

a.k.a. "G"
a.k.a. "Tay"
LERRON SHEPPARD,
a.k.a. "D-Loc"

and others persons both known and unknown to the grand jury, did knowingly and willfully conspire, combine, confederate, and agree, to possess, receive, conceal, store, barter, sell, and dispose of the stolen firearms listed in paragraph 3 subsection (c) of the Indictment, which had been shipped and transported in interstate commerce, and which were otherwise moving as, part of, and constituted interstate commerce, knowing and having reasonable cause to believe the firearms were stolen, in violation of Title 18 United States Code Section 922(j).

Ways, Manner and Means

2. Among the manner and means used by the Defendants and co-conspirators to achieve the objects of the conspiracy, were the following:

a. It was part of the conspiracy that the Defendants and co-conspirators would plan and organize the robbery of the employees inside the Blue Fins Bait-Tackle-Guns store ("Blue Fins," or the "Blue Fins robbery") through the use of firearms, force, and violence.

b. It was further part of the conspiracy that the Defendants and co-conspirators would obtain and use a stolen vehicle to commit the Blue Fins robbery.

c. It was further part of the conspiracy that the Defendants and co-conspirators would arm themselves with firearms for use during the Blue Fins robbery.

d. It was further part of the conspiracy that the Defendants and co-conspirators would rob the Blue Fins store for a large quantity of firearms.

e. It was further part of the conspiracy that the Defendants and co-conspirators would attempt to conceal their identities during and after the Blue Fins robbery.

f. It was further part of the conspiracy that the Defendants and co-

conspirators would use, carry, and brandish firearms against Blue Fins personnel, and other persons in order to commit the robbery and facilitate their escape.

g. It was further part of the conspiracy that the Defendants would physically restrain the Blue Fins employees in order to commit the robbery and facilitate their escape.

h. It was further part of the conspiracy that the Defendants would take and carry away stolen firearms robbed from the Blue Fins store.

i. It was further part of the conspiracy that the Defendants and co-conspirators would flee from law enforcement officers and take other actions in order to escape and avoid apprehension by law enforcement.

j. It was further part of the conspiracy that the Defendants and co-conspirators would enrich themselves and share the proceeds from the Blue Fins robbery.

k. It was further part of the conspiracy that the Defendants and co-conspirators would collectively take the stolen firearms to another location after the robbery to distribute said firearms to individual Defendants and co-conspirators.

l. It was further part of the conspiracy that the Defendants and co-conspirators would sell, transfer, or convey to other persons the stolen firearms robbed from the Blue Fins store.

m. It was further part of the conspiracy that the Defendants and co-conspirators would conceal evidence of their participation in the Blue Fins robbery.

OVERT ACTS

3. In furtherance of the conspiracy, and to effect the illegal objects thereof, the Defendants and their co-conspirators performed, participated in and did the following acts, among others in the District of Maryland and elsewhere:

a. On or around August 5, 2016, the Defendants, **DAVID WISE** (a.k.a. "Rambo," a.k.a. "Rampage"), **RAYMOND MCCULLOUGH** (a.k.a. "Troop"), **REGINALD SMITH** (a.k.a. "Young Loc," a.k.a. "Loc"), **TAVON HAWKINS** (a.k.a. "Tay," a.k.a. "G"), **LERRON SHEPPARD** (a.k.a. "D-Loc"), and their co-conspirators obtained and used a stolen vehicle to facilitate their planned robbery.

b. On or around August 5, 2016, the Defendants, **DAVID WISE** (a.k.a. "Rambo," a.k.a. "Rampage"), **RAYMOND MCCULLOUGH** (a.k.a. "Troop"), **REGINALD SMITH** (a.k.a. "Young Loc," a.k.a. "Loc"), **TAVON HAWKINS** (a.k.a. "Tay," a.k.a. "G"), **LERRON SHEPPARD** (a.k.a. "D-Loc"), and their co-conspirators armed themselves with firearms to use during their planned robbery.

