

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA
Plaintiff,

V.

ONE HUNDRED FORTY-NINE THOUSAND
FOUR HUNDRED TWENTY-SIX AND 00/100
DOLLARS (\$149,426.00) IN U.S. CURRENCY;
2022 CHEVROLET CORVETTE (VIN#
1G1YB2D46N5113704);
2022 PORSCHE 911 (VIN#
WP0CD2A95NS260111);
2021 MERCEDES-BENZ GLS MAYBACH
(VIN# 4JGFF8HB4MA326991);
WHITE 2021 MERCEDES-BENZ AMG GT
(VIN# W1K7X8JB8MA036940);
GRAY 2021 MERCEDES-BENZ AMG GT
(VIN# W1K7X8JB7MA039537);
2021 JEEP GRAND CHEROKEE (VIN#
1C4RJFN95MC749511);
2021 DODGE DURANGO (VIN#
1C4SDJH94MC692743);
2018 LAMBORGHINI AVENTADOR (VIN#
ZHWUG4ZD6JLA07121);
2015 CAN-AM SPYDER (VIN#
2BXNABC42FV000293);
GLOCK 19X FIREARM (SERIAL# BTDY617);
GLOCK 45 9MM-CALIBER FIREARM
(SERIAL# BPHW105);
FN FIVE SEVEN FIREARM (SERIAL#
386380329)
SMITH & WESSON M&P .40-CALIBER
FIREARM (SERIAL# NCLB00);
GLOCK .357-CALIBER FIREARM
(SERIAL# BKMN536);
GLOCK 30S .45-CALIBER FIREARM
(SERIAL# BVNU633);
ASSORTED JEWELRY DESCRIBED IN
ADDENDUM A

Defendants, in rem;

JEFFERY LAMAR WILLIAMS II;
MARTINEZ ARNOLD;

CIVIL ACTION FILE NO.
2022CV367165

Atlanta Police Dept. No. 221291090

ALLY FINANCIAL, INC.;
MERCEDES-BENZ FINANCIAL SERVICES
USA LLC;
RAFAELLO & COMPANY INC. D/B/A A+A
DIAMONDS LTD.;
TRUIST BANK INC F/K/A SUNTRUST BANK;
YSL ENTERPRISES, INC.,
Alleged Owners / Interest Holders.

COMPLAINT FOR FORFEITURE

The State of Georgia, pursuant to OCGA § 9-16-12 and by and through its counsel Fani T. Willis, District Attorney for the Atlanta Judicial Circuit, and the undersigned, hereby files this complaint for forfeiture, and shows this Honorable Court the following.

1.

Fani T. Willis is the District Attorney for the Atlanta Judicial Circuit, Fulton County, Georgia, and is the proper party to bring this action of the State of Georgia.

2.

Venue for this action is with the Fulton County Superior Court.

3.

Defendant Personal Property was seized on May 9, 2022 at 355 Allison Drive NE, Atlanta, Fulton County, Georgia by the Fulton County District Attorney's Office (FCDAO) and Atlanta Police Department (APD) law enforcement officers.

4.

This Honorable Court has jurisdiction over Defendant Personal Property and this action.

5.

The search and seizure of Defendant Personal Property occurred pursuant to and in the course of the aforementioned officers' official duties.

6.

Defendant Personal Property is located within Fulton County, in the actual or constructive custody of the Fulton County District Attorney's Office.

7.

On information and belief, Alleged Owner / Interest Holder Jeffery Lamar Williams II is the owner of all Defendant Personal Property, and is the registered owner of Defendant Personal Property, in part, 2022 PORSCHE 911 (VIN# WP0CD2A95NS260111); 2021 MERCEDES-BENZ GLS MAYBACH (VIN# 4JGFF8HB4MA326991); 2021 DODGE DURANGO (VIN# 1C4SDJH94MC692743); GRAY 2021 MERCEDES-BENZ AMG GT (VIN# W1K7X8JB7MA039537); 2018 LAMBORGHINI AVENTADOR (VIN# ZHWUG4ZD6JLA07121); and 2015 CAN-AM SPYDER (VIN# 2BXNABC42FV000293).

8.

Jeffery Lamar Williams II may be served at the Cobb County Jail, 1825 County Services Parkway, Marietta, Cobb County, Georgia 30008.

9.

On information and belief, Alleged Owner / Interest Holder Martinez Arnold is the registered owner of Defendant Personal Property, in part, 2021 WHITE MERCEDES-BENZ AMG GT (VIN# W1K7X8JB8MA036940).

10.

Martinez Arnold may be served at the Fulton County Jail, 901 Rice Street NW, Atlanta, Fulton County, Georgia, 30318.

11.

On information and belief, Alleged Owner / Interest Holder YSL Enterprises, Inc. is the registered owner of Defendant Personal Property, in part, 2022 CHEVROLET CORVETTE (VIN# 1G1YB2D46N5113704); 2021 JEEP GRAND CHEROKEE (VIN# 1C4RJFN95MC749511); and 2018 LAMBORGHINI AVENTADOR (VIN# ZHWUG4ZD6JLA07121).

12.

Alleged Owner / Interest Holder YSL Enterprises, Inc. is a Georgia corporation and may be served through its president, Jeffery Lamar Williams II, at the Cobb County Jail, 1825 County Services Parkway, Marietta, Cobb County, Georgia 30008.

13.

On information and belief, Alleged Owner / Interest Holder Truist Bank Inc, f/k/a Suntrust Bank, holds a lien on Defendant Personal Property, in part, 2018 LAMBORGHINI AVENTADOR (VIN# ZHWUG4ZD6JLA07121).

14.

Alleged Owner / Interest Holder Truist Bank Inc, f/k/a Suntrust Bank, is a North Carolina corporation authorized to transact business in Georgia and may be served through its registered agent, Corporation Service Company, at 2 Sun Court, Suite 400, Peachtree Corners, Gwinnett County, Georgia 30092.

15.

On information and belief, Alleged Owner / Interest Holder Ally Financial Inc. holds a lien on Defendant Personal Property, in part, 2022 PORSCHE 911 (VIN# WP0CD2A95NS260111).

16.

Alleged Owner / Interest Holder Ally Financial Inc. is a Delaware corporation authorized to transact business in Georgia and may be served through its registered agent, C T Corporation System, at 289 S. Culver Street, Lawrenceville, Gwinnett County, Georgia 30046.

17.

On information and belief, Alleged Owner / Interest Holder Mercedes-Benz Financial Services USA LLC holds a lien on Defendant Personal Property, in part, **2021 MERCEDES-BENZ GLS MAYBACH (VIN# 4JGFF8HB4MA326991); GRAY 2021 MERCEDES-BENZ AMG GT (VIN# W1K7X8JB7MA039537).**

18.

Alleged Owner / Interest Holder Mercedes-Benz Financial Services USA LLC is a Delaware corporation authorized to transact business in Georgia and may be served through its registered agent, C T Corporation System, at 289 S. Culver Street, Lawrenceville, Gwinnett County, Georgia 30046.

19.

Yaakov Nektalov a/k/a Gabriel Jacobs has represented himself to the undersigned as “owner” of Alleged Owner / Interest Holder Raffaello & Company Inc. d/b/a A+A Diamonds, Ltd., and has submitted a claim to the Fulton County District Attorney’s Office asserting on behalf of Raffaello ownership interest in 9 separate pieces of jewelry he has provided pictures of. Mr. Nektalov further asserts in his claim that he and his company Raffaello loaned Alleged Owner / Interest Holder Jeffery Lamar Williams II said 9 separate pieces of jewelry.

20.

Of the 9 jewelry pieces which Raffaello & Company Inc. asserts to own and to have lent to Mr. Williams, only 4 pieces resemble any of the pieces of jewelry seized on May 9, 2022. The other 5 pieces of jewelry do not resemble any of the pieces of jewelry seized on May 9, 2022.

21.

Alleged Owner / Interest Holder Raffaello & Company Inc. d/b/a A+A Diamonds Ltd., is a New York corporation which has not been authorized to transact business in Georgia and whose principal address is 22 West 47th Street, New York, New York 10036.

22.

On May 9, 2022, Jeffery Lamar Williams II, Martinez Arnold, Deamonte Kendrick, and 25 other persons, were indicted by a Fulton County Grand Jury in Fulton County Superior Court Case Number 22SC182273, a 56-Count indictment alleging crimes including, but not limited to, conspiracy to violate the Georgia RICO (Racketeer Influenced and Corrupt Organizations) Act; murder; aggravated assault; and participation in criminal street gang activity.

23.

On May 9, 2022, warrants were issued to arrest Jeffery Lamar Williams II, Martinez Arnold, and Deamonte Kendrick in Case No. 22SC182273.

24.

On May 9, 2022, a FCDAO investigator obtained a warrant to enter and search 355 Allison Drive NE, Atlanta, Fulton County, Georgia, which address is, among other things, the last known residential address of Jeffery Lamar Williams II.

25.

On May 9, 2022, officers from the Atlanta Police Department and the FCDAO entered 355 Allison Drive NE, Atlanta, Fulton County, Georgia pursuant to the warrant referenced in Paragraph 24 of this Complaint.

26.

Jeffery Lamar Williams II, Martinez Arnold, and Deamonte Kendrick were located inside said 355 Allison Drive NE and were subsequently arrested on the active/outstanding arrest warrants issued in Case No. 22SC182273.

27.

APD officers searched 355 Allison Drive NE pursuant to the aforementioned warrant and two additional warrants obtained on May 9, 2022.

28.

Officers located inside a kitchen cabinet Defendant Personal Property, in part, **GLOCK 19X FIREARM (SERIAL# BTDY617); and SMITH & WESSON M&P .40-CALIBER FIREARM (SERIAL# NCLB00)**; and a large bag of marijuana that weighed approximately 1,299 grams.

29.

Officers located atop a kitchen counter Defendant Personal Property, in part, **FN FIVE SEVEN FIREARM (SERIAL# 386380329)**.

30.

Officers located inside a secret compartment of the kitchen pantry 5 open bottles of codeine; 33 sealed bottles of a liquid controlled substance containing codeine and promethazine;

2 packages of cocaine; multiple miscellaneous pills; and Defendant Personal Property, in part, **GLOCK 30S .45-CALIBER FIREARM (SERIAL# BVNU633)**.

31.

Officers located and seized from inside the first bedroom one necklace and 4PF pendant. This necklace and pendant are listed as Item Number 2 on the Addendum A to this Complaint.

32.

On information and belief, 4PF stands for “4 Pockets Full,” which is a Crips-connected criminal street gang operating in Atlanta.

33.

Officers located in a bathroom connected to the first bedroom 32 .45-caliber firearm cartridges; bags of marijuana; and 2 unopened bottles of a liquid controlled substance containing codeine and promethazine.

34.

The first bedroom contained items in the name of Jimmy Winfrey, a known YSL criminal street gang member who was indicted on the related May 9, 2022 indictment, Case No. 22SC182273.

35.

Officers located inside the third bedroom one watch; one necklace; 2 empty firearms magazines; 2 boxes of firearm ammunition; and Defendant Personal Property, in part, **GLOCK .357-CALIBER FIREARM (SERIAL# BKMN536)**. The watch and necklace seized from this bedroom are listed as Item Numbers 76 and 77, respectively, on the Addendum A to this Complaint.

36.

Officers located and seized from inside a closet in the master bedroom Defendant Personal Property, in part, **ONE HUNDRED TWENTY-SEVEN THOUSAND FIVE HUNDRED AND 00/100 DOLLARS (\$127,500.00) IN U.S. CURRENCY** and 68 pieces of jewelry. These pieces of jewelry are listed as Item Numbers 3 through 70 on the Addendum A to this Complaint.

37.

Officers located inside another closet in the master bedroom a bag containing THC vape pens.

38.

Officers located in the downstairs game room Defendant Personal Property, in part, **GLOCK 45 9MM-CALIBER FIREARM (SERIAL# BPHW105)** underneath a couch.

39.

Officers located on Martinez Arnold's person marijuana.

40.

Officers located inside a coat closet in the common area a red bandana, which is an item that is frequently owned and used by Bloods gang members; and 20 bottles of "YSL Slime Drink," which is a beverage containing THC, a Schedule I Controlled Substance.

41.

Officers located and seized from inside the garage of 355 Allison Drive NE, Defendant Personal Property, in part, one pink **2018 LAMBORGHINI AVENTADOR (VIN# ZHWUG4ZD6JLA07121)**; and **2015 CAN-AM SPYDER (VIN# 2BXNABC42FV000293)**.

42.

Officers located and seized from upon the driveway of 355 Allison Drive, Defendant Personal Property, in part, 2022 CHEVROLET CORVETTE (VIN# 1G1YB2D46N5113704); 2022 PORSCHE 911 (VIN# WP0CD2A95NS260111); 2021 MERCEDES-BENZ GLS MAYBACH (VIN# 4JGFF8HB4MA326991); WHITE 2021 MERCEDES-BENZ AMG GT (VIN# W1K7X8JB8MA036940); GRAY 2021 MERCEDES-BENZ AMG GT (VIN# W1K7X8JB7MA039537); 2021 JEEP GRAND CHEROKEE (VIN# 1C4RJFN95MC749511); 2021 DODGE DURANGO (VIN# 1C4SDJH94MC692743).

43.

Officers seized from Jeffery Lamar Williams II's person Defendant Personal Property, in part, SEVENTEEN THOUSAND EIGHT HUNDRED AND 00/100 DOLLARS (\$17,800.00) IN U.S. CURRENCY and Item Number 1 on the Addendum A to this Complaint.

44.

Officers seized from Martinez Arnold's person Defendant Personal Property, in part, FOUR THOUSAND ONE HUNDRED TWENTY-SIX AND 00/100 DOLLARS (\$4,126.00) IN U.S. CURRENCY and Item Numbers 71 through 75 on the Addendum A to this Complaint.

45.

On May 17, 2022, officers located inside Defendant Personal Property, in part, WHITE 2021 MERCEDES-BENZ AMG GT (VIN# W1K7X8JB8MA036940) 10 pieces of jewelry. These pieces of jewelry seized from this vehicle are listed as Item Numbers 78 through 87 on the Addendum A to this Complaint.

46.

On May 9, 2022, Jeffery Lamar Williams II, Martinez Arnold, Deamonte Kendrick, and 25 other persons, were indicted by a Fulton County Grand Jury in Fulton County Superior Court Case Number 22SC182273, a 56-Count indictment alleging crimes including, but not limited to, conspiracy to violate the Georgia RICO (Racketeer Influenced and Corrupt Organizations) Act; murder; aggravated assault; and participation in criminal street gang activity. The indictment alleges at least 182 overt acts from 2013 to the present that furthered the RICO conspiracy.

47.

Plaintiff State incorporates by reference and in fact all averments, accusations, and statements contained in the criminal indictment of Case No. 22SC182273, attached herein to the instant Complaint as Addendum B, and Plaintiff State says as follows.

48.

YSL is an enterprise consisting of a group of individuals associated in fact although not a legal entity. YSL constitutes an ongoing organization whose members function as a continuing unit for the common purpose of achieving the objectives of the enterprise, as set out in the criminal indictment of Case No. 22SC182273, attached herein as Addendum B.

49.

YSL, also known as Young Slime Life, is a criminal street gang that started in late 2012 in the Cleveland Avenue area of Atlanta, Fulton County, Georgia. YSL claims affiliation with the national Bloods gang.

50.

On information and belief, since 2015, the YSL gang has been engaged in a war with rival gang YFN. This war has led to over 50 shootings in that time period, and in some of these shootings innocent victims have been shot and killed.

51.

Alleged Owner / Interest Holder Jeffery Lamar Williams, II is one of the founders of the YSL criminal street gang and is known by the nicknames: “Young Thug”; “Slime”; and “King Slime.”

52.

Under the Young Thug moniker Mr. Williams, an Atlanta-based hip-hop rap artist, has propelled the YSL name and gang to notoriety by referring to the name YSL in his songs and on social media.

53.

Mr. Williams has used his credibility on the streets of Atlanta as a true gangster to bolster his public image as a rapper who is involved in criminal conduct, and vice versa.

54.

YSL associates use a variety of identifiers including colors, clothing, tattoos, and hand signs, as well as verbal and written identifiers that reflect their membership in YSL. YSL associates often display their colors by wearing a green or red bandanna on their person; wear clothing with the letters “YSL” or the word “Slime” printed on them; and/or wear pendants displaying the letters “YSL” or the word “SLATT,” which means Slime Love All the Time. YSL associates will write or say the word “BLATT” which means Blood Love All the Time. YSL associates will often refer to each other as “Blood” or Slime”; they refer to Cleveland Avenue as “Bleveland,” replacing the

“C” with a “B.” And common symbols used by YSL associates are the Green Heart , Green Snake , Blowing Nose , and Green Vomit emojis/emoticons . One of the most common hand signs is wiping the nose with the index finger. Another frequently used YSL hand sign consists of curling the ring and pinky finger inward toward the palm while extending the index and thumb with the middle finger slightly curved.

55.

Mr. Williams and/or Mr. Arnold have been seen in multiple photographs and videos using their hands to make YSL and Bloods gang signs.

56.

Officers located and seized from inside the kitchen of Mr. Williams’ 355 Allison Drive residence a cardboard box containing multiple baseball caps. “SLATT” is printed on one of the sides of this cardboard box.

57.

Officers located and seized from inside the kitchen of Mr. Williams’ 355 Allison Drive residence a green hooded sweatshirt on which there was printed the phrase “SLIME OVER SLUTS Make America Slime Again.”

58.

The piece of jewelry seized from Mr. Williams’ 355 Allison Drive residence that is listed as Item Number 8 on the Addendum A to this Complaint is a watch on which “KING SLIME” is engraved on the rear.

59.

The piece of jewelry seized from Mr. Williams' 355 Allison Drive residence that is listed as Item Number 52 on the Addendum A to this Complaint is a bracelet on which "SLIME" is embossed in diamonds on the plate and which has snake eyes on either side of the plate.

60.

The piece of jewelry seized from Mr. Williams' 355 Allison Drive residence that is listed as Item Number 54 on the Addendum A to this Complaint is a pendant on which "KING SLIME" is engraved on the rear and "SHADY BABY" is spelled out on the front in diamond lettering.

61.

The piece of jewelry seized from Mr. Williams' 355 Allison Drive residence that is listed as Item Number 64 on the Addendum A to this Complaint is a ring shaped in the YSL gang hand-sign and on which "King Slime Jeffrey" is engraved on the rear.

