

Violent Ways - Sweeping Indictment Charges Philadelphia Gang in Check Fraud Scheme, Shootings and Violence

26 Alleged Members of North Philadelphia Gang Charged in Wide-Ranging Indictment

- SaySlide members deposited over \$1.2 million in stolen, altered, and counterfeit checks into dozens of bank accounts as part of a sophisticated fraud scheme. The gang successfully withdrew over \$200,000 from these accounts before banks detected the fraud.
- SaySlide recruited people to open bank accounts, stole checks from the mail, and used computers and printers to create fake checks.
- Proceeds from the fraud were used to fund the gang's lifestyle and violent activities.
- Several SaySlide members are charged with shootings and attempted murders of rival gang members.
- In one incident, a man was shot in the face and robbed of his wallet and an arrow key used to access mailboxes.
- Another shooting left one of two brothers paralyzed after they were shot while getting into their car.
- SaySlide members frequently posted about violence and antagonized rivals on social media.
- Authorities pieced together the gang's involvement through photos, videos, and messages obtained from their phones and social media accounts.

A grand jury has indicted 26 members of a North Philadelphia gang called SaySlide, accusing them of orchestrating an elaborate bank fraud operation and committing violent crimes and shootings as part of an ongoing feud with rival groups.

Sophisticated Bank Fraud Operation Funded Gang's Criminal Activities

According to the indictment, SaySlide members deposited over \$1.2 million worth of stolen, altered and counterfeit checks into dozens of bank accounts, successfully withdrawing over \$200,000 before the fraud was detected. The scheme allegedly involved recruiting people to open bank accounts, stealing checks from the mail, and using computers and printers to create fake checks.

Prosecutors say the fraud funded the gang's lifestyle and violent activities.

Violent Crimes and Shootings Tied to Gang Rivalry

Several SaySlide members are charged with shootings and attempted murders of rival gang members. In one incident, two brothers were shot while getting into their car, with one left paralyzed. In another, a man was shot in the face and robbed of his wallet and arrow key used to access mailboxes.

"This group used the proceeds of financial crimes to carry out violence in their community," said the state attorney general. "By taking them off the streets, we hope to reduce the needless shootings that have plagued this neighborhood."

Social Media Posts Provided Key Evidence

SaySlide allegedly used social media to coordinate their activities, frequently posting about the violence and antagonizing rivals. Authorities were able to piece together their involvement through photos, videos and messages obtained from their phones and accounts.

Defendants Face Decades in Prison if Convicted

The defendants, who range in age from 18 to 40, each face dozens of charges including racketeering, aggravated assault, firearms offenses and fraud. Prosecutors vowed to dismantle what they called one of the most brazen criminal enterprises in the city. If convicted, the alleged gang members could face decades in prison.

READ THE ORIGINAL INDICTMENT ON FOLLOWING PAGES

INTRODUCTION

We, the members of the Fiftieth Statewide Investigating Grand Jury, having received and reviewed evidence pertaining to violations of the Pennsylvania Crimes Code occurring in Philadelphia and Montgomery Counties pursuant to Notice of Submission of Investigation Number 5, hereby make the following findings of fact and recommendation of charges:

OVERVIEW

The Grand Jury conducted an investigation into the sometimes violent underside of a crime wave affecting citizens in Pennsylvania and other states: the theft of checks from United States Postal Service mailboxes. The thefts investigated in this case were carried out by an organized urban gang that used guns, robbery, infiltration, and black market purchases to acquire mailbox keys, systematically raided mailboxes to steal checks, and operated a sophisticated money laundering scheme to turn the stolen checks into cash, with which members purchased luxury items and illegal firearms. In total over \$200,000 was stolen from people who were simply using the mail to pay their bills or send money to family and friends.

The gang called itself SaySlide and operated in the 77th Street and Ogontz Avenue section of Philadelphia. Over the course of time it acquired numerous "arrow" keys – the keys that postal workers use to open the blue street mailboxes where people deposit their letters. Each key is linked to a specific zip code. Among other acts, gang members shot an out-of-favor associate in the face in connection with a murder-for-hire contract and stole his USPS mailbox arrow key, robbed a female postal worker, staged a robbery of another postal worker who was the girlfriend of one of the members, attempted to murder a member of a rival gang, attempted to murder another individual who had "disrespected" the SaySlide gang, and attempted to murder an associate of a violent drug organization to which SaySlide had ties. The gang developed an

elaborate process for profiting from stolen mail. Using illicit arrow keys to open mailboxes, members removed the mail and took it to a location to be sorted, searching for envelopes containing checks. The checks were then altered and made ready for deposit and cashing.

To disguise its crimes, however, members did not use their own bank accounts for clearing checks. Instead, the gang recruited individuals for use of their bank accounts, with a promise that they would receive money in return. Recruitment typically occurred by placing "ads" and communications on Instagram. The Grand Jury learned that successful recruitment tended to rely on the "popularity" of the SaySlide recruiter. SaySlide holds itself out as a music group and, while the music was ancillary to its criminal activities, a few members did actually perform rap music. Popularity as a rapper, or notoriety on the street, enabled SaySlide recruiters to gain more followers on social media, which in turn led to recruitment of more account holders.

Next, a meeting with the account holder was arranged and the recruited individual provided members with his/her debit card and personal identification number (PIN). The next step was to deposit a forged check into the account either by making a deposit at a bank or through a mobile banking application.

In the early stages of the scheme, members would change the name of the payee reflected on the check to the name of the person recruited for use of his/her bank account by applying white-out and writing in the name of the account holder. The check was then deposited. Gang members would then withdraw the funds or make a purchase against the account with a debit card. How quickly the funds could be accessed, and the amount of money that could be withdrawn, varied by financial institution. SaySlide members would continue to launder stolen checks through an account until it was flagged or frozen due to suspected fraudulent activity.

SaySlide members eventually refined their skills, however, and progressed to the creation of counterfeit checks so that they were not limited to the checks they could steal.

Although the recruited individuals were promised money for their participation, the reality was that they rarely received any funds from the scam and, instead, were left with a frozen or closed bank account. SaySlide members, however, obviously reaped the benefits of the fraud and spent the stolen money on luxury goods, illegal firearms, arrow keys, and other criminal endeavors. The source for the guns obtained them from individuals in Detroit who were able to buy them legally. Members would often trade and swap guns after a crime was committed to avoid detection.

FINDINGS OF FACT

The Grand Jury heard testimony the SaySlide scheme was initiated by William Logan. Logan was introduced to SaySlide in January 2019 by a former cellmate. Logan had acquired arrow keys for the areas of Willow Grove, King of Prussia and Blue Bell, located in Montgomery County, several of which he purchased on the black market. Testimony revealed that, generally, the street value of arrow keys ranged from \$2,500 to \$10,000 and the price was dictated by the zip code - - the more affluent the area, the higher the street price of the key.

Logan employed fellow SaySlide members and associates as his "runners" to make use of the arrow keys. His "runners" included associates John Klotz and Davon Broughton. "Runners" would steal mail from USPS mailboxes utilizing the arrow keys, or they would perform other errands, such as picking up debit cards from recruited account holders, or depositing checks at ATMs or at financial institutions. "Runners" usually "hit" the mailboxes on a Sunday, because the mail accumulated there over the course of a weekend. They would often strategically steal from mailboxes late at night in locations that had little to no surveillance. The Grand Jury

learned that Logan's "runners" brought trash bags of mail to his upscale apartment in Camden, New Jersey, where they would sort through the stolen mail for checks and financial documents. As payment for their assistance, Logan would provide firearms that were straw-purchased in Michigan¹ to those individuals who were ineligible to purchase or possess firearms.

The Grand Jury learned that Klotz and Broughton were caught stealing mail from USPS mailboxes in October 2022 in Montgomery County. The Upper Merion Police Department ultimately filed charges against the two men, and against Kayla Massa, Logan's girlfriend. While Broughton and Massa entered guilty pleas in connection with the criminal conduct, Klotz's case remains pending trial.

The Grand Jury learned that Logan, along with Massa, fellow SaySlide member Jabreel Martin, and confidential source #1, an individual known to law enforcement, hereafter CS #1 were among a group of individuals who were charged in a New Jersey federal indictment in connection with the commission of bank fraud. Logan was ultimately incarcerated in February 2022. Following Logan's incarceration, other members of SaySlide, including Jahan Stevenson, Jahmir Martin, Jamal Carson, Abdul Anderson, Qahmire Goolsby, Zaahir Beckham, Zahmir Beckham, and John Klotz, then discussed their use of Logan's arrow keys on Telegram, an encrypted, cloud-based cross platform instant messaging service. The Grand Jury reviewed several of these messages.

Because SaySlide members had learned how to process stolen checks through recruited bank accounts, they were able to continue the criminal activity following Logan's incarceration. Khyzeem Brown, Jamal Carson and Jahan Stevenson played a major role in carrying out the scams and their activities will be discussed below.

¹ A straw purchase occurs when an individual completes the necessary paperwork and purchases a firearm from a gun dealer on behalf of someone else who is legally unable, or unwilling, to make the purchase. In this case, an individual by the name of Kyler Cox organized the straw-purchasing of firearms in Michigan and sold them to Logan in Camden who, in turn, provided them to SaySlide members.

Bank Fraud Scams

• Khyzeem Brown

The Grand Jury received testimony and reviewed posts on Brown's Instagram account on October 5, 2022. The first post depicted a stack of U.S. currency on top of a debit card in the name of Nichelle Baldwin-Hunt. Also shown in this photograph was an ATM receipt showing an available balance of \$3,932.55. This photograph was captioned, "Gwm I'm locked in 90 days all next day (yawning face emoji)." Another post depicted Brown's hand bearing his distinctive tattoos on top of numerous \$20 bills. Underneath the money was the same ATM receipt. The photograph was captioned, "@mallygeez3x I just graduated brother did this by myself (sun glassed smiling face emoji)." Agents who monitored SaySlide's social media activity confirmed that @mallygeez3x is one of the Instagram accounts associated with Jamal Carson.

Another post on October 5 displayed a video of Brown and two unknown males in a vehicle. Brown was the driver. The unknown male in the front side passenger seat fanned out a significant amount of money. This video was captioned, "Two cash outs in day #walk". The Grand Jurors learned that "walk" is a slang term the scammers used to describe the process of walking up to an ATM to conduct a transaction. Brown then posted a photograph that depicted him holding multiple debit/credit cards. This photograph was captioned, "Everybody that troll me I just made 5k this morning SMD (sun glassed smiling face emoji)." Agents who were familiar with Brown's lingo testified that SMD is shorthand for "suck my dick." The Grand Jury learned that these posts were advertising techniques used to recruit account holders to participate in these schemes.

