of Cocaine Base)
EARL WHITLEY CHARLES	:	21 U.S.C. §§ 841(a)(1) and 841(b)(C)
also known as "Little Earl";	:	(Unlawful Possession With Intent to
SEAN DE ANGELO CRAWFORD,	:	Distribute Cocaine)
also known as "Ski-boe," "Boe,"	:	18 U.S.C. § 922(g)(1)
"Sean Crawford," "Sean	:	(Unlawful Possession of a Firearm and
Deangelo," "Crawford,"	:	Ammunition by a Person Convicted of a
"Sean Jackson," "Seal," "Sean D.	:	Crime Punishable by Imprisonment for a
Crawford" and "Sean Deon	:	Term Exceeding One Year)
Crawford";	:	18 U.S.C. § 924(c)(1)
JOSEPH TOLBERT, III;	:	(Using, Carrying, and Possessing a
WILLIAM EMANUEL WILSON, JR.;	:	Firearm During a Drug Trafficking
HENRY BRANDON WILLIAMS;	:	Offense)
ROSCOE EDD MINNS;	:	21 U.S.C. § 853
also known as "Ra-Loe"	:	(Criminal Forfeiture)
and "Loe;"and	:	
TRACY LAWRENCE BROOKS	:	<u>FILED UNDER SEAL</u>
also known as "Tray," "T Brooks,"	:	
"Toriano V. Brooks," "Toriano	:	
Vencit Brooks," "Torian Vincente	:	

Brooks," "Toriano V. Ghetto," :  
"X Toy," "Toriano L. Brooks," :  
"Toriano Vincint Brooks," :  
"Toriano Vincent Brooks," :  
"Toy Brooks," "Toy Tor"and :  
SHAWN ANTHONY LUCAS, :  
: :  
Defendants. :

### INDICTMENT

The Grand Jury charges that:

#### COUNT ONE

From in or about January 2009, the exact date being unknown to the Grand Jury, and continuing through at least April 26, 2011, GEZO GOEONG EDWARDS, also known as Zo"; WILLIAM MARTIN BOWMAN, also known as "Bone" and "Bones"; ROBERT CARL RICHARDS, also known as "Bob," "B-Love and "Beano"; WILLIE SHAWN MOORER; NATHANIEL HARRISON also known as "Nate," "Nathaniel Harrison, Jr.," "Nathan" and "Anthony Newman"; OMAR AHMAD ISMAEEL, also known as "Omar Ahmed"; EARL WHITLEY CHARLES also known as "Little Earl"; SEAN DE ANGELO CRAWFORD, also known as "Ski-boe," "Boe," "Sean Crawford," "Sean Deangelo Crawford," "Sean Jackson," "Seal," "Sean D. Crawford" and "Sean Deon Crawford"; JOSEPH TOLBERT, III; WILLIAM EMANUEL WILSON, JR.; HENRY BRANDON WILLIAMS; ROSCOE EDD MINNS; also known as "Ra-Loe and "Loe"; TRACY LAWRENCE BROOKS also known as "Tray," "T Brooks," "Toriano V. Brooks," "Toriano Vencit Brooks," "Torian Vincente Brooks," "Toriano V. Ghetto," "X Toy," "Toriano L. Brooks," "Toriano Vincint Brooks," "Toriano Vincent Brooks," "Toy Brooks" and "Toy Tor" and SHAWN ANTHONY LUCAS,



within the District of Columbia and elsewhere, did knowingly and intentionally combine, conspire, confederate and agree together and with other persons both known and unknown to the Grand Jury, to unlawfully, knowingly and intentionally distribute and possess with intent to distribute mixtures and substances containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, and the amount of said mixtures and substances was five (5) kilograms or more in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

**(Conspiracy to Distribute and Possess with Intent to Distribute Five Kilograms or more of Cocaine, in violation of Title 21, United States Code, Section 846)**

**COUNT TWO**

On or about July 1, 2010, within the District of Columbia, **WILLIAM MARTIN BOWMAN**, also known as **"Bone"** and **"Bones,"** did unlawfully, knowingly and intentionally distribute five (5) grams or more of a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of 5 Grams or More of Cocaine Base, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii))**

**COUNT THREE**

On or about July 7, 2010, within the District of Columbia, **WILLIAM MARTIN BOWMAN**, also known as **"Bone"** and **"Bones,"** did unlawfully, knowingly and intentionally distribute five (5) grams or more of a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of 5 Grams or More of Cocaine Base, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii))**

**COUNT FOUR**

On or about October 22, 2010, within the District of Columbia, **WILLIAM MARTIN BOWMAN**, also known as “Bone” and “Bones,” did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of Cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))**

**COUNT FIVE**

On or about October 27, 2010, within the District of Columbia, **WILLIAM MARTIN BOWMAN**, also known as “Bone” and “Bones,” did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of Cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))**

**COUNT SIX**

On or about November 10, 2010, within the District of Columbia, **WILLIAM MARTIN BOWMAN**, also known as “Bone” and “Bones,” did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of Cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))**