62.

The seized items were possessed by Mr. Williams and/or Mr. Arnold with the intent to promote their status as leaders of the YSL criminal street gang and to entice young people to join the YSL criminal street gang.

63.

Officers located on the downstairs game room wall of Mr. Williams' 355 Allison Drive residence a recreation of Leonardo da Vinci's The Last Supper, with Jesus Christ replaced by Mr. Williams and the Twelve Apostles replaced by various YSL gang members.

64.

Officers located in the kitchen and dining room area of 355 Allison Drive a piece of wall art in which Mr. Williams is depicted wearing a military-style jacket with a “YSL” insignia on his left collar and a “Slime” patch on the jacket’s left arm.

65.

Officers located in the living room of Mr. Williams’ 355 Allison Drive residence a celebration of life booklet for Christian McMiller, a known YSL gang member, whose March 11, 2022 murder is suspected to be gang-related.

66.

On information and belief, Mr. Williams has told YSL members that he pays for everything for everyone in the gang; Mr. Williams has paid bail for YSL gang members’ criminal gang charges; and Mr. Williams has on multiple occasions directed lower-ranking YSL members to bring him money.

67.

On information and belief, some of Mr. Williams’ songs contain renditions of violent crimes that Mr. Williams himself has directly and/or indirectly been involved in, ordered, and/or otherwise been an accessory after the fact thereto, in the name of the YSL criminal street gang. On information and belief, Williams has admonished fellow gang members for not beating up certain people or not shooting certain people. In his songs, Mr. Williams glamorizes homicides and shootings he and/or lower-level gang members have committed, and has thus credibly portrayed the image of a real gangster to a local, national, and international audience, all to his own and the YSL gang’s own pecuniary gain and benefit.

68.

Mr. Arnold, also known as Lil Duke, has himself been the primary aggressor in multiple shootings in Fulton County, Georgia, including, but not limited to, drive-by shootings in rival gang territory directed towards rival gang members.

69.

Similar to Mr. Williams, Mr. Arnold raps about violence that he has directly and/or indirectly been involved in, ordered, and/or otherwise been an accessory after the fact thereto, in the name of the YSL criminal street gang.

70.

On information and belief, Williams and/or Arnold have directly and/or indirectly encouraged people to join the YSL criminal street gang.

71.

On information and belief, Williams has preached fealty to founding members of the Sex Money Murder Bloods-connected criminal street gang.

72.

On information and belief, Williams and/or Arnold has directly provided material assistance to fellow YSL gang members to commit various criminal acts in violation of the Official Code of Georgia Annotated, including murder. See Addendum B.

73.

On information and belief, Williams occupies a high-ranking position of influence in the YSL criminal street gang and lower-level members seek out his approval and authorization to commit violent crimes.

74.

A “switch,” (also known as a “conversion device”) was installed on Defendant Personal Property, in part, GLOCK 45 9MM-CALIBER FIREARM (SERIAL# BPHW105). Such a “switch” installed on a firearm allows a semi-automatic firearm to function as an automatic weapon that can shoot more than one shot, without manual reloading, by a single function of the trigger. “Switches” and firearms on which “switches” are installed are “machineguns” as defined by 26 USC § 5845(b); OCGA § 16-11-121(2). Possession of such a firearm is illegal pursuant to 26 USC § 5861(c); OCGA § 16-11-122. Possession of such a firearm is criminal gang activity pursuant to 16-15-3(1)(J).

75.

Defendant Personal Property is contraband and forfeitable to the State of Georgia pursuant to OCGA § 16-13-49(b)(2) on the grounds that the items were directly or indirectly used or intended for use to facilitate violation of Article 2 of Chapter 13 of Title 16 of the Official Code of Georgia Annotated.

76.

Defendant Personal Property is contraband and forfeitable to the State of Georgia pursuant to OCGA § 16-13-49(b)(2) on the grounds that the items are proceeds of violation of Article 2 of Chapter 13 of Title 16 of the Official Code of Georgia Annotated.

77.

Defendant Personal Property is contraband and forfeitable to the State of Georgia pursuant to OCGA § 16-13-49(b)(4) on the grounds that the items are property which afforded Alleged Owners / Interest Holders Jeffery Lamar Williams II and/or Martinez Arnold a source of influence over the YSL criminal enterprise that Jeffery Lamar Williams II and/or Martinez Arnold

established, operated, controlled, conducted, and/or participated in the conduct of in violation of Article 2 of Chapter 13 of Title 16 of the Official Code of Georgia Annotated.

78.

Defendant Personal Property is contraband and forfeitable to the State of Georgia pursuant to OCGA § 16-13-49(b)(4) on the grounds that the items are proceeds of the YSL criminal enterprise that Jeffery Lamar Williams II and/or Martinez Arnold established, operated, controlled, conducted, and/or participated in the conduct of in violation of Article 2 of Chapter 13 of Title 16 of the Official Code of Georgia Annotated.

79.

Defendant Personal Property is contraband and forfeitable to the State of Georgia pursuant to OCGA § 16-13-49(b)(5) on the grounds that the items were found at 355 Allison Drive NE in close proximity to a controlled substance or any other property subject to forfeiture under OCGA § 16-13-49.

80.

Defendant Personal Property, in part, **GLOCK 19X FIREARM (SERIAL# BTDY617); GLOCK 45 9MM-CALIBER FIREARM (SERIAL# BPHW105); FN FIVE SEVEN FIREARM (SERIAL# 386380329); SMITH & WESSON M&P .40-CALIBER FIREARM (SERIAL# NCLB00); GLOCK .357-CALIBER FIREARM (SERIAL# BKMN536); GLOCK 30S .45-CALIBER FIREARM (SERIAL# BVNU633)**, is contraband and forfeitable to the State of Georgia pursuant to OCGA § 16-13-49(b)(6) on the grounds that said firearms were available for use to facilitate violation of Article 2 of Chapter 13 of Title 16 of the Official Code of Georgia Annotated.

81.

Defendant Personal Property, in part, **GLOCK 19X FIREARM (SERIAL# BTDY617); GLOCK 45 9MM-CALIBER FIREARM (SERIAL# BPHW105); FN FIVE SEVEN FIREARM (SERIAL# 386380329); SMITH & WESSON M&P .40-CALIBER FIREARM (SERIAL# NCLB00); GLOCK .357-CALIBER FIREARM (SERIAL# BKMN536); GLOCK 30S .45-CALIBER FIREARM (SERIAL# BVNU633)**, is contraband and forfeitable to the State of Georgia pursuant to OCGA § 17-5-51 on the grounds that the firearms were weapons, the possession of which constituted the crime of Possession of Firearm During the Commission of a Felony under OCGA § 16-11-106(b).

82.

Defendant Personal Property is contraband and forfeitable to the State of Georgia pursuant to OCGA § 16-15-5 on the grounds that the items were directly or indirectly used or intended for use to facilitate a violation of Chapter 15 of Title 16 of the Official Code of Georgia Annotated.

83.

Defendant Personal Property is contraband and forfeitable to the State of Georgia pursuant to OCGA § 16-15-5 on the grounds that the items are proceeds of a violation of Chapter 15 of Title 16 of the Official Code of Georgia Annotated.

84.

Defendant Personal Property is contraband and forfeitable to the State of Georgia pursuant to OCGA § 16-14-7 on the grounds that the items were used or intended for use, derived from, or realized through a pattern of racketeering activity.

Defendant Personal Property is contraband and forfeitable to the State of Georgia pursuant to OCGA § 16-14-7 on the grounds that the items are proceeds of a pattern of racketeering activity.

WHEREFORE THE STATE OF GEORGIA PRAYS:

- a) That service of process issue directing any and all persons, corporations, and other entities claiming an interest in Defendant Personal Property to appear and answer this Complaint within the time allowed by law;
- b) That the Court hold a hearing within sixty (60) days of service of this Complaint as provided by OCGA § 9-16-12(f);
- c) That the Court enter a judgment in favor of the State of Georgia, declaring the property listed herein as Defendant in rem be forfeited to the State of Georgia;
- d) That the Court order any claimant who fails to establish that a substantial portion of the claimant's interest is exempt from forfeiture to pay to the State of Georgia the actual costs incurred in the investigation and prosecution of this action, including reasonable attorney's fees, as provided by OCGA § 9-16-20(b);
- e) That the Court retain jurisdiction to direct the proper disposition and distribution of the property which is forfeited, as provided by OCGA § 9-16-19; and
- f) That the State of Georgia be afforded such other relief and remedies as are available under law and for due process to enforce the forfeiture.

Respectfully submitted this 7th day of July 2022.



Grant Rood, Ga. Bar No. 955552
Chief Sr. Assistant District Attorney



Stephany J. Luttrell, Ga. Bar No. 451273
Deputy District Attorney

Attorneys for the State, Civil Forfeiture Unit
Fulton County District Attorney's Office
136 Pryor St., 3rd Floor, Atlanta GA 30303

VERIFICATION

Personally appearing before the undersigned officer duly authorized to administer oaths; marissa viveito, a law enforcement officer employed by the Fulton County District Attorney's Office, first being duly sworn, deposes and says that, based upon a full and complete review of the official reports and documents made or prepared in connection with this case, the facts and allegations set forth in the foregoing Complaint for Forfeiture are true and accurate to the best of his or her knowledge and belief.



Affiant

Marissa Viveito

Affiant Printed Name

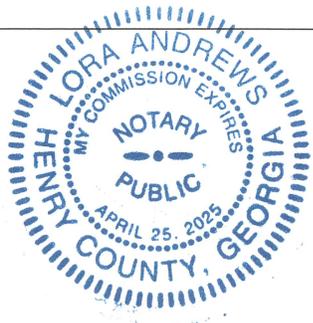
Sworn to and subscribed before me,

This 7 day of July, 2022.

Lora Andrews

Notary Public

My Commission Expires: 4/25/2025



ADDENDUM A

1. Gold dual-heart ring with diamonds
2. Rope chain necklace with “4PF” pendant
3. Cartier Santos de Cartier watch encrusted in blue jewels (serial# 4072-356504AX)
4. Richard Mille RM16-01 watch with pink band (serial# RM16-01 WG-CEM/025)
5. Richard Mille RM 023 watch with black band (serial# RM023 AN Ti/991)
6. Audemars Piguet Royal Oak Double Balancier watch with black metal band (serial# KF5533L)
7. 18k Gold Patek Philippe watch with green jewels around face
8. Rolex Datejust watch; “KING SLIME” engraved on rear
9. Audemars Piguet Royal Oak Offshore jewel-encrusted watch (serial# 18793)
10. Audemars Piguet watch with exhibition caseback (serial# J 61277)
11. Rolex watch with rainbow jewels around watchface
12. Rolex Datejust jewel-encrusted watch
13. Cartier Santos de Cartier Skeleton watch (serial# 11315YX)
14. Patek Philippe watch with exhibition caseback; steel and gold band (Serial# A3841AP)
15. Diamond cross pendant (approximately 17 grams)
16. Avianne two-finger diamond ring
17. Bracelet encrusted in square diamonds
18. Diamond tennis bracelet (approximately 46 grams)
19. Diamond tennis bracelet (approximately 33 grams)
20. Diamond tennis bracelet (approximately 24 grams)
21. Gold cuff bracelet with mix of large and small diamonds on half of the bracelet
22. Cartier gold cuff bracelet; “2.18 to the moon & back” engraved on inside of bracelet
23. Gold bracelet with diamonds; cathead with emerald eyes on one end of bracelet
24. Gold and diamond Cuban link bracelet with gold and diamond plate
25. Eliantte gold Cuban link bracelet
26. Necklace with circular and square green jewels (approximately 83 grams)

27. Diamond double row tennis necklace
28. Diamond necklace with multiple cross charms; “NYC” clasp
29. Gold and diamond Cuban chain necklace; “Eliantte” in raised lettering on front of clasp
30. Gold and diamond Cuban square-link necklace; Status Jewelers engraved on rear of clasp
31. White gold and diamond Cuban chain necklace; “Eliantte” in raised lettering on front of clasp
32. Gold and diamond Cuban link chain necklace; “Eliantte” in raised lettering on front of clasp
33. Gold and diamond Cuban chain bracelet; “Eliantte” engraved on rear of clasp
34. White gold necklace containing baguette diamonds surrounded by additional gemstones
35. Rose gold and diamond Cuban chain necklace
36. Diamond tennis necklace (approximately 35 grams)
37. Diamond tennis necklace (approximately 72 grams)
38. Diamond tennis necklace (approximately 60 grams)
39. Gold snake-style chain necklace
40. Eliantte diamond and gold ball necklace
41. Gold ball, pearl, and diamond necklace
42. Geometric diamond chain necklace with cross pendant; Eliantte inscribed on rear of cross pendant
43. Eliantte circular diamond pendant with portrait of a male on the front; “In loving memory Bennie 06/07/80-08/13/2000” engraved on rear of pendant
44. Eliantte diamond pendant depicting a wave, “EMERGENCY TSUNAMI” in block lettering on front of pendant
45. Gold chain necklace with purple snake eye jewels
46. Raffaello diamond “P*nk!” Pendant; “YSL X BC 4 LIFE” engraved on rear
47. Diamond and gold infinity-style necklace with snake heads on clasp
48. Gold chain necklace with diamond “1017” pendant
49. Diamond “BIRDMAN” pendant

50. Eliantte diamond “YSL” pendant
51. Diamond Cuban link chain necklace with “YSL” pendant; “In Loving Memory BENNIE” and praying hands motif engraved on rear of pendant
52. Diamond chain bracelet with “SLIME” name plate
53. “YSL” diamond pendant
54. Diamond “SHADY BABY” cross pendant; “KING SLIME” engraved on rear of pendant
55. Diamond spider pendant; “PUNK” cutout on rear of pendant
56. White gold and rose gold Cuban link bracelet
57. Pair of Diamond cross earrings
58. Pair of square diamond earrings
59. Avianne circular diamond and gold ring
60. Avianne gold and diamond circular ring with “OHB” embossed on face of ring
61. Diamond cross ring
62. Two (2) diamond wing-shaped pendants
63. Two (2) diamond hoop earrings
64. Diamond YSL gang sign ring; “King Slime Jeffrey” engraved on rear
65. Gold and diamond dollar-bill sign (\$) ring
66. Two (2) diamond cross earrings
67. Chrome Hearts cemetery cross ring
68. Two (2) diamond stud earrings (approximately 7 grams)
69. Two (2) diamond stud earrings (approximately 4 grams)
70. Diamond ring with 13 diamonds on band (approximate total weight of ring: 18 grams)
71. Diamond Rolex Datejust watch with blue face
72. Diamond Cuban link chain necklace with trapezoidal clasp
73. Diamond tennis necklace with diamond “DUKE” pendant
74. Diamond “SHADY BABY” ring
75. Diamond cuff bracelet
76. Audemars Piguet Royal Oak watch with black band (serial# 1012)

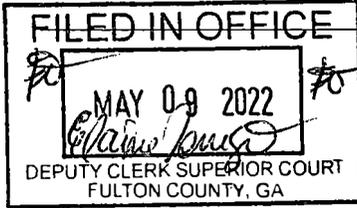
77. Diamond tennis necklace (approximately 38 grams)
78. Baguette diamond necklace
79. Diamond tennis necklace (approximately 52 grams)
80. Diamond tennis necklace (approximately 36 grams)
81. Silver link bracelet
82. Two (2) diamond stud earrings in rose gold setting
83. Diamond tennis bracelet (approximately 15 grams)
84. Diamond tennis bracelet (approximately 9 grams)
85. Diamond tennis bracelet (approximately 24 grams)
86. Diamond tennis bracelet (approximately 13 grams)
87. Gold and diamond "SHADY BABY" pendant

ADDENDUM B

MM

INDICTMENT

EJIS-Glanville



Clerk No. 22SC182273

FULTON SUPERIOR COURT

THE STATE OF GEORGIA

V.