² Agents explained that "GWM" or, get with me, was posted by Brown in an attempt to recruit bank account holders by bragging about the money that he secured.

One of those recruited on the source #2, an individual known to law enforcement, hereafter CS #2 The Grand Jury was shown copies of four money orders, each in the amount of \$1,000, that were made payable to her from fictitious names. All of these money orders were deposited into her TD Bank Account on October 4, 2022. Employees from USPS and Western Union confirmed that the money orders were fraudulent in that they were purchased for small amounts (less than \$15.00) and then altered to read as \$1,000.

The bank account was then used for a debit point of sale and for multiple cash withdrawals between October 4, 2022, and October 6, 2022, according to C.S. #2 's bank statement. Additionally, two money orders totaling \$1,500 were purchased on October 5, 2022, at a post office in Philadelphia using her debit card. The first one was issued for \$700.00 and made payable to "Steve Randolph." This money order was endorsed with an unknown signature. The second money order was issued to "Steven Randolph" in the amount of \$800.00. It too was endorsed with an unknown signature. The Grand Jury learned that Randolph is a known associate of Brown.

The Grand Jury reviewed surveillance photographs of the October 4 and October 6 deposits, which occurred in New Jersey. SA Boyd identified Brown as the individual making the deposits. SA Boyd also identified Brown in surveillance photographs of TD Bank ATMs in Philadelphia when withdrawals were made on October 5 and 6, 2022.

In total, Brown fraudulently deposited \$8,000.00 into Baldwin-Hunt's TD Bank account. Eight debits were made against the account, totaling \$4,124.40.

The Grand Jury heard testimony about the manner in which C.S. #2 was recruited into this fraud scheme for the use of her bank account. She was initially contacted on Instagram and then by FaceTime. When shown surveillance photographs, C.S. #2 identified Brown

as the person she communicated with on FaceTime, but that the profile picture on the Instagram account was different from the person who FaceTimed her. Testimony revealed that Brown's @3Khyzee's Instagram account displayed a photograph of known SaySlide member Tyler King, who has been incarcerated since January 2022.

C.S. #2 communicated with "3Khyzee" via a telephone number identified by authorities as a number used by Brown. She stated that an unknown male traveled to the area of C.S. #2 's apartment and picked up her debit card on October 3, 2022. From a photo array, she identified SaySlide member Zaahir Beckham as the male who picked up her card. She described his vehicle as an older model gray Nissan Maxima or Altima. Investigators learned that Beckham was known to drive a gray Nissan Altima, which is registered to his mother.

C.S. #2 told the Grand Jury that she also provided her PIN to this individual.

C.S. #2 testified that on one occasion, she transferred \$1,000.00 out of her account via CashApp as she had understood this amount to be her "payment" for allowing her account to be utilized. She immediately began receiving threatening calls from SaySlide members, became uncomfortable, and did not want to participate in the scam anymore. She testified that she changed her PIN to stop the transactions and blocked two Instagram accounts associated with Brown.

C.S. #2 testified that she then received a threatening call from a male who said he knew where she lived and that "he gets busy in the streets." She stated that Brown, Beckham and their associates scared her into unlocking her account, and the unauthorized withdrawals then resumed. She explained that she received a call from 267-476-5489 in which a male claimed that he never received his cut of the money and that she owed him \$100. She sent \$100 via Apple Pay to 267-476-5489 -- a number associated with Beckham. The Grand Jury learned that Beckham demanded that she not contact the police.

The jurors were shown text messages exchanged between Brown and Beckham that occurred over the course of October 3, 2022, and October 6, 2022, wherein they talked about the recruitment of C.S.#2. In the messages, they discussed how Beckham had obtained her debit card, PIN and login information for her TD Bank account and that Brown had made several deposits and withdrawals from her account. Through the exchanges, the two men argued several times about what portion of the proceeds each would receive.

Another person recruited for his bank account was Tyrone Waters. His Bank of America (BoA) account was funded by two checks totaling \$6,343.43 that were stolen from a U.S. Post Office mailbox and altered to be made payable to Waters. The deposit was made on December 8, 2022. On December 14, 2022, \$1,500 was withdrawn from an ATM in Philadelphia. From his review of surveillance photographs, SA Boyd identified Brown as the person who made the deposit and withdrawal from Waters' account. Additional purchases were made from the Waters account on December 14 at a WalMart in New Jersey, but investigators were unable to obtain any surveillance footage. The Grand Jury reviewed an Instagram post by Brown displaying a BoA withdrawal receipt with a stack of cash covering half of the receipt, which was posted on December 19, 2022. The receipt bore the date of December 14, 2022. A second consecutive post by Brown depicted an unknown male holding at least 12 \$100 bills and at least nine \$20 bills.

The Grand Jury learned that Waters' account was opened 14 days prior to the deposit of the stolen and altered checks. The jurors viewed surveillance footage of Waters opening the account and it appeared that he required assistance from another person. Investigators have been unable to locate Waters. The address that was provided to BoA when the account was opened is actually the address of a vacant property.

Brown proudly identifies himself as a member of SaySlide through a "Sayslide Rack Racers" insignia tattooed across the back of his neck.

Jamal Carson

In July 2022, the Upper Moreland Police Department investigated complaints of stolen checks from a mailbox at the Willow Grove Area Post Office. One complainant indicated that he mailed a check to his credit card company in June 2022, and, at some point, the check was intercepted, altered, and deposited into the BoA account of Ijayonna Felder. A second complainant reported a similar theft of his check from the mail. The investigation revealed that a total of 17 checks were stolen and deposited into Felder's account via mobile deposit between May 25, 2022 and June 5, 2022.

Investigators requested records and surveillance video associated with Felder's BoA account and the Grand Jury subsequently reviewed video surveillance still images of the transactions. Sayslide member Jamal Carson was identified as the individual who made \$1,500 in cash withdrawals from Felder's account at an ATM in Philadelphia on June 11, 2022.

Felder was interviewed and told investigators she was recruited by one of her brother's friends to participate in the scheme.

On May 12, 2023, OAG agents executed a search warrant at Carson's residence. Of note, agents seized the following: 1) Eight debit cards (TD, BoA, Navy Federal Credit Union) all linked to previous fraud incidents; 2) 27 personal checks (stolen from U.S. Mail and not made payable to Carson); and 3) Two unloaded handgun magazines and one magazine extender. Following his arrest, Carson admitted to his involvement in the scam but claimed that Felder was a girl he dated.

OAG agents reviewed the Instagram account records for Carson and the jurors were shown a November 22, 2022 direct message that Brown sent to Carson. It stated: "She said I can come get them 2 OA's one of em yours bro." The Grand Jury learned that OA is short for Bank of America. Carson responded, "Yktv we doin all pick up then we doing all big packs after TLI". ³

The Grand Jury also reviewed two photographs posted to Carson's Instagram account on March 9, 2023. The first photograph depicted a bank screen and was captioned, "All active Oas n TDS N Pncs Tapp inn (red heart, green heart, money face emoji)." OAG agents who had experience with the lingo used by these scammers explained that "TDS" was a reference to TD Bank; "Pncs" was a reference to PNC Bank; and, "Tapp inn" was jargon used to solicit individuals to participate in the scheme. The second photograph depicted a BoA Visa debit card over the top of a BoA deposit slip showing two check deposits totaling \$3,619.12. It was captioned, "Dey looking 4 N I'm prolyl [sic] where da Bank at (fire emoji)." The Grand Jury learned that this was another example of an attempt to recruit account holders,

The Grand Jury learned that Bianca Garcia was another person recruited for use of her bank account. A \$13,500 check was deposited into the account on March 27, 2023 at a TD Bank ATM located in Trooper, Montgomery County. The check was issued by Merrill Lynch to another person, but had been stolen from the mail and the name of the payee had been altered to reflect Garcia's name. A review of still images from surveillance video revealed that it was Carson who made the deposit. Additionally, records revealed that on March 27, 2023, his telephone interacted with a cellular tower in Trooper, close in time to when the deposit was made.

³ Agents explained that "YKTV" means "you know the vibe." "TLI" is shorthand for "the latest information." Investigators interpreted this to mean that the conspirators intended to pursue the deposit of checks with a higher dollar amount and/or business checks.

Another person recruited was TD Bank customer Kevin Cooke. A \$14,954.84 check was deposited into Cooke's account on March 27, 2023 at a TD Bank ATM located in Hatboro, Montgomery County. A review of still images from surveillance video revealed that it was Klotz who made the deposit. Additionally, Carson's cellular telephone interacted with a cellular tower in the area of this ATM close in time to when the deposit was made. The check had been issued by Harrielle Embroidery LTD and had been stolen from the mail. The maker of the check indicated that the check in question was not issued to Cooke and was placed into a U.S. Post Office mailbox located in Blue Bell on March 24, 2023.

Withdrawals from the accounts of Garcia and Cooke were subsequently made on April 5, 2023 from a TD Bank ATM at a Rite-Aid store in Philadelphia. On that date, video surveillance revealed that an unidentified female exited a gray sedan, completed three ATM withdrawals from Garcia's account inside the store, and returned to the vehicle. While inside the store, she used her mobile device to communicate with someone during the transactions. Agents familiar with this type of fraud testified that it is common for suspects to communicate during transactions via mobile devices in order to receive instructions on how much to withdraw and/or obtain PIN information. Mobile communications were also used as a way to control "runners" and verify that the transaction was completed. After she returned to the vehicle, Carson got out of the car and entered the store. He was seen utilizing his mobile device during the course of the transaction and made withdrawals from Cooke's account.

The Grand Jury was shown photographs posted to Carson's Instagram account on April 5, 2023 that depicted the inside of an unknown vehicle with bulk U.S. currency, an Apple iPhone and a TD Bank ATM withdrawal receipt dated April 5, 2023, reflecting a withdrawal of \$1,000 and an available balance of \$12,955.12. The second photograph depicted a screenshot of a TD

Bank mobile banking application showing an account assigned to a customer with the letters "BI" and the total available balance of \$13,282.30. The photograph was time stamped 9:52 a.m. and was captioned, "TD mornings (green heart, fire emoji)." The third photograph depicted an individual at an ATM with bulk U.S. Currency bearing the caption, "If you Got TD Lock Inn (green heart, fire emoji)." In the posts, Carson tagged Jahan Stevenson with the caption, "Its just me an KD," Stevenson's nickname. Carson's telephone also interacted with a cellular tower in the area of the Rite-Aid near the time of the withdrawals.

