

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

- - - - -	x	Hon.
	:	
UNITED STATES OF AMERICA	:	Crim. No.
	:	
-v.-	:	18, U.S.C., Sections
	:	1962(c), 1962(d),
	:	924(c), 1959(a)(3)
TOMMY TERRELL THOMPSON,	:	1959(a)(5) and 2;
a/k/a "Rel,"	:	21, U.S.C., Sections
a/k/a "Omega Red,"	:	841 and 846
a/k/a "Mega,"	:	
a/k/a "Big Homey,"	:	
	:	
and	:	
	:	
DAVID NEALLY,	:	
a/k/a "Wee Wee"	:	
	:	
- - - - -	x	

**INDICTMENT**

The Grand Jury in and for the District of New Jersey,  
sitting at Newark, charges:

**COUNT ONE**  
(Racketeering Conspiracy)

1. Defendant TOMMY TERRELL THOMPSON was the leader of a "set" of the Bloods Street Gang in Jersey City, New Jersey called "Sex, Money, Murder - 252." In his capacity as the leader, defendant TOMMY TERRELL THOMPSON, a/k/a "Rel," a/k/a "Omega Red," a/k/a "Mega," a/k/a "Big Homey," was a member of a criminal organization, specifically, the Sex, Money, Murder - 252 set of the Bloods Street Gang located in Jersey City, New Jersey, also known as Sex, Money, Murder or SMM or SMM 252 (hereinafter "Sex, Money, Murder"). Defendant David Neally was an associate of Sex, Money, Murder.

2. Members and associates of this criminal organization engaged in acts of violence, including attempted murder, conspiracy to commit murder, robbery, narcotics distribution, witness intimidation and other offenses.

3. Sex, Money, Murder, including its leadership, membership and associates, constituted an "enterprise," as defined in Title 18, United States Code, Section 1961(4), in that it was a group of individuals associated in fact. The enterprise was engaged in, and its activities affected, interstate commerce. The enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

The Sex, Money, Murder Set of the Bloods Street Gang

4. In the early 1970s, a street gang was formed in Los Angeles, California called the Bloods. As time passed, the Bloods spread to areas surrounding Los Angeles and other locations, and broke into units or sub-groups, each identified or affiliated with a certain street, neighborhood or area.

5. In or about 1993, an individual named Omar Portee, a/k/a "OG Mac," while incarcerated at the Rikers Island Correctional Facility in New York City, was involved in starting a gang called the United Bloods Nation, or "UBN," which is commonly known as the East Coast Bloods or more generally, the Bloods Street Gang. The Bloods exist and function in individual units that are commonly referred to as "sets." These sets tend to operate in, and identify with, certain locations, neighborhoods and areas.

6. In the mid-1990s, the Sex, Money, Murder set of the Bloods was established in the area of the Soundview Housing Projects in the Bronx, New York, by, among others, Peter Rollack, a/k/a "Pistol Pete." Over time, the set spread to other locations.

7. The UBN generally, and the Sex, Money, Murder Set particularly, has followed and continues to follow many of the same traditions and protocols as the Bloods on the west coast, including:

a. an identification with the color red, which appears prominently in clothing, hats and bandanas worn by Blood members on both the east and west coasts;

b. a long-term and often lethal rivalry with the Crip gang, whose signature color is blue; and

c. the sub-division of the gang into individual units called "sets" which are generally headed by an "OG" or "Original Gangster," or a "101," and are typically aligned with different areas or neighborhoods.

8. In or about the Summer of 2002, defendant TOMMY TERRELL THOMPSON and others established the Sex, Money, Murder set in Jersey City, New Jersey by recruiting existing members of the Bloods and others to join Sex, Money, Murder. Defendant TOMMY TERRELL THOMPSON was the leader of the Sex, Money Murder set located in Jersey City, New Jersey.

9. Members of Sex, Money, Murder, as is true with most Bloods sets, have used and continue to use a system of codes and

hand signals to communicate with each other and to signify their association with the Bloods or a set of the Bloods.

10. The following are examples of verbal codes used by Bloods, and particularly, by members of Sex, Money, Murder:

- a. "550" refers to a "neutral" or someone who is neither a blood nor rival gang member;
- b. "Put in work" means to commit an act of violence, which may include murder;
- c. "Bulletproof" refers to a person who is affiliated or associated with the Bloods but not a formal member;
- d. "031" means "I have love for my Bloods;" and
- e. "Crab" or "Brab" is a derogatory term for a member of rival Crips gang.

