

KJD

68

RE-INDICTMENT / RULE 9 WARRANT

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

STATE OF DELAWARE)	
)	
V.)	INDICTMENT BY THE GRAND JURY
)	
AZHE ALLEN)	I.D. #1605013866
NAKEEM BAILEY)	I.D. #1605014261
DANTE COOPER)	I.D. #1605013857
SHAKA DORSEY)	I.D. #1606024600
ANTHONY FISTZGILES)	I.D. #1606024605
KYAIR HENRY)	I.D. #1606020173
OLIVER HENRY)	I.D. #1606024612
JABRI HUNTER)	I.D. #1606020165
THEODORE JOHNSON)	I.D. #1606024522
RAQUAN JORDAN)	I.D. #1606024523
JAHLIL LEWIS)	I.D. #1605013839
NA-QUAN LEWIS)	I.D. #1606013385
JOVAN MARTIN)	I.D. #1606024615
STEPHAN MINUS)	I.D. #1606001282
ARVEL NESMITH)	I.D. #1606024621
NASEEM PARKS)	I.D. #1606002200
ARTIE PRATT)	I.D. #1606024629
MALIK PURNELL)	I.D. #1606020169
JAHDI RAINEY)	I.D. #1606024648
# LLOYD SMITH)	I.D. #1607010661
ZAKIER SMITH)	I.D. #1606024651
SHA'MIR SUDLER)	I.D. #1609005096
ELIJAH THOMAS)	I.D. #1608015353
DONALD TILLMAN)	I.D. #1606024672
JEREMY TUNNELL)	I.D. #1504021469
KENNETH TRUITT)	I.D. #1609005102
TAVION WASHINGTON)	I.D. #1606024679 / #1509004005
MALIK WINTERS)	I.D. #1603002220

The Grand Jury charges AZHE ALLEN, NAKEEM BAILEY, DANTE COOPER, SHAKA DORSEY, ANTHONY FISTZGILES, KYAIR HENRY, OLIVER HENRY, JABRI HUNTER, THEODORE JOHNSON, RAQUAN JORDAN, JAHLIL LEWIS, NA-QUAN LEWIS, JOVAN MARTIN, STEPHAN MINUS, ARVEL NESMITH, NASEEM PARKS, ARTIE PRATT, MALIK PURNELL, JAHDI RAINEY, LLOYD SMITH, ZAKIER SMITH, SHA'MIR

SUDLER, ELIJAH THOMAS, DONALD TILLMAN, JEREMY TUNNELL, KENNETH TRUITT, TAVION WASHINGTON AND MALIK WINTERS with the following offenses;

COUNT 1. A FELONY

#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____

GANG PARTICIPATION in violation of Title 11, Section 616 of the Delaware Code.

AZHE ALLEN, NAKEEM BAILEY, DANTE COOPER, SHAKA DORSEY, ANTHONY FISTZGILES, KYAIRE HENRY, OLIVER HENRY, JABRI HUNTER, THEODORE JOHNSON, RAQUAN JORDAN, JAHLIL LEWIS, NA-QUAN LEWIS, JOVAN MARTIN, STEPHAN MINUS, ARVEL NESMITH, NASEEM PARKS, ARTIE PRATT, JAHDI RAINEY, LLOYD SMITH, ZAKIER SMITH, SHA'MIR SUDLER, ELIJAH THOMAS, DONALD TILLMAN, JEREMY TUNNELL, KENNETH TRUITT, TAVION WASHINGTON AND MALIK WINTERS, on or between the 23rd day of January, 2015 and the 11th day of September, 2016, in the County of New Castle, State of Delaware, did knowingly participate in a criminal street gang known as Only My Brothers, aka "OMB", and did actively promote, further or assist in any criminal conduct by members of that gang, with knowledge that its members did engage in or had engaged in a pattern of criminal gang activity, as defined in 11 Del. C. § 616(a)(2), by having committed, attempted to commit, having conspired to commit, or having solicited the commission of two or more of the following predicate offenses:

1. ANTHONY FISTZGILES, on or about the 25th day of February, 2015, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.
2. ANTHONY FISTZGILES, on or about the 25th day of February, 2015, in the County of New Castle, State of Delaware, did engage in conduct constituting Carrying a Concealed Deadly Weapon, as defined by Title 11, Section 1442 of the Delaware Code of 1974, as amended;
3. JABRI HUNTER, on or about the 17th day of May, 2015, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.
4. ANTHONY FISTZGILES, on or about the 25th day of August, 2015, in the County of New Castle, State of Delaware, did engage in conduct constituting Carrying a Concealed Deadly Weapon, as defined by Title 11, Section 1442 of the Delaware Code of 1974, as amended;
5. NAKEEM BAILEY, DANTE COOPER, SHAKA DORSEY, KYAIRE HENRY, JABRI HUNTER, JAHLIL LEWIS, STEPHAN MINUS, NASEEM PARKS, JAHDY RAINY, LLOYD SMITH, ZAKIER SMITH, ELIJAH THOMAS, TAVION WASHINGTON OR MALIK WINTERS, on or between the 1st day of February and the 11th day of September, 2016, in the County of New Castle, State of Delaware, as juveniles under the age of 18, did knowingly possess a handgun, a firearm, and did engage in conduct constituting Possession of a Firearm by a Person Prohibited, as

defined by Title 11, Section 1448 of the Delaware Code, and did not do so for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under direct or indirect supervision of an adult.

6. RAQUAN JORDAN, OLIVER HENRY, JOVAN MARTIN, ARTIE PRATT, OR KENNETH TRUITT, on or between the 1st day of February, and the 4th day of July, 2016, in the County of New Castle, State of Delaware, did knowingly possess a handgun, a firearm, and did engage in conduct constituting Possession of a Firearm By Person Prohibited, as defined by Title 11, Section 1448 of the Delaware Code of 1974, after having been adjudicated delinquent in the Family Court of the State of Delaware, in and for New Castle County, to a charge which, if committed by an adult, would constitute a felony, and the defendants had not reached his 25th birthday.