When OAG agents contacted the makers of checks that were used to fund multiple, additional TD Bank accounts, several of these individuals confirmed that they had placed checks in the blue mailboxes located at their local U.S. Post Office and that the checks did not reach the intended payee. The Grand Jury was shown social media records of various SaySlide members related to the sale and/or exchange of arrow keys for zip codes in the greater Philadelphia area and northern Delaware. The check makers indicated that the mailboxes that they used to deposit the checks were located within these areas. Ultimately, however, due to the sheer volume of accounts, investigators were not able to review all of these records during the time-frame of this investigation.

• Jahan Stevenson

Forensic extraction of information from Stevenson's telephone yielded significant evidence of the fraud schemes. Various social media posts had revealed some type of caption, emoji, or other writing on the photographs of receipts or debit cards that usually obstructed some or all of the identifying information. Stevenson's telephone, however, contained many of the original unobstructed photographs and messages between SaySlide members, or with recruited account holders, related to each scam. The Grand Jury viewed several color images of checks

⁴ Agents testified that this was believed to be a reference to Bianca Garcia.

with the "pay to" name whited out and replaced with the name of the recruited account holder. There were also several unobstructed receipts of deposits and withdrawals in the hands of various SaySlide members. The Grand Jury viewed videos that actually depicted Stevenson making the deposits and withdrawals. The photographs also depicted a printer and software capable of printing counterfeit checks. On April 26, 2023, Stevenson told SaySlide members in a Telegram chat the he had CheckBuilderPro (software) and then sent a video of printing the same day.

The Grand Jury reviewed Instagram posts by Stevenson and other SaySlide members related to the ATM Deposits and withdrawals with captions recruiting viewers to "Tap In" if they had accounts at specific financial institutions, including BoA and TD Bank. There were also numerous examples of Stevenson's attempts to recruit individuals for the use of their bank accounts.

The Grand Jury learned that SaySlide members TaeJohn Bradley and Javon Wilson were heavily involved in stealing mail for Stevenson. There were numerous messages between the three men wherein they discussed mailbox and arrow key locations, when and how frequently to steal the mail, the price Stevenson would pay for "hitting" all of the mailboxes, as well as when to sort the mail and who was allowed to participate. These particular mailboxes were located in Philadelphia and Montgomery Counties, as well as Delaware.

Shamaine Richardson was an individual who allowed her bank account to be used for fraudulent deposits. On February 23, 2023, a check in the amount of \$18,580.05 that was issued by Brandywine Prime L.P. was deposited into Richardson's account at a TD Bank in Philadelphia. A review of still images from the video surveillance revealed that it was Stevenson who made the deposit and subsequent withdrawals related to this check.

A second fraudulent deposit into Richardson's account occurred on March 3, 2023, at a TD Bank located in Philadelphia. The check was issued by the United States Treasury in the amount of \$74,912. The Grand Jury reviewed surveillance images of Stevenson making the deposit and subsequent withdrawals. The Grand Jury reviewed a photo posted to Stevenson's Instagram account of an ATM receipt dated March 3, 2023, reflecting a deposit in the amount of \$74,912 at a TD Bank in Philadelphia.

The Grand Jury learned that on February 23, February 24, and February 27, 2023, Stevenson's telephone interacted with cellular towers in areas where TD Banks are located close in time to when the deposit and subsequent withdrawals from Richardson's accounts were made. Similarly, on March 3 and 4, 2023, his telephone again interacted with cellular towers in areas where TD Banks are located close in time to when the deposit and subsequent withdrawals from Richardson's account were made.

The Grand Jury was shown a March 25, 2023 Instagram post by SaySlide associate Saadiq Barrett that depicted a photograph of a TD Bank ATM receipt dated March 23, 2023, reflecting a deposit in the amount of \$4,706.75 into the account of Alexis Raines. Barrett had just received a time-served sentence that day for possession of a firearm without a license. TD Bank records confirmed that a deposit into Raines' account of \$4,706.75 occurred at a TD Bank in Philadelphia on that day. The deposit consisted of a check issued by Aaron Abstract Company that had been stolen and altered. Surveillance images revealed that it was Stevenson who deposited the check. No funds were able to be withdrawn from this transaction, however, as the account was flagged for fraudulent activity.

On March 31, 2023, a post on Stevenson's Instagram account depicted a TD Bank receipt reflecting a \$31,935.45 ATM Deposit into the account of Johnise Mayer. The Grand Jury was

shown the account records of Mayer, which reflected that a check in that amount was deposited that day at a TD Bank in Devon, Chester County. The check was from Merrill Lynch. Stevenson was identified in the video surveillance as the individual making the ATM deposit. Additionally, his telephone interacted with a cellular tower in Devon where a TD Bank is located. This interaction occurred close in time to when the deposit was made into Mayer's account. The Grand Jury learned that no funds were able to be withdrawn because the account was frozen due to suspected fraud.

As noted above, Carson posted three photographs that day and tagged Stevenson in the post. Stevenson also posted an Instagram story around the same time as Carson. The post showed a text message conversation with an iPhone contact labeled, "B." SA Grady testified that the conversation appeared to reference bank fraud transactions. During the text conversation, Stevenson requested a SS (social security number) from the recipient. There was also a photograph that was captioned, "I love people that appreciate me & what I do for em lol but y'all see what's going on." The Grand Jury also reviewed a Telegram chat among SaySlide members wherein Stevenson sent a screenshot of the TD mobile banking application that contained the following greeting: "Welcome Bianca." Carson then responded by stating, "TD morning." The message was sent on April 5, 2023 at 10:03 am. Stevenson also sent the group a photograph of the available balance for Garcia's account.

With respect to the April 5, 2023 transactions at the TD Bank ATM in the Rite-Aid store that was discussed above, a review of the surveillance video revealed that the driver of the car never emerged. However, given the overlapping Instagram posts of Carson and Stevenson, as well as the group messages, it is believed that Stevenson was assisting in the facilitation of the

⁵ Agents testified that they believed this to be Bianca Garcia.

fraudulent activity that day. Additional examples of SaySlide members working together in order to execute the financial scam will now be discussed.

Multi-Member Scams

The Grand Jury reviewed an April 12, 2023 Instagram LIVE video posted to Stevenson's Instagram account. Stevenson, Abdul Anderson and Jahmir Martin were in a car and Stevenson was in possession of a black semi-automatic handgun while Anderson was holding a black and tan semi-automatic handgun. Stevenson was prohibited by law from possessing a firearm due to his prior juvenile adjudication for robbery. A check dated March 13, 2023, in the amount of \$166,400 was shown during the video. The jurors then viewed a photograph that was posted to Anderson's Instagram account the next day. It depicted a blue debit card with "LLC" and an ATM deposit slip showing a check deposit in the amount of \$166,400. The post was captioned, "6 months or better 15-20k on the floor all fresh jawns I got a 5-8 pack for us!" and "TOPP OF THE MORNING OA's navyfed TD'S PNC RUSH ME BEFORE 3 (male running and wave emojis) trying to get everybody out the way soons as possible."

Testimony revealed that a check in the amount of \$166,400 was deposited into the business account of confidential source #3, an individual known to law enforcement, hereafter C.S. #3, at the Navy Federal Credit Union (NFCU) in Horsham, Montgomery County, on April 12, 2023. The name of C.S. #3's business was Four My Children LLC, and he was the authorized signatory. Investigation revealed, however, that the issuer of the check was Sovereign Home Realty, which had not made the check payable to C.S. #3 or Four My Children LLC. It had been placed in the mailbox at a U.S. Post Office in Blue Bell. NFCU placed a hold on this check for suspected fraudulent activity and no money was withdrawn. C.S. #3's account was subsequently closed and the relationship was terminated due to this fraudulent activity. Surveillance photographs revealed that it was Anderson who made the

deposit. Additionally, records revealed that Stevenson's telephone interacted with a cellular tower in Horsham close in time to when the deposit was made.

C.S. #3 appeared before the Grand Jury and testified that he offered use of his account after being recruited via Instagram. He identified the handle photo as "@lilhaddi." He stated that he met someone named "Mark" or "Marlo" at a McDonalds located in Philadelphia and provided his debit card and PIN. C.S. #3 testified that he thought he was participating in a loan opportunity and that his business account was needed because the check was written for a large sum of money. The communications initially occurred through Instagram but then quickly moved to text messages. Once the messaging switched to text messages that contained typographical errors and included a request to meet at a McDonald's, C.S. #3 began to question the legitimacy of the venture.

The Grand Jury heard testimony that Justin Thompson, the treasurer of the Radnor Hunt Club, wrote approximately 30 checks and placed them in a mailbox at the U.S. Post Office in Blue Bell on April 26, 2023. He subsequently reported to his local police department that he was alerted that the checks had been stolen from the mailbox. Investigation revealed that several of the checks had been altered and cashed.

One of these checks was in the amount of \$4,320.00 and was altered to be made payable to Deondre Means. The check was deposited at JP Morgan/Chase Bank in Clifton Heights, Pennsylvania and a cash withdrawal followed. SA Boyd testified that a review of the surveillance video and social media revealed that the deposit was made by Stevenson.

Another check was altered to be made payable to Daniel Mistretta and was in the amount of \$3,858.40. This check was deposited into Mistretta's account at BB&T/Truist Bank in Cherry Hill, New Jersey, followed by a withdrawal. Through surveillance video and social media, SA

Boyd identified Brahim Bey-Upchurch, a SaySlide associate, as the one who made the deposit of the Mistretta check. Bey-Upchurch has unique facial features (eyes/eyebrows) which assisted in the identification.

A third Radnor Hunt Club check was altered to be made payable to Nyelle Ombam and was in amount of \$7,795.29. There was an attempt to deposit this check at Franklin Mint Credit Union via a mobile deposit but a "stop payment" had been placed on it by Radnor Hunt Club's bank.

The Grand Jury viewed a Telegram video that was posted on Jahmir Martin's Instagram account. It depicted many of the stolen Radnor Hunt Club checks in question, as well as a computer program and printer being utilized to generate new fraudulent checks with the Radnor Hunt Club fox logo on them. Also depicted in the video were individuals practicing the writing of the Radnor Hunt Club maker's signature, as well as trash bags full of stolen mail.

Once evidence from Stevenson's telephone was extracted, the Grand Jury viewed multiple group chats between Stevenson, Martin and Upchurch-Bey. They discussed the use of C.S. #3 's account and several aspects of the Radnor Hunt Club check thefts. The Grand Jury viewed a Telegram chat between Stevenson and an unidentified individual that discussed the bank account, PIN, and two-factor authentication code for online banking for recruited account holder Deondre Means. There was also a group chat between Jabreel Martin, Jahmir Martin, Zaahir Beckham, Javon Wilson, along with Carson, Stevenson, Anderson and Goolsby, in which Stevenson shared a video of himself making a deposit into the Means account at JP Morgan. In this same chat, Stevenson shared photos of recruited account holders' cards, including that of Nyelle Ombam, several stolen checks, and deposit receipts corresponding to identified fraud. Stevenson also shared photos of the stolen Radnor Hunt Club checks, as well as

other checks identified as stolen and fraudulently deposited into recruited account holders' accounts.

