

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

08-60018 CR-MARRA  
CASE NO. 18 USC 1962(d)

MAGISTRATE JUDGE  
VITUNAC

UNITED STATES OF AMERICA,

Plaintiff,

v.

EARNEST COPELAND,  
a/k/a Gully,  
a/k/a Wuz,  
a/k/a Buzz,  
a/k/a Hakim,  
RAYMOND EDWARD DESINOR,  
a/k/a Spider,  
ALFRED JEROME ALLEN,  
a/k/a Juggernaut,  
a/k/a Fred,  
ALDEN BERT BUDHOO,  
a/k/a Alpo,  
a/k/a Po,  
RANDOLPH DERCIVAL BARROW,  
a/k/a Debo,  
MICHAEL M. PETTY,  
a/k/a Ox,  
OMEAL ANTHONY LEE,  
a/k/a 50,  
a/k/a Oaks,  
WILLIE LEE ELLIS,  
a/k/a Peanut,  
JEFFREY BYRD, JR.,  
SHARLENE COPELAND,  
a/k/a Shelly,  
a/k/a Sharlene S. Grant,  
AMR KAHLIL RAMSON,  
a/k/a A.R.,  
LINUS S. BRIDGELAL,  
a/k/a Trini,  
a/k/a/Shawn Benjamin,

FILED  
2008 JUN 24 PM 2:07  
D.C.

TYRONE DOOLAM,  
a/k/a T., and  
DAQUAN THOMAS,  
a/k/a S.K.,

Defendants.

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INDICTMENT

The Grand Jury charges:

INTRODUCTION

At all times relevant to this Indictment:

1. The Bloods gang, also known variously as "Bloods," "Neighborhood Piru," and "NHP" (hereinafter "Bloods"), was an organized criminal group that operated in the Southern District of Florida and elsewhere.

2. The Bloods operated as a group of individuals, headed by a person referred to as an "OG," which stands for "Original Gangsta." The "OG" was a member of the Bloods who had gained the respect of other members as a result of past criminal acts. The Bloods group, which was referred to as a "set," consisted of inducted members of the Bloods and of non-member criminal associates of the Bloods. The non-member criminal associates were not formally inducted members of the Bloods, but engaged in and participated in organized criminal activity under the authority of the "OG" or other formally inducted Bloods member.

3. The "OG" was responsible for supervising the criminal activities of the set, and provided set members and

associates with direction, support and protection. In return, the "OG" received a share of the proceeds earned through the criminal activities of each of the set's members and associates, which payments were designated as "dues."

4. The "OG" represented members of the set in resolving disputes with other members of the Bloods, resolving disputes between members of the set and members of other criminal organizations, and authorized the commission of wide-ranging criminal acts. The OG had the power to raise or lower a gang member's status.

5. The Bloods was a criminal organization. The members and associates of the Bloods were united by their common criminal interests. While the membership of the Bloods changed during the period of time charged in this indictment, and not all members and associates pursued each unlawful end, the structure of the Bloods remained intact.

6. Defendant EARNEST COPELAND was the "OG" in the Bloods. Defendant EARNEST COPELAND controlled the set operating in the Southern District of Florida, including the members and associates of the set named herein. Defendant EARNEST COPELAND supervised the activities of the set, the members and associates of which are identified below, and received dues and other proceeds generated through the commission of criminal acts.

7. Defendants RAYMOND EDWARD DESINOR, ALFRED JEROME

ALLEN, ALDEN BERT BUDHOO, RANDOLPH DERCIVAL BARROW, MICHAEL M. PETTY, OMEAL ANTHONY LEE, WILLIE LEE ELLIS, JEFFREY BYRD, JR., SHARLENE COPELAND, AMR KAHLIL RAMSON, LINUS S. BRIDGELAL, TYRONE DOOLAM, and DAQUAN THOMAS were members of, or were associated with, the set. The set's activities were based in Miramar, Florida, but the members and associates operated in other areas of the Southern District of Florida.

#### THE ENTERPRISE

8. The set, known variously as "Bloods," "Neighborhood Piru," and "NHP," constituted an "Enterprise," as that term is defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact although not a legal entity, which Enterprise engaged in, and the activities of which affected, interstate and foreign commerce. The Enterprise constituted an ongoing organization, the members and associates of which functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise.

#### THE CONSPIRACY

9. From in or about January 2006 and continuing thereafter up to and including the date of the return of this Indictment, in the Southern District of Florida, the defendants:

EARNEST COPELAND,  
a/k/a Gully,  
a/k/a Wuz,  
a/k/a Buzz,  
a/k/a Hakim,

RAYMOND EDWARD DESINOR,  
a/k/a Spider,  
ALFRED JEROME ALLEN,  
a/k/a Juggernaut,  
a/k/a Fred,  
ALDEN BERT BUDHOO,  
a/k/a Alpo,  
a/k/a Po,  
RANDOLPH DERCIVAL BARROW,  
a/k/a Debo,  
MICHAEL M. PETTY,  
a/k/a Ox,  
OMEAL ANTHONY LEE,  
a/k/a 50,  
a/k/a Oaks,  
WILLIE LEE ELLIS,  
a/k/a Peanut,  
JEFFREY BYRD, JR.,  
SHARLENE COPELAND,  
a/k/a Shelly,  
a/k/a Sharlene S. Grant,  
AMR KAHLIL RAMSON,  
a/k/a A.R.,  
LINUS S. BRIDGELAL,  
a/k/a Trini,  
a/k/a/Shawn Benjamin,  
TYRONE DOOLAM,  
a/k/a T., and  
DAQUAN THOMAS,  
a/k/a S.K.,

being persons employed by and associated with an Enterprise, that is, the Bloods set described hereinabove, which Enterprise engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly, willfully and unlawfully combine, conspire, confederate, and agree, together and with each other, and with other persons known and unknown to the Grand Jury, 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 that term is defined in Title 18, United States Code, Sections 1961(1) and (5), as set forth hereinbelow in paragraph 10.

THE PATTERN OF RACKETEERING ACTIVITY

10. The pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), through which the defendants and their co-conspirators agreed to conduct and participate in the conduct of the affairs of the Enterprise consisted of multiple acts and threats involving:

(a) Murder, Attempted Murder and Conspiracy to Commit Murder, in violation of Sections 782.04 and 777.04 Florida Statutes;

(b) Robbery, Attempted Robbery and Conspiracy to Commit Robbery, in violation of Sections 812.13 and 777.04 Florida Statutes;

(c) Extortion, Attempted Extortion and Conspiracy to Commit Extortion, in violation of Sections 836.05 and 777.04 Florida Statutes;

(d) Kidnaping, Attempted Kidnaping and Conspiracy to Commit Kidnaping, in violation of Sections 787.01 and 777.04 Florida Statutes; and

(e) Dealing in Controlled Substances and Listed Chemicals, Attempt to Deal in Controlled Substances and Listed Chemicals and Conspiracy to Deal in Controlled Substances and

Listed Chemicals, in violation of Sections 893.13 and 777.04 Florida Statutes;

and acts which are indictable under the following provisions:

(f) Tampering with a Witness, in violation of Title 18, United States Code, Section 1512; and Conspiracy to do so, in violation of Title 18, United States Code, Section 371;

(g) Retaliating Against a Witness, in violation of Title 18, United States Code, Section 1513; and Conspiracy to do so, in violation of Title 18, United States Code, Section 371;

(h) Interference with Commerce by Threats and Violence, and Conspiracy to do so, in violation of Title 18, United States Code, Section 1951; and

(I) Possession With Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 841 and Conspiracy to Possess With Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 846.

#### ROLES AND RESPONSIBILITIES OF THE CONSPIRATORS

11. The members of the Bloods each engaged in diverse crimes on behalf of the Enterprise and had overlapping roles and responsibilities described as follows:

(a) Defendant EARNEST COPELAND was the "OG" and, as such, was the organizer/supervisor of the set. He supervised the various criminal activities of the set. Defendant COPELAND identified

potential victims of various criminal acts, including, murder, robbery, extortion, kidnaping, assault, burglary and witness intimidation, and directed members and associates of the set to carry out such acts. Defendant COPELAND provided firearms to be used by members of the set in various criminal acts. Defendant COPELAND planned criminal acts to be perpetrated by the members of the set and received tribute from the criminal proceeds generated through such crimes. Defendant COPELAND issued monetary and/or physical sanctions, known as "violations," to members and associates of the set as a result of perceived non-compliance with his orders, instructions and/or dictates. Defendant COPELAND authorized a "green light" on individuals, which term refers to the approval for assault and/or murder of such persons by members and associates of the set. Defendant COPELAND represented the interests of the Bloods during interaction with other gang members and associates. The criminal activities of the set were perpetrated under COPELAND's authority. Defendant COPELAND communicated with Bloods members who were superior to him in the gang hierarchy and reported on the activities of the gang and its members. Defendant COPELAND, during the period of his incarceration, solicited money from members and associates of the set in order to pay for a criminal defense attorney and for the domestic expenses of his wife, SHARLENE COPELAND.

(b) Defendants RAYMOND EDWARD DESINOR and DAQUAN THOMAS



and other co-conspirators were set leaders, acting under the authority of defendant COPELAND. Defendants DESINOR and THOMAS planned, organized and participated in the diverse criminal activity perpetrated by the set. Defendants DESINOR and THOMAS solicited and recruited new members for the set.

(c) Defendants RAYMOND EDWARD DESINOR, ALFRED JEROME ALLEN, ALDEN BERT BUDHOO, RANDOLPH DERCIVAL BARROW, MICHAEL M. PETTY, OMEAL ANTHONY LEE, WILLIE LEE ELLIS, JEFFREY BYRD, JR., SHARLENE COPELAND, AMR KAHLIL RAMSON, LINUS S. BRIDGELAL, TYRONE DOOLAM, and DAQUAN THOMAS and other co-conspirators were involved in diverse criminal activities as part of their association with the Enterprise. The defendants participated in murder and assault conspiracies, armed robberies of individuals and commercial businesses and armed home invasions. The defendants confronted members of rival gangs in order to maintain and protect the territory and reputation of the Bloods. The defendants participated in the theft of automobiles and burglaries. The defendants participated in wide-ranging criminal conduct on behalf of the Enterprise and paid tribute to defendant COPELAND and others through criminally derived proceeds.