**COUNT SEVEN**

On or about March 30, 2011, within the District of Columbia, **TRACY LAWRENCE BROOKS** also known as "Tray," "T Brooks," "Toriano V. Brooks," "Toriano Vencit Brooks," "Torian Vincente," "Brooks," "Toriano V. Ghetto," "X Toy," "Toriano L. Brooks," "Toriano Vincint Brooks," "Toriano Vincent Brooks," "Toy Brooks" and "Toy Tor," did unlawfully, knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of Cocaine Base, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))**

**COUNT EIGHT**

On or about April 1, 2011, within the District of Columbia, **TRACY LAWRENCE BROOKS** also known as "Tray," "T Brooks," "Toriano V. Brooks," "Toriano Vencit Brooks," "Torian Vincente," "Brooks," "Toriano V. Ghetto," "X Toy," "Toriano L. Brooks," "Toriano Vincint Brooks," "Toriano Vincent Brooks," "Toy Brooks" and "Toy Tor," did unlawfully, knowingly and intentionally distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II narcotic drug controlled substance.

**(Unlawful Distribution of 28 Grams or More of Cocaine Base, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(iii))**



**COUNT NINE**

On or about April 25, 2011, within the District of Columbia, **GEZO GOEONG EDWARDS**, also known as “Zo”; **WILLIAM MARTIN BOWMAN**, also known as “Bone” and “Bones”; **ROBERT CARL RICHARDS**, also known as “Bob,” “B-Love” and “Beano” and **WILLIE SHAWN MOORER**, did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of a drug trafficking offense, for which each may be prosecuted in a court of the United States, that is Count One of this Indictment which is incorporated herein, a firearm, that is, a .40 Caliber Glock Pistol.

**(Using, Carrying, and Possessing a Firearm During a Drug Trafficking Offense, in violation of Title 18, United States Code, Sections 924(c)(1))**

**COUNT TEN**

On or about April 25, 2011, within the District of Columbia, **GEZO GOEONG EDWARDS**, also known as “Zo”; **WILLIAM MARTIN BOWMAN**, also known as “Bone” and “Bones”; **ROBERT CARL RICHARDS**, also known as “Bob,” “B-Love” and “Beano” and **WILLIE SHAWN MOORER**, did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of a drug trafficking offense, for which each may be prosecuted in a court of the United States, that is Count One of this Indictment which is incorporated herein, a firearm, that is, an .AR15 Bushmaster Semi-automatic Assault Rifle.

**(Using, Carrying, and Possessing a Firearm During a Drug Trafficking Offense, in violation of Title 18, United States Code, Sections 924(c)(1))**

**COUNT ELEVEN**

On or about April 26, 2011, within the District of Columbia, **WILLIAM MARTIN BOWMAN, also known as "Bone" and "Bones,"** did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of a drug trafficking offense, for which he may be prosecuted in a court of the United States, that is Count One of this Indictment which is incorporated herein, a firearm, that is, a .40 Caliber Sig Sauer Pistol.

**(Using, Carrying, and Possessing a Firearm During a Drug Trafficking Offense, in violation of Title 18, United States Code, Sections 924(c)(1))**

**COUNT TWELVE**

On or about May 12, 2011, within the District of Columbia, **OMAR AHMAD ISMAEEL, also known as "Omar Ahmed,"** did unlawfully, knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance.

**(Unlawful Possession with the Intent to Distribute Cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C))**

**COUNT THIRTEEN**

On or about May 12, 2011, within the District of Columbia, **OMAR AHMAD ISMAEEL, also known as "Omar Ahmed,"** did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of a drug trafficking offense, for which he may be prosecuted in a court of the United States, that is Count Twelve of this Indictment, which is incorporated herein, a firearm, that is, a .357 Magnum Revolver.

**(Using, Carrying, and Possessing a Firearm During a Drug Trafficking Offense, in violation of Title 18, United States Code, Sections 924(c)(1))**



**COUNT FOURTEEN**

On or about May 12, 2011, within the District of Columbia, **OMAR AHMAD ISMAEEL**, also known as "**Omar Ahmed**," having been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Circuit Court, Howard County, Maryland, in Criminal Case No.13K96033284, did unlawfully and knowingly receive and possess a firearm, that is, a .357 Magnum Revolver, and did unlawfully and knowingly receive and possess ammunition, that is .357 ammunition, both of which had been possessed, shipped and transported in and affecting interstate and foreign commerce.

**(Unlawful Possession of a Firearm and Ammunition by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year, in violation of Title 18, United States Code, Section 922(g)(1))**

**FORFEITURE ALLEGATION**

1. The violations charged in Count One through Count Eight and Twelve of this Indictment, that is: (1) **Conspiracy to Distribute and Possess with Intent to Distribute Five Kilograms or more of Cocaine**, in violation of Title 21, United States Code, Section 846 (Count One); (2) **Unlawful Distribution of Cocaine**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) (Counts Two, Four, Five, and Six); and (3) **Unlawful Distribution of Cocaine Base**, in violation of Title 21, Sections 841(a)(1) and 841(b)(1)(C) (Counts Three, Seven, and Eight), (4) **Unlawful Possession With Intent to Distribute Cocaine**, in violation of Title 21, Sections 841(a)(1) and 841(b)(1)(C) (Count Twelve) are re-alleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.