With respect to social media, the Grand Jury also reviewed SaySlide member conversations and messages discussing arrow keys for zip codes in the greater Philadelphia and northern Delaware areas. In one post by Stevenson to an unknown user, he wrote: "3 pack for del nd kop north 1500." Agents testified that this was a reference to northern Delaware (del nd), King of Prussia (KOP) and North Philadelphia (north) \$1500. Stevenson provided a list of Delaware mailboxes that he had been stealing from with the arrow keys and then wrote: "Bro it's over 100 boxes." Additionally, the jurors were shown conversations involving Stevenson, Anderson and other co-conspirators wherein they exchanged bank account log-in data and PINs.

In an Instagram post by Anderson on his "@lilhaddi24" Instagram account on June 7, 2023, there was a photograph of two ATM deposit receipts reflecting a deposit of \$10,228 on April 24, 2023 at BoA in Warrington, Bucks County, and a deposit of \$8,731.25 on April 24, 2023 at TD Bank in Doylestown, Bucks County that same day. Investigation revealed that the checks were deposited into the accounts of one Sarah Rogers and Nia James, respectively. Both checks had been altered to reflect their names as the payee. Stevenson was identified through surveillance photographs as making the deposit of the \$8,731.25 check into James' account. Investigators were unable to obtain surveillance video of the deposit into Rogers' account. However, the Grand Jury learned that Stevenson's telephone interacted with cellular towers in Warrington and Doylestown close in time to when the deposits into the accounts of Rogers and James were made. Stevenson also shared unobstructed photos of both checks with other SaySlide members in a Telegram chat in April, 2023.

The Grand Jury learned that 15 checks totaling \$309,743.95 were issued by Universal Health Services, Inc. in August 2022. These checks were placed in a U.S. Post Office mailbox in Upper Merion and stolen and deposited into various TD Bank accounts which did not belong to the intended recipients. Following an investigation by the Upper Merion Police Department, Klotz was arrested along with Massa and Broughton. A further review of all the surveillance footage by OAG agents, however, revealed additional connections to other SaySlide members who were not initially identified by the Upper Merion detectives. Specifically, Yahsir Keaton was identified as making a withdrawal from the TD Bank account of Jaleel Dickerson, one of the accounts associated with fraudulent transactions made on August 15, 2022. He was also identified as making two additional deposits of fraudulent checks into Dickerson's account on September 6, 2022, and September 16, 2022, at an ATM in Philadelphia.

An investigation by the Springfield Township Police Department uncovered additional fraud scams involving SaySlide members. In November 2022, it was discovered that checks written by a Springfield Township resident were stolen from a U.S. Post Office mailbox, altered and deposited into accounts that did not belong to the intended payee. The checks were written in the amounts of \$8,460, \$1,870, \$20,000 and \$2,500. Following an investigation, Zahmir Beckham was charged in connection with the altered checks in the amounts of \$1,870 and \$2,500. Brown was charged in connection with the \$20,000 altered check. Both men entered guilty pleas.

The Grand Jury learned that on September 11, 2023, Justice Fairfax opened an account online with PSECU. Fairfax is a college student at Shippensburg University. The next day a check in the amount of \$3,000 was deposited into his account through a TruMark FCU ATM⁶ in

⁶ The Grand Jury learned that PSECU works with other banks, including TruMark FCU, so that PSECU customers can make deposits through their ATMs.

Philadelphia and \$500 was withdrawn immediately. On October 25, 2023, another check in the amount of \$3,000 was deposited at a different TruMark FCU ATM in Philadelphia and \$500 was withdrawn. Funds were then transferred via Cash App to user accounts, including that of SaySlide member John McDonald and Bobby Hanton, an alias used by Jahmir Martin. Additionally there were other point-of-sale transactions where cash was withdrawn at numerous retail stores, including Walmart. Surveillance video from the ATMs revealed that it was Jahmir Martin who deposited the checks. The alleged maker of the checks was Arizona Best Color Graphics, Inc. While the business was a legitimate one, the checks were not. On November 7, 2023, the bank determined that they were counterfeited and the business confirmed that it never issued the checks. As a result, PSECU suffered a loss of \$5,537.21.

SA Grady interviewed Fairfax, who advised that his friend "Brittany" from Philadelphia informed him about a way to make extra money. Investigators are still attempting to identify her and the connection to SaySlide. Fairfax told investigators he made contact with an Instagram account that was identified as being operated by Darian Roach. Fairfax was given a telephone number that was associated with Roach. The jurors viewed two photos from the Instagram account of Roach, depicting him with several Sayslide members, including Zahmir Beckham and Jahmir Martin, standing on a well-known corner in SaySlide territory. Fairfax stated that the unknown male came to Shippensburg University between midnight and 1:00 am on October 23, 2023 in order to obtain Fairfax's PSECU debit card and PIN. Fairfax explained that it was dark, but he observed approximately three individuals in the vehicle. During the early morning hours of October 24, 2023, Carson posted a video on his Instagram account that depicted him driving on Interstate 83 and he tagged his location as Penn Township, Cumberland County. This is just outside the area where Shippensburg University is located. Fairfax was asked to send money via

Cash App to the accounts of gang members McDonald and Hanton a/k/a Jahmir Martin after checks were deposited into his PSECU account.

Fairfax also told investigators that shortly after he turned over his debit card, he realized that it was probably a scam and so he locked his card. He then received calls from numerous unknown telephone numbers telling him to reactivate the card, or he would be forced to make the deposits. Fairfax reluctantly reactivated the card, and the fraud continued.

The Grand Jury learned that on November 17, 2023, Teren Rice opened a PSECU account. On December 6, 2023, a \$985 deposit was made into the account through a TruMark FCU ATM in Philadelphia and \$500 was withdrawn immediately. The next day, another \$985 deposit was made through a TruMark FCU ATM in Upper Darby and \$500 was withdrawn immediately. Funds were also withdrawn via point-of-sale transactions at various retail locations and there were transfers to various Cash App accounts, including accounts held by Saadiq Barrett and his mother (whose account was registered with the same telephone number as Barrett). Surveillance images from the ATMs revealed that Zahmir Beckham, accompanied by Carson, deposited a check on December 6, 2023. Unfortunately, the surveillance image of another deposit the next day was of poor quality and the depositor was wearing a hood covering most of his face. SA Grady testified that the checks were purportedly issued by Brown Printing, a legitimate business. However, the checks were determined to be fully printed, counterfeit checks that were not issued by the company.

Following the issuance of search warrants, SA Grady determined that there were 79 Cash App accounts that were identified in connection with the fraud accounts and known telephone numbers associated with SaySlide members. She stated that the two PSECU accounts were attached to the Cash App account of Jabreel Martin in December 2023. The records revealed that

Martin's Cash App account was used in transactions with individuals including Hanton a/k/a Jahmir Martin, Tyler King (an incarcerated member of SaySlide) and Saadiq Barrett.

The Grand Jury learned about Cash App records related to previously identified instances of fraud perpetrated by SaySlide members. SA Grady stated that Shamaine Richardson, whose account had been used to deposit fraudulent checks in February and March 2023, transferred funds via Cash App to Shacora Taylor, whose account is registered with a mobile telephone number belonging to Stevenson. A review of that Cash App account revealed that a portion of funds were thereafter transferred to Saadiq Barrett. Cash App records also showed transfers between Jahmir Martin, Zaahir Beckham and Brown.

SA Grady also informed the Grand Jury about 33 Citizens Bank account records that the OAG received in January 2024. These particular accounts were identified through ATM receipts that were posted on the social media accounts of various SaySlide members. Two accounts of note belonged to Mynaya Stewart, Brown's girlfriend, and Kwamea Gaymon, the girlfriend of Carson. Once the accounts were opened, fraudulent checks were subsequently deposited. Unlike others who were recruited for the use of their bank accounts, Stewart and Gaymon actually received funds from SaySlide members via Cash App transfers. The Grand Jury learned that Stewart opened her account on August 1, 2023, approximately 10 months after she claimed to have been "robbed at gun point," which will be discussed in the next section. That same day, a \$10,000 check purported to be issued by GSC, a Canadian company, was deposited.

From her review of the Citizens Bank records, SA Grady determined that dozens of counterfeit checks had been deposited into various accounts held by young females that investigators believed to be recruited by SaySlide: 30 in the name of the Chester County Prison, nine in the name of Diedrich Flooring, and 13 in the name of GSC.

With respect to Jabreel Martin, who, along with Logan, had educated SaySlide members on the bank fraud scam, the Grand Jury learned that he continued to be involved with the fraud despite the fact that he was on house arrest with federal authorities pending trial in New Jersey. The Grand Jury reviewed numerous still images captured by a pole camera at the intersection of Huntington Street and Myrtlewood Street in Philadelphia, where Martin lived. The images showed Martin's interactions with other gang members. Martin's ankle monitor was visible in the photos, which showed various members of SaySlide running up to him and handing him their cellular telephones. Martin would then respond to calls or answer text messages. This activity, coupled with his Cash App records and hundreds of telegram messages — in which Martin advised Sayslide members on how to best effectuate the bank fraud scams, including the details of fund limits, individual bank policies, hold times, differences between personal and business accounts, and when to make deposits and withdrawals — was indicative of his continued involvement in this criminal activity despite his house arrest status.

To date, 62 bank accounts have been identified as being utilized in fraudulent transactions involving SaySlide members. All told, gang members deposited over \$1,266,058.01 in stolen, altered, and counterfeit checks. They were not able to access the full amount of the deposited checks because banks froze or flagged some accounts for fraudulent activity. Nevertheless, SaySlide was actually able to successfully withdraw and access \$213,563.71 in stolen funds.

Violent Crimes

SaySlide's organized mail theft scheme was supported and accompanied by regular acts of violence committed by gang members. In the summer of 2022, Agent Kyle Boyd (SA Boyd) opened an investigation into a series of violent crimes, firearms crimes and narcotics violations

committed by SaySlide member Richard Parker. During the execution of a July 21, 2022 search warrant at Parker's Philadelphia residence, law enforcement seized a Polymer 80 9mm firearm, a substantial amount of narcotics, and, Parker's cellular telephone. The Grand Jury learned that a forensic examination of his telephone provided new information regarding numerous crimes committed by various members and associates of the SaySlide organization. For example, SA Boyd became aware of the non-fatal shooting of Brian Gratsy that occurred on July 13, 2022 at 161 West Nedro Avenue in Philadelphia. The intended target was Coby Claibourne, a member of SaySlide's rival gang, M24. Gratsy, who was not a known member of that gang, suffered a gunshot wound to the leg. Parker admitted committing the shooting to numerous Sayslide members via text messages. The evidence revealed that Parker and SaySlide members often took screenshots of the "Citizen?" application notification about shootings they committed, and then shared those screenshots with their contacts in an effort to improve their status within SaySlide and antagonize their enemies.