c. On or around August 5, 2016, the Defendants, **DAVID WISE** (a.k.a. "Rambo," a.k.a. "Rampage"), **RAYMOND MCCULLOUGH** (a.k.a. "Troop"), **REGINALD SMITH** (a.k.a. "Young Loc," a.k.a. "Loc"), **TAVON HAWKINS** (a.k.a. "Tay," a.k.a. "G"), **LERRON SHEPPARD** (a.k.a. "D-Loc"), while brandishing firearms, robbed Blue Fins of stolen property, including United States Currency, a cellular telephone, a computer, computer monitor, credit cards, and the following firearms:

- i. A Charter Arms revolver, model: Off Duty, caliber: .38, serial number: 13-34728.
- ii. A Grand Power semiautomatic pistol, caliber: 9mm, serial number: 3K-00056
- iii. A Grand Power semiautomatic pistol, model: K100, caliber: 9mm, serial number: 1K-00185

- iv. A Charter Arms revolver, model: Under Cover, caliber: .38, serial number: 13-44361
- v. A Colt semiautomatic pistol, model: Woodsman, caliber: .22, serial number: 30295S
- vi. A LRB Arms rifle receiver, model: M25, caliber: 5.56mm, serial number: 10151
- vii. A Century Arms International rifle, model: Cetme Sporter, caliber: .308, serial number: C45053
- viii. A Beretta semiautomatic pistol, model: Tomcat, caliber: .32, serial number: DAA546024
- ix. A Ruger semiautomatic pistol, model: Mark III, caliber: .22, serial number: 272-78167
- x. A Colt semiautomatic pistol, model: Gold Cup 1911, caliber: .45, serial number: 70N98300
- xi. A Taurus revolver, model: The Judge, caliber: .45/410, serial number: FP586111
- xii. A Smith & Wesson semiautomatic pistol, model: M&P22, caliber: .22, serial number: HHJ8183
- xiii. A Ruger revolver, model: SP101, caliber: .38, serial number: 575-04388
- xiv. A Colt semiautomatic pistol, model: Colt 22, caliber: .22, serial number: PH29690

- xv. A Ruger semiautomatic pistol, model: 22/45, caliber: .22, serial number: 223-94050
- xvi. An Accu-Tek semiautomatic pistol, model: AT380, caliber: .380, serial number: 043067
- xvii. A Sig Sauer semiautomatic pistol, model: P229, caliber: .357, serial number: AD11493
- xviii. A Sig Sauer semiautomatic pistol, model: Mosquito, caliber: .22, serial number: F182668
- xix. A Ruger semiautomatic pistol, model: P94, caliber: .40, serial number: 341-22068
- xx. A Taurus revolver, model: 905, caliber: 9mm, serial number: YA57519
- xxi. A Smith & Wesson semiautomatic pistol, model: SD40VE, caliber: .40, serial number: HEY9572
- xxii. A Browning semiautomatic pistol, model: Buckmark, caliber: .22, serial number: 655NT10170
- xxiii. A Taurus revolver, model: 66, caliber: .357, serial number: 1L249229
- xxiv. A Ruger revolver, model: SP101, caliber: .357, serial number: 575-47459
- xxv. A Spikes Tactical rifle, model: ST15, caliber: multi, serial number: NSL074919

- xxvi. An Anderson rifle, model: AM-15, caliber: multi, serial number:
16216516
- xxvii. A Llama semiautomatic pistol, model: Max I, caliber: 9mm, serial
number: 10397-95
- xxviii. A Beretta semiautomatic pistol, model: 92FS, caliber: 9mm, serial
number: A107777Z
- xxix. A Smith & Wesson revolver, model: Governor, caliber: .45/.410,
serial number CZY1939
- xxx. A Sig Sauer rifle suppressor, model: SRD338TI-QD, caliber: .338,
serial number: 61A006487
- xxxi. A Remington rifle, model: R-15 VTR, caliber: .223, serial number:
RA027222
- xxxii. A Smith & Wesson revolver, caliber: .357, serial number:
BAP7662
- xxxiii. A Colt semiautomatic pistol, model: 1908, caliber: .25, serial
number: 158315
- xxxiv. A Smith & Wesson revolver, model: 686-4, caliber: .357, serial
number: CLV9122
- xxxv. A Smith & Wesson revolver, model: 10, caliber: .38, serial
number: D101350
- xxxvi. A Glock semiautomatic pistol, model: 19, caliber: 9mm, serial
number: BATF300

