

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

QUENTIN BLADE,
aka QUENTON BLADE,
aka "Q," and
NICHOLAS DANIEL,

Defendants.

INDICTMENT

1:15CR035

CASE NO. _____

Title 18, Sections 1951(a),
924(c), and 2, United States
Code

JUDGE GWIN

GENERAL ALLEGATIONS

The Grand Jury charges:

1. At all times material to this Indictment, Family Dollar had stores located at: 1250 E. 105th Street, Cleveland, Ohio, and 11491 Buckeye Road, Cleveland, Ohio. Said stores were engaged in the retail sale of articles and commodities that had moved in interstate commerce, to include clothing, food, and other merchandise.

2. At all times material to this Indictment, said Family Dollar stores were owned and operated by Family Dollar Stores, Inc., which had its headquarters in Charlotte, North Carolina.

3. At all times material to this Indictment, Dollar General had stores located at: 13741 Euclid Avenue, East Cleveland, Ohio; 5133 Superior Avenue, Cleveland, Ohio; 2966 E.

116th Street, Cleveland, Ohio; 2272 E. 55th Street, Cleveland, Ohio; and, 9111 Miles Avenue, Cleveland, Ohio. Said stores were engaged in the retail sale of articles and commodities that had moved in interstate commerce, to include clothing, food, and other merchandise.

4. At all times material to this Indictment, said Dollar General stores were owned and operated by Dollar General Corporation, which had its headquarters in Goodlettsville, Tennessee.

5. At all times material to this Indictment, ACE Cash Express had a store located at 11411 Buckeye Road, Cleveland, Ohio. Said store engaged in interstate commerce in that it offered financial services, including payday loans, title loans, check cashing, and prepaid debit cards.

6. At all times material to this Indictment, said ACE Cash Express store was owned and operated by ACE Cash Express, which had its headquarters in Irving, Texas.

COUNT 1

The Grand Jury further charges:

7. Between on or about August 6, 2014, and on or about September 24, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, did knowingly, willfully, and unlawfully conspire and agree with each other and other persons unknown to the Grand Jury to unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," NICHOLAS DANIEL, and others unknown to the Grand Jury did unlawfully take and obtain, and attempt to take and obtain monies in the custody, possession, and presence of employees of various retail stores in the

Cleveland, Ohio, area, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished firearms in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 2

The Grand Jury further charges:

8. On or about August 6, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL did unlawfully take and obtain monies in the custody, possession, and presence of employees of Dollar General located at 13741 Euclid Avenue, East Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 3

The Grand Jury further charges:

9. On or about August 10, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL,

aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL did unlawfully take and obtain monies in the custody, possession, and presence of employees of Dollar General located at 5133 Superior Avenue, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 4

The Grand Jury further charges:

10. On or about August 12, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL did unlawfully take and obtain monies in the custody, possession, and presence of employees of Dollar General located at 2966 E. 116th Street, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished a firearm in

the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 5

The Grand Jury further charges:

11. On or about August 17, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL did unlawfully take and obtain monies in the custody, possession, and presence of employees of Dollar General located at 2272 E. 55th Street, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 6

The Grand Jury further charges:

12. On or about September 4, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18,

United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL did unlawfully take and obtain monies in the custody, possession, and presence of employees of Dollar General located at 2272 E. 55th Street, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 7

The Grand Jury further charges:

13. On or about September 15, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL did unlawfully take and obtain, and attempt to unlawfully take and obtain, monies in the custody, possession, and presence of employees of Family Dollar located at 1250 E. 105th Street, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 8

The Grand Jury further charges:

14. On or about September 17, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL did unlawfully take and obtain monies in the custody, possession, and presence of employees of Dollar General located at 9111 Miles Avenue, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 9

The Grand Jury further charges:

15. On or about September 17, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did knowingly use, carry, and brandish firearms during and in relation to a crime of violence for which said defendants may be prosecuted in a court of the United States, that is, Interference with Commerce by Means of Robbery, in violation of Title 18, United States Code, Sections 1951(a), as charged in Count 8 of the

Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 10

The Grand Jury further charges:

16. On or about September 17, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL did unlawfully take and obtain monies in the custody, possession, and presence of employees of Family Dollar located at 11491 Buckeye Road, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 11

The Grand Jury further charges:

17. On or about September 17, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did knowingly use, carry, and brandish a firearm during and in relation to a crime of violence for which said defendants may be prosecuted in a court of the United States, that is, Interference with Commerce by Means of Robbery, in

violation of Title 18, United States Code, Sections 1951(a), as charged in Count 10 of the Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2, and punishable under Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 12

The Grand Jury further charges:

18. On or about September 19, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL did unlawfully take and obtain monies in the custody, possession, and presence of employees of Dollar General located at 2966 E. 116th Street, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT 13

The Grand Jury further charges:

19. On or about September 24, 2014, in the Northern District of Ohio, Eastern Division, defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL, aiding and abetting one another, did unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of

articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL did unlawfully take and obtain monies in the custody, possession, and presence of employees of ACE Cash Express located at 11411 Buckeye Road, Cleveland, Ohio, against said employees' will, by means of actual and threatened force, violence, and fear of immediate injury to said employees, in that defendants QUENTIN BLADE, aka QUENTON BLADE, aka "Q," and NICHOLAS DANIEL displayed and brandished a firearm in the presence of said employees, in violation of Title 18, United States Code, Sections 1951(a) and 2.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.