The Grand Jury learned that a forensic comparison established a match between the handgun seized from Parker's bedroom and the 9mm fired cartridge casings (FCCs) recovered from the shooting scene on West Nedro Avenue.⁸ The Grand Jury learned that Parker and other unidentified co-conspirators obtained the gun in a robbery of Christian Quesada-Rivera on July 11, 2022, two days before the Nedro Avenue shooting. With the assistance of the OAG, the Philadelphia Police Department arrested Parker and he ultimately pled guilty to robbery, aggravated assault and a firearms violation. Like Brown, Parker proudly identifies himself as a

⁷ Citizen is an application that alerts users that a 9-1-1 call has been made in the area or that another user has reported an emergency incident.

⁸ The Grand Jury learned that members of law enforcement enter images of FCCs recovered from crime scenes and FCCs test-fired from recovered firearms into the National Integrated Ballistic Information Network. The database then microscopically compares the FCCs and sends a notification to law enforcement whenever there is a match between FCCs and a firearm. Ballistic evidence is assigned a "crime gun" number and reports are then generated that show all incidents that are tied to the specific crime gun.

member of SaySlide through a "Sayslide Rack Racers" insignia tattooed across the front of his neck.

The Grand Jury learned that the shooting was an act of retaliation by SaySlide for violence committed by SaySlide's rival gang, "M24," specifically, the shooting of Parker. M24 members reside in the same neighborhood as SaySlide members, which consists of the vicinity of the 7700 block of Ogontz Avenue in Philadelphia. M24 and Sayslide gangs have engaged in numerous acts of violence over social media slights and retaliation for previous acts of violence. For example, the murder of Marquise Chandler, a former member of M24, has been a trigger point for violence. Testimony established that Brown was prosecuted for Chandler's murder but acquitted. Brown has subsequently been relentless in taunting M24 members about getting away with Chandler's murder.

• Robbery of Natalie Gilmore and Staged Robbery of Mynaya Stewart

The Grand Jury heard testimony that on November 9, 2022, Natalie Gilmore, a USPS mail carrier, reported that she was robbed at 6500 North 13th Street in Philadelphia. She told police that she was inside her postal truck and sorting mail when she observed a black, newer model Impala pull alongside her truck. She stated that a black male wearing all black appeared at the back of the truck. He was wearing a black mask and pointed a black semi-automatic pistol at her. He stated, "I'm gonna need your mail bag and your work keys." She turned over the bag but not her arrow key. She described him as 6'0" to 6'2" and skinny.

The Grand Jury reviewed numerous images, and a video recording from Instagram Live on the same day as the robbery, November 9, 2022, depicting Brown, Carson and Bradley. In this Instagram Live video, Bradley was brandishing numerous firearms while dressed in black sweatpants, a black ski mask and a black Nike hoodie. Bradley is ineligible to possess a firearm

due to his prior conviction for aggravated assault. The Grand Jury also learned that a black 2016 Chevrolet Impala was stolen in Norristown on November 5, 2022, four days before the robbery. However, it was not reported stolen to the police until November 10, 2022.

Prior to the robbery of Gilmore, another USPS employee was allegedly the victim of a robbery on the same day in the 6400 block of North 12th Street. This employee did not call 9-1-1, however, to report the crime. Instead, she made a call to her supervisor to relay what had occurred. Police subsequently became involved. The employee informed the police that she was approached by a darker-skinned black male wearing all black clothing and a ski mask. She stated that he was no taller than 5'11" and weighed between 140-150 pounds. The male produced a black handgun and demanded that she give him her mail bag and (arrow) key. She gave him her mail bag, scanner and arrow key. He then entered the passenger side of a black, newer model Chevrolet (possibly an Impala). The employee was Stewart, Brown's girlfriend.

In her appearance before the Grand Jury, Stewart continued to perpetuate the robbery narrative and claimed that she was "surprised" and "in shock" when it occurred. She stated that she did not call 9-1-1 to report the crime because it was USPS policy that carriers not contact the police if they are the victim of a robbery. She stated that she had been trained on this policy. Instead, she called her supervisor, her grandmother and Brown. She testified that she had shared her location with Brown just prior to the robbery because "I always share my location with him." Even though she provided specific details to Postal Inspectors about the robbery, including a description of the car, the robber's build and the gun that he brandished, she only claimed to have a vague recollection of such details when she appeared before the Grand Jury.

Stewart told the Grand Jury that she met Brown at the end of October 2022. She claimed that they only dated for three months even though, as indicated earlier in this Presentment, the

Grand Jury discovered that she opened up a Citizens Bank account almost a year later, in August 2023, and a deposit was made of a \$10,000 counterfeit check. When asked if Brown had any tattoos on his neck, she stated, "Like I said, he has a lot of tattoos. I cannot say what I know and I didn't know on his body, but he does have a lot of tattoos." When asked if Brown was involved with SaySlide, she testified that "like a few of the people he hang with, his friends, they're from there I guess." When she was asked the question, "What is SaySlide," she responded, "I honestly don't -- I don't know if that's a rap name. I don't know if it's a street name. I don't know. I couldn't tell you. I don't know if that's like a street name or like a rap group. I don't know."

Stewart testified that she visited Brown in prison prior to her Grand Jury appearance and also spoke with him over the telephone. The Grand Jury listened to their recorded calls wherein they discussed her subpoena and the questions that the OAG agents had asked of her. The Grand Jury learned that Stewart initially told OAG agents she did not know Brown. When presented with a photo array, she picked out Bradley as someone she knew, but claimed he was not involved in the robbery. Later, in her recorded calls with Brown, she told Brown about Bradley's picture in the photo array and they both had extremely animated reactions as they could not believe that OAG agents had identified Bradley.

The Grand Jury learned that Stewart worked for the USPS from September through December 2022. She was a "floater," meaning that she did not have a customary route for mail delivery. She testified that November 9 was the first time that she was assigned to that particular delivery route.

The Grand Jury found that Stewart's testimony about her purported robbery was not credible or worthy of belief.

Testimony from multiple witnesses established that Brown and Bradley had been discussing their plan to rob a USPS postal carrier for an arrow key, and that these individuals were in possession of an arrow key after November 9, 2022. Testimony revealed that Brown and Bradley were bragging about the robbery of two female mail carriers and that they had been driving a black Impala that Brown had stolen.

The Grand Jury reviewed text messages between Brown and Stevenson on November 11, 2022, during which they discussed the key that was taken from, or given by, Stewart. When asked by Stevenson, "Where was she at?", Brown responded, "Like 65th and 11th Street." The Grand Jury also reviewed messages between Bradley and Stevenson, as well as Brown and Stevenson, wherein they discuss the fact that the key was not working. The evidence revealed that despite Brown and Bradley obtaining an arrow key, they did not know the location of the mailboxes that corresponded with that key.

The Grand Jury reviewed a message that Brown sent to Stewart during the evening of November 9, 2022, approximately two hours after the shooting of Nascia Wise, which will be discussed below. Brown wrote:

"I just made Ah dub today baby"

"You gonna help me count this"

The message was accompanied by a photo of a large stack of money. The Grand Jury was informed that "dub" is a slang term for \$10,000. Stewart responded:

"U got our liq?"

"Oou don't play with roy"

Testimony revealed that a lick (sic "liq") is a slang term for robbery and SA Boyd explained that Stewart was referencing the "robbery" of her mail key earlier that day. "Roy" is one of Brown's many nicknames.

• The Attempted Murder and Robbery of Nascia Wise

Confidential source #4 is an individual known to law enforcement, hereafter C.S. #4, who was an associate of SaySlide and lived in New Jersey. He had participated in the mail theft scheme with Brown and Carson. C.S. #4 possessed an arrow key for the Germantown/Chestnut Hill area of Philadelphia.

The Grand Jury heard testimony that on or about October 28, 2022, ^{C.S. #4} asked Brown to pick him up near the Camden, New Jersey waterfront. At that time, ^{C.S. #4} had a black 10 mm Glock firearm with a switch (a modification to a semiautomatic firearm that makes it fully automatic) that he had hidden in bushes nearby. ^{C.S. #4} had been involved in a car chase with police in New Jersey and wanted to hide his gun so that he was not caught with it if he was arrested. Brown and Carson picked up ^{C.S. #4}, and they met with ^{C.S. #4}'s friend, C.S. #1

. C.S. #1 was also a New Jersey-based associate of SaySlide who committed bank fraud scams.

After the group met with C.S. #1 in an open lot, less than one mile from where the gun was hidden, Brown and Carson left abruptly. When C.S. #1 and C.S. #4 eventually went back to the Camden waterfront to retrieve C.S. #4's gun, they discovered that the gun was gone. Both C.S. #4 and C.S. #1 suspected that Brown and Carson had stolen C.S. #4's gun. C.S. #1 testified that it was a valuable, designer gun.

The Grand Jury was shown text messages between Brown and SaySlide associate Javon Wilson on October 31, 2022 and November 1, 2022 wherein they discussed ^{C.S. #4}'s gun and the

price for which it could be sold. On November 1, Brown informed Carson in a message that "Steve" bought the gun.

A week later, at 6:59 p.m. on November 9, 2022, members of the Philadelphia Police Department responded to the rear of 1709 North 68th Avenue, in the Ogontz neighborhood, for a report of shots fired. Upon arrival, officers located ^{C.S. #4}, who was unconscious and suffering from a gunshot wound to his face. ^{C.S. #4} was transported for emergency treatment and had to undergo surgeries on his face and jaw. At the crime scene, officers recovered a 9mm FCC from an unknown firearm and one loaded black Canik TP9 semi-automatic handgun. After ^{C.S. #4} awoke from his surgeries, he was interviewed by officers from the Philadelphia Police Department. He identified Brown as his shooter and Brown was subsequently arrested.