11. Sex, Money, Murder, as with most Bloods sets, maintains a system of rules and regulations governing the Bloods, its membership, and entry into the Bloods; these regulations establish a hierarchical membership structure headed by a Five-Star General, with a second in command known as the "101," followed by the "102."

12. The rules governing entry into the Bloods sometimes require those seeking membership to commit acts of violence against another person, or to be beaten in by one or more fellow Bloods member for 31 seconds, referred to as a "31" or being "jumped in." Bloods members are also at times beaten by fellow

members as a form of punishment for violating the rules of the set.

13. The rules governing the Bloods also establish penalties for those who violate the rules and/or "disrespect" higher ranking members of the Bloods. Such penalties can include (a) being stripped of one's status within the Bloods, (b) being placed on probationary status within the Bloods, and/or (c) being labeled "food." All members of the Bloods are directed to violently attack and/or kill any person labeled as "food."

14. Members of Sex, Money, Murder, as with all Bloods sets, often wear signature red clothing, including hats, shirts, pants, beads, and bandanas or handkerchiefs, which they call "rags" or "flags." At times, members of the Bloods have switched from red to other colors in an attempt to evade law enforcement detection.

15. The rules and regulations governing the Bloods, including members of Sex, Money, Murder, require members to cross out the letter "C" whenever they write that letter. This is done out of disrespect for members of the "Crips."

16. The criminal activity of Sex, Money, Murder also includes general intimidation of persons who threaten or who are perceived to pose a threat to the gang's power or control of a neighborhood as well as the disciplining of members and

associates who undermine or are perceived to undermine the power and authority of the enterprise and its members.

17. Members and associates of Sex, Money, Murder at times have used the enterprise's resources to advance their personal interests, and at times have assisted members of other Blood Sets and others to advance the interests of such other persons.

Role of the Defendants

18. Defendant TOMMY TERRELL THOMPSON was the leader or Five-Star General of Sex, Money, Murder, and in that role, he participated in the operation and management of the enterprise by directing other members of the enterprise in the carrying out of unlawful and other activities in furtherance of the conduct of the enterprise's affairs. Defendant David Neally was an associate of Sex, Money, Murder.

The Racketeering Conspiracy

19. Between in or about July 2002 and February 2004 of this Indictment, within the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

and others, being persons employed by and associated with Sex, Money, Murder, which engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully, knowingly and intentionally conspired to violate Title 18, United States Code, Section 1962(c), that is to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise, through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5).

20. The pattern of racketeering activity through which the defendant and others agreed to conduct the affairs of the enterprise consisted of the acts set forth in Racketeering Acts One through Six, as set forth in Count Two of this Indictment, which are incorporated as if fully set forth herein. It was a further part of the conspiracy that the defendant and others agreed that a coconspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Purposes Of The Enterprise

21. The purposes of the Sex, Money, Murder enterprise included the following:

a. enriching the members and associates of the enterprise through, among other things, acts in violation of the laws of the United States and the State of New Jersey involving murder, robbery, threats of violence, narcotics trafficking, and intimidation of witnesses;

b. preserving and protecting the power of the enterprise, and its members and associates, both in and out of prison, through the use of acts in violation of the laws of the United States and the State of New Jersey involving murder, robbery, threats of violence, narcotics trafficking, and intimidation of witnesses; and

c. promoting and enhancing the enterprise as well as the Bloods street gang in general and the activities of its members and associates.

Means and Methods of the Enterprise

22. Among the means and methods by which the members and associates of the enterprise conduct and participate in the conduct of the affairs of the enterprise are the following:

a. defendant TOMMY TERRELL THOMPSON created and expanded the Sex, Money, Murder set of the Bloods in Jersey City, New Jersey by recruiting individuals and causing them to be beaten or jumped into the set;

b. members of Sex, Money, Murder maintained the power and authority of the set by instilling in rivals, potential

rivals, and others in the community, a sense of fear which members of Sex, Money, Murder created by committing acts of violence, including shootings, assaults and armed robberies;

c. additionally, Sex, Money, Murder members maintained an area of drug territory by shooting or threatening to shoot non-members who sold narcotics in the area without permission of the set's leaders; this allowed Sex, Money, Murder members to have unfettered access to lucrative drug locations in which to sell heroin, powder cocaine and other narcotic drugs;