KAHLIEFF ADAMS
A/K/A BOBBY HUNT
 Count(s): 1,40,42,43

MARTINEZ ARNOLD
A/K/A DUKE
 Count(s): 1

DERONTAE BEBEE
A/K/A BEE
A/K/A B
 Count(s): 1,8,9,10,11,12,27,28

DAMONE BLALOCK
A/K/A BALI
 Count(s): 1

JAVARIS BRADFORD
A/K/A TUDA
 Count(s): 1,2

JUSTIN COBB
A/K/A DUWAP
 Count(s): 1,2

CORDARIUS DORSEY
A/K/A POLO
A/K/A JUICY
 Count(s): 1,55

CHRISTIAN EPPINGER
A/K/A BHRIS
 Count(s): 1,27,28,29,31,32,33
 34,35,36,37,38,39,47,48

- 1 CONSPIRACY TO VIOLATE THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT O.C.G.A. §16-14-4(C)
- 2 MURDER O.C.G.A. §16-5-1
- 3 ARMED ROBBERY O.C.G.A. §16-8-41
- 4 AGGRAVATED ASSAULT WITH A DEADLY WEAPON O.C.G.A. §16-5-21
- 5 AGGRAVATED ASSAULT WITH A DEADLY WEAPON O.C.G.A. §16-5-21
- 6 POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106
- 7 POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106
- 8 THEFT BY RECEIVING STOLEN PROPERTY O.C.G.A. §16-8-7
- 9 VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT O.C.G.A. §16-13-30
- 10 VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT O.C.G.A. §16-13-30
- 11 POSSESSION OF A FIREARM BY CONVICTED FELON O.C.G.A. §16-11-131
- 12 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)

MILES FARLEY A/K/A SLATO A/K/A LIL MILES Count(s): 1,49,50,51,54	13 THEFT BY RECEIVING STOLEN PROPERTY O.C.G.A. §16-8-7
JEVON FLEETWOOD A/K/A 4TRAY A/K/A PSYCHO Count(s): 1	14 ARMED ROBBERY O.C.G.A. §16-8-41
DAMEKION GARLINGTON A/K/A DEE A/K/A SXARFAXE Count(s): 1,40,42,43,49,50,51,54	15 ARMED ROBBERY O.C.G.A. §16-8-41
QUANTAVIOUS GRIER A/K/A UNFOONK Count(s): 1, 13	16 AGGRAVATED ASSAULT WITH A DEADLY WEAPON O.C.G.A. §16-5-21
MARQUAVIUS HUEY A/K/A QUA Count(s): 1,3,4,5,6,7,14,15,16,17, 18,19,20,21,22,23,44,45,46	17 AGGRAVATED ASSAULT WITH A DEADLY WEAPON O.C.G.A. §16-5-21
DEAMONTE KENDRICK A/K/A YAK GOTTI Count(s): 1,2	18 HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE O.C.G.A. §16-5-44.1
SERGIO KITCHENS A/K/A GUNNA Count(s): 1	19 POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106
WUNNIE LEE A/K/A SLIMELIFE SHAWTY Count(s): 1	20 POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106
DEMISE MCMULLEN A/K/A NARD Count(s): 1,2	21 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)
TENQUARIUS MENDER A/K/A NARD A/K/A STUNNA Count(s): 1,44,45,46	22 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(b)
	23 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(c)
	24 VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT O.C.G.A. §16-13-30
	25 POSSESSION OF A FIREARM BY CONVICTED FELON O.C.G.A. §16-11-131
	26 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)
	27 ARMED ROBBERY O.C.G.A. §16-8-41

<p>WALTER MURPHY A/K/A DK Count(s): 1</p>	<p>28 HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE O.C.G.A. §16-5-44.1</p>
<p>JAYDEN MYRICK A/K/A SETTRIP A/K/A JAYMAN Count(s): 1,40,41,42,43</p>	<p>29 POSSESSION OF FIREARM BY FIRST OFFENDER PROBATIONER O.C.G.A. §16-11-131</p> <p>30 POSSESSION OF A FIREARM BY CONVICTED FELON O.C.G.A. §16-11-131</p>
<p>QUAMARVIOUS NICHOLS A/K/A QUA Count(s): 1,49,50,51,53,54</p>	<p>31 THEFT BY TAKING O.C.G.A. §16-8-2</p> <p>32 ATTEMPTED MURDER O.C.G.A. §16-4-1</p>
<p>RODALIUS RYAN A/K/A LIL ROD Count(s): 1</p>	<p>33 ATTEMPTED MURDER O.C.G.A. §16-4-1</p> <p>34 POSSESSION OF FIREARM BY A FIRST OFFENDER PROBATIONER O.C.G.A. §16-11-131</p>
<p>ANTONIO SLEDGE A/K/A MOUNK TOUNK Count(s): 1,30</p>	<p>35 POSSESSION OF FIREARM BY A FIRST OFFENDER PROBATIONER O.C.G.A. §16-11-131</p>
<p>TRONTAVIOUS STEPHENS A/K/A TICK A/K/A SLUG Count(s): 1</p>	<p>36 POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106</p> <p>37 POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106</p>
<p>SHANNON STILLWELL A/K/A SHANNON JACKSON A/K/A SB Count(s): 1,2,49,50,51,52,54</p>	<p>38 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)</p>
<p>ANTONIO SUMLIN A/K/A OBAMA Count(s): 1,47,48,55</p>	<p>39 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(b)</p>
<p>JEFFERY WILLIAMS A/K/A YOUNG THUG A/K/A SLIME Count(s): 1, 56</p>	<p>40 ATTEMPTED MURDER O.C.G.A. §16-4-1</p> <p>41 POSSESSION OF WEAPON BY INCARCERATED INDIVIDUAL O.C.G.A. § 42-5-18</p>
<p>JIMMY WINFREY A/K/A ROSCOE Count(s): 1,24,25,26</p>	<p>42 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)</p> <p>43 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(b)</p>

- 44 POSSESSION OF WEAPON BY INCARCERATED INDIVIDUAL O.C.G.A. §42-5-18
- 45 POSSESSION OF A TELECOMMUNICATION DEVICE BY INCARCERATED INDIVIDUAL O.C.G.A. §42-5-18
- 46 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)
- 47 CONSPIRACY TO COMMIT A CRIME O.C.G.A. §16-4-8
- 48 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)
- 49 MURDER O.C.G.A. §16-5-1
- 50 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)
- 51 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(b)
- 52 POSSESSION OF FIREARM BY CONVICTED FELON PREVIOUSLY CONVICTED OF FELONY INVOLVING THE USE OR POSSESSION OF A FIREARM O.C.G.A. §16-11-133
- 53 POSSESSION OF FIREARM BY CONVICTED FELON PREVIOUSLY CONVICTED OF FELONY INVOLVING THE USE OR POSSESSION OF A FIREARM O.C.G.A. §16-11-133
- 54 POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106
- 55 CONSPIRACY TO COMMIT A CRIME O.C.G.A. §16-4-8

56 PARTICIPATION IN CRIMINAL STREET GANG
ACTIVITY O.C.G.A. §16-15-4(d)

True BILL

May 9, 2022

J. M. D. C.
Grand Jury Foreperson

PERSONID: _____

FANI T. WILLIS, District Attorney

The Defendant waives copy of indictment, list of witnesses, formal arraignment and pleads _____ Guilty.

The Defendant waives copy of indictment, list of witnesses, formal arraignment and pleads _____ Guilty.

The Defendant waives copy of indictment, list of witnesses, formal arraignment and pleads _____ Guilty.

Defendant

Defendant

Defendant

Attorney for Defendant

Attorney for Defendant

Attorney for Defendant

Assistant District Attorney

Assistant District Attorney

Assistant District Attorney

This ___ day of _____,

This ___ day of _____,

This ___ day of _____,

The Defendant waives copy of indictment, list of witnesses, formal arraignment and pleads _____ Guilty.

Defendant

Attorney for Defendant

Assistant District Attorney

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Attorney for Defendant

Attorney for Defendant

Attorney for Defendant

Assistant District Attorney

Assistant District Attorney

Assistant District Attorney

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Assistant District Attorney

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Attorney for Defendant

Attorney for Defendant

Assistant District Attorney

Assistant District Attorney

Assistant District Attorney

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Attorney for Defendant

Attorney for Defendant

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Assistant District Attorney

Assistant District Attorney

Assistant District Attorney

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This ___ day of _____,

This ___ day of _____,

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The Defendant waives copy of indictment, list of witnesses, formal arraignment and pleads _____ Guilty.

The Defendant waives copy of indictment, list of witnesses, formal arraignment and pleads _____ Guilty.

Defendant

Defendant

Defendant

Attorney for Defendant

Attorney for Defendant

Attorney for Defendant

Assistant District Attorney

Assistant District Attorney

Assistant District Attorney

This ___ day of _____,

This ___ day of _____,

This ___ day of _____,

STATE OF GEORGIA, COUNTY OF FULTON
IN THE SUPERIOR COURT OF SAID COUNTY

THE GRAND JURORS, selected, chosen and sworn for the County of Fulton, to wit:

- | | |
|---|------------------------------|
| 1. JASON DICESARE, Foreperson | 14. JOSELYN JONES |
| 2. THOMAS TRELEASE, Asst. FP | 15. LA'FAYE JONES |
| 3. STEVEN HERRAN, Secretary | 16. LINDA KILGORE |
| 4. SEBASTIAN MARULANDA, Asst. Sec. | 17. LAUREN MCEWEN |
| 5. JOHN ANTHONY | 18. KYLE MCGROTTY |
| 6. TIMOTHY ACCOIN | 19. DEBRA REESE |
| 7. KAREN BROWN | 20. ABRIL RIVAS |
| 8. SHARON BRYDEN | 21. ESAA SAGGUS |
| 9. EVAN ELLINGTON | 22. PTAHCHI TAMEEN |
| 10. ANGANETTA GORDON-ESTES | 23. JAN WOLBRECHT |
| 11. EDDIE HARLEMON | 24. KHADIJA AHMED |
| 12. DORA HOWARD | 25. TIFFANY WYNE |
| 13. MICHAEL INGRAM | 26. CRESHAWN ROBERTSON |

COUNT 1

The Grand Jurors aforesaid, in the name of and on behalf of the citizens of Georgia, do charge and accuse: **KAHLIEFF ADAMS, AKA BOBBY HUNT**

MARTINEZ ARNOLD, AKA DUKE

DERONTAE BEBEE, AKA BEE, AKA B

DAMONE BLALOCK, AKA BALI

JAVARIS BRADFORD, AKA TUDA

JUSTIN COBB, AKA DÚWAP

CORDARIUS DORSEY, AKA POLO, AKA JUICY

CHRISTIAN EPPINGER, AKA BHRIS

MILES FARLEY, AKA SLATO, AKA LIL MILES

JEVON FLEETWOOD, AKA 4TRAY, AKA PSYCHO

DAMEKION GARLINGTON, AKA DEE AKA SXARFAXE

QUANTAVIOUS GRIER, AKA UNFOONK

MARQUAVIUS HUEY, AKA QUA

DEAMONTE KENDRICK, AKA YAK GOTTI

SERGIO KITCHENS, AKA GUNNA

WUNNIE LEE, AKA SLIMELIFE SHAWTY

DEMISE MCMULLEN, AKA NARD

TENQUARIUS MENDER, AKA NARD, AKA STUNNA

WALTER MURPHY, AKA DK

JAYDEN MYRICK, AKA SETTRIP, AKA JAYMAN

QUAMARVIOUS NICHOLS, AKA QUA

RODALIUS RYAN, AKA LIL ROD

ANTONIO SLEDGE, AKA MOUNK TOUNK

TRONTAVIOUS STEPHENS, AKA TICK, AKA SLUG

SHANNON STILLWELL, AKA SHANNON JACKSON, AKA SB

ANTONIO SUMLIN, AKA OBAMA

JEFFERY WILLIAMS, AKA YOUNG THUG, AKA SLIME

JIMMY WINFREY, AKA ROSCOE

with the offense of **CONSPIRACY TO VIOLATE THE RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT (O.C.G.A. § 16-14-4 (c))**, for the said accused together with unindicted co-conspirators, in the State of Georgia and County of Fulton, on or between the 24th day of January, 2013 and the 8th day of May, 2022, did unlawfully conspire to acquire and maintain, directly and indirectly, an interest in and control of United States currency and other personal property through a pattern of racketeering activity, in violation of O.C.G.A. § 16-14-4 (a), and while associated with an enterprise, did unlawfully conspire to conduct and participate in, directly and indirectly, such enterprise through a pattern of racketeering activity in violation of O.C.G.A. § 16-14-4 (b), as described below and incorporated by reference as if fully set forth herein, contrary to the law of said State, the good order, peace, and dignity thereof;

Part 1 – The Conspiracy

As associates of the enterprise Young Slime Life (hereinafter “YSL”), the defendants conspired to associate together and with others for the common purposes of illegally obtaining money and property through a pattern of racketeering activity and conducting and participating in the enterprise through a pattern of racketeering activity. In furtherance of the conspiracy, the defendants engaged in the activities enumerated herein. The objectives of the conspiracy included but were not limited to:

- Preserving, protecting and enhancing the reputation, power and territory of the enterprise through acts of racketeering activity including murder, assault and threats of violence;
- Preserving, protecting and enhancing the reputation, power and territory of the enterprise by the posting of messages, images, videos and songs, demonstrating allegiance to the enterprise and a willingness to engage in violence on its behalf;
- Maintaining armed individuals ready and willing to preserve, protect and enhance the reputation, power and territory of the enterprise through the use of violence;
- Obtaining money, weapons and other property through acts of racketeering activity, including robbery, theft and the unlawful sale and distribution of drugs; and
- Obstructing law enforcement investigations and court proceedings through witness intimidation and attacks upon law enforcement officers.

Part 2 - The Enterprise

A. The Enterprise

YSL is an enterprise consisting of a group of individuals associated in fact although not a legal entity. YSL constitutes an ongoing organization whose members function as a continuing unit for the common purpose of achieving the objectives of the enterprise.

B. YSL

1. History

YSL is a criminal street gang that started in late 2012 in the Cleveland Avenue area of Atlanta, Georgia. YSL claims affiliation with the national Bloods gang.

YSL's founders were Jeffery Williams AKA "Young Thug," AKA "Slime," Walter Murphy AKA "DK," and Trontavious Stephens AKA "Tick," AKA "Slug." Jeffery Williams, an Atlanta-based hip-hop artist, made YSL a well-known name by referring to it in his songs and on social media.

2. Identifiers

YSL associates use a variety of identifiers including colors, clothing, tattoos, and hand signs, as well as verbal and written identifiers. YSL claims affiliation with the national Bloods gang, and some associates also claim the Blood subset gangs Sex Money Murder or 30 Deep. YSL associates often display their colors by wearing a green or red bandanna on their person, a practice known as flagging. YSL associates often wear clothing with the letters "YSL" or the word "Slime" printed on them. YSL associates also often wear pendants displaying the letters "YSL" or the word "SLATT." The most predominant YSL colors are red for Bloods, and green for Slime.

YSL associates use a variety of hand signs. One of the most common hand sign wiping the nose with the index finger. Another frequently used YSL hand sign consists of curling the ring and pinky finger inward toward the palm while extending the index and thumb with the middle finger slightly curved. The extended middle and index fingers represent the "Y." The curved middle finger and curved ring finger represent the "S." The extended index finger and thumb represent the "L." YSL associates will also make the "two guns" hand sign by forming pistols with their fingers, and pointing them in opposite directions.

YSL associates use a variety of other identifiers. Often, YSL associates will write or say the word "BLATT," which means "Blood Love All the Time." YSL associates also use the word "SLATT" which means "Slime Love All the Time." Often, associates will simply refer to each other as "Blood" or "Slime." They also refer to Cleveland Avenue as "Bleveland," replacing the "C" with a "B." Green Heart, Green Snake, Blowing Nose, and Green Vomit emojis, are also symbols commonly used by members of YSL.

3. Primary Locale

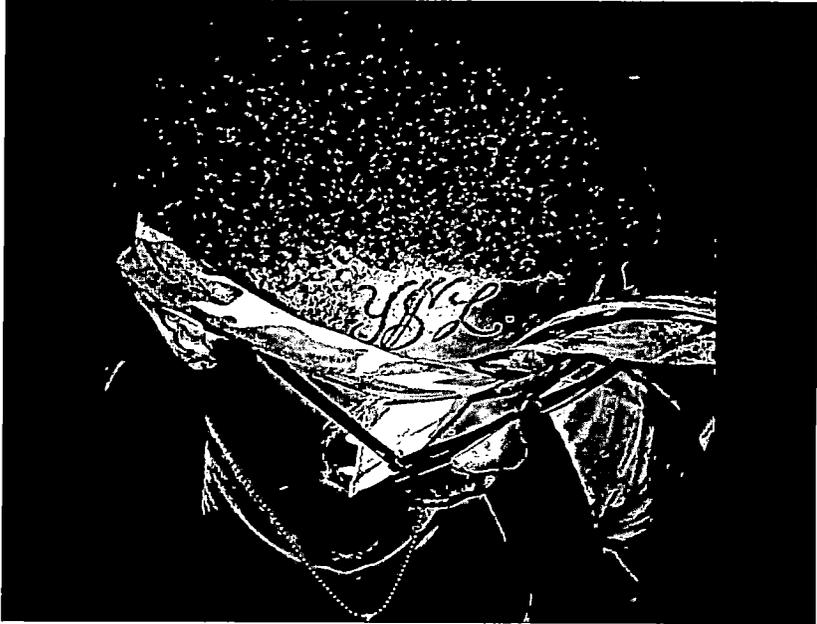
YSL associates are predominately active in Southeast Atlanta in the Cleveland Avenue area, but are expanding their activities into the surrounding metropolitan Atlanta area.

Part 3 - Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy and to effect its objectives and purposes, the defendants committed and caused to be committed, among others, the following overt acts, certain of which constitute acts of racketeering activity:

Act	On or about	Scope of Conduct
1	01/25/2013	Defendant TRONTAVIOUS STEPHENS , an associate of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, against the person of Reginald Pettis, by pointing at, toward and in the direction of Reginald Pettis with said firearm, placing Reginald Pettis in reasonable apprehension of immediately receiving a violent injury, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
2	06/18/2013	Defendant JUSTIN COBB , an associate of YSL, did commit the felony offense of THEFT BY DECEPTION against the person of Draonte Johnson, by obtaining a firearm by deceitful means from Draonte Johnson with the intention of depriving Draonte Johnson of said firearm, in violation of Georgia Law pursuant to O.C.G.A. § 16-8-3, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xii), and an overt act in furtherance of the conspiracy.
3	08/23/2013	Defendant SHANNON STILLWELL , an associate of YSL, did commit the felony offense of POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(j)(1), which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxxvi), and an overt act in furtherance of the conspiracy.
4	09/09/2013	Defendant JEFFERY WILLIAMS , an associate of YSL, did commit the felony offense of THEFT BY RECEIVING STOLEN PROPERTY , when he possessed property, to wit: a firearm, the property of Ann Phillips, that Williams knew or should have known was stolen with the intent of depriving Ann Phillips of said property, in violation of Georgia law pursuant to O.C.G.A. § 16-8-7, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xii), and an overt act in furtherance of the conspiracy.

5	09/11/2013	Defendant WALTER MURPHY , an associate of YSL, did, with the intent to commit a theft, commit the felony offense of ATTEMPTED ARMED ROBBERY , by taking a substantial step toward the commission of the offense by pointing an offensive weapon, to wit: a firearm, at the person of Derrick Dotson and demanding property from, or from the immediate presence of, Derrick Dotson, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xiii), and an overt act in furtherance of the conspiracy.
6	09/11/2013	Defendant WALTER MURPHY , an associate of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, an object which when used offensively against a person is likely to result in serious bodily injury, against the person of Derrick Dotson, by shooting at, toward and in the direction of Derrick Dotson with said firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
7	09/11/2013	Defendant WALTER MURPHY , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY A FIRST OFFENDER PROBATIONER , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been sentenced pursuant to Article 3 of Chapter 8 of Title 42 of the Official Code of Georgia to a term of probation as a Felony First Offender for the felony offense of ROBBERY in Indictment 09SC86267, in the Superior Court of Fulton County, Georgia, on the 16 th day of February, 2010, an overt act in furtherance of the conspiracy.
8	11/29/2013	Defendant ANTONIO SLEDGE , an associate of YSL, did commit the felony offense of POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE , cocaine being a controlled substance, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(b), which is an act of racketeering activity under O.C.G.A. § 16-14-3(5)(A)(xxxiv), and an overt act in furtherance of the conspiracy.