7. NAQUAN LEWIS, on or about the 4th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly possess a handgun, a firearm, and did engage in conduct constituting Possession of a Firearm by a Person Prohibited, as defined by Title 11, Section 1448 of the Delaware Code, after having been convicted in the Superior Court of the State of Delaware of Robbery Second Degree, a violent felony, in Case Number 1411015792, on or about July 10, 2015.

8. ARVEL NESMITH, on or about the 17th day of May 2016, in the County of New Castle, State of Delaware, did knowingly possess a handgun, a firearm, and did engage in conduct constituting Possession of a Firearm by a Person Prohibited, as defined by Title 11, Section 1448 of the Delaware Code, after having been convicted in the Superior Court of the State of Delaware of Reckless Endangering First Degree, a violent felony, in Case Number 1508013151, on or about December 22, 2015.

9. NAKEEM BAILEY, on or about the 17th day of May, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Carrying a Concealed Deadly Weapon, as defined by Title 11, Section 1442 of the Delaware Code of 1974, as amended;

10. NAKEEM BAILEY, on or about the 17th day of May, 2016, in the County of New Castle, State of Delaware, did engage in, attempt to engage in, conspire to engage in or solicit, coerce, or intimidate another person to engage in Robbery First degree as defined by Title 11, Section 832 of the Delaware Code of 1974, as amended;

11. NAKEEM BAILEY, on or about the 17th day of May, 2016, in the County of New Castle, State of Delaware, did engage in, attempt to engage in, conspire to engage in or solicit, coerce or intimidate another person to engage in Assault First Degree as defined in Title 11, Section 613 of the Delaware Code of 1974, as amended;

12. NAKEEM BAILEY, on or between the 17th day of May, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Possession of a Firearm During Commission of a Felony, as defined by Title 11, Sections 1447A, of the Delaware Code of 1974, as amended, during incidents including but not limited to a Robbery or Assault First Degree on May 17, 2016.

13. AZHE K. ALLEN, DANTE COOPER, JEREMY TUNNELL OR JAHLIL LEWIS, on or about the 19th day of May, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Carrying a Concealed Deadly Weapon, as defined by Title 11, Section 1442 of the Delaware Code of 1974, as amended;

14. STEPHAN MINUS, on or about the 2nd day of June, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Carrying a Concealed Deadly Weapon, as defined by Title 11, Section 1442 of the Delaware Code of 1974, as amended;

15. STEPHAN MINUS, on or between the 2nd day of June, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Possession of a Firearm During Commission of a Felony, as defined by Title 11, Sections 1447A, of the Delaware Code of 1974, as amended, during incidents including but not limited to an Aggravated Menacing on June 2, 2016.

16. NASEEM PARKS, on or about the 3rd day of June, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Carrying a Concealed Deadly Weapon, as defined by Title 11, Section 1442 of the Delaware Code of 1974, as amended;

17. NASEEM PARKS, on or about the 3rd day of June, 2016, in the County of New Castle, State of Delaware, did engage in, attempt to engage in, conspire to engage in or solicit, coerce or intimidate another person to engage in Assault First Degree as defined in Title 11, Section 613 of the Delaware Code of 1974, as amended;

18. NASEEM PARKS, on or about the 3rd day of June, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Possession of a Firearm During Commission of a Felony, as defined by Title 11, Sections 1447A, of the Delaware Code of 1974, as amended, during incidents including but not limited to an Attempted Assault or Reckless Endangering First Degree on June 3, 2016.

19. KYAIRE HENRY OR JABRI HUNTER, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Possession of a Firearm During Commission of a Felony, as defined by Title 11, Sections 1447A, of the Delaware Code of 1974, as amended, including but not limited to the incident of Drug Dealing Marijuana.

20. KYAIRE HENRY OR JABRI HUNTER, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting

Drug Dealing, by knowingly possessing with intent to deliver marijuana, a controlled substance.

21. KYAIRE HENRY OR JABRI HUNTER, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Carrying a Concealed Deadly Weapon, as defined by Title 11, Section 1442 of the Delaware Code of 1974, as amended;

22. ANTHONY FISTZGILES, on or about the 10th day of June, 2016, in the County of New Castle, State of Delaware, did engage in, attempt to engage in, conspire to engage in or solicit, coerce or intimidate another person to engage in Assault First Degree as defined in Title 11, Section 613 of the Delaware Code of 1974, as amended;

23. ANTHONY FISTZGILES, on or about the 10th day of June, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Possession of a Firearm During Commission of a Felony, as defined by Title 11, Sections 1447A, of the Delaware Code of 1974, as amended, including but not limited to the incident of Attempted Assault First Degree, or Reckless Endangering First Degree.

24. ANTHONY FISTZGILES, on or about the 10th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly possess a handgun, a firearm, and did engage in conduct constituting Possession of a Firearm by a Person Prohibited, as defined by Title 11, Section 1448 of the Delaware Code, after having been convicted in the Superior Court of the State of Delaware of Carrying a Concealed Deadly Weapon (Firearm), a violent felony, in Case Number 1508019793B, on or about February 10, 2016.

25. LLOYD SMITH, on or about the 14th day of July, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Carrying a Concealed

Deadly Weapon, as defined by Title 11, Section 1442 of the Delaware Code of 1974, as amended;

26. SHA'MIR SUDLER, on or about the 27th day of March, 2016, in the County of New Castle, State of Delaware, as a juvenile under the age of 18, did knowingly possess a handgun, a firearm, and did engage in conduct constituting Possession of a Firearm by a Person Prohibited, as defined by Title 11, Section 1448 of the Delaware Code, and did not do so for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under direct or indirect supervision of an adult.

27. DONALD TILLMAN, on or between the 1st day of February and the 4th day of July, 2016, in the County of New Castle, State of Delaware, did transfer, give, lend or otherwise furnish a firearm to others in the criminal street gang known as Only My Brothers, aka "OMB", including but not limited to Artie Pratt, knowing that he or they are juveniles, or persons prohibited under Delaware law from possessing or controlling a firearm, which is conduct constituting the offense of Giving a Firearm to a Person Prohibited, as defined by Title 11, Section 1454 of the Delaware Code of 1974, as amended.