d. members of Sex, Money, Murder would shoot or rob rival drug dealers who impeded, or were believed to have impeded, the successful drug activities of the members of the set;

e. additionally, Sex, Money, Murder members would rob area drug dealers and others for financial gain;

f. defendant TOMMY TERRELL THOMPSON, as the Five Star General of the set, would order subordinate members to attack and assault members of the set who had violated the set's rules or otherwise had fallen into disfavor;

g. defendant TOMMY TERRELL THOMPSON would order subordinate members to attack and assault individuals he believed to be members of the rival Crip gang; and

h. defendant TOMMY TERRELL THOMPSON would order subordinate members to shoot individuals he believed were cooperating with law enforcement against the set and its members.

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

COUNT TWO  
(Racketeering)

1. The allegations contained in paragraphs 1 through 18, 21 and 22 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. From at least in or about July 2002 through February 2004, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

being a person employed by and associated with Sex, Money, Murder, which was engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly conduct and participate, directly and indirectly, in the conduct of the affairs of Sex, Money, Murder through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), consisting of the acts more fully described below.

The Pattern of Racketeering Activity

3. The pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), through which the defendant conducted the affairs of the enterprise consisted of the Racketeering Acts set forth as Racketeering Acts One through Six, as follows:

RACKETEERING ACT ONE  
(Conspiracy to Rob and Robbery)

4. Defendant TOMMY TERRELL THOMPSON committed the following acts, either of which alone constitutes the commission of Racketeering Act One:

a. Conspiracy to Rob

During or around Summer 2003, in the District of New Jersey and elsewhere, defendant TOMMY TERRELL THOMPSON did knowingly and intentionally conspire and agree others to forcibly rob another person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:15-1.

b. Robbery

During or around Summer 2003, in the District of New Jersey and elsewhere, defendant TOMMY TERRELL THOMPSON did forcibly rob another person, in violation of N.J.S.A. Sections 2C:2-6 and 2C:15-1.

RACKETEERING ACT TWO  
(Conspiracy to Rob and Robbery)

5. Defendant TOMMY TERRELL THOMPSON committed the following acts, either of which alone constitutes the commission of Racketeering Act Two:

a. Conspiracy to Rob

During or around Summer 2003, in the District of New Jersey and elsewhere, defendant TOMMY TERRELL THOMPSON did

knowingly and intentionally conspire and agree others to forcibly rob another person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:15-1.

b. Robbery

During or around Summer 2003, in the District of New Jersey and elsewhere, defendant TOMMY TERRELL THOMPSON did forcibly rob another person, in violation of N.J.S.A. Sections 2C:2-6 and 2C:15-1.

RACKETEERING ACT THREE

(Conspiracy and Attempt to Murder Another Person)

6. Defendant TOMMY TERRELL THOMPSON committed the following acts, either of which alone constitutes the commission of Racketeering Act Three:

a. Conspiracy to Murder Another Person

On or about August 25, 2003, in the District of New Jersey and elsewhere, defendant TOMMY TERRELL THOMPSON did knowingly and intentionally conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

b. Attempted Murder of Another Person

On or about August 25, 2003, in the District of New Jersey and elsewhere, defendant TOMMY TERRELL THOMPSON did knowingly and intentionally attempt to cause the death and

serious bodily injury resulting in death of another person, in violation of N.J.S.A. Sections 2C:2-6, 2C:5-1 and 2C:11-3(1) & (2).

RACKETEERING ACT FOUR  
(Conspiracy and Attempt to Murder Another Person)

7. Defendant TOMMY TERRELL THOMPSON committed the following acts, either of which alone constitutes the commission of Racketeering Act Three:

a. Conspiracy to Murder Another Person

On or about December 23, 2003, in the District of New Jersey and elsewhere, defendant TOMMY TERRELL THOMPSON did knowingly and intentionally conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, in violation of N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

b. Attempted Murder of Another Person

On or about December 23, 2003, in the District of New Jersey and elsewhere, defendant TOMMY TERRELL THOMPSON did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, in violation of N.J.S.A. Sections 2C:2-6, 2C:5-1 and 2C:11-3(1) & (2).