d. On or around August 5, 2016, the Defendants, **DAVID WISE (a.k.a. "Rambo," a.k.a. "Rampage"), RAYMOND MCCULLOUGH (a.k.a. "Troop"), REGINALD SMITH (a.k.a. "Young Loc," a.k.a. "Loc"), TAVON HAWKINS (a.k.a. "Tay," a.k.a. "G"), LERRON SHEPPARD (a.k.a. "D-Loc")**, fled from the robbery in a stolen vehicle.

e. On or around August 5, 2016, the Defendants, **DAVID WISE (a.k.a. "Rambo," a.k.a. "Rampage"), RAYMOND MCCULLOUGH (a.k.a. "Troop"), REGINALD SMITH (a.k.a. "Young Loc," a.k.a. "Loc"), TAVON HAWKINS (a.k.a. "Tay," a.k.a. "G"), LERRON SHEPPARD (a.k.a. "D-Loc")**, fled with the stolen contraband to 4801 Lorelly Avenue, Apartment D, Baltimore, Maryland 21206, where the Defendants distributed the U.S. Currency and firearms detailed, *supra* ¶ 3(c) of the Indictment, among the conspiracy.

f. From on or around August 5, 2016 until the date of the Indictment, Defendants, **DAVID WISE (a.k.a. "Rambo," a.k.a. "Rampage"), RAYMOND MCCULLOUGH (a.k.a. "Troop"), REGINALD SMITH (a.k.a. "Young Loc," a.k.a. "Loc"), TAVON HAWKINS (a.k.a. "Tay," a.k.a. "G"), LERRON SHEPPARD (a.k.a. "D-Loc")**, received, possessed, concealed, stored, bartered, sold, and disposed of the firearms stolen in the Blue Fins robbery.

18 U.S.C. §§ 371, 922(j)

COUNT TWO

(Hobbs Act Robbery Conspiracy)

The Grand Jury for the District of Maryland further charges that:

On or around August 2016, in the District of Maryland,

DAVID WISE,
a.k.a. "Rambo"
a.k.a. "Rampage"
RAYMOND MCCULLOUGH
a.k.a. "Troop"
REGINALD SMITH,
a.k.a. "Young Loc"
a.k.a. "Loc"
TAVON HAWKINS,
a.k.a. "G"
a.k.a. "Tay"
LERRON SHEPPARD,
a.k.a. "D-Loc"

and others persons both known and unknown to the grand jury, did knowingly and willfully conspire, combine, confederate, and agree, to obstruct, delay and affect commerce, and attempt to obstruct delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants unlawfully did knowingly take and obtain property consisting of U.S. Currency, personal property, and firearms from the person and presence of employees of the Blue Fins Bait-Tackle-Guns Store, 701 Wise Avenue, Dundalk, Maryland 21222, against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employees' person by threatening serious physical injury and death to said employee, in violation of Title 18 United States Code Section 1951(a).

18 U.S.C. § 1951(a)

COUNT THREE

(Hobbs Act Robbery)

The Grand Jury for the District of Maryland further charges that:

On or around August 5, 2016, in the District of Maryland, the Defendants

DAVID WISE,
a.k.a. "Rambo"
a.k.a. "Rampage"
RAYMOND MCCULLOUGH
a.k.a. "Troop"
REGINALD SMITH,
a.k.a. "Young Loc"
a.k.a. "Loc"
TAVON HAWKINS,
a.k.a. "G"
a.k.a. "Tay"
LERRON SHEPPARD,
a.k.a. "D-Loc"

did knowingly obstruct, delay and affect commerce, and attempt to obstruct delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the Defendants unlawfully did knowingly take and obtain property consisting of U.S. Currency, personal property, and firearms from the person and presence of employees of the Blue Fins Bait-Tackle-Guns Store, 701 Wise Avenue, Dundalk, Maryland 21222, against the employees' will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person by threatening serious physical injury and death to said employee.