9	04/20/2014	<p>Defendant JEFFERY WILLIAMS, an associate of YSL, appeared in a video released on social media titled "Eww," where Defendant states "Red just like Elmo but I never fuckin giggle," "YSL won't fold, pick his ass off from the balcony," "YSL, wipe a nigga nose," "I'ma fuck for the cash then she getting robbed by Tick," "In a Bentley on West Lee getting trailed by sniper," "All I ever wanted was the money, put your hands in the air if you dare, any motherfucker to step over here, F&N put em in a wheel chair," an overt act in furtherance of the conspiracy.</p>
10	07/13/2014	<p>Defendant WALTER MURPHY, an associate of YSL, did pose for a photo released on social media with the letters "YSL" tattooed on his forehead, an overt act in furtherance of the conspiracy.</p> <div data-bbox="548 699 1318 751">  ysl_dk ... </div> <div data-bbox="527 764 1344 1388">  </div> <div data-bbox="553 1402 1305 1444"> ♡ 💬 📌 🔖 </div> <div data-bbox="553 1455 1143 1587"> <p> Liked by yungri5hnigga and 148 others ysl_dk ¥\$£ 4 life View all 5 comments July 13, 2014</p> </div>

11	09/18/2014	<p>Defendant MARTINEZ ARNOLD, an associate of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON, to wit: a firearm, an object which when used offensively against a person is likely to result in serious bodily injury, against the person of Michael Castellini, by shooting at, toward and in the direction of Michael Castellini with said firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.</p>
12	09/27/2014	<p>Defendant DAMEKION GARLINGTON, an associate of YSL, did pose for a photo released on social media holding what appears to be an AK-47 variant firearm, with a red bandanna tied around his face, an overt act in furtherance of the conspiracy.</p> 
13	10/12/2014	<p>Defendant TRONTAVIOUS STEPHENS, an associate of YSL, did pose for a photo released on social media wearing a “YSL” pendant, with the caption, “Y\$L slimelife”, an overt act in furtherance of the conspiracy.</p>

14	11/03/2014	<p>Defendant JEFFERY WILLIAMS, an associate of YSL, did pose for a photo released on social media wearing red clothing, and flashing a YSL gang hand sign, an overt act in furtherance of the conspiracy.</p>  <p>Id 84529819252925942 Taken 2014-11-03 04:03:38 UTC Status 0 - Active Url https://photos-b.ak.instagram.com/photos-ak-xp/151.2885-15/10755047_1503326160507345_1905022022_n.jpg Source Library Filter 24 - Amaro Upload Ip 172.56.19.181 Is Published true Shared By true Author Caption Id 84519319398533011 Date Created 2014-11-03 04:03:38 UTC Status Active Text @ [redacted] r loved by me!!! PHOTO BY: @mpaduke1</p>
15	01/03/2015	<p>Defendants DAMEKION GARLINGTON and JEFFERY WILLIAMS, associates of YSL, did pose for a photo with the caption, "we ain't going back and forth," an overt act in furtherance of the conspiracy.</p>
16	01/07/2015	<p>Defendant JEFFERY WILLIAMS, an associate of YSL, did rent a 2014 silver Infiniti Q50 sedan from HERTZ Rent-A-Car, which was used in the commission of the MURDER of Donovan Thomas, Jr., a rival gang member, on the 10th day of January, 2015, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(B), and an overt act in furtherance of the conspiracy.</p>

17	01/10/2015	Defendants JAVARIS BRADFORD, JUSTIN COBB, DEAMONTE KENDRICK, DEMISE MCMULLEN and SHANNON STILLWELL , associates of YSL, did unlawfully and with malice aforethought, commit the felony offense of MURDER , by causing the death of Donovan Thomas Jr., a human being, by shooting Donovan Thomas Jr. with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.
18	01/10/2015	Defendants JAVARIS BRADFORD, JUSTIN COBB, DEAMONTE KENDRICK, DEMISE MCMULLEN and SHANNON STILLWELL , associates of YSL, did, unlawfully and with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER , upon the person of Reginald Hendricks, by shooting Reginald Hendricks with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3(5)(A)(iv), and an overt act in furtherance of the conspiracy.
19	01/10/2015	Defendants JAVARIS BRADFORD, JUSTIN COBB, DEAMONTE KENDRICK, DEMISE MCMULLEN and SHANNON STILLWELL , associates of YSL, did, unlawfully and with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER , upon the person of Cordarius Sanders, by shooting Cordarius Sanders with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3(5)(A)(iv), which is also an overt act in furtherance of the conspiracy.
20	01/10/2015	Defendants, JAVARIS BRADFORD, JUSTIN COBB, DEAMONTE KENDRICK, DEMISE MCMULLEN and SHANNON STILLWELL , associates of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participated in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: MURDER and ATTEMPTED MURDER , acts involving violence and possession or use of a weapon, in violation of Georgia law pursuant to O.C.G.A. § 16-5-1 and O.C.G.A. § 16-4-1, as alleged in Acts 17, 18, and 19 of this Count, an overt act in furtherance of the conspiracy.

21	01/19/2015	Defendant JUSTIN COBB , an associate of YSL, did, with the intent to commit a theft, commit the felony offense of ATTEMPTED ARMED ROBBERY , by taking a substantial step toward the commission of the offense by pointing an offensive weapon, to wit: a firearm, at the person of Travis White and demanding property from or from the immediate presence of Travis White, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xiii), and an overt act in furtherance of the conspiracy.
22	01/19/2015	Defendant JUSTIN COBB , an associate of YSL, did, with the intent to commit a theft, commit the felony offense of ATTEMPTED ARMED ROBBERY , by taking a substantial step toward the commission of the offense by pointing an offensive weapon, to wit: a firearm, at the person of Tony Luttrell and demanding property from or from the immediate presence of Tony Luttrell, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xiii), and an overt act in furtherance of the conspiracy.
23	01/19/2015	Defendant JUSTIN COBB , an associate of YSL, did, unlawfully and with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER , upon the person of Travis White, by shooting Travis White with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3(5)(A)(iv), and an overt act in furtherance of the conspiracy.
24	01/19/2015	Defendant JUSTIN COBB , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 13SC120462, in the Superior Court of Fulton County, Georgia, for the offense of POSSESSION OF COCAINE on the 24th day of January, 2014, an overt act in furtherance of the conspiracy.

25	01/25/2015	Defendant JEFFERY WILLIAMS , an associate of YSL, and Kyle Oree, the leader of the criminal street gang Sex Money Murder, did engage in conversation with one another, and the conversation stated that “sacrifices must be made, soldiers must fall in order for battle to be won”. The conversation further states per all “5, H020 Street Life, KG DA GOD, 3Shot, Nazty Nu, and M1 [the AKA’s of the 5 leaders of Sex Money Murder in Georgia], anybody not under one of these individuals in the state of GA must line up PETE-SAP. There is no rolling from one to the other. Everything is as is if you are one, SEX MONEY MURDA. Nothing added and nothing taken away 2gunz,” an overt act in furtherance of the conspiracy.
26	01/26/2015	Defendant JEFFERY WILLIAMS , an associate of YSL, did appear in an video released on social media 16 days after the murder of Donovan Thomas Jr., stating “so a nigga lie to they momma, lie to they kids, lie to they brothers and sisters then get right into the courtroom and tell the God’s honest truth, don’t get it, y’all niggas need to get fucking killed bro, from me and YSL,” an overt act in furtherance of the conspiracy.
27	02/09/2015	Defendants DAMEKION GARLINGTON and JEFFERY WILLIAMS , associates of YSL, did appear in a video released on social media displaying YSL gang hand signs and Blood gang signs with the caption “U digg 30 / YSL xoming soon,” an overt act in furtherance of the conspiracy.
28	03/10/2015	Defendants DAMEKION GARLINGTON and TRONTAVIOUS STEPHENS , associates of YSL, did pose for a photo released on social media wearing red clothing, with the caption “slime shit” with a green snake emoji and red B emoji, an overt act in furtherance of the conspiracy.

29	03/20/2015	<p>Defendants MARTINEZ ARNOLD, DAMEKION GARLINGTON, DEAMONTE KENDIRCK, SHANNON STILLWELL and JEFFERY WILLIAMS, associates of YSL, did pose for a photo released on social media flashing a YSL gang hand sign, an overt act in furtherance of the conspiracy.</p>  <p>Liked by n30yce and 151 others sxar_faxe In these new Orleans streets View all 7 comments March 20, 2015</p>
30	04/12/2015	<p>Defendants DEMISE MCMULLEN and WALTER MURPHY, associates of YSL, did, unlawfully with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER, upon the person of Dexter Montgomery, by shooting Dexter Montgomery with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.</p>
31	04/12/2015	<p>Defendants DEMISE MCMULLEN and WALTER MURPHY, associates of YSL, did, unlawfully with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER, upon the person of Cornelius Davis, by shooting at Cornelius Davis with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.</p>

32	04/12/2015	Defendants DEMISE MCMULLEN and WALTER MURPHY , associates of YSL, did, unlawfully with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER , upon the person of Deangelo White, by shooting at Deangelo White with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.
33	04/12/2015	Defendants DEMISE MCMULLEN and WALTER MURPHY , associates of YSL, did, unlawfully with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER , upon the person of Christian James, by shooting at Christian James with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.
34	04/12/2015	Defendant WALTER MURPHY , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 09SC86267, in the Superior Court of Fulton County, Georgia, for the offense of ROBBERY on the 16 th day of February, 2010, an overt act in furtherance of the conspiracy.

35	04/12/2015	<p>Defendant DEMISE MCMULLEN, an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY A CONVICTED FELON, in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 04SC15568, in the Superior Court of Fulton County, Georgia, for the offense of THEFT BY RECEIVING STOLEN PROPERTY on the 12th day of July, 2004; Indictment 04SC18438, in the Superior Court of Fulton County, Georgia, for the offenses of POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE and POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE on the 30th day of December, 2005; Indictment 04SC21480, in the Superior Court of Fulton County, Georgia, for the offense of SALE OF COCAINE on the 3rd day of January, 2004; Indictment 06SC41803, in the Superior Court of Fulton County, Georgia, for the offense of POSSESSION OF A FIREARM BY CONVICTED FELON on the 10th day of May, 2006; Indictment 10SC95387, in the Superior Court of Fulton County, Georgia, for the offense of BURGLARY on the 15th day of July, 2011, an overt act in furtherance of the conspiracy.</p>
36	04/12/2015	<p>Defendants DEMISE MCMULLEN and WALTER MURPHY, associates of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)), when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: ATTEMPTED MURDER, an act involving violence and possession or use of a weapon, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, as alleged in Acts 30, 31, 32 and 33 of this Count, an overt act in furtherance of the conspiracy.</p>
37	04/15/2015	<p>Defendant JAYDEN MYRICK, an associate of YSL, did, with the intent to commit a theft, commit the felony offense of ARMED ROBBERY, by taking property, to wit: a handbag, from or from the immediate presence of another, to wit: Kimberly Craig, by use of an offensive weapon, to wit: a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-8-41, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xiii), and an overt act in furtherance of the conspiracy.</p>

38	04/15/2015	Defendant JAYDEN MYRICK , an associate of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, upon the person of Kimberly Craig, by pointing at, toward and in the direction of Kimberly Craig with said firearm, placing Kimberly Craig in reasonable apprehension of immediately receiving a violent injury in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
39	04/26/2015	Defendant JIMMY WINFREY , an associate of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, an object which when used offensively against a person is likely to result in serious bodily injury, upon the person of Dwayne Carter AKA "Lil Wayne," by shooting at a bus in which Dwayne Carter was a passenger, with said firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
40	04/26/2015	Defendant JIMMY WINFREY , an associate of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: AGGRAVATED ASSAULT WITH A DEADLY WEAPON , an act involving violence and possession or use of a weapon, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, as alleged in Act 39 of this Count, an overt act in furtherance of the conspiracy.
41	04/28/2015	Defendants DAMEKION GARLINGTON and ANTONIO SLEDGE , associates of YSL, did commit the felony offense of AGGRAVATED BATTERY , by maliciously causing bodily harm and seriously disfiguring the buttocks of Denise Bell by shooting Denise Bell with a firearm, to wit: a rifle, in violation of Georgia law pursuant to O.C.G.A. § 16-5-24, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.

42	04/28/2015	Defendants DAMEKION GARLINGTON and ANTONIO SLEDGE , associates of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, an object which when used offensively against a person is likely to result in serious bodily injury, upon the person of Cecilla Davis, by shooting at, toward and in the direction of Cecilla Davis with said firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
43	04/28/2015	Defendants DAMEKION GARLINGTON and ANTONIO SLEDGE , associates of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, an object which when used offensively against a person is likely to result in serious bodily injury, upon the person of Diamond Mills, by shooting at, toward and in the direction of Diamond Mills with said firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
44	04/28/2015	Defendants DAMEKION GARLINGTON and ANTONIO SLEDGE , associates of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, an object which when used offensively against a person is likely to result in serious bodily injury, by shooting at, toward and in the direction of Nastassia Battle with said firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
45	04/28/2015	Defendant ANTONIO SLEDGE , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a rifle, after having been convicted of a felony in Indictment 13SC123423, in the Superior Court of Fulton County, Georgia, for the offense of POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE on the 3 rd day of January, 2014, an overt act in furtherance of the conspiracy.

46	04/28/2015	<p>Defendants DAMEKION GARLINGTON and ANTONIO SLEDGE, associates of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)), when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: AGGRAVATED ASSAULT WITH A DEADLY WEAPON and AGGRAVATED BATTERY, acts involving violence and possession or use of a weapon, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21 and O.C.G.A. § 16-5-24, as alleged in Acts 41, 42, 43 and 44 of this Count, an overt act in furtherance of the conspiracy.</p>
47	05/21/2015	<p>Defendant DAMEKION GARLINGTON, an associate of YSL, did pose for a photo holding a firearm, with the caption, "They can fuck with us if they want we gonna bring em homicide," an overt act in furtherance of the conspiracy.</p>  <p>The screenshot shows an Instagram post interface. At the top, there are social media sharing icons (Facebook, Email, Good, etc.) and a status bar with '4G LTE' and '12:52 PM'. Below the icons is a back arrow and the word 'PHOTO'. The user's profile picture and name 'ysl_lildee' are visible, along with a timestamp '1w'. The main image is a dark, high-contrast photograph of a person's hands holding a handgun. Below the image, it says '67 likes' and the caption: 'ysl_lildee They can fuck with us if they want we gonna bring em homicide @30deep_dee no1trusted_ Wya'. At the bottom, there are navigation icons for home, search, post, activity, and profile.</p>

48	07/03/2015	Defendant TRONTAVIOUS STEPHENS , an associate of YSL, did commit the felony offense of POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(j)(1), which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxxvi), and an overt act in furtherance of the conspiracy.
49	07/03/2015	Defendant TRONTAVIOUS STEPHENS , an associate of YSL, did commit the felony offense of POSSESSION OF OXYCODONE , a controlled substance, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(a), which is an act of racketeering activity under O.C.G.A. § 16-14-3(5)(A)(xxxiv), and an overt act in furtherance of the conspiracy.
50	07/03/2015	Defendant TRONTAVIOUS STEPHENS , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 12SC108036, in the Superior Court of Fulton County, Georgia, for the offense of THEFT BY TAKING on the 7 th day of January, 2014; and Indictment 13SC116787, in the Superior Court of Fulton County, Georgia, for the offenses of AGGRAVATED ASSAULT WITH A DEADLY WEAPON and POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY on the 21 st day of February, 2013, an overt act in furtherance of the conspiracy.
51	07/07/2015	Defendant JEFFERY WILLIAMS , an associate of YSL, did commit the felony offense of TERRORISTIC THREATS , when, while Christopher May attempted to inform Williams that he was no longer welcome at Perimeter Mall, Williams stated “If you continue to approach, I’ll shoot you in the face with a gun,” in violation of Georgia law pursuant to O.C.G.A. § 16-11-37, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxx), and an overt act in furtherance of the conspiracy.
52	07/15/2015	Defendants TRONTAVIOUS STEPHENS and SHANNON STILLWELL , associates of YSL, did commit the felony offense of POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(j)(1), which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxxvi), and an overt act in furtherance of the conspiracy.

53	07/15/2015	Defendant TRONTAVIOUS STEPHENS , an associate of YSL, did commit the felony offense of CRIMINAL USE OF AN ARTICLE WITH ALTERED ID (OTHER THAN MOTOR VEHICLE) , in violation of Georgia law pursuant to O.C.G.A. § 16-9-70, by possessing a firearm from which the accused knew the identification mark had been removed for the purpose of concealing and destroying the identity of said article, an overt act in furtherance of the conspiracy.
54	07/15/2015	Defendant TRONTAVIOUS STEPHENS , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 12SC108036, in the Superior Court of Fulton County, Georgia, for the offense of THEFT BY TAKING on the 7 th day of January, 2014; and Indictment 13SC116787, in the Superior Court of Fulton County, Georgia, for the offenses of AGGRAVATED ASSAULT WITH A DEADLY WEAPON and POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY on the 21 st day of February, 2013, an overt act in furtherance of the conspiracy.
55	07/15/2015	Defendant SHANNON STILLWELL , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 10SC5687662, in the Superior Court of Fulton County, Georgia, for the offenses of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY and BURGLARY , on the 27 th day of May, 2010; and Indictment 11SC98860, in the Superior Court of Fulton County, Georgia, for the offense of BURGLARY , on the 2 nd day of June, 2011; and Indictment 13SC121320, in the Superior Court of Fulton County, Georgia, for the offense of POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , on the 19 th day of September, 2013, an overt act in furtherance of the conspiracy.

56	10/01/2015	Defendants MARTINEZ ARNOLD and DEAMONTE KENDRICK , associates of YSL, did commit the felony offense of CONSPIRACY TO COMMIT MURDER , by driving to the territory of a rival gang with the intent to cause the death of another human being in retaliation for a prior shooting by the rival gang, while armed with an AK-47 assault rifle and a .40 caliber handgun, in violation of Georgia law pursuant to O.C.G.A. § 16-4-8, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(B), and an overt act in furtherance of the conspiracy.
57	10/01/2015	Defendants MARTINEZ ARNOLD AND DEAMONTE KENDRICK , associates of YSL, did commit the felony offense of THEFT BY RECEIVING STOLEN PROPERTY , when they possessed property, to wit: a firearm, the property of Christopher Greer, that Arnold and Kendrick knew or should have known was stolen with the intent of depriving Christopher Greer of said property, in violation of Georgia law pursuant to O.C.G.A. § 16-8-7, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xii), and an overt act in furtherance of the conspiracy.
58	10/01/2015	Defendant DEAMONTE KENDRICK , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment CR2015-114069-001, in the Maricopa County Arizona Superior Court, for the felony offenses of SHOPLIFTING and POSSESSION OF DANGEROUS DRUGS , on the 15 th day of May, 2015, an overt act in furtherance of the conspiracy.
59	10/01/2015	Defendants MARTINEZ ARNOLD and DEAMONTE KENDRICK , associates of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: CONSPIRACY TO COMMIT MURDER , an act involving violence and possession or use of a weapon, as alleged in Act 56 of this Court, in violation of Georgia law pursuant to O.C.G.A. § 16-4-8, an overt act in furtherance of the conspiracy.