28. KENNETH TRUITT, on or about the 9th day of February, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Carrying a Concealed Deadly Weapon, as defined by Title 11, Section 1442 of the Delaware Code of 1974, as amended;

29. JEREMY TUNNELL, on or about the 27th day of April, 2015, in the County of New Castle, State of Delaware, did engage in, attempt to engage in, conspire to engage in or solicit, coerce, or intimidate another person to engage in Robbery First degree as defined by Title 11, Section 832 of the Delaware Code of 1974, as amended.

30. MALIK WINTERS, on or about the 8th day of February, 2016, in the County of New Castle, State of Delaware, did engage in, attempt to engage in, conspire to engage in or solicit, coerce or intimidate another person to engage in Assault First Degree as defined in Title 11, Section 613 of the Delaware Code of 1974, as amended;

31. MALIK WINTERS, on or about the 8th day of February, 2016, in the County of New Castle, State of Delaware, did engage in, attempt to engage in, conspire to engage in or solicit, coerce, or intimidate another person to engage in Robbery First degree as defined by Title 11, Section 832 of the Delaware Code of 1974, as amended.

32. SHAKA DORSEY, on or about the 17th day of March, 2016, in the County of New Castle, State of Delaware, did engage in, attempt to engage in, conspire to engage in or solicit, coerce or intimidate another person to engage in Assault First Degree as defined in Title 11, Section 613 of the Delaware Code of 1974, as amended;

33. SHAKA DORSEY, on or about the 17th day of March, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Possession of a Firearm During Commission of a Felony, as defined by Title 11, Sections 1447A, of the Delaware Code of 1974, as amended, including but not limited to the incident of Assault First Degree.

34. TAVION WASHINGTON, on or about the 5th day of September, 2015, in the County of New Castle, State of Delaware, did engage in conduct constituting Carrying a Concealed Deadly Weapon, as defined by Title 11, Section 1442 of the Delaware Code of 1974, as amended;

35. SHA'MIR SUDLER, on or about the 5th day of March, 2016, in the County of New Castle, State of Delaware, did engage in conduct constituting Possession of a Firearm During Commission of a Felony, as defined by Title 11, Sections 1447A, of the

Delaware Code of 1974, as amended, including but not limited to the incident of Reckless Endangering First Degree.

COUNT 2. A FELONY

#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

AZHE ALLEN, NAKEEM BAILEY, DANTE COOPER, SHAKA DORSEY, ANTHONY FISTZGILES, KYAIRE HENRY, OLIVER HENRY, JABRI HUNTER, THEODORE JOHNSON, RAQUAN JORDAN, JAHLIL LEWIS, NA-QUAN LEWIS, JOVAN MARTIN, STEPHAN MINUS, ARVEL NESMITH, NASEEM PARKS, ARTIE PRATT, JAHDI RAINEY, LLOYD SMITH, ZAKIER SMITH, SHA'MIR SUDLER, ELIJAH THOMAS, DONALD TILLMAN, JEREMY TUNNELL, KENNETH TRUITT, TAVION WASHINGTON AND MALIK WINTERS, on or between the 23rd day of January, 2015, and the 11th day of September, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a handgun, a firearm, as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Gang Participation, a felony, as set forth in Count 1 of this indictment, which is incorporated herein by reference.

COUNT 3. A FELONY

#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

AZHE ALLEN, NAKEEM BAILEY, DANTE COOPER, SHAKA DORSEY, ANTHONY FISTZGILES, KYAIRE HENRY, OLIVER HENRY, JABRI HUNTER, THEODORE JOHNSON, RAQUAN JORDAN, JAHLIL LEWIS, NA-QUAN LEWIS, JOVAN MARTIN, STEPHAN MINUS, ARVEL NESMITH, NASEEM PARKS, ARTIE PRATT, JAHDY RAINEY, LLOYD SMITH, ZAKIER SMITH, SHA'MIR SUDLER, ELIJAH THOMAS, DONALD TILLMAN, JEREMY TUNNELL, KENNETH TRUITT, TAVION WASHINGTON AND MALIK WINTERS, on or between the 23rd day of January, 2015, and the 11th day of September, 2016, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of the felony of Gang Participation, as set forth in Count 1 of this indictment, which is incorporated herein by reference, did agree with each other or another person that one, some, or all of them would engage in conduct constituting the felony or predicate felonies, and one, some or all of them did commit an overt act in furtherance of the conspiracy.

COUNT 4. A FELONY

#N _____

GIVING A FIREARM TO A PERSON PROHIBITED in violation of Title 11, Section 1454 of the Delaware Code.

DONALD TILLMAN, on or between the 1st day of February and the 4th day of July, 2016, in the County of New Castle, State of Delaware, did transfer, give, lend or otherwise furnish a firearm to others in the criminal street gang known as Only My Brothers, aka "OMB", including but not limited to Artie Pratt, knowing that he or they are juveniles, or persons prohibited under Delaware law from possessing or controlling a firearm.

COUNT 5. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

ARTIE PRATT, on or between the 2nd day of March and the 4th day of July, 2016, in the County of New Castle, State of Delaware, did knowingly own, possess or control a firearm as defined under Title 11, Section 222 of the Delaware Code of 1974, after having been adjudicated delinquent in Case Number 1405024443 in the Family Court of the State of Delaware, in and for New Castle County, on or about the 10th day of December 2014, to the charge of Possession of a Firearm by a Person Prohibited as set forth in Title 11, Section 1448 of the Delaware Code, which conduct, if committed by an adult, would constitute a felony, and the defendant had not reached his 25th birthday.

COUNT 6. A FELONY

#N _____

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

ARTIE PRATT AND DONALD TILLMAN, on or about the 2nd day of March, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a Mac-11 automatic weapon, a firearm, in addition to that set forth in Count 2, as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Gang Participation, a felony, as set forth in Count 1 of this indictment, which is incorporated herein by reference.