18 U.S.C. § 1951(a)

18 U.S.C. § 2

COUNT FOUR

**(Using, Carrying, and Brandishing a Firearm During and In Relation To a Crime of
Violence)**

The Grand Jury for the District of Maryland further charges that:

On or around August 5, 2016, in the District of Maryland,

DAVID WISE,
a.k.a. "Rambo"
a.k.a. "Rampage"
RAYMOND MCCULLOUGH
a.k.a. "Troop"
REGINALD SMITH,
a.k.a. "Young Loc"
a.k.a. "Loc"
TAVON HAWKINS,
a.k.a. "G"
a.k.a. "Tay"
LERRON SHEPPARD,
a.k.a. "D-Loc"

did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, to wit, Hobbs Act Robbery in violation of Title 18, United States Code, Section 1951(a), as alleged in Count Three of this Indictment.

18 U.S.C. § 924(c)

18 U.S.C. § 2

COUNT FIVE

(Felon in Possession of a Firearm)

The Grand Jury for the District of Maryland further charges:

On or around August 11, 2016, in the District of Maryland, the Defendant,

DAVID WISE,
a.k.a. "Rambo"
a.k.a. "Rampage"

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess firearms, in and affecting commerce, to wit: (1) a Smith & Wesson, Model M-186-2 .357 caliber revolver with serial number BAP7662, in and affecting commerce; (2) a Ruger, SP101 .38 caliber revolver with serial number 575-04388, in and affecting commerce; (3) a Colt, Custom Government .45 caliber semiautomatic pistol with serial number 663CGOV, in and affecting commerce; (4) a Colt, Gold Cup 1911 .45 caliber semiautomatic pistol with serial number 70N98300, in and affecting commerce; (5) a Ruger, 22/45 .22 caliber semiautomatic pistol with serial number 223-94050, in and affecting commerce; (6) a Ruger, P94 .40 caliber semiautomatic pistol with serial number 341-22068, in and affecting commerce; and (7) a Beretta, 92FS 9 millimeter caliber semiautomatic pistol with serial number A107777Z, in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT SIX

The Grand Jury for the District of Maryland further charges:

On or around August 12, 2016, in the District of Maryland, the Defendant,

**RAYMOND MCCULLOUGH,
a.k.a. "Troop"**

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, in and affecting commerce, to wit: a Colt 22, .22 caliber semiautomatic pistol with serial number PH29690, in and affecting commerce, and .38 caliber ammunition, in and affecting commerce.

18 U.S.C. § 922(g)(1)

COUNT SEVEN

The Grand Jury for the District of Maryland further charges:

On or around August 16, 2016, in the District of Maryland, the Defendant,

**REGINALD SMITH,
a.k.a. "Young Loc"
a.k.a. "Loc"**

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, in and affecting commerce, to wit: (1) a Century Arms, Grand Power 9 millimeter caliber semiautomatic pistol with serial number 3K-00056, in and affecting commerce; (2) a Charter Arms, Off Duty .38 caliber revolver with serial number 13-34728, in and affecting commerce.

18 U.S.C. § 922(g)(1)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. Crim. P. Rule 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence, in accordance with Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), in the event of the defendants' convictions under Count Four, Count Five, Count Six, and Count Seven of this Indictment.

2. As a result of the offense set forth in Count Four, Count Five, Count Six, and Count Seven of this Indictment, the defendants, **DAVID WISE (a.k.a. "Rambo," a.k.a. "Rampage")**, **RAYMOND MCCULLOUGH (a.k.a. "Troop")**, **REGINALD SMITH (a.k.a. "Young Loc," a.k.a. "Loc")**, **TAVON HAWKINS (a.k.a. "Tay," a.k.a. "G")**, **LERRON SHEPPARD (a.k.a. "D-Loc")**, shall forfeit to the United States the firearm and ammunition identified in Count One, Count Five, Count Six, and Count Seven involved in those offenses.

18 U.S.C. § 924(d)

28 U.S.C. § 2461(c)


ROD J. ROSENSTEIN
UNITED STATES ATTORNEY

A TRUE BILL:

SIGNATURE REDACTED

FOREPERSON

3/8/17

DATE