60	03/25/2016	Defendant JEFFERY WILLIAMS , an associate of YSL, appeared in a video released on social media titled "Slime Shit," where lyrics state "Hey, this that slime shit, hey, YSL shit, hey, killin 12 shit, hey, fuck a jail shit, hey," "cooking white brick," "I'm not new to this, hey, I'm so true to this, hey, I done put a whole slime on a hunnid licks," "slime or get slimed," "I'm in the VIP and I got that pistol on my hip, you prayin that you live I'm prayin that I hit, hey, this that slime shit," "Fuck, fuck the police (fuck'em), in a high speed," "huindred rounds in a Tahoe," "I'm prepared to take em down," "got banana clips for all these niggas actin monkey," "this that slim shit, this that mob shit," "fuck the judge, YSL, this that mob life," an overt act in furtherance of the conspiracy.
61	05/11/2016	Defendant CHRISTIAN EPPINGER , an associate of YSL, did, with the intent to commit a theft, commit the felony offense of ARMED ROBBERY , by taking property, to wit: a set of keys and a purse, from or from the immediate presence of another, to wit: Toravia Hill, by use of an offensive weapon, to wit: a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-8-41, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xiii), and an overt act in furtherance of the conspiracy.
62	02/27/2017	Defendant JIMMY WINFREY , an associate of YSL, did commit the felony offense of POSSESSION OF DRUGS BY AN INMATE , when, while incarcerated at the Carroll County Prison, did possess illegal drugs, to wit: MARIJUANA , beyond the guard lines, in violation of Georgia law pursuant to O.C.G.A. § 42-4-13, an overt act in furtherance of the conspiracy.
63	02/27/2017	Defendant JIMMY WINFREY , an associate of YSL, did commit the felony offense of POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(j)(1), which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxxvi), and an overt act in furtherance of the conspiracy.

64	02/27/2017	Defendant JIMMY WINFREY , an associate of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , as alleged in Act 63 of this Count, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(j)(1), an overt act in furtherance of the conspiracy.
65	07/03/2017	Defendant QUAMARVIOUS NICHOLS , an associate of YSL, did commit the felony offense of POSSESSION OF MDMA WITH INTENT TO DISTRIBUTE , a controlled substance, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(b), which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxxiv), and an overt act in furtherance of the conspiracy.
66	07/03/2017	Defendant QUAMARVIOUS NICHOLS , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 12SC110015, in the Superior Court of Fulton County, Georgia, for the offense of CRIMINAL DAMAGE TO PROPERTY IN THE SECOND DEGREE on the 19 th day of July, 2013, an overt act in furtherance of the conspiracy.
67	07/03/2017	Defendant QUAMARVIOUS NICHOLS , an associate of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: POSSESSION OF MDMA WITH INTENT TO DISTRIBUTE , as alleged in Act 65 of this Count, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(b), an overt act in furtherance of the conspiracy.

68	09/24/2017	Defendants SERGIO KITCHENS and JEFFERY WILLIAMS , associates of YSL, did commit the felony offense of THEFT BY RECEIVING STOLEN PROPERTY , when, while possessing property, to wit: a firearm, the property of Trevon Lewis, that Kitchens or Williams knew or should have known was stolen with the intent of depriving Trevon Lewis of said property, in violation of Georgia law pursuant to O.C.G.A. § 16-8-7, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xii), and an overt act in furtherance of the conspiracy.
69	09/24/2017	Defendants SERGIO KITCHENS and JEFFERY WILLIAMS , associates of YSL, did commit the felony offense of POSSESSION OF METHAMPHETAMINE WITH INTENT TO DISTRIBUTE , a controlled substance, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(b), which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxxiv), and an overt act in furtherance of the conspiracy.
70	09/24/2017	Defendants SERGIO KITCHENS and JEFFERY WILLIAMS , associates of YSL, did commit the felony offense of POSSESSION OF HYDROCODONE WITH INTENT TO DISTRIBUTE , a controlled substance, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(b), which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxxiv), and an overt act in furtherance of the conspiracy.
71	09/24/2017	Defendants SERGIO KITCHENS and JEFFERY WILLIAMS , associates of YSL, did commit the felony offense of POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(j)(1), which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxxvi), and an overt act in furtherance of the conspiracy.

72	09/24/2017	Defendants SERGIO KITCHENS and JEFFERY WILLIAMS , associates of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: THEFT BY RECEIVING STOLEN PROPERTY , to wit: a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-8-7, POSSESSION OF METHAMPHETAMINE WITH INTENT TO DISTRIBUTE , a controlled substance, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(b), POSSESSION OF HYDROCODONE WITH INTENT TO DISTRIBUTE , a controlled substance, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(b), and POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(j)(1), as alleged in Acts 68, 69, 70 and 71 of this Count, an overt act in furtherance of the conspiracy.
73	12/30/2017	Defendants ANTONIO SUMLIN and JEFFREY WILLIAMS , associates of YSL, did appear in a video released on social media captioned "Original Slime Shit" showing Williams flashing YSL gang signs with lyrics stating "murder gang shit," "YSL until we're dead and pale," an overt act in furtherance of the conspiracy.
74	04/12/2018	Defendant JEFFREY WILLIAMS , an associate of YSL, did appear in a video released on social media captioned "Anybody" with Williams stating "I never killed anybody but I got something to do with that body," "I told them to shoot a hundred rounds," "ready for war like I'm Russia," "I get all type of cash, I'm a general," an overt act in furtherance of the conspiracy.
75	05/18/2018	Defendants SERGIO KITCHENS and JEFFERY WILLIAMS , associates of YSL, were the subject of a traffic stop for speeding, involved in the stop were two vehicles, one being driven by Williams, and another vehicle closely following Williams containing four individuals who were armed with numerous weapons with high capacity magazines to include an AK-47 with a 30 round magazine, an overt act in furtherance of the conspiracy.

76	05/25/2018	Defendant MARQUAVIUS HUEY , an associate of YSL, did commit the felony offense of THEFT BY RECEIVING STOLEN PROPERTY , when he possessed property, to wit: a firearm, the property of Jeremy Smith, that Huey knew or should have known was stolen with the intent of depriving Jeremy Smith of said property, in violation of Georgia law pursuant to O.C.G.A. § 16-8-7, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xii), and an overt act in furtherance of the conspiracy.
77	10/23/2018	Defendant QUAMARVIOUS NICHOLS , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 17SC153307, in the Superior Court of Fulton County, Georgia, for the offense of POSSESSION OF MDMA WITH INTENT TO DISTRIBUTE , a controlled substance, on the 27 th day of March, 2018, an overt act in furtherance of the conspiracy.
78	01/15/2019	Defendant JEFFERY WILLIAMS , an associate of YSL, did appear in a video released on social media titled “Bad Boy”, with lyrics stating “you better watch the way you breathe around me fore that breath be your last, boy,” “Smith & Wesson .45 put a hole in his heart better not play with me, killers they stay with me,” “I shot at his mommy, now he no longer mention me,” “I had on Margielas when I shot at the cunt, act like you want war and they gon’ smoke you like a blunt,” an overt act in furtherance of the conspiracy.
79	02/23/2019	Defendants DAMONE BLALOCK and RODALIOUS RYAN , associates of YSL, did unlawfully and with malice aforethought, commit the felony offense of MURDER , by causing the death of Jamari Holmes, a member of another gang, a human being, by shooting Jamari Holmes with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.

80	02/23/2019	Defendants DAMONE BLALOCK and RODALIOUS RYAN , associates of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, an object which when used offensively against a person is likely to result in serious bodily injury, upon the person of Bernard Mitchell, Jr., a member of another gang, by shooting at, toward, and in the direction of Bernard Mitchell, Jr. with said firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
81	02/23/2019	Defendants DAMONE BLALOCK and RODALIOUS RYAN , associates of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, an object which when used offensively against a person is likely to result in serious bodily injury, upon the person of Rodney Ooten, a member of another gang, by shooting at, toward, and in the direction of Rodney Ooten with said firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
82	02/24/2019	Defendant DAMONE BLALOCK , an associate of YSL, did pose for a photo released on social media flashing a YSL gang hand sign, with the caption, "SLIME OVER SLUTS" with a green heart emoji and green snake emoji, an overt act in furtherance of the conspiracy.
83	02/25/2019	Defendant RODALIOUS RYAN , an associate of YSL, did appear in a video released on social media displaying money with the caption "FUCK YFN," YFN being a rival street gang, an overt act in furtherance of the conspiracy.
84	04/19/2019	Defendant ANTONIO SUMLIN , an associate of YSL, did commit the felony offense of BURGLARY IN THE SECOND DEGREE , when, without authority and with the intent to commit a theft therein, he entered an unoccupied cargo container of CSX Transportation, located at 1590 Marietta Blvd, NW, Atlanta, Fulton County, Georgia, in violation of Georgia law pursuant to O.C.G.A. § 16-7-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(viii), and an overt act in furtherance of the conspiracy.

85	04/22/2019	Defendant JEVON FLEETWOOD , an associate of YSL, did commit the felony offense of HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE , by unlawfully, while in possession of a firearm, obtain a 2017 Dodge Charger from the person of Casey Battle by force and violence, in violation of Georgia law pursuant to O.C.G.A. § 16-5-44.1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(B), and an overt act in furtherance of the conspiracy.
86	04/22/2019	Defendant JEVON FLEETWOOD , an associate of YSL, did, with the intent to commit a theft, commit the felony offense of ARMED ROBBERY , by taking property, to wit: a cell phone and U.S. currency, from or from the immediate presence of another, to wit: Casey Battle, by use of an offensive weapon, to wit: a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-8-41, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xiii), and an overt act in furtherance of the conspiracy.
87	04/22/2019	Defendant JEVON FLEETWOOD , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 09SC76107, in the Superior Court of Fulton County, State of Georgia, for the felony offense of POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE on the 7 th day of January, 2011, an overt act in furtherance of the conspiracy.
88	04/26/2019	Defendant MARQUAVIUS HUEY , an associate of YSL, did, with the intent to commit a theft, commit the felony offense of ARMED ROBBERY , by taking property, to wit: a debit card, U.S. currency and jewelry, from or from the immediate presence of another, to wit: Dajuan Maynard, by use of an offensive weapon, to wit: a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-8-41, which is an act of racketeering activity under O.C.G.A. 16-14-3 (5)(A)(xiii), and an overt act in furtherance of the conspiracy.

89	04/26/2019	Defendant MARQUAVIUS HUEY , an associate of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, an object which when used offensively against a person is likely to result in serious bodily injury, upon the person of Dajuan Maynard, by striking Dajuan Maynard in the face with said firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
90	04/26/2019	Defendant MARQUAVIUS HUEY , an associate of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON , to wit: a firearm, upon the person of Demon Jenkins, by pointing at, toward and in the direction of Demon Jenkins with said firearm, placing Demon Jenkins in reasonable apprehension of immediately receiving a violent injury, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.
91	05/10/2019	Defendant JEVON FLEETWOOD , an associate of YSL, did unlawfully with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER , upon the person of Milton Howard, Jr., by shooting at Milton Howard, Jr. with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.
92	05/10/2019	Defendant JEVON FLEETWOOD , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 5:18-mj-00051, in the United States District Court, Middle District of Georgia, for the offense of INTERFERENCE WITH COMMERCE BY THREAT OF VIOLENCE on the 19 th day of April, 2012, an overt act in furtherance of the conspiracy.

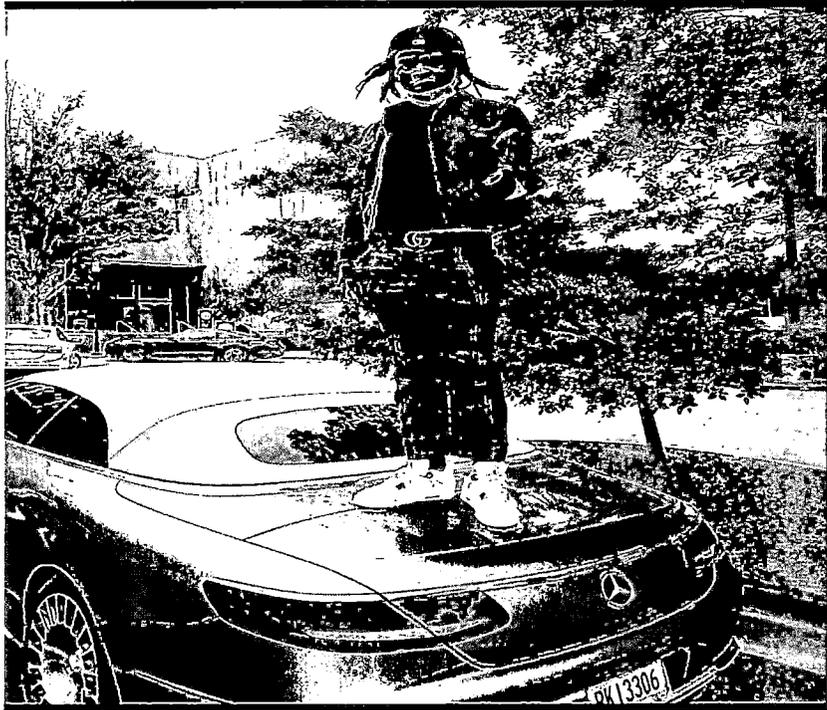
93	05/10/2019	Defendant JEVON FLEETWOOD , an associate of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: ATTEMPTED MURDER , an act involving violence and possession or use of a weapon, as alleged in Act 91 of this Count, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, an overt act in furtherance of the conspiracy.
94	06/13/2019	Defendant JEVON FLEETWOOD , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 5:18-mj-00051, in the United States District Court, Middle District of Georgia, for the offense of INTERFERENCE WITH COMMERCE BY THREAT OF VIOLENCE on the 19 th day of April, 2012, an overt act in furtherance of the conspiracy.
95	07/22/2019	Defendants MILES FARLEY, WUNNIE LEE, QUAMARVIOUS NICHOLS and SHANNON STILLWELL , associates of YSL, did appear in a video released on social media with Stillwell wearing red and a YSL necklace, stating “I just beat a murder rap pay my lawyer 30 for that me and my slimes above the law,” an overt act in furtherance of the conspiracy.
96	08/08/2019	Defendant JEFFERY WILLIAMS , an associate of YSL, posted an image on social media tagging YFN Lucci stating “yfn if ain like what u do for your mother and kids I WOULDVE BEEN KILLED U,” an overt act in furtherance of the conspiracy.

97	09/16/2019	Defendant JEFFERY WILLIAMS , an associate of YSL, posted a video titled "Just How It Is," with lyrics stating "I escaped every one of the licks cause I was supposed to be rich, I don't care nothing bout no cop, I'm tellin you just how it is," "Hit em with the MAC now, now his whole body scabbed," "I done for the crew, I done did the robbin, I done did the jackin, now I'm full rappin," "last nigga tried me almost got popped in Lenox, ask the cops, ask the detectives, they know all the business, ask the cops and the detectives, all the jurisdictions," "gave the lawyer close to two mil, he handles all the killings," "we don't speak bout shit on wax, it's all mob business, we know to kill the biggest cats of all kittens," an overt act in furtherance of the conspiracy.
98	09/25/2019	Defendant SHANNON STILLWELL , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 10SC5687662, in the Superior Court of Fulton County, Georgia, for the offenses of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY and BURGLARY , on the 27 th day of May, 2010; and Indictment 11SC98860, in the Superior Court of Fulton County, Georgia, for the offense of BURGLARY , on the 2 nd day of June, 2011; and Indictment 13SC121320, in the Superior Court of Fulton County, Georgia, for the offense POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , on the 19 th day of September, 2013; and Indictment 15SC140132, in the Superior Court of Fulton County, Georgia, for the offenses of POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE, POSSESSION OF A FIREARM BY A CONVICTED FELON, and POSSESSION OF FIREARM DURING COMMISSION OF A FELONY , on the 10 th day of March, 2016, an overt act in furtherance of the conspiracy.
99	10/07/2019	Defendant DAMEKION GARLINGTON , an associate of YSL, did appear in a video released on social media wearing a "YSL" pendant stating "I can't fuck with you cuz you told, rat..., blood ya I earned this stain," an overt act in furtherance of the conspiracy.
100	01/21/2020	Defendant DERONTAE BEBEE , an associate of YSL, did commit the felony offense of POSSESSION OF COCAINE , a controlled substance, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(a), which is an act of racketeering activity under O.C.G.A. § 16-14-3(5)(A)(xxxiv), an overt act in furtherance of the conspiracy.

101	02/19/2020	Defendants DAMEKION GARLINGTON and WUNNIE LEE , associates of YSL, did engage in conversation regarding rival YFN gang members disrespecting YSL, to which Garlington responded “Fuk dem boys,” an overt act in furtherance of the conspiracy.
102	03/12/2020	Defendants MARQUAVIUS HUEY and JEFFERY WILLIAMS , associates of YSL, did engage in a conversation, where Williams and Huey were discussing a vehicle theft and Williams directs Huey to tell another “if he don’t take it back he goin die,” an overt act in furtherance of the conspiracy.
103	04/25/2020	Defendants MILES FARLEY, QUANTAVIOUS GRIER, DEAMONTE KENDRICK and WUNNIE LEE , associates of YSL, posted a video on social media titled “Mob Ties,” defendants were flashing gang signs with lyrics stating “and we ride round with guns probably big as us, and we be on some 2Pac shit, Hit Em Up,” “nigga play with Unfoonk and get hogtied, Nigga play with Unfoonk, then they all die, Talking bout knocking off your big homie, even his small fry, why would I lie,” “Old murder never switching up, you say you niggas gangsters, you ain’t did enough, spin the block a couple times think they did enough, Hail Mary, 2Pac shit, I’m bout to Hit Em Up” “every nigga around me wicked, like why would I lie, Slime ball nigga like ya ya ya ,” “why would I lie, I got mob ties,” “tell them spin a bend, they send shots flying,” “knockin off yo big homie, bitch,” an overt act in furtherance of the conspiracy.
104	05/08/2020	Defendant DERONTAE BEBEE , an associate of YSL, did commit the felony offense of SALE OF MARIJUANA , in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(j)(1), which is an act of racketeering activity under O.C.G.A. § 16-14-3(5)(A)(xxxvi), and an overt act in furtherance of the conspiracy.
105	05/08/2020	Defendant DERONTAE BEBEE , an associate of YSL, did commit the felony offense of POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(j)(1), which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxxvi), and an overt act in furtherance of the conspiracy.