COUNT 7. A FELONY

#N _____

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

JAHDI RAINEY AND DANTE COOPER, on or before the 18th day of March, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 8. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

AZHE K. ALLEN, on or between the 28th day of April and the 19th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a Taurus .380 caliber semi-automatic handgun in addition to that set forth in Count 2, which is a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Gang Participation, a felony, as set forth in Count 1 of this indictment, which is incorporated herein by reference.

COUNT 9. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

AZHE K. ALLEN, on or between 28th day of April and the 19th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a Smith and Wesson .40 caliber semi-automatic handgun in addition to that set forth in Count 2, which is a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Gang Participation, a felony, as set forth in Count 1 of this indictment, which is incorporated herein by reference.

COUNT 10. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

J AHLIL LEWIS, on or about the 1st or 2nd days of May, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, an Astra A-80, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 11. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

J AHLIL LEWIS, on or about the 1st or 2nd days of May, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess an Astra A-80, a handgun in addition to that set forth in Count 2, which is a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Gang Participation, a felony, as set forth in Count 1 of this indictment, which is incorporated herein by reference.

COUNT 12. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

NA-QUAN LEWIS, on or about the 4th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully own, possess or control a firearm, an

AstraA80, which is a deadly weapon as defined by Title 11, Section 222 of the Delaware Code, after having been convicted in the Superior Court of the State of Delaware of Robbery Second Degree, a violent felony, in Case Number 1411015792, on or about July 10, 2015.

COUNT 13. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

J AHLIL LEWIS, on or about the 5th day of May, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, a Smith and Wesson Chief's Special, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 14. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

NA-QUAN LEWIS, on or about the 5th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully own, possess or control a firearm, a Smith & Wesson Chiefs Special, which is a deadly weapon as defined by Title 11, Section 222 of the Delaware Code, after having been convicted in the Superior Court of the State of Delaware of Robbery Second Degree, a violent felony, in Case Number 1411015792, on or about July 10, 2015.

COUNT 15. A FELONY

#N _____

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

J AHLIL LEWIS AND NA-QUAN LEWIS, on or about the 5th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a Smith and Wesson Chiefs Special, a handgun in addition to that set forth in Count 2, which is a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Gang Participation, a felony, as set forth in Count 1 of this indictment, which is incorporated herein by reference.

COUNT 16. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

J AHLIL LEWIS, on or between the 7th and the 13th days of May, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a Ruger LC9, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 17. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

J AHLIL LEWIS, on or between the 7th and 13th days of May, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a Ruger LC9, a handgun in

addition to that set forth in Count 2, which is a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Gang Participation, a felony, as set forth in Count 1 of this indictment, which is incorporated herein by reference.

COUNT 18. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code

SHAKA DORSEY, on or about the 10th day of May, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 19. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

OLIVER HENRY, on or about the 10th day of May, 2016, in the County of New Castle, State of Delaware, as depicted in a photograph with Shaka Dorsey, did knowingly own, possess or control a firearm as defined under Title 11, Section 222 of the Delaware Code of 1974, after having been adjudicated delinquent in Case Number 1405011088 in the Family Court of the State of Delaware, in and for New Castle County, on or about the 18th day of June 2014, to the charge of Carrying a Concealed Deadly Weapon as set forth in Title 11, Section 1442 of the Delaware Code, which conduct, if committed by an adult, would constitute a felony, and the defendant had not reached his 25th birthday.

COUNT 22. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

J AHLIL LEWIS AND ZAKIER SMITH, on or between the 13th and 15th days of May 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 23. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

TAVION WASHINGTON, on or about the 15th day of May, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 24. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

THEODORE JOHNSON, on or about the 15th day of May, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 25. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

NAKEEM BAILEY, on or about the 16th day of May 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 26. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

JOVAN MARTIN, on or about the 16th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly own, possess or control a firearm as defined under Title 11, Section 222 of the Delaware Code of 1974, after having been adjudicated delinquent in Case Number 1405011088 in the Family Court of the State of Delaware, in and for New Castle County, on or about the 18th day of June 2014, to the charge of Carrying a Concealed Deadly Weapon as set forth in Title 11, Section 1442 of the Delaware Code, which conduct, if committed by an adult, would constitute a felony, and the defendant had not reached his 25th birthday.

COUNT 27. A FELONY

#N _____

ROBBERY FIRST DEGREE in violation of Title 11, Section 832 of the Delaware Code.

NAKEEM BAILEY, on or about the 17th day of May 2016, in the County of New Castle, State of Delaware, when in the course of committing theft, did use or threaten the immediate use of force upon Michael Childress with intent to prevent or overcome resistance to the taking of property or with intent to compel said person to deliver up property or to engage in other conduct which aided in the commission of theft, and in the course of the commission of the crime or the immediate flight there from, the defendant displayed what appeared to be a firearm, a deadly weapon as that term is defined under Title 11, Section 222 of the Delaware Code.

COUNT 28. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

NAKEEM BAILEY, on or about the 17th day of May 2016, in the County of New Castle, State of Delaware, did knowingly possess a firearm as defined by Title 11, Section 222 of the Delaware Code, during the commission of Robbery First Degree, a felony as set forth in Count 27 of this indictment which is incorporated herein by reference.

COUNT 29. A FELONY

#N _____

ASSAULT FIRST DEGREE in violation of Title 11, Section 613 of the Delaware Code.

NAKEEM BAILEY, on or about the 17th day of May 2016, in the County of New Castle, State of Delaware, did intentionally cause serious physical injury to Michael Childress by means of a firearm, a deadly weapon as that term is defined by Title 11, Section 222 of the Delaware Code.

COUNT 30. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

NAKEEM BAILEY, on or about the 17th day of May 2016, in the County of New Castle, State of Delaware, did knowingly possess a firearm, as defined by Title 11, Section 222 of the Delaware Code, during the commission of Assault First Degree, a felony, as set forth in Count 29 of this indictment, which is incorporated herein by reference.

COUNT 31. A FELONY

#N _____

CARRYING A CONCEALED DEADLY WEAPON in violation of Title 11, Section 1442 of the Delaware Code.