RACKETEERING ACT FIVE

(Conspiracy to Distribute Cocaine and Heroin)

8. Between 2002 and 2003, in the District of New Jersey, and elsewhere, defendant TOMMY TERRELL THOMPSON did knowingly and intentionally conspire and agree with another person to distribute and possess with the intent to distribute, a quantity of cocaine, a Schedule II narcotic drug controlled substance, and a quantity of heroin, a Schedule I narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and 846.

RACKETEERING ACT SIX

(Heroin Distribution)

9. On or about July 8, 2003, in the District of New Jersey, and elsewhere, defendant TOMMY TERRELL THOMPSON did knowingly and intentionally sell and distribute a quantity of heroin, a Schedule I narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and 846.

All of which was in violation of Title 18, United States Code, Sections 1962(c).

COUNTS THREE THROUGH ELEVEN  
(Violent Crimes In Aid of Racketeering)

Introduction to Counts Relating to the  
Commission of Violent Crimes in Aid of Racketeering

1. The allegations contained in paragraphs 1 through through 18, 21 and 22 of Count One are hereby realleged and incorporated by reference as though set forth fully herein.

2. At all times relevant to this Indictment, in the District of New Jersey and elsewhere, the defendant, as set forth in Counts 3 through 11, was a member of Sex, Money, Murder, and as more fully described in paragraphs 1 through 18, 21 and 22 of Count One. This criminal organization constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which engaged in, and the activities of which affected, interstate commerce.

3. At all times relevant to this Indictment, Sex, Money, Murder, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, among other things,

a. acts involving murder and robbery under the laws of the state of New Jersey; and

b. narcotics distribution and conspiracy to commit narcotics distribution, in violation of Title 21, United States Code.

COUNT THREE  
(Assault With a Dangerous Weapon)

1. The allegations contained in paragraphs 1 through 3 of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about February 16, 2003, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

for the purpose of gaining entrance into, maintaining and increasing his position in Sex, Money, Murder, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person with a dangerous weapon, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

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

COUNT FOUR  
(Assault With a Dangerous Weapon)

1. The allegations contained in paragraphs 1 through 3

of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about March 9, 2003, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

for the purpose of gaining entrance into, maintaining and increasing his position in Sex, Money, Murder, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person with a dangerous weapon, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

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

COUNT FIVE  
(Assault With a Dangerous Weapon)

1. The allegations contained in paragraphs 1 through 3

of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about August 16, 2003, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

for the purpose of gaining entrance into, maintaining and increasing his position in Sex, Money, Murder, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person with a dangerous weapon, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

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

COUNT SIX  
(Murder Conspiracy)

1. The allegations contained in paragraphs 1 through 3

of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about August 25, 2003, in the District of New Jersey and elsewhere, defendants

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

and

DAVID NEALLY,  
a/k/a "Wee Wee,"

for the purpose of gaining entrance into, maintaining and increasing his position in Sex, Money, Murder, which enterprise was engaged in racketeering activity, did knowingly and intentionally conspire and agree with others to cause the death and serious bodily injury resulting in death of another person, contrary to N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a) (5) and 2.

COUNT SEVEN  
(Attempted Murder)

1. The allegations contained in paragraphs 1 through 3

of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about August 25, 2003, in the District of New Jersey and elsewhere, defendants

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

and

DAVID NEALLY,  
a/k/a "Wee Wee,"

for the purpose of gaining entrance into, maintaining and increasing his position in Sex, Money, Murder, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of another person, contrary to N.J.S.A. Sections 2C:2-6, 2C:5-1 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a) (5) and 2.

COUNT EIGHT  
(Assault With a Dangerous Weapon)

1. The allegations contained in paragraphs 1 through 3

of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about August 25, 2003, in the District of New Jersey and elsewhere, defendants

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

and

DAVID NEALLY,  
a/k/a "Wee Wee"

for the purpose of gaining entrance into, maintaining and increasing his position in the Sex, Money, Murder, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person with a dangerous weapon, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

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

COUNT NINE  
(Murder Conspiracy)

1. The allegations contained in paragraphs 1 through 3

of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about December 23, 2003, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

for the purpose of gaining entrance into, maintaining and increasing his position in Sex, Money, Murder, which enterprise was engaged in racketeering activity, did knowingly and intentionally conspire and agree with each other and others to cause the death and serious bodily injury resulting in death of a person, contrary to N.J.S.A. Sections 2C:5-2 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT TEN  
(Attempted Murder)

1. The allegations contained in paragraphs 1 through 3

of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about December 23, 2003, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

for the purpose of gaining entrance into, maintaining and increasing his position in Sex, Money, Murder, which enterprise was engaged in racketeering activity, did knowingly and intentionally attempt to cause the death and serious bodily injury resulting in death of T.H., in violation of N.J.S.A. Sections 2C:5-2, 2C:2-6 and 2C:11-3(1) & (2).

In violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT ELEVEN  
(Assault With A Dangerous Weapon)

1. The allegations contained in paragraphs 1 through 3

of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about December 23, 2003, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

for the purpose of gaining entrance into, maintaining and increasing his position in Sex, Money, Murder, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person with a dangerous weapon, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

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

COUNT TWELVE  
(Assault With A Dangerous Weapon)

1. The allegations contained in paragraphs 1 through 3

of the Introduction to Counts Relating to the Commission of Violent Crimes in Aid of Racketeering are hereby realleged and incorporated by reference as though set forth fully herein.

2. On or about December 23, 2003, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

for the purpose of gaining entrance into, maintaining and increasing his position in Sex, Money, Murder, which enterprise was engaged in racketeering activity, did knowingly and intentionally assault another person with a dangerous weapon, contrary to N.J.S.A. Sections 2C:2-6 and 2C:12-1.

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

COUNT THIRTEEN

(Possession, Use and Carrying of a Firearm for Violent Crime)

1. During or around Summer 2003, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

during and in relation to a crime of violence for which he may be prosecuted in a Court of the United States, specifically the Conspiracy to Commit Robbery and Robbery charged in Racketeering Act One herein, did knowingly and intentionally use, carry, and, in furtherance of such crime, possess a firearm.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and (iii), and 2.

COUNT FOURTEEN

(Possession, Use and Carrying of a Firearm for Violent Crime)

1. During or around Summer 2003, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

during and in relation to a crime of violence for which he may be prosecuted in a Court of the United States, specifically the Conspiracy to Commit Robbery and Robbery charged in Racketeering Act Two herein, did knowingly and intentionally use, carry, and, in furtherance of such crime, possess a firearm.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and (iii), and 2.

COUNT FIFTEEN

(Possession, Use and Discharge of a Firearm for Violent Crime)

1. On or about August 25, 2003, in the District of New Jersey and elsewhere, defendants

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

and

DAVID NEALLY,  
a/k/a "Wee Wee,"

during and in relation to a crime of violence, specifically the Murder Conspiracy alleged in COUNT SIX, the Attempted Murder alleged in COUNT SEVEN, and the Assault With A Dangerous Weapon alleged in COUNT EIGHT herein, did knowingly and intentionally use, carry, discharge and, in furtherance of such crime, possess a firearm.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and (iii), and 2.

COUNT SIXTEEN

(Possession, Use and Discharge of a Firearm for Violent Crime)

1. On or about December 23, 2003, in the District of New Jersey and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"

a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

during and in relation to a crime of violence, specifically the Murder Conspiracy alleged in COUNT NINE, the Attempted Murder alleged in COUNT TEN, and the Assault With A Dangerous Weapon alleged in COUNT ELEVEN herein, did knowingly and intentionally use, carry, discharge and, in furtherance of such crime, possess a firearm.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and (iii), and 2.

COUNT SEVENTEEN

(Conspiracy to Distribute Cocaine and Heroin)

Between 2002 and 2003, in the District of New Jersey, and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"  
a/k/a "Omega Red,"

a/k/a "Mega,"  
a/k/a "Big Homey,"

did knowingly and intentionally conspire and agree with other persons to distribute and possess with the intent to distribute, a quantity of cocaine, a Schedule II narcotic drug controlled substance, and a quantity of heroin, a Schedule I narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

COUNT EIGHTEEN  
(Heroin Distribution)

On or about July 8, 2003, in the District of New Jersey, and elsewhere, defendant

TOMMY TERRELL THOMPSON,  
a/k/a "Rel,"

a/k/a "Omega Red,"  
a/k/a "Mega,"  
a/k/a "Big Homey,"

did knowingly and intentionally sell and distribute a quantity of heroin, a Schedule I narcotic drug controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

A TRUE BILL

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FOREPERSON

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CHRISTOPHER J. CHRISTIE  
UNITED STATES ATTORNEY