(d) Defendant SHARLENE COPELAND, during the pendency of defendant EARNEST COPELAND's incarceration, facilitated the communication of instructions received from defendant EARNEST COPELAND to members and associates of the set regarding the

operation and management of the set. Defendant SHARLENE COPELAND discussed the operation, management and supervision of the set with incarcerated defendant EARNEST COPELAND. Defendant SHARLENE COPELAND, on behalf of incarcerated defendant EARNEST COPELAND, solicited money from members and associates of the set to pay for a criminal defense attorney for defendant EARNEST COPELAND and for the domestic expenses of defendant SHARLENE COPELAND.

#### THE PURPOSE OF THE ENTERPRISE

12. The principal purpose of the Enterprise was to generate money for its members and associates through the commission of various criminal acts, including, among other crimes, armed robbery, armed home invasion, robbery of commercial businesses, extortion, kidnaping, drug trafficking, and criminal acts involving the felonious buying, selling and otherwise dealing in narcotics and other dangerous drugs, tampering with witnesses, retaliating against witnesses, interfering with commerce by robbery and extortion, in such a way as to avoid detection by law enforcement agents. Among the methods and means by which members and associates of the Enterprise furthered its criminal activities was the threatened and actual use of force and violence, including murder.

#### METHOD AND MEANS

13. It was part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of

racketeering activity in the conduct of the affairs of the Enterprise or would otherwise agree on the overall objective of the Enterprise.

(a) The members and associates of the set planned criminal conduct with defendant COPELAND, received instructions from defendant COPELAND, and paid tribute to defendant COPELAND.

(b) The members and associates of the set committed diverse crimes in the Southern District of Florida which included, but were not limited to, acts involving murder, commercial robberies, home invasion robberies, robberies of individuals, assault, extortion, dealing in controlled substances, burglary and automobile theft.

(c) The members and associates of the set wore signature red and/or burgundy clothing, including hats, shirts, pants, beads and bandanas or handkerchiefs, which the gang members called "rags" or "flags."

(d) The members and associates of the set engaged in criminal activity to protect and maintain the geographic territory over which the gang claimed control. Such activity included murder, assault, kidnaping, and discharge of firearms at persons and dwellings. The members and associates of the set marked their territory by using specially "tagged" graffiti, which included words, numbers and symbols.

(e) The members and associates of the set organized and

participated in violent initiation ceremonies known as "jump ins" whereby new members were viciously assaulted by members of the set for a period of approximately thirty-one seconds. Additionally, the rules governing entry into the gang enabled the OG to "bless in" a potential gang member by verifying such member's status with other gang members. Sometimes the OG required those seeking membership to commit acts of violence, and in the case of a female, sexual acts with gang members.

(f) The members and associates of the set were compelled to follow the instructions, orders and dictates of defendant COPELAND or suffer monetary and/or physical sanctions, known as "violations." Such violations could culminate in the violator being labeled as "food," subjecting the violator to potential murder by members and associates of the set.

(g) The members and associates of the set used a system of hand signals called "stacking" to communicate among and between gang members. The members and associates further used coded language during verbal and written communications in order to conceal and disguise the true nature and import of these communications.

(h) The members and associates of the set illegally obtained firearms in South Florida to be used in the commission of violent criminal activities.

(I) The members and associates of the set committed

"drive-by" shootings during which they discharged firearms from vehicles at individuals and residences in order to maintain and enhance their dominion over certain geographical areas and the violent reputation of the gang.

(j) The members and associates of the set kidnaped, restrained and assaulted robbery victims in order to force them to turn over money and property.

(k) The members and associates of the set illegally sold goods obtained from individuals and commercial businesses by means of force and violence.

(l) The members and associates of the set stole automobiles to be used during the commission of violent criminal acts against individuals and businesses.

(m) The members and associates of the set obtained and sold controlled substances, including marijuana and cocaine, in order to generate profits.

(n) The members and associates of the set arranged for telephonic and personal communication among and between incarcerated criminal set members and non-incarcerated members of the set. Such activity was to ensure the continued supervision of the set by the gang leaders and to ensure that members of the set remained loyal to the set and did not cooperate with law enforcement authorities.

(o) The members and associates of the set engaged in

conduct designed to prevent government detection of their identities, their illegal activities and the proceeds of their activities. That conduct included the intimidation, threatening, tampering, assaulting and attempted murder of potential witnesses against the set and its members, including law enforcement officers who were investigating criminal conduct committed by members and associates of the set..

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

A TRUE BILL

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FOREPERSON

*Rogert Steffen, for*  
\_\_\_\_\_  
R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY

*Lawrence D. Lavecchio*  
\_\_\_\_\_  
LAWRENCE D. LAVECCHIO  
ASSISTANT U. S. ATTORNEY

*for* *Paul F. Schwartz*  
\_\_\_\_\_  
PAUL F. SCHWARTZ  
ASSISTANT U. S. ATTORNEY