NAKEEM BAILEY, on or about the 17th day of May 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully carry concealed upon or about his person a firearm, a deadly weapon as defined by Title 11, Section 222 of the Delaware Code, without a license to do so.

COUNT 32. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

NAKEEM BAILEY, on or about the 17th day of May 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 33. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

STEPHAN MINUS, on or about the 17th day of May 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, a Ruger LCP 380, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 34. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

STEPHAN MINUS, on or about the 17th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly possess a handgun in addition to that set forth in Count 2, which is a firearm as defined by Title 11, Section 222 of the Delaware Code, during the

commission of Gang Participation, a felony, as set forth in Count 1 of this indictment, which is incorporated herein by reference.

COUNT 35. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

ARVEL NESMITH, on or about the 17th day of May 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully own, possess or control a firearm, which is a deadly weapon as defined by Title 11, Section 222 of the Delaware Code, after having been convicted in the Superior Court of the State of Delaware of Reckless Endangering First Degree, a violent felony, in Case Number 1508013151, on or about December 22, 2015.

COUNT 36. A FELONY

#N _____

#N _____

#N _____

#N _____

ATTEMPTED ASSAULT FIRST DEGREE in violation of Title 11, Section 531 of the Delaware Code

AZHE K. ALLEN, DANTE COOPER, JAHLIL LEWIS, AND JEREMY TUNNELL on or about the 19th day of May, 2016, in the County of New Castle, State of Delaware, did intentionally walk to 508 Shearman Street, a residence in the City of Wilmington, armed with handguns which acts, under the circumstances as they believed them to be, constituted a substantial step in a course of conduct planned to culminate in the commission of Assault First Degree in violation of Title 11, Section 613 of the Delaware Code of 1974.

COUNT 37. A FELONY

#N _____
#N _____
#N _____
#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

AZHE K. ALLEN, DANTE COOPER, JAHLIL LEWIS, AND JEREMY TUNNELL on or about the 19th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly possess a handgun, a firearm as defined by Title 11, Section 222 of the Delaware Code, during the commission of Attempted Assault First Degree, a felony as set forth in Count 36 of this Indictment which is incorporated herein by reference.

COUNT 38. A FELONY

#N _____
#N _____
#N _____
#N _____

CARRYING A CONCEALED DEADLY WEAPON in violation of Title 11, Section 1442 of the Delaware Code.

AZHE K. ALLEN, DANTE COOPER, JAHLIL LEWIS, AND JEREMY TUNNELL on or about the 19th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully carry concealed about their person a firearm, a deadly weapon, without a license to do so.

COUNT 39. A FELONY

#N _____

#N _____

#N _____

#N _____

POSSESSION OF A WEAPON (CONCEALED FIREARM) IN A SAFE SCHOOL ZONE in violation of Title 11, Section 1457 of the Delaware Code.

AZHE K. ALLEN, DANTE COOPER, JAHLIL LEWIS, AND JEREMY TUNNELL on or about the 19th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly commit the offense of Carrying a Concealed Deadly Weapon, a firearm, as set forth in Count 6 of this indictment, while within 1000 feet of Stubbs Elementary School, a “Safe School and Recreation Zone” as defined by Title 11, Section 1457(c)(1) of the Delaware Code.

COUNT 40. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

DANTE COOPER, on or about the 19th day of May, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 41. A FELONY

#N _____

RECEIVING A STOLEN FIREARM in violation of Title 11, Section 1450 of the Delaware Code.

DANTE COOPER, on or about the 19th day of May, 2016, in the County of New Castle, State of Delaware, did intentionally receive, retain, or dispose of a firearm belonging to another person, with intent to deprive the owner of it or to appropriate it, knowing or believing that the firearm had been acquired under circumstances amounting to theft.

COUNT 42. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

J AHLIL LEWIS, on or about the 19th day of May, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 43. A FELONY

#N _____

#N _____

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

AZHE K. ALLEN, DANTE COOPER, J AHLIL LEWIS, AND JEREMY TUNNELL, on or about the 19th day of May, 2016, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Assault First Degree or Carrying a

Concealed Deadly Weapon, did agree with each other or another person that one, some or all of them would engage in conduct constituting the felony or felonies, and one, the other, or each of them did commit an overt act by arriving in a specific area together with loaded firearms.

COUNT 44. A MISDEMEANOR

#N _____

#N _____

#N _____

#N _____

RESISTING ARREST in violation of Title 11, Section 1257 of the Delaware Code.

AZHE K. ALLEN, DANTE COOPER, JAHLIL LEWIS, AND JEREMY TUNNELL, on or about the 19th day of May, 2016, in the County of New Castle, State of Delaware, did intentionally prevent or attempted to prevent Ricardo Flores, a peace officer, from effecting an arrest or detention of himself, or intentionally fled from a peace officer effecting a detention.

COUNT 45. A FELONY

#N _____

#N _____

RECKLESS ENDANGERING FIRST DEGREE in violation of Title 11, Section 604 of the Delaware Code.

RAQUAN JORDAN AND ZAKIER SMITH, on or about the 20th day of May, 2016, in the County of New Castle, State of Delaware did recklessly engage in conduct which created a substantial risk of death to persons in or around 508 Shearman Street by firing a weapon multiple times at the residence.

COUNT 46. A FELONY

#N _____

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

RAQUAN JORDAN AND ZAKIER SMITH, on or about the 20th day of May, 2016, in the County of New Castle, State of Delaware, did knowingly possess a firearm as defined by Title 11, Section 222 of the Delaware Code, during the commission of Reckless Endangering First Degree, a felony as set forth in Count 45 of this Indictment which is incorporated herein by reference.

COUNT 47. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

RAQUAN JORDAN AND ZAKIER SMITH, on or about the 20th day of May, 2016, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of a felony of Assault First Degree or Reckless Endangering First Degree, did agree with each other or another person that one, the other, or each of them would engage in conduct constituting the felony or felonies, and one, the other, or each of them did commit an overt act by firing upon 508 Shearman Street.