C.S.#4 appeared and testified before the Grand Jury. He stated that on the day of the shooting, November 9, 2022, he asked Brown for a ride to Philadelphia so that he could buy narcotics and visit a girl in Ogontz. C.S.#4 testified that Brown picked him up in a stolen black Chevrolet Impala with tinted windows (consistent with the description of the car used earlier that same day in the robbery and staged robbery of postal workers Stewart and Gilmore). C.S.#4 indicated that he got into the back seat because Carson was in the front passenger seat, and the three headed to Philadelphia. C.S.#4 testified that Carson gave him a black Canik TP9 semi-automatic handgun because his own gun had been stolen and he did not want to go into Philadelphia without one. Once they arrived in the rear of 1709 North 68th Avenue, C.S.#4 got out of the car to stretch. As soon as C.S.#4 was out of the car, Brown shot him in the face with a tan Glock 19x. Brown then got back into the car and drove away with Carson, leaving C.S.#4 lying on the ground. C.S.#4 testified that his cellular telephone, wallet and arrow key were still in the car.

C.S. #4 testified that Logan, the SaySlide member who developed the gang's money laundering scheme, "put a bag on his head" while Logan was out on house arrest. C.S. #4 stated that Brown and Carson were each paid \$10,000.00 to kill him, and that while he was still in the hospital recovering from his injuries, they were posting on Instagram about a spending spree of luxury item purchases. C.S. #4 testified that Logan may have regretted selling arrow keys to him in the past because they had become so valuable. He also noted that Brown made clear his desire to obtain his own arrow key but he did not have the funds to buy one. After C.S. #4 survived the shooting. Logan posted a photo of himself to his Instagram account with the following caption: "Hula Hoop Ass Nigga Got Slimed Out For Tryna Go Around Me (snake emoji) Kno I Get A Nigga Touched Right Now Ain't Gotta Be Around Him (blood drop emoji) #DaBiggest." Logan also posted a photo of himself with a large amount of money fanned out, along with this caption: "Playing wit the wires. Jus made this shxt this morning Put it on ya head Don't play wit fire! (eagle emoji)." These posts were Logan's way of boasting that he was behind the shooting of C.S. #4. Witnesses informed the Grand Jury that street credibility or reputation is paramount in gaining status within SaySlide.

The Grand Jury viewed a photo posted to Instagram by Brown on November 9, 2022 at approximately 10:00 p.m. that depicted Brown and Carson both holding a large amount of money fanned out. C.S. #1 and C.S. #4 testified that prior to C.S. #4's shooting, both Carson and Brown were broke. The Grand Jury reviewed a photo posted by Brown on November 10, 2022 to his Instagram account which depicted him smiling, with a stack of money on his head. "Putting money on someone's head" is a slang expression for murder for hire. Carson admitted to C.S. #1 in a telephone call that he and Brown had been planning the shooting of C.S. #4 for about a week, from the time they had stolen C.S. #4's gun. Carson also admitted to giving C.S. #4 a cheap

gun on the day of the shooting. As for Brown, C.S. #1 testified that Brown stated the following to him in a telephone call on November 16, 2022: "We fucked up. We did this shit to Nas." This meant that ^{C.S. #4} was supposed to die after he shot him. Brown admitted several details to C.S. #1, including that he shot ^{C.S. #4} with a Glock 19x. Additionally, call detail records for Brown's cellular telephone revealed that his telephone was near the location where ^{C.S. #4} was shot, as well as near the locations of the postal carrier robberies earlier that day.

The evidence established that the very first call that Brown made after the shooting was to Logan. SA Boyd testified that the two had not been in consistent contact in the months and weeks leading up to the shooting. He explained to the Grand Jury that in murder-for-hire cases, the first telephone call made is the "it's done" call. Brown also sent Logan a text message at that time, stating "yo bro." The Grand Jury learned that in January 2023, federal agents searched Logan's apartment in Camden. At that time, agents recovered a receipt which showed that Logan had paid for an attorney to represent Brown in connection with the shooting and robbery of C.S.#4.

Through data extracted from Brown's telephone, it was determined that the device was at 1 Market Street in Camden (Logan's address) at 10:07 p.m. on November 9, 2022. The Grand Jury reviewed a text message that Brown sent to Carson wherein Logan's address was discussed. Brown also sent text messages to Stewart and another female at 9:33 p.m. and 10:25 p.m. where he noted that he was counting money.

As for Carson, November 9, 2022 call detail records revealed that his cellular telephone was "pinging" a cellular tower in the area of 1 Market Street in Camden from 10:42 p.m. to 11:55 p.m. This was consistent with the records for Brown's telephone and with going to Logan's apartment to receive payment for the hit on ^{C.S. #4}. The Grand Jury viewed photos

posted to Carson's Instagram account on November 10, 2022 that depicted him holding wads of money fanned out. Direct messages between Logan and Carson, discussing an expenditure recently paid by Logan to Carson, were also reviewed. In a message sent by Logan on November 29, 2022, he wrote: "That's over \$500 I spent on you when you didn't have money before the cashout."

A November 9, 2022 Instagram video was played for the Grand Jury which showed Carson, Brown, and several other SaySlide members celebrating the shooting of ^{C.S. #4}. The video was recorded at Stevenson's apartment just before Brown and Carson traveled to New Jersey to receive their payment.

C.S. #1 testified that he knew that Logan paid for C.S. #4 to be killed because both Carson and Brown admitted to him that Logan paid them to do it. Prior to these admissions, his ex-girlfriend (sister of Kayla Massa) had informed him that Logan had contracted the pair to kill C.S. #4. He stated that Logan had also posted several cryptic messages on Instagram after the shooting such as "like play with someone safe next time" so he suspected that Logan was involved. Additionally, C.S. #1 thought it was odd at the time that Brown, Carson and Logan, whom at times held themselves out as friends to C.S. #4, never visited him in the hospital or called to check on him. C.S. #1 testified that when he called Logan via FaceTime to tell him that C.S. #4 had survived the shooting, "there was fear in his face" and he "jumped out of bed." C.S. #1 also informed the Grand Jury that prior to the shooting, C.S. #4 was antagonizing Massa, Logan's girlfriend, on Instagram. According to C.S. #1, Logan was livid about this. C.S. #1 also testified about a photo, viewed by the Grand Jury, posted to Stevenson's Instagram account on November 10, 2022, that depicted several firearms, alcohol, and stacks of money. One of the firearms pictured was a black Glock firearm with a switch. The photograph of the Glock was

posted to Instagram after ^{C.S. #4} was shot in the face by Brown. C.S. #1 testified that this post was an effort to taunt ^{C.S. #4}, a boast indicating that SaySlide was behind both the theft of ^{C.S. #4}'s gun as well as his shooting.

Upon examination of Brown's telephone, messages were recovered wherein Brown and Carson discussed the shooting of ^{C.S.#4}. Specifically, Carson sent the following message to Brown on November 9, 2022, at 12:15 a.m.: "Greeeeeeen Lighttttttttttttttt," followed by a smiley face emoji. Brown responded: "Sayless" followed by a smiley face emoji.

The Grand Jury reviewed text messages between Brown and Quaddir Sheppard, a rapper and SaySlide associate, wherein Brown discussed swapping the gun utilized in the ^{C.S. #4} shooting. On November 10, 2022, the day after the shooting, Brown sent the following message to Sheppard:

"ft me",9

"gotta swap"

"19x" This was accompanied by a photo of a tan, Glock 19x.

Testimony established that 19x is shorthand for a Glock 19x. The Grand Jury learned that the Glock 19x was eventually recovered by law enforcement on October 4, 2023 after two juveniles were apprehended in connection with a carjacking in Philadelphia. It matched the sole FCC located at the ^{C.S. #4} shooting crime scene.

The Grand Jury viewed Telegram messages between Jabreel Martin, Jahmir Martin, Carson, Stevenson, Anderson, Goolsby, Zaahir Beckham, and Javon Wilson wherein they discussed ^{C.S. #4}'s testimony at Brown's preliminary hearing on May 4, 2023, which followed Brown's arrest for the shooting after ^{C.S. #4} identified him to police as the gunman. Carson wrote:

⁹ The Grand Jury learned that "ft" is short hand for FaceTime. Law enforcement officials believe that criminals favor the use of FaceTime with Wi-Fi because it cannot be tracked utilizing cellular tower data.

"Bout to turn myself in." Referencing his involvement in the shooting of C.S. #4, Carson lamented the fact that C.S. #4 had testified that Carson had given him a gun prior to the shooting, as it was clearly an illegal transfer of a firearm. Since that gun was recovered by police, Carson was now tied to the scene of the crime. The Grand Jury received a photo posted to Carson's Instagram story the day after C.S. #4 testified. The posted photo was captioned: "Niggas go to court an point they finger an you niggaz still hang wit em (disappointed emoji) freecreep dis shxt ridiculous." This post was apparently intended to discourage anyone else from testifying against Brown. The Grand Jury also reviewed numerous posts by Logan on his Instagram account depicting Brown in his jail cell with the following caption: "Free Roy he jellin not tellin" (heart emoji)." These messages were apparently posted to intimidate any witnesses from coming forward or testifying, as well as to reinforce SaySlide's "no snitching" culture.

The Grand Jury was also shown a photo posted to Stevenson's Instagram the day of Brown's preliminary hearing. The posted photo was of Goolsby, Brown, C.S. #4 and Stevenson. It was captioned "Free my partner Nem" and a second caption "fuck dude he (cheese emoji)" accompanied by a rat emoji placed above the head of C.S. #4. Agents familiar with use of this type of street lingo explained that C.S. #4 was being called out as a rat and the post was made in an attempt to draw awareness to that fact, placing C.S. #4 in danger. They explained this was also an attempt to discourage anyone from testifying against a Sayslide member.

The Grand Jury reviewed a meme that Brown sent to several SaySlide members via Instagram direct messages. It depicted his own inmate photo "claiming" the shooting of ^{C.S. #4} with the caption: "Dem: did you turn that boy into a dolphin" accompanied by a picture of Brown smiling in an orange jumpsuit. SA Boyd informed the Grand Jury that the term dolphin is a slang term used to refer to a person who is shot in the head.

The Grand Jury was also shown a photo posted to Carson's Instagram account, depicting him blowing a plume of smoke with the caption: "I bet Nas still twitchin he changed sum Different" with a questioning face emoji. This was posted after Brown's preliminary hearing. Agents testified that this was done to taunt C.S.#4, as well as intimidate, or dissuade him from appearing at future court proceedings. Carson also posted a photo to his Instagram stories with several captions: "Dis shxt 4L wif us @Bignlb_100k¹⁰ (fingers crossed emoji)"; "I'll break outta jail if 100k call me 4 anything Cause ik Bro a do the same shxt 4 me (100 emoji, heart hands emoji)"; and "Play wit something safe".

