

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on November 12, 2010

UNITED STATES OF AMERICA	:	CRIMINAL NO. 11-129 (CKK)
	:	
v.	:	VIOLATIONS: 21 U.S.C. § 846
	:	(Conspiracy to Distribute and Possess
GEZO GOEONG EDWARDS,	:	with Intent to Distribute Five Kilograms
also known as Zo"	:	or More of Cocaine);
WILLIAM MARTIN BOWMAN	:	21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) :
known as "Bone,"	:	Unlawful Distribution of Cocaine Base):
and "Bones," and	:	21 U.S.C. §§ 841(a)(1) and 841(b)(1)
HENRY BRANDON WILLIAMS	:	(Unlawful Distribution of Cocaine)
Defendants.	:	21 U.S.C. §§ 841(a)(1) and
	:	(Unlawful Distribution of Cocaine)
	:	More of Cocaine
	:	21 U.S.C. § 846
	:	(1)

Indictment

: (Using, Carrying, and Possessing
: Firearm During a Drug Trafficking
: Offense);
: 21 U.S.C. § 853
: (Criminal Forfeiture)

Re-Typed
~~REDACTED~~ INDICTMENT

The Grand Jury charges that:

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v.

GEZO GOEONG EDWARDS,
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WILLIAM MARTIN BOWMAN
known as "Bone,"
and "Bones," and
HENRY BRANDON WILLIAMS
Defendants.

FILED

DEC 12 2012

Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

CRIMINAL NO. 11-129 (CKK)

VIOLETIONS: 21 U.S.C. § 846
(Conspiracy to Distribute and Possess
with Intent to Distribute Five Kilograms
or More of Cocaine);
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C) :
Unlawful Distribution of Cocaine Base);
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)
(Unlawful Distribution of Cocaine);
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii)
(Unlawful Distribution of 5 Grams or
More of Cocaine Base);
21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(iii)
(Unlawful Distribution of 28 Grams or
More of Cocaine Base);
21 U.S.C. §§ 841(a)(1) and 841(b)(C)
(Unlawful Possession With Intent to
Distribute Cocaine);
18 U.S.C. § 922(g)(1)
(Unlawful Possession of a Firearm and
Ammunition by a Person Convicted of a
Crime Punishable by Imprisonment for a
Term Exceeding One Year);
18 U.S.C. § 924(c)(1)
(Using, Carrying, and Possessing a
Firearm During a Drug Trafficking
Offense);
21 U.S.C. § 853
(Criminal Forfeiture)

Re-Typed

~~REDACTED~~ INDICTMENT

The Grand Jury charges that:

COUNT ONE

From in or about January 2009, the exact date being unknown to the Grand Jury, and continuing through at least April 26, 2011, **GEZO GOEONG EDWARDS**, also known as **Zo**; **WILLIAM MARTIN BOWMAN** also known as **"Bone"** and **"Bones"**; **HENRY BRANDON WILLIAMS** and others, within the District of Columbia and elsewhere, did knowingly and intentionally combine, conspire, confederate and agree together and with other persons both known and unknown to the Grand Jury, to unlawfully, knowingly and intentionally distribute and possess with intent to distribute mixtures and substances containing a detectable amount of cocaine, a Schedule II narcotic drug controlled substance, and the amount of said mixtures and substances was five (5) kilograms or more in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

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

COUNT TWO

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

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

COUNT THREE

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

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

COUNT FOUR

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

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

COUNT FIVE

On or about April 25, 2011, within the District of Columbia, **GEZO GOEONG EDWARDS**, also known as "**Zo**" and **WILLIAM MARTIN BOWMAN** also known as "**Bone**" and "**Bones**", did unlawfully and knowingly use, and carry during and in relation to, and possess in furtherance of a drug trafficking offense, for which each may be prosecuted in a court of the United States, that is Count One of this Indictment which is incorporated herein, a firearm, that is, a .40 Caliber Glock Pistol and an .AR15 Bushmaster Semi-automatic Assault Rifle.

On or about April 26, 2011, within the District of Columbia, **WILLIAM MARTIN BOWMAN** also known as "**Bone**" and "**Bones**", did unlawfully and knowingly use, and carry

during and in relation to, and possess in furtherance of a drug trafficking offense, for which he may be prosecuted in a court of the United States, that is Count One of this Indictment which is incorporated herein, a firearm, that is, a .40 Caliber Sig Sauer Pistol.

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

FORFEITURE ALLEGATION

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

2. As a result of the violations charged in Counts One through Eight and Twelve, the defendants in this Indictment, **GEZO GOEONG EDWARDS, also known as Zo**; **WILLIAM MARTIN BOWMAN also known as "Bone" and "Bones"**; and **HENRY BRANDON WILLIAMS**, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853: (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the said violations; and (2) any of the defendants' property used, or intended to be used,

in any manner or part, to commit, or to facilitate the commission of, the said violations, including but not limited to:

(a) Money Judgment:

(i) A judgment in favor of the United States of America for a sum of money equal to the value of any and all the property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of the felony offenses of: (1) **Conspiracy to Distribute and Possess with Intent to Distribute Five Kilograms or more of Cocaine**, in violation of Title 21, United States Code, Section 846 ; (2) **Unlawful Distribution of Cocaine**, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); and (3) **Unlawful Distribution of Cocaine Base**, in violation of Title 21, Sections 841(a)(1) and 841(b)(1)(C), for which the defendants are jointly and severally liable.

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

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

By virtue of the commission of the felony offenses charged in Count One through Eight of this Indictment, any and all interest that the defendants, **GEZO GOEONG EDWARDS**, also known as **Zo**, **WILLIAM MARTIN BOWMAN** also known as **"Bone"** and **"Bones"**, and **HENRY BRANDON WILLIAMS**, have in (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of the said violation; and (2) any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the said violation, is vested in the United States and hereby forfeited to the United States pursuant to Title 21, United States Code, Section 853.

3. If any of the property described above as being subject to forfeiture pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property that cannot be subdivided without difficulty;

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

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

A TRUE BILL:

FOREPERSON

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