

CLERK U.S.D.C. ED
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 23-CR-77

RONNELL BOWMAN,
RONNIE JACKSON, and
LAWRENCE TURNER,

[18 U.S.C. §§ 2(a), 371, 924(c), 1512,
1349, & 1958]

Defendants.

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

Background Allegations

At times material to this Second Superseding Indictment:

1. The “Wild 100s” was a street gang operating in the Milwaukee, Wisconsin area. The defendants herein, who are all members and affiliates of the “Wild 100s,” engaged in various criminal activities, including crimes of violence, illegal firearms possession, conspiracy, and fraud in Milwaukee and elsewhere.

2. Unemployment Insurance (“UI”) is a joint state and federal program overseen by the U.S. Department of Labor that provides monetary benefits to eligible workers who became unemployed through no fault of their own.

3. Beginning in March 2020, in response to the COVID-19 pandemic, several federal programs expanded UI eligibility and increased UI benefits, including

the Pandemic Unemployment Assistance Program (“PUA”). PUA federal funds were then distributed to the states’ UI programs.

4. In the State of California, the Employment Development Department (“EDD”) administered the state’s UI program. Applicants had to submit online applications and respond to various questions to establish they were eligible to receive UI benefits, including by providing their name, Social Security Number (“SSN”), and mailing address, among other things. Applicants also had to self-certify that they met a COVID-19-related reason for being unemployed, partially employed, or unable to work. The EDD relied upon the information in the online application to determine eligibility for UI benefits. Once an application was approved, the EDD typically distributed state and federal UI benefits electronically to a debit card in the claimant’s name, which the claimant could use to withdraw funds and make purchases. These debit cards were sent via the U.S. Postal Service to the address the claimant provided. Claimants could activate their debit cards via telephone or online.

COUNT ONE

The Conspiracy and its Object

5. Beginning in or about March 2020, and continuing through in or about February 2022, in the State and Eastern District of Wisconsin, the State and Southern District of Texas, and elsewhere,

**RONNELL BOWMAN and
RONNIE JACKSON**

knowingly conspired with each other and others, known and unknown to the Grand Jury, to devise and participate in a scheme to defraud the United States Department

of Labor by means of materially false and fraudulent pretenses, representations, and promises (the “scheme”), which is further described below, and for the purpose of executing that scheme caused mail matter to be sent by the Postal Service, in violation of Title 18, United States Code, Section 1341.

6. It was part of the scheme that the defendants and their co-conspirators acquired the personal identifying information (“PII”) of third parties and used that PII to submit false and fraudulent PUA claims to California EDD and other state UI programs.

7. It was further part of the scheme that the defendants provided addresses that they controlled on the fraudulent PUA applications, which caused debit cards loaded with the fraudulently obtained monetary benefits to be sent to those addresses under their control.

8. It was further part of the scheme that the defendants collected and utilized those fraudulently obtained debit cards for their own benefit, as further described below.

Manner and Means of the Conspiracy

9. In order to accomplish the purpose of the conspiracy, the defendants used, and caused others to use, the following manner and means:

- a. The defendants electronically submitted fraudulent UI applications to multiple states on behalf of themselves and others, in which they made materially false and fraudulent representations.
- b. It was further part of the scheme that the defendants communicated

with each other and other co-conspirators about submitting the fraudulent PUA claims and members of the conspiracy taught each other how to submit false and fraudulent PUA claims to California EDD and other state UI programs.

- c. The defendants' materially false and fraudulent representations caused California EDD and other states to award PUA funds in the claimants' names through pre-loaded debit cards mailed to various locations, including the Eastern District of Wisconsin.
- d. As a result of the scheme, the defendants fraudulently obtained federal PUA benefits from California EDD and other state-administered UI programs to which they were not entitled.
- e. The defendants used the fraudulently obtained PUA funds to purchase, among other things, firearms, jewelry, clothing, vacations, and to solicit murder for hire.

Overt Acts in Furtherance of the Conspiracy

10. To further the conspiracy, the conspirators committed acts in the Eastern District of Wisconsin, and the Southern District of Texas, including but not limited to:

- a. On or about June 9, 2021, BOWMAN caused to be mailed an envelope containing a PUA debit card that was delivered to XXXXX Micmac Court, Cypress, Texas through the United States Postal Service.

All in violation of Title 18, United States Code, Sections 1349 and 2(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on or about March 15, 2021, and continuing until on or about April 5, 2021, within the State and Eastern District of Wisconsin, the State and Southern District of Texas, and elsewhere,

**RONNELL BOWMAN,
RONNIE JACKSON, and
LAWRENCE TURNER**

did knowingly and intentionally use and cause to be used a facility of interstate commerce, with intent that a murder be committed in violation of the laws of Wisconsin and the United States, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value; namely, the defendants used and caused to be used means of transportation and communication, including a Kia Soul bearing Michigan license plate EBZ-9428, cellular telephones operating on interstate networks, and social media platforms, with the intent that a murder be committed as consideration for the receipt of money, and which resulted in the death of N.B.