• The Attempted Murder of Nyseem Aziz

The Grand Jury heard testimony about a double shooting that occurred on November 1, 2022, at 151 Apsley Street in Philadelphia. Testimony established that one of the victims, Nyseem Aziz, is a member of M24. The Grand Jury learned that Aziz was walking into his house at 151 Apsley Street when he heard multiple gun shots and realized he was struck in both of his legs. The other victim, Dante Brown, was shot in the shoulder. It was not clear to investigators whether he was affiliated with M24 or was simply dropping off Aziz and got caught in the gunfire. Neither Aziz nor the other victim were able to describe the shooter. From the scene, police recovered 11 .40 caliber FCC's, nine 9mm FCC's and one deformed projectile. One black Glock 27 .40 caliber handgun containing a magazine with the slide locked was found on Aziz. As Aziz was unlawfully in possession of the firearm, he was arrested.

The Grand Jury reviewed text messages between Sayslide member Khyzeem Brown and his brother, Saieem. Brown sent a screenshot of the "Citizen" application notification about the shooting at 151 Apsley Street, taken approximately one hour after the shooting was committed. Brown then instructed Saieem to FaceTime him.

¹⁰ This is the Instagram handle for Logan, 100k is his nickname.

The Grand Jury was also shown text messages between Khyzeem Brown and "Lil Corey" in the two days leading up to the shooting.. "Lil Corey" was identified as the nickname of Corey Robinson, a younger SaySlide associate from the Ogontz neighborhood. The texts between Brown and Robinson discuss sightings of "Seemo," which, the Grand Jury learned, was a nickname of Aziz. In the texts, Robinson advised Brown of several locations where "Seemo" had been recently seen, including 151 Apsley Street. Robinson sent a photo of Aziz to Brown at 6:11 p.m. on October 31, 2022 with geo location tags and told Brown "that was like 20 min ago." The two men exchanged messages wherein they discussed a plan of action for the following day, including getting a "V", or stolen vehicle.

The Grand Jury learned that Brown then sent Carson the 151 Apsley address on November 1, 2022 at 11:57 a.m. Brown told Carson he was waiting outside his residence at 1:45 p.m., and was exasperated that Carson was not ready to go do the shooting. Frustrated, Brown did not wait for Carson and left his residence. The shooting occurred at 2:10 p.m.

The next day, Brown sent the following message to Carson:

"Seem"

"He ran with his burner." Carson responded:

"He aint get touched lol." Brown then replied

"ik" Carson responded:

"I was asking he didn't" Brown responded:

"Yeah he did bro"

The Grand Jury learned that a burner is slang for an illegal firearm, "ik" is shorthand for "I know," and "touched" in this context is synonymous with, or a euphemism for, getting shot. In

¹¹ The Grand Jury learned that the attempted murder of Aziz did not take place on October 31 because it was trick-or-treat night and there obviously would be a number of potential witnesses out in the street.

this exchange, investigators explained that Carson was inquiring about the shooting, including whether Aziz ran with his illegal gun, thereby indicating that he was not present for it. Brown then responded and confirmed that the shooting did in fact occur.

In their appearances before the Grand Jury, C.S. #1 and C.S. #4 testified that "everybody know" that "Dump" (the nickname for SaySlide member Keaton) and "KD" (the nickname for Stevenson) were involved in the shooting of Aziz, which corroborates the fact that Carson was unavailable and other members were recruited. Both C.S. #1 and C.S. #4 testified that SaySlide members notoriously would say "they just did a cookout." Testimony established that "cookout" was a slang term for spraying a city block or area with bullets -- used interchangeably with conducting a drive-by shooting. Both witnesses recalled Keaton and Stevenson discussing a "cookout" involving Brown that occurred one week prior to the attempted murder of C.S. #4. Aziz was unable to describe the shooter to police but believed it was a drive-by shooting because of how quickly it occurred. The other victim told police that he was in his vehicle parked on Apsley Street when he heard multiple gunshots and ducked. He stated that he too was unable to observe the shooter due to how quickly the shooting happened and corroborated that it was a drive-by shooting.

The Grand Jury was shown text messages between Brown and "snax." "Snax" was identified as Charles Torres, another associate of the SaySlide organization. Brown sent a screenshot of the "Citizen" application notification about the shooting of Aziz approximately one hour after it occurred. Brown then sent a subsequent message to him that stated: "Jordan gone, swapped out." The Grand Jury learned that "Jordan" is a slang term for a Glock 23 and a Glock 23 is a .40 caliber pistol. As noted above, .40 caliber FCCs were recovered from the crime scene. His message included a photo of a Ruger, the gun that was swapped for the Glock 23. The Grand

Jury was also shown several messages between Brown and Torres wherein they described previous shootings or "cookouts" in which they participated.

• October 18, 2022 Shooting

The Grand Jury was shown surveillance video of a shooting that occurred at 3222 Allegheny Avenue in Philadelphia on October 18, 2022. The shooting involved four individuals believed to be SaySlide members who shot at J.P. and W.R. J.P. suffered multiple gunshot wounds to his body. Investigators believe that this was a case of misidentification, as the victims were slightly older and had no idea why someone would shoot at them. They were not from the Ogontz neighborhood, nor were they members of M24.

The shooting was captured on video and broadcasted by several news outlets. C.S. #1 testified that Brown and other SaySlide members circulated the video in group chats. Having spent a significant amount of time with SaySlide members, C.S. #1 was able to identify Carson as one of the shooters in the video. SA Boyd viewed the official police video and identified Carson as one of the actors based on his clothing, gait, height, weight, and mannerisms. C.S. #1 testified that he believed that Brown was involved in the shooting, as well, because he wore a grey/beige "Essentials" sweat suit for "two weeks straight" at that time because it "was the nicest thing he owned." The Grand Jury observed that one of the shooters on the video was wearing a grey/beige matching sweat suit.

C.S. #1 testified that this shooting occurred around the time when SaySlide members had obtained an assault-style rifle. The Grand Jury learned that many assault rifles have unique caliber bullets, such as .223 caliber. One of the shooters in the video was firing what appeared to be an assault-style rifle, and a witness to the shooting told police that the shooters began firing "what he described as AK-47 style weapons at the complainant." At the scene police recovered

eighteen .40 cal casings, seven .45 cal casings, nineteen .223 cal casings, two 9mm casings, three live 9mm rounds, four projectiles, and one fragment. This physical evidence is consistent with shots fired from four different weapons, one of which was an AK-47 style rifle.

• The Attempted Murder of the Sargeant Brothers

The Grand Jury learned that on May 20, 2023, police responded to a report of a person with a gun at 7311 Thouron Avenue in Philadelphia. Upon arrival, officers located Phil Sargeant, suffering from a gunshot wound to his left leg. Around the same time, officers received additional radio calls for a second victim at 80th and Ogontz Avenue, less than a mile away.

Officers located confidential source #5, an individual known to law enforcement, hereafter C.S. #5, in his car. He had been shot five times.

Detective Jarell Babb of the Philadelphia Police Shooting Investigation Group (SIG) responded to the Thouron Avenue scene. There police recovered nine .40 caliber FCCs, 14 9mm FCCs, and one fragment. All of the casings were found between 7311 and 7305 Thouron Avenue. Ring camera footage from a neighboring address showed two shooters leaning out of the rear passenger sides of a black Audi SUV bearing license plate LDF3165, firing shots at the Sargeant brothers and fleeing the scene.

Phil Sargeant stated that he was helping his paralyzed brother ^{C.S. #5} into the driver's seat of his car when unknown persons began firing multiple shots from behind them. C.S. #5 appeared and testified that he had just been placed in the driver's seat of his car when he heard gunshots. He stated that he was shot once in each leg, twice in the back, and once in the arm. Due to the fact that he was partially paralyzed, he did not feel some of these gunshots and was able to drive a short distance away. The Grand Jury viewed a still image of the vehicle involved in the shootings, which C.S. #5 identified as a black Audi SUV. He testified that he knows the car was typically driven by Shawn Robinson, whose nickname was "80," a cocaine

dealer who was older in age, and was associated with a drug gang that operated in the same neighborhood as SaySlide.

The Grand Jury learned that C.S. #5 worked for Robinson, and that Robinson suspected C.S. #5 had been stealing from him. Robinson appeared and testified before the Grand Jury that he employed several younger individuals in his drug business, including C.S. #5

, Japeth Wells and DeShaun Mumford. Robinson testified that he had items stolen from him on two occasions in April and May 2023. In total, the thieves took approximately \$13,000, two firearms, including a designer gun with a gold switch, and approximately ½ kilogram of cocaine. Robinson suspected that Sargeant, Wells, and Mumford were involved in the robberies, due to their familiarity with his residence and business. Robinson claimed he was not a violent person and did not feel the need to retaliate for the robberies committed against him. He acknowledged, however, that his vehicle appeared to have been utilized in the shooting of the Sargeant brothers and that his "business partners" may have "done their own research." Robinson claimed, however, that the vehicle was no longer in his possession at the time of the shooting. He stated that he had previously lent his car to Mumford, who, in turn, claimed that he had been carjacked.

The Grand Jury, however, heard evidence that contradicted Robinson's claims. Officials intercepted multiple telephone calls between Robinson and inmate Omar Tucker, who was incarcerated at a state prison. On May 5, 2023, two weeks before the Sargeant brother shootings, Robinson told Tucker: "I got a few N*iggas that need to get shot." Tucker responded that he could not be involved in any more shootings, as he was currently incarcerated for murder. On May 20, 2023, the day of the shootings, Robinson told Tucker: "I took care of it today, Omar these N*ggas that robbed me and everything..." "but I took care of it today, so everything is

looking up." On May 26, 2023, when asked by Omar about the individuals responsible for the robberies and the "situation," Robinson said: "Yeah! It was my young buls!" This was an apparent reference to C.S. #5, Wells and Mumford.

Testimony established that Robinson's cocaine group was known to utilize SaySlide members as "enforcers" for retaliation or for debt collection. The 77th and Ogontz neighborhood is home to both the cocaine group and SaySlide. SA Boyd testified that while many of the older men are still engaged in the trafficking of narcotics, they have delegated violent tasks to younger SaySlide members.

Intelligence sources identified Byron Vinson, a known associate of the cocaine organization, as a possible drug supplier for Robinson. Robinson admitted to knowing Vinson during his testimony. The Grand Jury learned that Vinson's son, Jabree Oliphant, (aka "Geezy"), was murdered in 2021. Geezy was Stevenson's cousin. The Grand Jury viewed several social media posts by C.S. #5 in which he mentioned the location where "Geezy got killed."