COUNT 48. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

ZAKIER SMITH, on or about the 20th day of May 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 49. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

RAQUAN JORDAN, on or about the 20th day of May 2016, in the County of New Castle, State of Delaware, did knowingly own, possess or control a firearm as defined under Title 11, Section 222 of the Delaware Code, after having been adjudicated delinquent in Case Number 1507012807 in the Family Court of the State of Delaware, in and for New Castle County, on or about the 9th day of September 2015, to the charge of Carrying a Concealed Deadly Weapon, which conduct, if committed by an adult, would constitute a felony, and the defendant had not reached his 25th birthday.

COUNT 50. A FELONY

#N _____

AGGRAVATED MENACING in violation of Title 11, Section 602(b) of the Delaware Code.

STEPHAN MINUS, on or about the 2nd day of June 2016, in the County of New Castle, State of Delaware, by displaying what appeared to be a firearm, a deadly weapon as defined by Title 11, Section 222 of the Delaware Code, did intentionally place Detwon Banner in fear of imminent physical injury.

COUNT 51. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

STEPHAN MINUS, on or about the 2nd day of June 2016, in the County of New Castle, State of Delaware, did knowingly possess a firearm, as defined by Title 11, Section 222 of the Delaware Code, during the commission of Aggravated Menacing, a felony, as set forth in Count 50 of this indictment, which is incorporated herein by reference.

COUNT 52. A FELONY

#N _____

CARRYING A CONCEALED DEADLY WEAPON in violation of Title 11, Section 1442 of the Delaware Code.

STEPHAN MINUS, on or about the 2nd day of June 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully carry concealed upon or about his person a firearm, a deadly weapon as defined by Title 11, Section 222 of the Delaware Code, without a license to do so.

COUNT 53. A FELONY

#N _____

POSSESSION OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

STEPHAN MINUS, on or about the 2nd day of June 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, a Ruger 22 caliber Mark II, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 54. A FELONY

#N _____

ATTEMPTED ASSAULT FIRST DEGREE in violation of Title 11, Section 531 of the Delaware Code

NASEEM PARKS, on or about the 3rd day of June, 2016, in the County of New Castle, State of Delaware, did intentionally attempt to cause serious physical injury to another person by means of a handgun, a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, which under the circumstances as he believed them to be, constituted a substantial step in a course of conduct planned to culminate in the commission of Assault First Degree in violation of Title 11, Section 613 of the Delaware Code of 1974, as amended.

COUNT 55. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

NASEEM PARKS, on or about the 3rd day of June, 2016, in the County of New Castle, State of Delaware, did knowingly possess a handgun, a firearm as defined by Title 11, Section 222

of the Delaware Code, during the commission of Attempted Assault First Degree, a felony as set forth in Count 54 of this Indictment which is incorporated herein by reference.

COUNT 56. A FELONY

#N _____

RECKLESS ENDANGERING FIRST DEGREE in violation of Title 11, Section 604 of the Delaware Code.

NASEEM PARKS, on or about the 3rd day of June, 2016, in the County of New Castle, State of Delaware, did recklessly engage in conduct which created a substantial risk of death to other persons by aiming a loaded firearm and attempting to fire a handgun at an individual in a crowd.

COUNT 57. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

NASEEM PARKS, on or about the 3rd day of June, 2016, in the County of New Castle, State of Delaware, did knowingly possess a handgun, a firearm as defined by Title 11, Section 222 of the Delaware Code, during the commission of Reckless Endangering First Degree, a felony as set forth in Count 56 of this Indictment which is incorporated herein by reference.

COUNT 58. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

NASEEM PARKS, on or about the 3rd day of June, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess, or control a handgun, a firearm, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 59. A FELONY

#N _____

CARRYING A CONCEALED DEADLY WEAPON in violation of Title 11 Section 1442 of the Delaware Code.

NASEEM PARKS, on or about the 3rd day of June, 2016, in the County of New Castle, State of Delaware, did knowingly carry concealed about his person a handgun, a firearm as defined under 11 Del. C. Section 222 of the Delaware Code, without a license to do so.

COUNT 60. A MISDEMEANOR

#N _____

RESISTING ARREST in violation of Title 11, Section 1257(b) of the Delaware Code.

NASEEM PARKS, on or about the 3rd day of June, 2016, in the County of New Castle, State of Delaware, did intentionally prevent or attempt to prevent a peace officer from effecting an arrest or detention of himself or did intentionally flee from a peace officer who was effecting an arrest.

COUNT 61. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

ARTIE PRATT, on or about the 15th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly own, possess or control a handgun in addition to that set forth in Count 2, which is a firearm as defined under Title 11, Section 222 of the Delaware Code of 1974, after having been adjudicated delinquent in Case Number 1405024443 in the Family Court of the State of Delaware, in and for New Castle County, on or about the 10th day of December 2014, to the charge of Possession of a Firearm by a Person Prohibited as set forth in Title 11, Section 1448 of the Delaware Code, which conduct, if committed by an adult, would constitute a felony, and the defendant had not reached his 25th birthday.

COUNT 62. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

ARTIE PRATT, on or about the 15th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a handgun in addition to that set forth in Count 2, which is a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Gang Participation, a felony, as set forth in Count 1 of this indictment, which is incorporated herein by reference.

COUNT 63. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

RAQUAN JORDAN, on or about the 23rd day of June 2016, in the County of New Castle, State of Delaware, did knowingly own, possess or control a firearm as defined under Title 11, Section 222 of the Delaware Code, after having been adjudicated delinquent in Case Number 1507012807 in the Family Court of the State of Delaware, in and for New Castle County, on or about the 9th day of September 2015, to the charge of Carrying a Concealed Deadly Weapon, which conduct, if committed by an adult, would constitute a felony, and the defendant had not reached his 25th birthday.