In violation of Title 18, United States Code, Sections 1958 and 2(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on or about March 15, 2021, and continuing until on or about April 5, 2021, within the State and Eastern District of Wisconsin, the State and Southern District of Texas, and elsewhere,

**RONNELL BOWMAN,
RONNIE JACKSON, and
LAWRENCE TURNER**

did knowingly and intentionally conspire to use and cause another to use a facility of interstate commerce, with intent that a murder be committed in violation of the laws of Wisconsin and the United States, as consideration for the receipt of, and as consideration for a promise and agreement to pay, something of pecuniary value, which resulted in the death of N.B.

In violation of Title 18, United States Code, Sections 1958 and 2(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 5, 2021, in the State and Eastern District of Wisconsin,

**RONNELL BOWMAN,
RONNIE JACKSON, and
LAWRENCE TURNER**

knowingly used, carried, and discharged a firearm during and in relation to a crime of violence, that is, Murder for Hire and Conspiracy to Commit Murder for Hire, as charged in Counts Two and Three of this Second Superseding Indictment.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Beginning in or about July 2020 and continuing until on or about April 21, 2023, in the State and Eastern District of Wisconsin, the State and Southern District of Texas, and elsewhere,

**RONNELL BOWMAN, and
RONNIE JACKSON**

knowingly and willfully conspired with each other and others, known and unknown to the Grand Jury, to commit offenses against the United States, namely:

- (a) to knowingly sell and otherwise dispose of firearms to prohibited persons, in violation of Title 18, United States Code, Sections 922(d)(1) and 2(a);
- (b) to knowingly transfer firearms, knowing that such firearm would be used to commit a felony and drug trafficking crime, in violation of Title 18, United States Code, Sections 924(h) and 2(a);
- (c) to knowingly possess and transfer machineguns, in violation of Title 18, United States Code, Sections 922(o) and 2(a); and
- (d) to knowingly possess firearms by a prohibited person, in violation of Title 18, United States Code, Sections 922(g) and 2(a).

2. To further the conspiracy, the conspirators committed acts in the Eastern District of Wisconsin, including but not limited to:

- (a) On or about December 18, 2020, Javonte Cotton sent a message to Ronnell Bowman asking to “swap” his Glock firearm and stating that, “we just found six more switches,” meaning machineguns.

All in violation of Title 18, United States Code, Sections 371 and 2(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

Beginning by at least October 8, 2024, and continuing through on or about March 7, 2025, in the State and Eastern District of Wisconsin and elsewhere,

RONNELL BOWMAN

did knowingly attempt to intimidate, threaten, and corruptly persuade Witness 1, a witness known to the Grand Jury, with the intent to influence, delay, and prevent the testimony of that witness in an official proceeding, namely, the jury trial in *United States v. Ronnell Bowman, et al.*, Case No. 23-CR-77.

In violation of Title 18, United States Code, Sections 1512(b)(1) and 2(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

Beginning on or about October 18, 2024, and continuing through on or about December 4, 2024, in the State and Eastern District of Wisconsin,

RONNELL BOWMAN

did knowingly attempt to intimidate, threaten, and corruptly persuade Witness 2, a witness known to the Grand Jury, with the intent to hinder, delay, and prevent that witness's communication to a law enforcement officer of information relating to the possible commission of a federal offense.

In violation of Title 18, United States Code, Sections 1512(b)(3) and 2(a).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

Beginning by at least October 8, 2024, and continuing through on or about March 7, 2025, in the State and Eastern District of Wisconsin and elsewhere,

RONNELL BOWMAN

knowingly and intentionally conspired with others, known and unknown to the Grand Jury, to attempt to corruptly obstruct, influence, and impede an official proceeding, namely, the jury trial in *United States v. Ronnell Bowman, et al.*, Case No. 23-CR-77.

In violation of Title 18, United States Code, Sections 1512(c)(2), 1512(k), and 2(a).

FORFEITURE NOTICE

Upon conviction of the mail fraud conspiracy, as set forth in Count One of this Second Superseding Indictment, in violation of Title 18, United States Code, Section 1349, the defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including, but not limited to a sum of money equal to the proceeds derived from the offense.

A TRUE BILL: 

FOREPERSON

Dated: 11 MAR 2025


RICHARD G. FROHLING
Acting United States Attorney