106	05/08/2020	Defendant DERONTAE BEBEE , an associate of YSL, did commit the felony offense of THEFT BY RECEIVING STOLEN PROPERTY , when he possessed property, to wit: a firearm, the property of Michael Eubanks, that Bebee knew or should have known was stolen with the intent of depriving Michael Eubanks of said property in violation of Georgia law pursuant to O.C.G.A. § 16-8-7, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xii), and an overt act in furtherance of the conspiracy.
107	05/08/2020	Defendant DERONTAE BEBEE , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY A CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony on Accusation 20SC174500, in the Superior Court of Fulton County, Georgia, for the offense of POSSESSION OF COCAINE on the 10 th day of March, 2020, an overt act in furtherance of the conspiracy.
108	05/08/2020	Defendant DERONTAE BEBEE , an associate of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: SALE OF MARIJUANA and POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE , as alleged in Acts 104 and 105 of this Count, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(j)(1), an overt act in furtherance of the conspiracy.
109	06/12/2020	Defendant SERGIO KITCHENS , an associate of YSL, appeared in a video released on social media titled "Fox 5," wearing a "YSL" pendant and a "Slatt" pendant, with lyrics stating "We got ten-hundred round choppers," an overt act in furtherance of the conspiracy.

110	06/13/2020	<p>Defendant WUNNIE LEE and MILES FARLEY associates of YSL, did appear in a music video released on social media titled “Where You From,” with lyrics stating “free Lil Rod,” “Fuck your squad,” “where you from, I’m from Bleveland, throw your set up,” “but where I’m from nigga talk too much then get wet up,” “the opps hate the crew we getting this paper and we ducking cases, slime, slime,” “free Lil Shannon,” “I’m a rock that crew thuggin,” “Ain’t know about tick,” “slimelife Young Thug nigga,” an overt act in furtherance of the conspiracy.</p>
111	06/23/2020	<p>Defendant MARTINEZ ARNOLD and DEAMONTE KENDRICK, associates of YSL, did pose for a photo released on social media wearing a shirt with Arnold wearing clothing with the word “Slime” on the front, with the caption “roll down the window, he running like Riccy,” an overt act in furtherance of the conspiracy.</p>
112	07/23/2020	<p>Defendant JEVON FLEETWOOD, an associate of YSL, did pose for a photo released on social media showing a “YSL” tattoo on the right side of his face, an overt act in furtherance of the conspiracy.</p> <div data-bbox="521 968 1354 1833" data-label="Image"> </div>

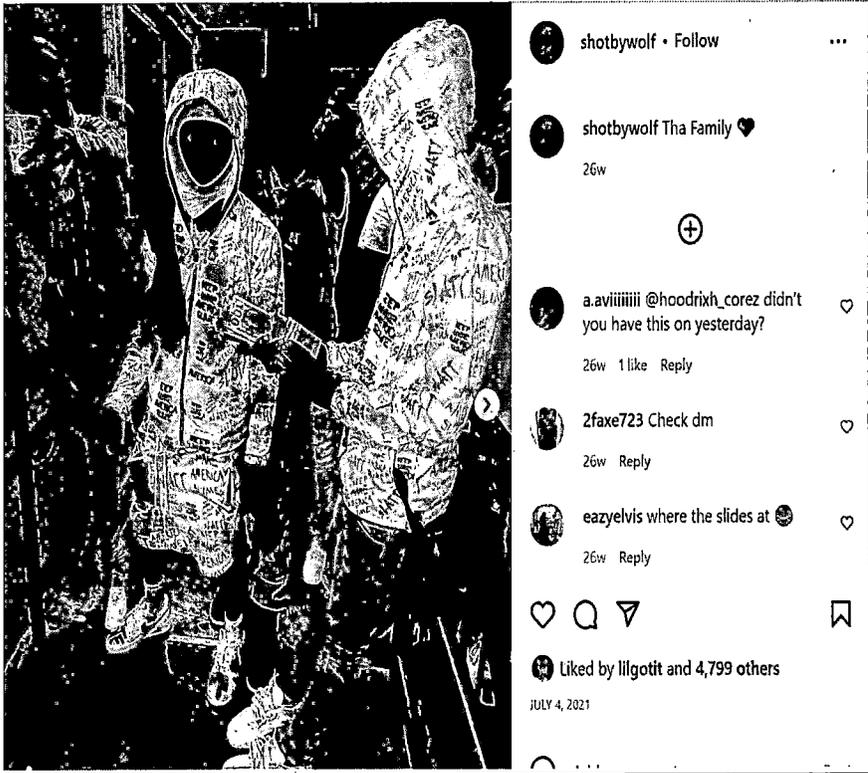
113	08/11/2020	<p>Defendant DEAMONTE KENDRICK, an associate of YSL, did pose for a photo released on social media standing on the vehicle of Rayshawn Bennett AKA “YFN Lucci”, Rayshawn Bennett being the leader of a rival street gang, an overt act in furtherance of the conspiracy.</p> 
114	09/05/2020	<p>Defendant QUANTAVIOUS GRIER, an associate of YSL, did commit the felony offense of THEFT BY RECEIVING STOLEN PROPERTY, when he possessed property, to wit: a firearm, the property of Quincy Campbell, that Grier knew or should have known was stolen with the intent of depriving Quincy Campbell of said property in violation of Georgia law pursuant to O.C.G.A. § 16-8-7, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xii), and an overt act in furtherance of the conspiracy.</p>
115	09/18/2020	<p>Defendant SHANNON STILLWELL, an associate of YSL, did pose for a photo released on social media captioned “Ain’t nun more compatible than a trench, a carbon while in the trenches,” an overt act in furtherance of the conspiracy.</p>

116	10/01/2020	Defendant MARQUAVIUS HUEY , an associate of YSL, did, with the intent to commit a theft, commit the felony offense of ARMED ROBBERY , by taking property, to wit: an iPhone, from or from the immediate presence of another, to wit: Gary Hollman, by use of an offensive weapon, to wit: a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-8-41, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xiii), and an overt act in furtherance of the conspiracy.
117	10/01/2020	Defendant MARQUAVIUS HUEY , an associate of YSL, did, with the intent to commit theft, commit the felony offense of HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE , by unlawfully, while in possession of a firearm, obtain a 2016 Buick LaCrosse from the person of Gary Holliman by force and violence, in violation of Georgia Law pursuant to O.C.G.A. § 16-5-44.1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(B), and an overt act in furtherance of the conspiracy.
118	10/01/2020	Defendant MARQUAVIUS HUEY , an associate of YSL, did, with the intent to commit a theft, commit the felony offense of ARMED ROBBERY , by taking property, to wit: an iPhone, from or from the immediate presence of another, to wit: Dilmesha Coppage, by use of an offensive weapon, to wit: a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-8-41, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xiii), and an overt act in furtherance of the conspiracy.
119	10/06/2020	Defendants WUNNIE LEE and SHANNON STILLWELL , associates of YSL, did pose for a photo released on social media with Lee wearing clothing with the words "Slime" and "Is you Slime Enough," with the caption "Fuck the other side put em on TV's bout my dawgs...Soulja Rees, Bloody Tees, Glock with beams bout my dawgs, cause a scene bout my dawg, clear a scene bout my dawg," an overt act in furtherance of the conspiracy.
120	10/19/2020	Defendant MILES FARLEY , an associate of YSL, did pose for a photo released on social media wearing clothing with the words "Slime" "is you slime enough," an overt act in furtherance of the conspiracy.

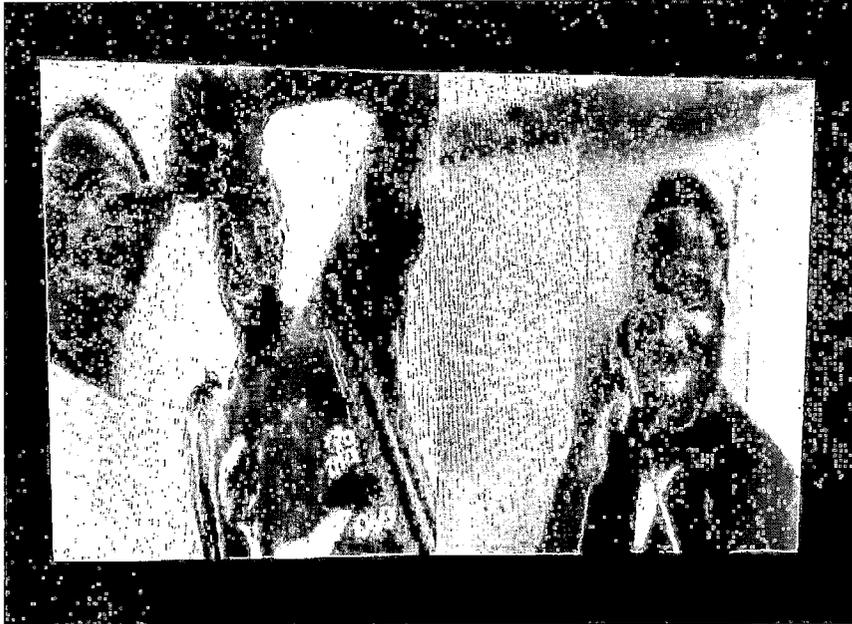
121	11/06/2020	Defendant JIMMY WINFREY , an associate of YSL, did pose for a photo released on social media with the caption, "IM FREE DEATHB4DISHONOR SLATTMAFIA BIZNESS 4EVERYOUNG GOATFREE BANKROLLMAFIA YSL," an overt act in furtherance of the conspiracy.
122	11/13/2020	<p>Defendant JIMMY WINFREY, an associate of YSL, did pose for a photo released on social media with the caption, "I WAS LOCKED UP NOT FUCKED UP #DEATHB4DISHONOR #FREEATLAST #BANKROLLMAFIA #SLATTBIZNESS," an overt act in furtherance of the conspiracy.</p> 
123	11/16/2020	Defendant MARQUAVIUS HUEY , an associate of YSL, did commit the felony offense of TERRORISTIC THREATS , when in a conversation with Justice Woodard, after Woodard stated she would see him in court, Huey stated "You'll die if you put the police on me," in violation of Georgia law pursuant to O.C.G.A. § 16-11-37, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xxx), and an overt act in furtherance of the conspiracy.
124	11/20/2020	Defendant ANTONIO SUMLIN , an associate of YSL, did pose for a photo released on social media wearing red with the letters "MASA" [AKA make America slime again], while in Cleveland Avenue Park, an overt act in furtherance of the conspiracy.

125	12/18/2020	Defendants DEAMONTE KENDRICK, SERGIO KITCHENS, and JEFFERY WILLIAMS , associates of YSL, appeared in a video released on social media titled "Take It To Trial," with lyrics stating "take this shit to motherfucking trial," "for slimes you know I kill, trial, I done beat it twice, state, I'm undefeated like feds came and snatched me, I don't know, no point in asking, I was on Bleveland, stuck like a magnet, Bitch ass nigga, I shoot at your mammy, need to stand down, I up my stamina, take it to trial, get an appeal, take it to trial, yeah, you gon wack em," "pay for that casket, that's just if we whack em," "my young niggas pulling up, Bentleys, Aston Martins, Raris and Teslas, Strapped with a FN, choppas, carbons," "YSL slimey and shady," "watch me whack that bitch, pop em like a cyst, Glock with the assist," an overt act in furtherance of the conspiracy.
126	01/21/2021	Defendant ANTONIO SUMLIN , an associate of YSL, did pose for a photo released on social media displaying gang tattoos "YSL" on his chest and "slime for life" on his right arm, an overt act in furtherance of the conspiracy.
127	02/04/2021	Defendants WUNNIE LEE, TRONTAVIOUS STEPHENS and JEFFERY WILLIAMS , associates of YSL, did engage in conversation, where Williams states "YSL rule the world kid. 24m on a nigga head, y'all just start bringing me the money," "man y'all niggas stop playing with me," an overt act in furtherance of the conspiracy.
128	04/08/2021	Defendant ANTONIO SLEDGE , an associate of YSL, did pose for a photo released on social media wearing pants with the letters "OTS" [AKA only the slime] with the caption "OG'z" with a green snake emoji and green heart emoji, an overt act in furtherance of the conspiracy.
129	04/16/2021	Defendant JEFFERY WILLIAMS , an associate of YSL, appeared in a song released on social media titled "Really Be Slime," with lyrics stating "My nigga, really, they slime, and we committing them crimes," "hop out and shoot," "roll one up for the gang," "you wanna be slime? Go catch you a body," "me and lil bro, we used to steal from the store, we had to stick it and go," an overt act in furtherance of the conspiracy.

130	04/16/2021	<p>Defendant JEFFERY WILLIAMS, an associate of YSL, appeared in a song released on social media titled "Slatty," with lyrics stating "I killed his man in front of his momma, like fuck lil bruh, sister and his cousin," "I shoot out," "kill em, not leaving a trace," "I had to break in the safe, yeah, and I didn't leave em a trace," "dissect your body like science class, nigga," "gangster cause you got a body, lil nigga, magazine clips, so you might get your issue, you think you gangster cause you got a pistol," "look at my trigger, my trigger start itching," "YSL, we going overboard," an overt act in furtherance of the conspiracy.</p>
131	04/16/2021	<p>Defendants MARTINEZ ARNOLD, SERGIO KITCHENS and JEFFERY WILLIAMS, associates of YSL, appeared in a video released on social media titled "Ski," with lyrics stating "I fuck with slatts and we come to eat rats and I came with some fuckin' piranhas" "I tote an FN on me, call Neechie-Neech, it's a Glock he keep" "Duke Rollin' 60's, he locked in C's," an overt act in furtherance of the conspiracy.</p>  <p>shopify.com is quick and easy to shop. Get behind custom care, printing and engraving. Shop from shopify.com</p> <p>Young Thug & Gunna - Ski (Official Video) Young Stoner Life 36,515,117 views · Premiered Apr 16, 2021</p> <p>462K DISLIKE SHARE CLIP SAVE ...</p>
132	05/13/2021	<p>Defendants MARTINEZ ARNOLD, MILES FARLEY, QUANTAVIOUS GRIER, WUNNIE LEE, TRONTAVIOUS STEPHENS, ANTONIO SUMLIN and JEFFERY WILLIAMS, associates of YSL, did engage in a conversation, where Williams asks "y'all ain't beat em up or shot em yet," then states "y'all niggas getting soft," an overt act in furtherance of the conspiracy.</p>

133	06/16/2021	Defendant DEAMONTE KENDRICK , an associate of YSL, did pose for a photo released on social media wearing a red bandanna and a “YSL” pendant, an overt act in furtherance of the conspiracy.
134	07/04/2021	<p>Defendants DEAMONTE KENDRICK and WUNNIE LEE, associates of YSL, did pose for a photo released on social media with Kendrick flashing a YSL gang hand sign, while Lee is wearing clothing with the lettering, “KEEP AMERICA SLIME”, “SLATT”, “MAKE AMERICA SLIME,” an overt act in furtherance of the conspiracy.</p> 
135	07/10/2021	Defendant JIMMY WINFREY , an associate of YSL, did commit the felony offense of POSSESSION OF OXYCODONE , a controlled substance, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(a), which is an act of racketeering activity under O.C.G.A. § 16-14-3(5)(A)(xxxiv), and an overt act in furtherance of the conspiracy.