The Grand Jury reviewed numerous Instagram live broadcasts, videos, and posts showing Stevenson making threats to C.S.#5. Testimony established that threats between Stevenson and C.S.#5 had been exchanged for months, until the days leading up to the shooting. For example, during one particular live session, Stevenson and several other SaySlide members made derogatory comments and veiled threats to C.S.#5, such as calling him "half a man" (a reference to the fact that he is paralyzed from the waist down) and Andre the Giant (a reference to the fact that he requires a wheelchair and thus is not able to stand tall). These remarks suggested not only that SaySlide members felt animosity toward C.S.#5, but that they may have been involved in the shooting that paralyzed him. C.S.#5 responded, "U never going to get clout off my name, I'm out here where your lil cousin got killed." Agents interpreted

this response to mean that SaySlide deserved no "credit" for that shooting. C.S. #5 testified that he knew where Stevenson's cousin Jabree Oliphant had been murdered and knew it was a trigger point with Stevenson.

The Grand Jury learned that C.S. #5 also posted a photograph on social media in which he appeared along with his two friends, Mumford and Wells, who worked with him for drug dealer Robinson. The picture was taken in the Simmons Playground and each man had their middle finger raised. Witnesses testified that this particular area is considered to be part of SaySlide territory and the photo was meant to antagonize SaySlide members.

The Grand Jury also heard evidence of an additional motivation for the shooting of C.S. #5

Five days before the shooting, a fight broke out at the Federal Detention Center in Philadelphia between Logan and an inmate named Frankie Page. C.S. #5 posted an Instagram story of a telephone call with Page, in which Page claimed to have beaten up Logan. The video was captioned "Sayslide better check on dey big homie." Investigators believed this to be a reference to Logan, as his Instagram handle is "@Bignlb_100k," and, that he was also a leader within SaySlide.

There were thus several apparent motivations for SaySlide's participation in the Sargeant shootings: the robberies of Shawn Robinson, the murder of Stevenson's cousin "Geezy," and the provocative postings regarding the beating of Logan.

SA Boyd testified that based upon his training and experience, violence does erupt out of social media braggadocio. The Grand Jury reviewed a post to Stevenson's Instagram account on May 20, 2023, minutes after the shooting that featured a photograph of the shooting scene of C.S. #5 t's car. Investigators testified that individuals who commit violence over arguments initiated on social media often taunt the victims by posting videos or photographs of

the shooting scenes. Other witnesses who testified before the Grand Jury stated that this appeared to be Stevenson "claiming" to be responsible for shooting C.S. #5 and getting "clout" off his name.

The Grand Jury viewed approximately 50 pages of messages where SaySlide members systematically researched, planned, and discussed where to find C.S. #5 in the days leading up to his shooting, as well as securing a vehicle to effectuate the crime. Jabreel Martin, Jahmir Martin, Carson, Stevenson, Anderson, Goolsby, Zaahir Beckham, Zahmir Beckham and Javon Wilson discussed in detail that Sargeant needed to pay for his disrespect and Instagram posts and where to find him. There were several photos taken on Stevenson's iPhone on May 20, 2023, including multiple photos of the shooting scene. There was also a screenshot of a mapping application with a pin dropped about a block from the site of the shooting.

The Grand Jury was shown three additional photos from May 20, 2023, the day of the shooting, which were recovered from Stevenson's phone. They were "selfies" of Stevenson in a vehicle with a grey-beige roof interior, a black dashboard, and a black front hood. Another photo was taken from a vehicle traveling during the afternoon of May 20, 2023, the day of the shootings, which depicted "City Line Avenue" on the overpass.

The Grand Jury also viewed call detail records for a telephone number used by Stevenson. Around the time when C.S. #5 was shot, Stevenson's telephone had nine transmissions with three different towers in the area of 7311 Thouron Avenue and 80th and Ogontz Avenue. After the shooting, from 2:15:48 pm until the end of the day, the telephone moved west/southwest on Route 1 and then traveled on the Schuylkill Expressway to the area of Norristown and King of Prussia, consistent with travel on City Line Avenue.

In addition, the aforementioned Audi was recovered on June 4, 2023, two weeks after the shooting of the Sargeant brothers. The Grand Jury was shown photos from the search of the vehicle, a black 2011 Audi Q7. There were multiple photos showing that the car had a grey-beige upper interior and a black dashboard, matching the photos of Stevenson in a car that day. Two black sweatshirts were recovered from the Audi. One sweatshirt was a Spider Worldwide X Young Thug P*NK hoodie. The second sweatshirt was a Paradox brand "shooting stars" hoodie. Testimony established that Paradox is a Philadelphia-based urban clothing brand owned by a convicted murderer. The brand is known to be popular among drug dealers and fraudsters in Philadelphia. C.S. #1 testified that Paradox is a Philly-specific clothing brand and that a SaySlide associate "and the dude that own it have been best friends since they were kids." Over the course of this investigation, the Grand Jury reviewed numerous photos of multiple SaySlide members wearing Paradox gear. The jurors were also shown two social media posts featuring Stevenson in a Spider Worldwide X Young Thug P*NK hoodie, consistent with the sweatshirt found in the Audi.

• Shooting of Yahsir Keaton

On November 7, 2022, Keaton arrived at Albert Einstein Medical Center with a gunshot wound to his stomach. C.S. #1 both testified that Stevenson, Keaton, Brown and TaeJohn Bradley all went to do a "cookout" that day and that Keaton was accidentally shot in the stomach by Bradley. Keaton informed C.S. #4 that he was shot by little Tae (Bradley) during the shooting. Keaton told police, however, that he was shot in the Logan section of Philadelphia at an unknown location, by an unknown offender, and refused to explain how he was transported to the hospital.

The Grand Jury learned that at the time Keaton claimed he was shot in the Logan neighborhood, there was a massive shootout in a different neighborhood, in the area of Temple Road. Based upon the time it would take to get from Temple Road to the hospital, as well as Keaton's unconvincing story and the fact that there were no reported shootings in the Logan neighborhood at that time, investigators surmised that he was actually involved in the shooting reported at Temple Road. At the Temple Road shooting scene, officers located 26 .762 caliber, 45 caliber and 9MM casings. Three vehicles were also struck with bullets. No witnesses were located.

Several witnesses testified that SaySlide members had recently obtained a "mini draco" around the time of Keaton's shooting. A mini Draco is a pistol variant of the Soviet AKM. It is capable of semi-automatic fire and is considered an assault rifle. Testimony established it has a unique caliber bullet: .762, which is the exact caliber of at least one of the casings found at the shooting scene at Temple Road.

The Grand Jury reviewed numerous photos from Brown's telephone, social media extractions, and Instagram live broadcasts of "Sayslide" members posing with the mini Draco. Keaton, Zahmir Beckham, Carson, Bradley and Stevenson all posted photos of themselves both in vehicles and on the streets of Philadelphia in which they were holding the mini Draco. Beckham, Keaton and Carson do not have a license to carry a firearm.

SA Boyd testified that during this time period, Brown, Keaton and Stevenson were frequently in contact with Tyler King, a known SaySlide member who has been incarcerated for gun-point robbery during the entirety of this investigation. On November 8, 2022, during a recorded call with King, Keaton, Brown and Stevenson discussed Keaton's stomach injury.

Several SaySlide members joked that it was an "accident" as Keaton lifted his shirt to reveal a bandage near his ribcage.

Firearm Offenses, Victim Intimidation, and Other Related Offenses

On June 24, 2022 at 7:24 pm, Keaton was stopped by Philadelphia police officers. As officers approached the vehicle, they observed Keaton bend down as if he was placing something underneath the driver's seat. Known SaySlide member and rapper Goolsby was the front seat passenger. When police made contact, both occupants began breathing heavily, appeared nervous and were looking around. Goolsby had visibly shaking hands. Police ultimately located a tan Glock 19x below the driver's seat. Because Keaton did not have a license to carry a firearm, he was charged. The Glock had been recently purchased in Battle Creek, MI. This is consistent with testimony regarding the straw-purchase ring and purchases by Logan for SaySlide members, as the Glock was purchased several weeks earlier outside of Detroit by a young female. Keaton's case is currently scheduled for trial in the Philadelphia Court of Common Pleas.

The Grand Jury also learned that on February 28, 2023, Keaton led police on a high-speed chase through Ridley Township. During the chase, he struck several Ridley Township police vehicles. Once the vehicle finally came to a stop, Keaton and his passenger were ordered out of the vehicle. Officers observed two, black semi-automatic handguns on the passenger side floor of the vehicle, and a .45cal extended magazine was observed on the driver's seat of the vehicle. Keaton's vehicle was confirmed stolen from an apartment complex at 8201 Henry Avenue, and a temporary tag on the vehicle was counterfeit. The evidence showed that this was the address and apartment complex of Zaahir and Zahmir Beckham. Keaton was charged with aggravated assault on the officers, several firearms offenses and receiving stolen property.

The jurors reviewed numerous social media posts by Stevenson and Anderson, and numerous group chats in which SaySlide members discussed both taking and selling stolen Dodge products such as Chargers, Strikers, and Hellcats. These vehicles are highly coveted by criminals because their engines are believed to be capable of outrunning police vehicles.

Several witnesses testified that "Lil Haddi," a/k/a Abdul Anderson, was the member of SaySlide with the most access to stolen vehicles. There were also several social media posts from Anderson depicting photos of vehicles with various captions such as "Bring me 5 bucks yu wanna go home in a SRT (cat emoji)," "Bring me 2500 yu can go home in a striker," and "who got a key to BMW M5 got sum cash 4 yu." All of these were advertisements for stolen vehicles.

Testimony established that Brown frequently posted pictures of himself on social media in possession of firearms. He is ineligible to possess a firearm due to a previous juvenile adjudication for robbery. The Grand Jury was shown text messages between Brown and Carson, Brown and Quaddir Sheppard, Brown and Javon Wilson, and Brown and Charles Torres, discussing the "swapping" of firearms or sale of firearms between Brown and these individuals on October 31, 2022, November 1, 2022, and November 10, 2022.

Testimony further established that there were numerous posts on Stevenson's Instagram account depicting him in the possession of firearms, which he was prohibited by law from possessing.

The Grand Jury heard testimony that on May 25, 2023, Philadelphia police officers observed Stevenson sitting on the steps of 2566 North Myrtlewood Street. Upon police approaching, Stevenson attempted to flee and barricade the door shut with his body, but police were able to apprehend him. At that time, a black Glock 19 9mm with an obliterated serial number, loaded with one bullet in the chamber and 15 rounds in the magazine, was recovered

from Stevenson. Police also recovered one Apple iPhone with a screensaver of a white skeleton. The Grand Jury was shown numerous photos and screen shots from a phone with this same white skeleton iPhone screensaver, which SA Boyd identified as Stevenson's. Testimony established that Stevenson had been posting photos of himself directly or indirectly in the possession of firearms from November 9, 2022, through May 25, 2023, thereby demonstrating to viewers that he had the capacity to carry out threats he had made on social media.