COUNT 64. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

ARTIE PRATT, on or about the 23rd day of June, 2016, in the County of New Castle, State of Delaware, did knowingly own, possess or control a handgun in addition to that set forth in Count 2, which is a firearm as defined under Title 11, Section 222 of the Delaware Code of 1974, after having been adjudicated delinquent in Case Number 1405024443 in the Family Court of the State of Delaware, in and for New Castle County, on or about the 10th day of December 2014, to the charge of Possession of a Firearm by a Person Prohibited as set forth in Title 11, Section 1448 of the Delaware Code, which conduct, if committed by an adult, would constitute a felony, and the defendant had not reached his 25th birthday.

COUNT 65. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

ARTIE PRATT, on or about the 23rd day of June, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a handgun in addition to that set forth in Count 2, which is a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Gang Participation, a felony, as set forth in Count 1 of this indictment, which is incorporated herein by reference.

COUNT 66. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

JABRI HUNTER, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess, or control a handgun, a firearm, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 67. A FELONY

#N _____

POSSESSION OR CONTROL AMMUNITION BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

JABRI HUNTER, on or between the 24th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly own, possess or control a firearm as defined under Title 11, Section 222 of the Delaware Code of 1974, after having been adjudicated delinquent in Case Number 1403001180 in the Family Court of the State of Delaware, in and for New Castle

County, on or about the 12th day of March 2014, to the charge of Carrying a Concealed Deadly Weapon, which conduct, if committed by an adult, would constitute a felony, and the defendant had not reached his 25th birthday.

COUNT 68. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

KYAIRES HENRY, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess, or control a handgun, a firearm, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 69. A FELONY

#N _____

POSSESSION OR CONTROL AMMUNITION BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

KYAIRES HENRY, on or between the 24th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly own, possess or control a firearm as defined under Title 11, Section 222 of the Delaware Code of 1974, after having been adjudicated delinquent in Case Number 1206009737 in the Family Court of the State of Delaware, in and for New Castle County, on or about the 11th day of September, 2012, to the charge of Burglary in the Second Degree, which conduct, if committed by an adult, would constitute a felony, and the defendant had not reached his 25th birthday.

COUNT 70. A MISDEMEANOR

#N _____

BREACH OF RELEASE in violation of Title 11, Section 2113 of the Delaware Code.

KYAIRES HENRY, on or between the 24th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully fail to comply with an Order of the Court in Case No. 1510016303 by being within a five-block radius of Jensen Drive.

COUNT 71. A FELONY

#N _____

#N _____

#N _____

DRUG DEALING in violation of Title 16, Section 4754(1) of the Delaware Code.

KYAIRES HENRY, JABRI HUNTER AND MALIK PURNELL, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly possess with intent to deliver marijuana, a controlled substance as described and classified in 16 Del. Code §§ 4701(26) and 4714(d)(19).

COUNT 72. A FELONY

#N _____

#N _____

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

KYAIRES HENRY, JABRI HUNTER AND MALIK PURNELL, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly possess a handgun, a firearm as defined by Title 11, Section 222 of the Delaware Code, during the commission of Drug Dealing, a felony as set forth in Count 71 of this Indictment which is incorporated herein by reference.

COUNT 73. A FELONY

#N _____

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

KYAIRE HENRY, JABRI HUNTER AND MALIK PURNELL, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of a felony of Drug Dealing, Carrying a Concealed Deadly Weapon, or Possession of a Firearm by a Person Prohibited, did agree with each other that one, the other, or each of them would engage in conduct constituting the felony or felonies, and one, the other, or each of them did commit an overt act in furtherance of the felony or felonies.

COUNT 74. A MISDEMEANOR

#N _____

#N _____

#N _____

POSSESSION OF DRUG PARAPHERNALIA in violation of Title 16, Section 4771 of the Delaware Code.

KYAIRE HENRY, JABRI HUNTER AND MALIK PURNELL, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly use or possess with intent to use drug paraphernalia, as defined in 16 Del. Code § 4701(17), to pack or weigh a controlled substance.

COUNT 75. A FELONY

#N _____

#N _____

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(9) of the Delaware Code.

KYAIR HENRY, JABRI HUNTER AND MALIK PURNELL, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly possess or control a semi-automatic handgun, a firearm as defined by Title 11, Section 222 of the Delaware Code, and, at the same time, did possess marijuana, a controlled substance, in violation of Title 16, Section 4764 of the Delaware Code.

COUNT 76. A FELONY

#N _____

#N _____

#N _____

CARRYING A CONCEALED DEADLY WEAPON in violation of Title 11 Section 1442 of the Delaware Code.

KYAIR HENRY, JABRI HUNTER AND MALIK PURNELL, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly carry concealed about their person a semi-automatic handgun, a firearm as defined under Title 11, Section 222 of the Delaware Code, without a license to do so.

COUNT 77. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

MALIK PURNELL, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly purchase, own, possess, or control a firearm after having been convicted of Failure to Reregister as a Sex Offender, in Case Number 1501006685, in the Superior Court of the State of Delaware, in and for New Castle County on or about July 9, 2015.

COUNT 78. A FELONY

#N _____

POSSESSION OR CONTROL OF AMMUNITION BY A PERSON PROHIBITED in violation of Title 11, Section 1448 of the Delaware Code.

MALIK PURNELL, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did knowingly purchase, own, possess, or control ammunition after having been convicted of Failure to Reregister as a Sex Offender, in Case Number 1501006685, in the Superior Court of the State of Delaware, in and for New Castle County on or about July 9, 2015.

COUNT 79. A VIOLATION

#N _____

DRIVING WITHOUT A LICENSE in violation of Title 21, Section 2701(a) of the Delaware Code.

MALIK PURNELL, on or about the 24th day of June, 2016, in the County of New Castle, State of Delaware, did drive a motor vehicle upon a public roadway known as N. Claymont Street, Wilmington, when he did not have a valid driver's license.

COUNT 80. A FELONY

#N _____

ATTEMPTED ROBBERY FIRST DEGREE in violation of Title 11, Section 531 of the Delaware Code.