136	07/10/2021	<p>Defendant JIMMY WINFREY, an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY A CONVICTED FELON, in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 15-9-152765-28, in the Superior Court of Cobb County, Georgia, for the offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY on the 11th day of November, 2015, an overt act in furtherance of the conspiracy.</p>
137	07/10/2021	<p>Defendant JIMMY WINFREY, an associate of YSL, did commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)), when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: POSSESSION OF OXYCODONE, a controlled substance, in violation of Georgia law pursuant to O.C.G.A. § 16-13-30(a), as alleged in Act 135 of this Count, and an overt act in furtherance of the conspiracy.</p>
138	08/28/2021	<p>Defendant DEAMONTE KENDRICK, an associate of YSL, did pose for a photo released on social media holding a red colored hat with a photo of a rat crossed out, with the caption “YSL,” “noratsallowed,” an overt act in furtherance of the conspiracy.</p> 

139	09/01/2021	<p>Defendants MARQUAVIUS HUEY, TENQUARIUS MENDER and JEFFERY WILLIAMS, associates of YSL, conducted a recorded video call while Tenquarius Mender was an inmate at the Fulton County jail, said video call being recorded in the normal course of business, and during said call Mender stated he needed something, Williams pointed to Huey to take care of it and flashed Mender a YSL gang sign, an overt act in furtherance of the conspiracy.</p> 
140	09/04/2021	<p>Defendants MARQUAVIUS HUEY and JEFFERY WILLIAMS, associates of YSL, did pose for a photo released on social media captioned “from lockdown to a jet slat biz,” an overt act in furtherance of the conspiracy.</p>
141	09/11/2021	<p>Defendant MILES FARLEY, an associate of YSL, did pose for a photo released on social media wearing clothing with the words “Slime or Die,” displaying tattoos stating “ESPN” [AKA every slime plays nasty] and “ROC crew” [AKA raised on Cleveland], an overt act in furtherance of the conspiracy.</p>
142	09/13/2021	<p>Defendant DEAMONTE KENDRICK, an associate of YSL, did pose for a photo, wearing a red bandana shirt standing in front of a spray painted fence with the word “SLATT,” [AKA slime love all the time], an overt act in furtherance of the conspiracy.</p>

143	09/29/2021	<p>Defendants DERONTAE BEBEE and CHRISTIAN EPPINGER, associates of YSL, did pose for a photo released on social media captioned “you know I hang with them snakes on da block gotta watch out for Jakes,” with Bebee wearing clothing with the lettering “OTS” and the words “only the slime,” and Eppinger wearing clothing with the words “keep America Slime,” an overt act in furtherance of the conspiracy.</p> 
144	10/01/2021	<p>Defendant RODALIUS RYAN, an associate of YSL, did pose for a photo released on social media while Ryan was in the Georgia Department of Corrections custody, with the caption “If You Xaught A Xase & Stayed Solidd You Deserve A Bag When You Get Home,” an overt act in furtherance of the conspiracy.</p>

145	10/04/2021	<p>Defendants WUNNIE LEE and RODALIUS RYAN, associates of YSL, did pose for a photo released on social media from the account “slimelife.shawty”, holding an unknown amount of cash, with the caption “Sorry we made you thug early lil Thug,” an overt act in furtherance of the conspiracy.</p>  <p>slimelife.shawty Knew it was more to life than sallin blow & Choppa bussin , but what's the good in knowin better if ain tellem nothin. #11/20/16 made us we talked about that in that cell the other day 🤍 I'm glad we was able to talk face to face that shit gave me chills , I wish the circumstances was better and we could talk out here but I was thankful for that moment fasho . I got so much to say but that's our business. I love u my lil thug . I'ma try my best to come and get you back word to 11:20. #BottomBoy4L #FreeLilRod P.s im sorry we made you thug early lil thug 🤍</p>
146	10/06/2021	<p>Defendant DAMEKION GARLINGTON, an associate of YSL, did receive a communication through social media from another YSL member, to wit: Woody, AKA Kenneth Copeland, stating “they trying to indict us on that body,” an overt act in furtherance of the conspiracy.</p>
147	10/12/2021	<p>Defendants DERONTAE BEBEE and CHRISTIAN EPPINGER, associates of YSL, did, with the intent to commit a theft, commit the felony offense of ARMED ROBBERY, by taking property, to wit: a diamond chain and a watch, from or from the immediate presence of another, to wit: Darius Smith, by use of an offensive weapon, to wit: a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-8-41, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xiii), and an overt act in furtherance of the conspiracy.</p>

148	10/12/2021	Defendants DERONTAE BEBEE and CHRISTIAN EPPINGER , associates of YSL, did commit the felony offense of HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE , by unlawfully, while in possession of a firearm, obtain a 2003 GMC Savana from the person of Darius Smith by force and violence, in violation of Georgia Law pursuant to O.C.G.A. § 16-5-44.1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(B), and an overt act in furtherance of the conspiracy.
149	11/05/2021	Defendants DERONTAE BEBEE, CHRISTIAN EPPINGER and WUNNIE LEE , associates of YSL, did pose for a photo released on social media with Bebee wearing clothing with the lettering “OTS” [AKA only the slime], an overt act in furtherance of the conspiracy.
150	11/14/2021	Defendants MARQUAVIUS HUEY and JEFFERY WILLIAMS , associates of YSL, were communicating when Huey stated “you know I’m ready to handle da business & go sit down if I got to bout any one of y’all on my momma,” an overt act in furtherance of the conspiracy.
151	12/05/2021	Defendant ANTONIO SLEDGE , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY A CONVICTED FELON , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 15SC138994, in the Superior Court of Fulton County, Georgia, for the offenses of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY, AGGRAVATED BATTERY, AGGRAVATED ASSAULT WITH A DEADLY WEAPON and POSSESSION OF A FIREARM DURING COMMISSION OF A FELONY on the 10 th day of January, 2018, an overt act in furtherance of the conspiracy.
152	12/27/2021	Defendant SHANNON STILLWELL , an associate of YSL, did pose for a photo released on social media wearing a hooded sweatshirt with the lettering “Slime,” an overt act in furtherance of the conspiracy.

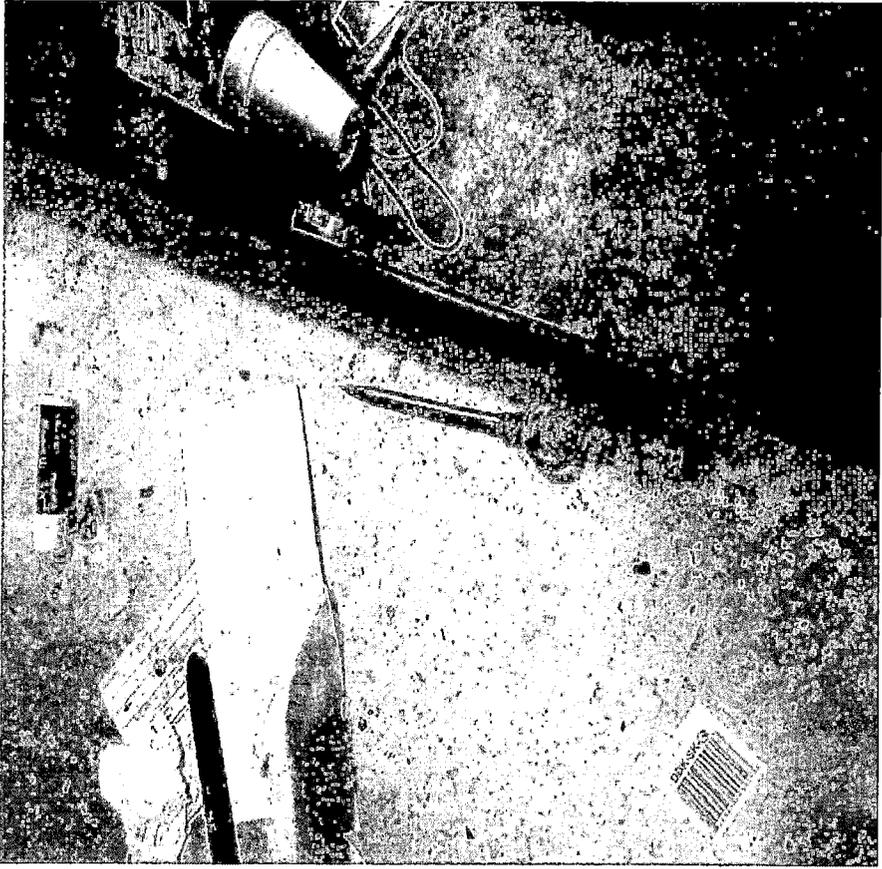
153	12/29/2021	<p>Defendants SHANNON STILLWELL and ANTONIO SUMLIN, associates of YSL, did pose for a photo released on social media with the caption, “Suit up and lace your Boots It’s War Time,” an overt act in furtherance of the conspiracy.</p> 
154	12/30/2021	<p>Defendant RODALIUS RYAN, an associate of YSL, did unlawfully commit the felony offense of POSSESSION OF A WEAPON BY AN INMATE, when, while incarcerated with the Georgia Department of Corrections, did appear in a video possessing an illegal weapon, to wit: a shank, beyond the guard lines, in violation of Georgia law pursuant to O.C.G.A. § 42-5-18, an overt act in furtherance of the conspiracy.</p>
155	12/31/2021	<p>Defendant JEFFERY WILLIAMS, an associate of YSL, did pose for a photo released on social media wearing a “YSL” pendant with his index finger wiping under his nose, an overt act in furtherance of the conspiracy.</p>

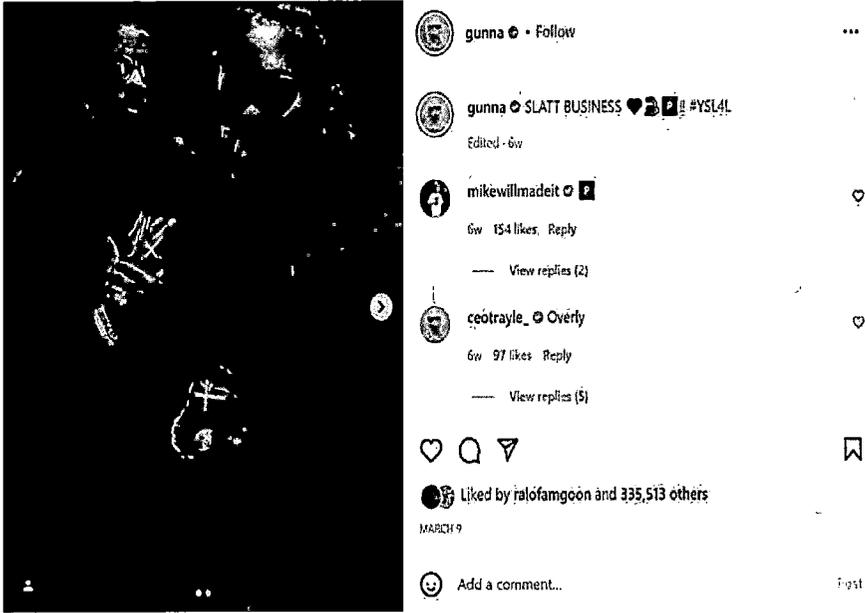
156	01/16/2022	<p>Defendant JEFFERY WILLIAMS, an associate of YSL, did appear in a video released on social media flashing a “Bloods” gang sign, an overt act in furtherance of the conspiracy.</p> 
157	01/22/2022	<p>Defendant CHRISTIAN EPPINGER, an associate of YSL, did commit the felony offense of THEFT BY TAKING, by unlawfully taking property, to wit: a 2018 Volkswagen Jetta, of another, to wit: Willie Moore, with the intent of depriving Willie Moore of said property, in violation of Georgia law pursuant to O.C.G.A. § 16-8-2, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(xii), and an overt act in furtherance of the conspiracy.</p>
158	01/27/2022	<p>Defendant SHANNON STILLWELL, an associate of YSL, did pose for a photo released on social media wearing a hoodie with the word “Slime” and tagging Peanuts’ tombstone in Spanish [“mani tumba de piedra”], an overt act in furtherance of the conspiracy.</p>

159	02/07/2022	Defendant CHRISTIAN EPPINGER , an associate of YSL, did unlawfully with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER , upon the person of David Rodgers, a uniformed Atlanta Police Officer while in the performance of his duties, by shooting David Rodgers with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.
160	02/07/2022	Defendant CHRISTIAN EPPINGER , an associate of YSL, did unlawfully with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER , upon the person of William Johnson, an Atlanta Police Office in the performance of his official duties, by shooting at William Johnson with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.
161	02/07/2022	Defendant CHRISTIAN EPPINGER , an associate of YSL, did commit the felony offense of POSSESSION OF A FIREARM BY A FIRST OFFENDER PROBATIONER , in violation of Georgia law pursuant to O.C.G.A. § 16-11-131, by possessing a firearm, to wit: a handgun, after having been sentenced pursuant to Article 3 of Chapter 8 of Title 42 of the Official Code of Georgia to a term of probation as a Felony First Offender for the felony offense of ROBBERY in Indictment 16SC143618, in the Superior Court of Fulton County, Georgia, on the 2 nd day of December, 2016, an overt act in furtherance of the conspiracy.

162	02/07/2022	<p>Defendant CHRISTIAN EPPINGER, an associate of YSL, had the letters "YSL," and other gang tattoos on his face, an overt act in furtherance of the conspiracy.</p> 
163	02/07/2022	<p>Defendant CHRISTIAN EPPINGER, an associate of YSL, did unlawfully commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)), when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: the ATTEMPTED MURDER of David Rodgers, a uniformed Atlanta Police Officer while in the performance of his official duties, an act involving violence and possession or use of a weapon, as alleged in Act 159 of this Count, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, an overt act in furtherance of the conspiracy.</p>

164	02/07/2022	Defendant CHRISTIAN EPPINGER , an associate of YSL, did unlawfully commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: the ATTEMPTED MURDER of William Johnson, an Atlanta Police Officer while in the performance of his official duties, an act involving violence and possession or use of a weapon, as alleged in Act 160 of this Count, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, an overt act in furtherance of the conspiracy.
165	02/09/2022	Defendants KAHLIEFF ADAMS, DAMEKION GARLINGTON and JAYDEN MYRICK , associates of YSL, did, unlawfully with malice aforethought and with the intent to kill, commit the felony offense of ATTEMPTED MURDER , upon the person of Rayshawn Bennett, AKA YFN Lucci, a rival gang member, by stabbing, and stabbing at, Rayshawn Bennett with a shank, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.
166	02/09/2022	Defendant JAYDEN MYRICK , an associate of YSL, did unlawfully commit the felony offense of POSSESSION OF A WEAPON BY AN INMATE , when, while incarcerated at the Fulton County Jail, did possess an illegal weapon, to wit: a shank, beyond the guard lines, in violation of Georgia law pursuant to O.C.G.A. § 42-5-18, an overt act in furtherance of the conspiracy.
167	02/09/2022	Defendants KAHLIEFF ADAMS, DAMEKION GARLINGTON and JAYDEN MYRICK , associates of YSL, did unlawfully commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: the ATTEMPTED MURDER of Rayshawn Bennett, AKA YFN Lucci, a rival gang member, an act involving violence and possession or use of a weapon, as alleged in Act 165 of this Count, in violation of Georgia law pursuant to O.C.G.A. § 16-4-1, an overt act in furtherance of the conspiracy.

168	02/12/2022	Defendant JEFFERY WILLIAMS , an associate of YSL, did pose for a photo released on social media wearing a “YSL” pendant, a bracelet with the word “Slime”, and with a red letter “B” tattoo on his chest, an overt act in furtherance of the conspiracy.
169	02/18/2022	<p>Defendants MARQUAVIUS HUEY and TENQUARIUS MENDER, associates of YSL, did unlawfully commit the felony offense of POSSESSION OF A WEAPON BY AN INMATE, when, while incarcerated at the Fulton County Jail, did possess an illegal weapon, to wit: a shank, beyond the guard lines, in violation of Georgia law pursuant to O.C.G.A. § 42-5-18, an overt act in furtherance of the conspiracy.</p> 
170	02/18/2022	Defendants MARQUAVIUS HUEY and TENQUARIUS MENDER , associates of YSL, did unlawfully commit the felony offense of POSSESSION OF A TELECOMMUNICATIONS DEVICE BY AN INMATE , when, while incarcerated at the Fulton County Jail, did possess, without authority, a communication device, to wit: a cell phone, beyond the guard line, in violation of Georgia law pursuant to O.C.G.A. § 42-5-18, an overt act in furtherance of the conspiracy.

171	02/22/2022	<p>Defendants CHRISTIAN EPPINGER and ANTONIO SUMLIN, associates of YSL, did commit the felony offense of CONSPIRACY TO COMMIT MURDER, by discussing how to obtain the permission of “Slime,” AKA Jeffery Williams, to make a second attempt to murder Rayshawn Bennett, AKA YFN Lucci, while Rayshawn Bennett was incarcerated at the Fulton County Jail, said first attempt to murder Rayshawn Bennett being alleged in Act 144 of this Count, in violation of Georgia law pursuant to O.C.G.A. § 16-4-8, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(B), and an overt act in furtherance of the conspiracy.</p>
172	03/09/2022	<p>Defendants SERGIO KITCHENS and JEFFERY WILLIAMS, associates of YSL, did pose for a photo released on social media captioned “slatt business, YSL4L,” an overt act in furtherance of the conspiracy.</p> 
173	03/14/2022	<p>Defendants MILES FARLEY, DAMEKION GARLINGTON, QUAMARVIOUS NICHOLS and SHANNON STILLWELL, associates of YSL, did unlawfully and with malice aforethought, commit the felony offense of MURDER, by causing the death of Shymel Drinks, a human being, by shooting Shymel Drinks, a rival gang member, with a firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-1, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(iv), and an overt act in furtherance of the conspiracy.</p>

174	03/14/2022	<p>Defendant SHANNON STILLWELL, an associate of YSL, did commit the felony offense of POSSESSION OF FIREARM BY CONVICTED FELON PREVIOUSLY CONVICTED OF FELONY INVOLVING THE USE OR POSSESSION OF A FIREARM, in violation of Georgia law pursuant to O.C.G.A. § 16-11-133, when, after having been convicted of felonies involving the use or possession of a firearm in Indictment 15SC140132, in the Superior Court of Fulton County, Georgia, for the offenses of POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE and POSSESSION OF A FIREARM BY A CONVICTED FELON, on the 10th day of March, 2016; and Indictment 19SC173371, in the Superior Court of Fulton County, Georgia, for the offense of POSSESSION OF A FIREARM BY CONVICTED FELON, on the 17th day of January, 2020, did possess or have within arm's reach of his person a firearm during the commission of a crime against or involving the person of another, to wit: the MURDER of Shymel Drinks, an overt act in furtherance of the conspiracy.</p>
175	03/14/2022	<p>Defendant QUAMARVIOUS NICHOLS, an associate of YSL, did commit the felony offense of POSSESSION OF FIREARM BY CONVICTED FELON PREVIOUSLY CONVICTED OF FELONY INVOLVING THE USE OR POSSESSION OF A FIREARM, in violation of Georgia law pursuant to O.C.G.A. § 16-11-133, when, after having been convicted of felonies involving the use or possession of a firearm in Indictment 17SC153307, in the Superior Court of Fulton County, Georgia, for the offenses of POSSESSION OF MDMA WITH INTENT TO DISTRIBUTE and POSSESSION OF A FIREARM BY A CONVICTED FELON, on the 27th day of March, 2018; and Indictment 18SC162953, in the Superior Court of Fulton County, Georgia, for the offense of POSSESSION OF A FIREARM BY CONVICTED FELON, on the 6th day of November, 2020, did possess or have within arm's reach of his person a firearm during the commission of a crime against or involving the person of another, to wit: the MURDER of Shymel Drinks, an overt act in furtherance of the conspiracy.</p>

176	03/14/2022	Defendants MILES FARLEY, DAMEKION GARLINGTON, QUAMARVIOUS NICHOLS and SHANNON STILLWELL , associates of YSL, did unlawfully commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a)) , when, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: the MURDER of Shymel Drinks, a rival gang member, an act involving violence and possession or use of a weapon, as alleged in Act 173 of this Count, in violation to Georgia law pursuant to O.C.G.A. § 16-5-1, an overt act in furtherance of the conspiracy.
177	04/03/2022	Defendants DAMEKION GARLINGTON and QUANTAVIOUS GRIER , associates of YSL, when, while speaking over a cell phone to an incarcerated Fulton County inmate, discussed protecting an incarcerated YSL associate from rival gang members, an overt act in furtherance of the conspiracy.
178	04/14/2022	Defendants DAMEKION GARLINGTON and QUANTAVIOUS GRIER , associates of YSL, when, while speaking over a cell phone to an incarcerated Fulton County inmate, discussed killing another Fulton County Jail inmate who had recently attacked a YSL associate incarcerated at the Fulton County Jail, an overt act in furtherance of the conspiracy.
179	04/14/2022	Defendants DAMEKION GARLINGTON and QUANTAVIOUS GRIER , associates of YSL, did unlawfully commit the felony offense of CONSPIRACY TO POSSESS A TELECOMMUNICATIONS DEVICE BY AN INMATE , when, while speaking over a cell phone to an incarcerated Fulton County Jail inmate, discussed a plan to fly a drone carrying cell phones beyond the guard lines to a window at the Fulton County Jail, in violation of Georgia law pursuant to O.C.G.A. § 42-5-18, an overt act in furtherance of the conspiracy.
180	04/20/2022	Defendant RODALIUS RYAN , an associate of YSL, while incarcerated in the Georgia Department of Corrections, did appear in a video released on social media flashing a "YSL" gang sign stating "we're coming to get you," "YSL shit," "gave my nigga a bond today," "free my nigga Bhriis," "fuck the DA," "the gang way," and "we catchin bonds on this shit," an overt act in furtherance of the conspiracy.