2. As a result of the violations charged in Counts One through Eight and Twelve, the defendants in this Indictment, **GEZO GOEONG EDWARDS**, also known as "Zo"; **WILLIAM MARTIN BOWMAN**, also known as "Bone" and "Bones"; **ROBERT CARL RICHARDS**, also known as "Bob", "B-Love" and "Beano"; **WILLIE SHAWN MOORER**; **NATHANIEL HARRISON** also known as "Nate," "Nathaniel Harrison, Jr.," "Nathan" and "Anthony Newman"; **OMAR AHMAD ISMAEEL**, also known as "Omar Ahmed"; **EARL WHITLEY CHARLES** also known as "Little Earl"; **SEAN DE ANGELO CRAWFORD**, also known as "Ski-boe," "Boe," "Sean Crawford," "Sean Deangelo Crawford," "Sean Jackson," "Seal," "Sean D. Crawford" and "Sean Deon Crawford"; **JOSEPH TOLBERT, III**; **WILLIAM EMANUEL WILSON, JR.**; **HENRY BRANDON WILLIAMS**; **ROSCOE EDD MINNS**; also known as "Ra-Loe" and "Loe"; **TRACY LAWRENCE BROOKS** also known as "Tray," "T Brooks," "Toriano V. Brooks," "Toriano Vencit Brooks," "Torian Vincente Brooks," "Toriano V. Ghetto," "X Toy," "Toriano L. Brooks," "Toriano Vincint Brooks," "Toriano Vincent Brooks," "Toy Brooks" and "Toy Tor" and **SHAWN ANTHONY LUCAS**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853: (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the said violations; and (2) any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the said violations, including but not limited to:

(a) Money Judgment:

(i) A judgment in favor of the United States of America for a sum of money equal to the value of any and all the property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of the felony offenses of: (1) **Conspiracy to Distribute and Possess with Intent to Distribute Five Kilograms**

**or more of Cocaine**, in violation of Title 21, United States Code, Section 846 ; (2) **Unlawful Distribution of Cocaine**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and (3) **Unlawful Distribution of Cocaine Base**, in violation of Title 21, Sections 841(a)(1) and 841(b)(1)(C), for which the defendants are jointly and severally liable.

(b) Real Property ( including things growing on, affixed to, and found in the land, and including any right, title, and interest (including any leasehold interest) in the whole of the lot or tract of land and appurtenances or improvements, commonly identified by the addresses of):

- (i) 29 46th Street, unit number seven, Southeast, Washington, District of Columbia 20019;
- (ii) 1219 Elm Grove Circle, Silver Spring, Maryland 20905;
- (iii) 9210 Rolling View Drive, Lanham-Seabrook, Maryland 20706.

By virtue of the commission of the felony offenses charged in Count One through Eight of this Indictment, any and all interest that the defendants, **GEZO GOEONG EDWARDS**, also known as **"Zo"**; **WILLIAM MARTIN BOWMAN**, also known as **"Bone"** and **"Bones"**; **ROBERT CARL RICHARDS**, also known as **"Bob"**, **"B-Love"** and **"Beano"**; **WILLIE SHAWN MOORER**; **NATHANIEL HARRISON** also known as **"Nate," "Nathaniel Harrison, Jr.," "Nathan"** and **"Anthony Newman"**; **OMAR AHMAD ISMAEEL**, also known as **"Omar Ahmed"**; **EARL WHITLEY CHARLES** also known as **"Little Earl"**; **SEAN DE ANGELO CRAWFORD**, also known as **"Ski-boe," "Boe," "Sean Crawford," "Sean Deangelo Crawford," "Sean Jackson," "Seal," "Sean D. Crawford"** and **"Sean Deon Crawford"**; **JOSEPH TOLBERT, III**; **WILLIAM EMANUEL WILSON, JR.**; **HENRY BRANDON WILLIAMS**; **ROSCOE EDD MINNS**; also known as **"Ra-Loe"** and **"Loe"**; **TRACY LAWRENCE BROOKS** also known as **"Tray," "T Brooks," "Toriano V. Brooks," "Toriano Vencit Brooks," "Torian Vincente Brooks," "Toriano V. Ghetto," "X Toy," "Toriano L.**



Brooks,” “Toriano Vincint Brooks,” “Toriano Vincent Brooks,” “Toy Brooks” and “Toy Tor” and SHAWN ANTHONY LUCAS, have in (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the said violation; and (2) any of the defendants’ property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the said violation, is vested in the United States and hereby forfeited to the United States pursuant to Title 21, United States Code, Section 853.

3. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853, 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 subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of said property listed above as being subject to forfeiture.

(Criminal Forfeiture, in violation of Title 21, United States Code, Section 853)

A TRUE BILL:

FOREPERSON

Attorney of the United States in  
and for the District of Columbia.