MALIK WINTERS, on or about the 8th day of February, 2016, in the County of New Castle, State of Delaware, when in the course of attempting to commit theft, did intentionally use or threaten the immediate use of force upon Bryanne Brown, with intent to prevent or overcome resistance to the taking of property or to the retention thereof immediately after the taking or with the intent to compel said person to deliver up property or to engage in other conduct which aided in the commission of theft, and in the course of the commission of the crime or the immediate flight there from, the defendant or another participant in the crime caused physical injury to Bryanne Brown, who was not a participant in the crime or displayed what appeared to be a firearm, a deadly weapon as that term is defined under Title 11, Section 222 of the Delaware Code of 1974, as amended which act(s), under the circumstances as he believed them to be, constituted a substantial step in a course of conduct planned to culminate in the commission of Robbery First Degree in violation of Title 11, Section 832 of the Delaware.

COUNT 81. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

MALIK WINTERS, on or about the 8th day of February, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Attempted Robbery First Degree, a felony as set forth in Count 80 of this indictment which is incorporated herein by reference.

COUNT 82. A FELONY

#N _____

ASSAULT FIRST DEGREE in violation of Title 11, Section 613 of the Delaware Code.

MALIK WINTERS, on or about the 8th day of February, 2016, in the County of New Castle, State of Delaware, while in the course of, or in the furtherance of the commission of the felony of Attempted Robbery First Degree, or in the immediate flight there from did intentionally or recklessly cause serious physical injury to Bryanne Brown; or did intentionally cause serious physical injury to Bryanne Brown by means of a firearm, a deadly weapon or dangerous instrument as those terms are defined by Title 11, Section 222 of the Delaware Code of 1974, as amended; or did recklessly engage in conduct which created a substantial risk of death to Bryanne Brown, which conduct caused serious physical injury to Bryanne Brown.

COUNT 83. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

MALIK WINTERS, on or about the 8th day of February, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Assault First Degree, a felony as set forth in Count 82 of this indictment which is incorporated herein by reference.

COUNT 84. A FELONY

#N _____

RECKLESS ENDANGERING FIRST DEGREE in violation of Title 11, Section 604 of the Delaware Code.

MALIK WINTERS, on or about the 8th day of February, 2016, in the County of New Castle, State of Delaware, did recklessly engage in conduct which created a substantial risk of death to Bryanne Brown.

COUNT 85. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

MALIK WINTERS, on or about the 8th day of February, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a firearm as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Reckless Endangering First Degree, a felony as set forth in Count 82 of this indictment which is incorporated herein by reference.

COUNT 86. A FELONY

#N _____

POSSESSION OR CONTROL A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

MALIK WINTERS, on or about the 8th day of February, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess, or control a handgun, a firearm, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 87. A FELONY

#N _____

ROBBERY FIRST DEGREE in violation of Title 11, Section 832 of the Delaware Code.

JEREMY TUNNELL, on or about the 27th day of April 2015, in the County of New Castle, State of Delaware, when in the course of committing theft, did use or threaten the immediate use of force upon Shane Mattero with intent to prevent or overcome resistance to the taking of property or with intent to compel said person to deliver up property or to engage in other conduct which aided in the commission of theft, and in the course of the commission of the crime or the immediate flight there from, the defendant or another participant in the crime caused physical injury to Shane Mattero.

COUNT 88. A FELONY

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

JEREMY TUNNELL, on or about the 27th day of April, 2016, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of a felony of Robbery in the First Degree, did agree with Nycier Kelley, Jamarr Williams and James Wing that one, some, or all of them would engage in conduct constituting the felony, and one, the other, or each of them did commit an overt act by attacking Shane Mattero or by taking his property.

COUNT 89. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

TAVION WASHINGTON, on or about the 11th day of July, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 90. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code,

TAVION WASHINGTON, on or about the 5th day of September, 2015, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

COUNT 91. A FELONY

#N _____

CARRYING A CONCEALED DEADLY WEAPON, in violation of Title 11, Section 1442 of the Delaware Code,

TAVION WASHINGTON, on or about the 5th day of September, 2015, in the County of New Castle, State of Delaware, did knowingly and unlawfully carry concealed upon or about his person a firearm, a deadly weapon as defined by Title 11, Section 222 of the Delaware Code, without a license to do so.

COUNT 92. A FELONY

#N _____

RECEIVING A STOLEN FIREARM, in violation of Title 11, Section 1450 of the Delaware Code,

TAVION WASHINGTON, on or about the 5th day of September, 2015, in the County of New Castle, State of Delaware, did intentionally receive, retain or dispose of a firearm of another person with the intent to deprive the owner of it or to appropriate it, knowing that it has been acquired under circumstances amounting to theft, or believing that it has been so acquired.

COUNT 93. A FELONY

#N _____

ASSAULT FIRST DEGREE in violation of Title 11, Section 613 of the Delaware Code, SHAKA DORSEY, on or about the 17th day of March, 2016, in the County of New Castle, State of Delaware, did intentionally cause serious physical injury to Isaiah Lecompte by means of a handgun, a deadly weapon as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended.

COUNT 94. A FELONY

#N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code, SHAKA DORSEY, on or about the 17th day of March, 2016, in the County of New Castle, State of Delaware, did knowingly and unlawfully possess a handgun, as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Assault First Degree, a felony as set forth in Count 93 of this indictment which is incorporated herein by reference.

First Degree, a felony as set forth in Count 107 of this Indictment which is incorporated herein by reference.

COUNT 109. A FELONY

#N _____

POSSESSION OR CONTROL OF A FIREARM BY A PERSON PROHIBITED in violation of Title 11, Section 1448(a)(5) of the Delaware Code.

SHA'MIR SUDLER, on or about the 5th day of March, 2016, in the County of New Castle, State of Delaware, did as a juvenile knowingly and unlawfully purchase, own, possess or control a handgun, a Kel-Tec 9mm, and said handgun was not possessed for the purpose of engaging in lawful hunting, instruction, sporting or recreational activity while under the supervision of an adult.

A TRUE BILL

(FOREPERSON)

MATTHEW P. DENN
ATTORNEY GENERAL



DEPUTY ATTORNEY GENERAL



DEPUTY ATTORNEY GENERAL



DEPUTY ATTORNEY GENERAL