181	04/28/2022	Defendants CORDARIUS DORSEY and ANTONIO SUMLIN , associates of YSL, did unlawfully commit the felony offense of CONSPIRACY TO COMMIT MURDER , when, while incarcerated at the DeKalb County Jail, Dorsey orders and directs Sumlin to kill another, to wit: Harold Clements, a fellow gang member, for disrespecting Dorsey by failing and refusing to put money on Dorsey's jail books, and thereafter Dorsey provides Sumlin the phone number for Harold Clements so that Sumlin can contact Harold Clements to set up the murder, in violation of Georgia law pursuant to O.C.G.A. § 16-4-8, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(B), and an overt act in furtherance of the conspiracy.
182	04/28/2022	Defendant CORDARIUS DORSEY , an associate of YSL, did unlawfully commit the felony offense of PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(d)) , when, while associated with a criminal street gang, to wit: YSL, and while occupying a position of organizer, supervisor, or other position of management or leadership of the criminal street gang YSL, did engage in, directly or indirectly, or conspire to engage in an act of criminal street gang activity, to wit: CONSPIRACY TO COMMIT MURDER , as alleged in Act 181 of this Count, an overt act in furtherance of the conspiracy.

The acts set forth above were committed in furtherance of the conspiracy alleged above and had the same or similar intents, results, accomplices, victims, or methods of commission or otherwise were interrelated by distinguishing characteristics.

COUNT 2

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

JAVARIS BRADFORD, AKA TUDA

JUSTIN COBB, AKA DUWAP

DEAMONTE KENDRICK, AKA YAK GOTTI

DEMISE MCMULLEN, AKA NARD

SHANNON STILLWELL, AKA SHANNON JACKSON, AKA SB

with the offense of **MURDER (O.C.G.A. § 16-5-1)**, for the said accused, in the County of Fulton and State of Georgia, on the 10th day of January, 2015, did unlawfully and with malice aforethought, cause the death of Donovan Thomas, Jr., a human being, by shooting him with a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 3

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **ARMED ROBBERY (O.C.G.A. § 16-8-41)**, for the said accused, in the County of Fulton and State of Georgia, on the 26th day of April, 2019, as a party to a crime with a person unknown to this Grand Jury, did, with the intent to commit theft, commit the offense of **ARMED ROBBERY**, by taking property, to wit: a purse, a debit card, U.S. currency and jewelry, from or from the immediate presence of another, to wit: Dajuan Maynard, by use of an offensive weapon, to wit: a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 4

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **AGGRAVATED ASSAULT WITH A DEADLY WEAPON (O.C.G.A. § 16-5-21)**, for the said accused, in the County of Fulton and State of Georgia, on the 26th day of April, 2019, as a party to a crime with a person unknown to this Grand Jury, did unlawfully commit an assault upon the person of Dajuan Maynard by striking him in the face with a firearm, an object which, when used offensively against a person, is likely to result in serious bodily injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 5

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **AGGRAVATED ASSAULT WITH A DEADLY WEAPON (O.C.G.A. § 16-5-21)**, for the said accused, in the County of Fulton and State of Georgia, on the 26th day of April, 2019, as a party to a crime with a person unknown to this Grand Jury, did unlawfully commit an assault upon the person of Demon Jenkins, by pointing at, toward, and in the direction of Demon Jenkins, with a firearm, the same being a deadly weapon, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 6

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **POSSESSION OF FIREARM DURING COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for the said accused, in the County of Fulton and State of Georgia, on the 26th day of April, 2019, as a party to a crime with a person unknown to this Grand Jury, did unlawfully have on and within arm's reach of accused's person a firearm during the commission of at least one of the following felonies against and involving the person of Dajuan Maynard, to wit: **ARMED ROBBERY** and **AGGRAVATED ASSAULT WITH A DEADLY WEAPON**, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 7

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **POSSESSION OF FIREARM DURING COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for the said accused, in the County of Fulton and State of Georgia, on the 26th day of April, 2019, as a party to a crime with a person unknown to this Grand Jury, did unlawfully have on and within arm's reach of accused's person a firearm during the commission of Aggravated Assault against and involving the person of Demon Jenkins, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 8

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

DERONTAE BEBEE, AKA BEE, AKA B

with the offense of **THEFT BY RECEIVING STOLEN PROPERTY (O.C.G.A. § 16-8-7)**, for the said accused, in the County of Fulton and State of Georgia, on the 8th day of May, 2020, did unlawfully receive and retain property, to wit: a Glock 43 handgun, that the accused knew or should have known was stolen, with the intent of depriving the owner, to wit: Michael Eubanks of said property, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 9

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

DERONTAE BEBEE, AKA BEE, AKA B

with the offense of **VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT (O.C.G.A. § 16-13-30)**, for the said accused, in the County of Fulton and State of Georgia, on the 8th day of May, 2020, did unlawfully sell marijuana to Officer I. Applewhaite, an undercover Atlanta Police Officer, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 10

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

DERONTAE BEBEE, AKA BEE, AKA B

with the offense of **VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT (O.C.G.A. § 16-13-30)**, for the said accused, in the County of Fulton and State of Georgia, on the 8th day of May, 2020, did unlawfully possess and control Marijuana With the Intent to Distribute, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 11

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

DERONTAE BEBEE, AKA BEE, AKA B

with the offense of **POSSESSION OF A FIREARM BY CONVICTED FELON (O.C.G.A. § 16-11-131)**, for the said accused, in the County of Fulton and State of Georgia, on the 8th day of May, 2020, did knowingly and without lawful authority possess a firearm, to wit: a handgun, after having been convicted of a felony in Accusation 20SC174500, in the Superior Court of Fulton County, Georgia, for the offense of **POSSESSION OF COCAINE**, on 10th day of March, 2020, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 12

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

DERONTAE BEBEE, AKA BEE, AKA B

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a))**, for the said accused, in the County of Fulton and State of Georgia, on the 8th day of May, 2020, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: **VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT, to wit: SALE OF MARIJUANA**, as alleged in Count 9 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 13

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

QUANTAVIOUS GRIER, AKA UNFOONK

with the offense of **THEFT BY RECEIVING STOLEN PROPERTY (O.C.G.A. § 16-8-7)**, for the said accused, in the County of Fulton and State of Georgia, on the 5th day of September, 2020, did unlawfully receive and retain property, to wit: a Taurus 9mm handgun, that the accused knew or should have known was stolen, with the intent of depriving the owner, to wit: Quincy Campbell of said property, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 14

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **ARMED ROBBERY (O.C.G.A. § 16-8-41)**, for the said accused, in the County of Fulton and State of Georgia, on the 1st day of October, 2020, with the intent to commit theft, take property, to wit: an iPhone, from or from the immediate presence of another, to wit: Gary Holliman, by use of an offensive weapon, to wit: a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 15

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **ARMED ROBBERY (O.C.G.A. § 16-8-41)**, for the said accused, in the County of Fulton and State of Georgia, on the 1st day of October, 2020, with the intent to commit theft, take property, to wit: an iPhone, from or from the immediate presence of another, to wit: Dilmesha Coppage, by use of an offensive weapon, to wit: a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 16

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **AGGRAVATED ASSAULT WITH A DEADLY WEAPON (O.C.G.A. § 16-5-21)**, for the said accused, in the County of Fulton and State of Georgia, on the 1st day of October, 2020, did unlawfully commit an assault upon the person of Gary Holliman, by pointing at, toward, and in the direction of Gary Holliman, with a firearm, the same being a deadly weapon, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 17

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **AGGRAVATED ASSAULT WITH A DEADLY WEAPON (O.C.G.A. § 16-5-21)**, for the said accused, in the County of Fulton and State of Georgia, on the 1st day of October, 2020, did unlawfully commit an assault upon the person of Dilmesha Coppage, by pointing at, toward, and in the direction of Dilmesha Coppage, with a firearm, the same being a deadly weapon, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 18

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE (O.C.G.A. § 16-5-44.1)**, for the said accused, in the County of Fulton and State of Georgia, on the 1st day of October, 2020, did unlawfully while in possession of a firearm, obtain a 2016 Buick LaCrosse from the person of Gary Holliman by force and violence, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 19

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **POSSESSION OF FIREARM DURING COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for the said accused, in the County of Fulton and State of Georgia, on the 1st day of October, 2020, did unlawfully have on and within arm's reach of accused's person a firearm during the commission of at least one of the following felonies against and involving the person of Gary Holliman to wit: **ARMED ROBBERY, AGGRAVATED ASSAULT WITH A DEADLY WEAPON** and **HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE**, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 20

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **POSSESSION OF FIREARM DURING COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for the said accused, in the County of Fulton and State of Georgia, on the 1st day of October, 2020, did unlawfully have on and within arm's reach of accused's person a firearm during the commission of at least one of the following felonies against and involving the person of Dilmesha Coppage, to wit: **ARMED ROBBERY** and **AGGRAVATED ASSAULT WITH A DEADLY WEAPON**, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 21

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a))**, for the said accused, in the County of Fulton and State of Georgia, on the 1st day of October, 2020, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: **ARMED ROBBERY**, as alleged in Counts 14 and 15 of this Indictment, **AGGRAVATED ASSAULT WITH A DEADLY WEAPON**, as alleged in Counts 16 and 17 of this Indictment, and **HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE**, as alleged in Count 18 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 22

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(b))**, for the said accused, in the County of Fulton and State of Georgia, on the 1st day of October, 2020, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the following offenses, to wit: **ARMED ROBBERY**, as alleged in Counts 14 and 15 of this Indictment, **AGGRAVATED ASSAULT WITH A DEADLY WEAPON**, as alleged in Counts 16 and 17 of this Indictment, and **HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE**, as alleged in Count 18 of this Indictment, with the intent to maintain or increase his status or position in the aforesaid criminal street gang, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 23

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(c))**, for the said accused, in the County of Fulton and State of Georgia, on the 1st day of October, 2020, did unlawfully, while associated with a criminal street gang, to wit: YSL, acquire, directly and indirectly, through criminal gang activity, to wit: **ARMED ROBBERY**, as alleged in Counts 14 and 15 of this Indictment, **AGGRAVATED ASSAULT WITH A DEADLY WEAPON**, as alleged in Counts 16 and 17 of this Indictment, and **HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE**, as alleged in Count 18 of this Indictment, control of personal property, to wit: a Buick LaCrosse, two iPhones, and U.S. currency, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 24

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

JIMMY WINFREY, AKA ROSCOE

with the offense of **VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT (O.C.G.A. § 16-13-30)**, for the said accused, in the County of Fulton and State of Georgia, on the 10th day of July, 2021, did unlawfully possess Oxycodone, a controlled substance in Schedule II of the Georgia Controlled Substances Act, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 25

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

JIMMY WINFREY, AKA ROSCOE

with the offense of **POSSESSION OF A FIREARM BY CONVICTED FELON (O.C.G.A. § 16-11-131)**, for the said accused, in the County of Fulton and State of Georgia, on the 10th day of July, 2021, did knowingly and without lawful authority possess a firearm, to wit: a handgun, after having been convicted in Indictment 152765, in the Superior Court of Cobb County, on the 20th day of November, 2015, for the felony offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY**, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 26

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

JIMMY WINFREY, AKA ROSCOE

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a))**, for the said accused, in the County of Fulton and State of Georgia, on the 10th day of July, 2021, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: **POSSESSION OF OXYCODONE**, as alleged in Count 24 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 27

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

DERONTAE BEBEE, AKA BEE, AKA B

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **ARMED ROBBERY (O.C.G.A. § 16-8-41)**, for the said accused, in the County of Fulton and State of Georgia, on the 12th day of October, 2021, with the intent to commit theft, take property, to wit: a diamond necklace, diamond earrings, and 2 cell phones, from or from the immediate presence of another, to wit: Darius Smith, by use of an offensive weapon, to wit: a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 28

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

DERONTAE BEBEE, AKA BEE, AKA B

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE (O.C.G.A. § 16-5-44.1)**, for the said accused, in the County of Fulton and State of Georgia, on the 12th day of October, 2021, did unlawfully while in possession of a firearm, obtain a 2003 GMC Savana from the person of Darius Smith by force and violence, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 29

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **POSSESSION OF A FIREARM BY A FIRST OFFENDER PROBATIONER (O.C.G.A. § 16-11-131)**, for the said accused, in the County of Fulton and State of Georgia, on the 12th day of October, 2021, by possession a firearm, to wit: a handgun, after having been sentenced to Article 3 of Chapter 8 of Title 42 of the Official Code of Georgia, to a term of probation as a felony first offender, for the felony offense of **ROBBERY and AGGRAVATED ASSAULT WITH A DEADLY WEAPON**, in Indictment 16SC1434618, in the Superior Court of Fulton County, Georgia, on the 2nd day of December, 2016, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 30

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

ANTONIO SLEDGE, AKA MOUNK TOUNK

with the offense of **POSSESSION OF A FIREARM BY CONVICTED FELON (O.C.G.A. § 16-11-131)**, for the said accused, in the County of Fulton and State of Georgia, on the 5th day of December, 2021, did knowingly and without lawful authority possess a firearm, to wit: a handgun, after having been convicted of a felony in Indictment 15SC138994, in the Superior Court of Fulton County, Georgia, for the offenses of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY, AGGRAVATED ASSAULT WITH A DEADLY WEAPON and AGGRAVATED BATTERY**, on 10th day of January, 2018, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 31

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **THEFT BY TAKING (O.C.G.A. § 16-8-2)**, for the said accused, in the County of Fulton and State of Georgia, on the 22nd day of January, 2022, did unlawfully take the property, to wit: a 2018 Volkswagen Jetta, of another, to wit: Willie Moore, with the intent of depriving Willie Moore of said property, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 32

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **ATTEMPTED MURDER (O.C.G.A. § 16-4-1)**, for the said accused, in the County of Fulton and State of Georgia, on the 7th day of February, 2022, did unlawfully and with malice aforethought, attempt to murder David Rodgers, a human being, by shooting David Rogers with a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 33

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **ATTEMPTED MURDER (O.C.G.A. § 16-4-1)**, for the said accused, in the County of Fulton and State of Georgia, on the 7th day of February, 2022, did unlawfully and with malice aforethought, attempt to murder William Johnson, a human being, by shooting at William Johnson with a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 34

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **POSSESSION OF FIREARM BY A FIRST OFFENDER PROBATIONER (O.C.G.A. § 16-11-131)**, for the said accused, in the County of Fulton and State of Georgia, on the 7th day of February, 2022, after having been placed on First Offender probation for the offenses of **ROBBERY** and **AGGRAVATED ASSAULT WITH A DEADLY WEAPON** on the 2nd day of December, 2016, in Indictment 16SC143618, in the Superior Court of Fulton County, did possess a firearm during the commission of a crime against or involving the person of another, to wit: the **ATTEMPTED MURDER** of David Rodgers as alleged in Count 32 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 35

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **POSSESSION OF FIREARM BY A FIRST OFFENDER PROBATIONER (O.C.G.A. § 16-11-131)**, for the said accused, in the County of Fulton and State of Georgia, on the 7th day of February, 2022, after having been placed on First Offender probation for the offenses of **ROBBERY** and **AGGRAVATED ASSAULT WITH A DEADLY WEAPON** on the 2nd day of December, 2016, in Indictment 16SC143618, in the Superior Court of Fulton County, did possess a firearm during the commission of a crime against or involving the person of another, to wit: the **ATTEMPTED MURDER** of William Johnson as alleged in Count 33 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 36

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **POSSESSION OF FIREARM DURING COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for the said accused, in the County of Fulton and State of Georgia, on the 7th day of February, 2022, did unlawfully have on and within arm's reach of accused's person a handgun during the commission of a felony against and involving the person of another, to wit: the **ATTEMPTED MURDER** of David Rodgers, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 37

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **POSSESSION OF FIREARM DURING COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for the said accused, in the County of Fulton and State of Georgia, on the 7th day of February, 2022, did unlawfully have on and within arm's reach of accused's person a handgun during the commission of a felony against and involving the person of another, to wit: the **ATTEMPTED MURDER** of William Johnson, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 38

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a))**, for the said accused, in the County of Fulton and State of Georgia, on the 7th day of February, 2022, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: **ATTEMPTED MURDER**, as alleged in Counts 32 and 33 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 39

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(b))**, for the said accused, in the County of Fulton and State of Georgia, on the 7th day of February, 2022, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of at least one of the following offenses, to wit: **ATTEMPTED MURDER**, as alleged in Counts 32 and 33 of this Indictment, with the intent to maintain or increase his status or position in the aforesaid criminal street gang, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 40

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

KAHLIEFF ADAMS, AKA BOBBY HUNT

DAMEKION GARLINGTON, AKA DEE, AKA SXARFAXE

JAYDEN MYRICK, AKA SETTRIP, AKA JAYMAN

with the offense of **ATTEMPTED MURDER (O.C.G.A. § 16-4-1)**, for the said accused, in the County of Fulton and State of Georgia, on the 9th day of February, 2022, did unlawfully and with malice aforethought, attempt to murder Rayshawn Bennett, AKA YFN Lucci, a rival gang member, a human being, by stabbing and stabbing at Rayshawn Bennett with a shank, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 41

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

JAYDEN MYRICK, AKA SETTRIP, AKA JAYMAN

with the offense of **POSSESSION OF WEAPON BY INCARCERATED INDIVIDUAL (O.C.G.A. § 42-5-18)**, for the said accused, in the County of Fulton and State of Georgia, on the 9th day of February, 2022, did, without authority and while being incarcerated at the Fulton County Jail, possess a weapon, to wit: a shank, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 42

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

KAHLIEFF ADAMS, AKA BOBBY HUNT

DAMEKION GARLINGTON, AKA DEE, AKA SXARFAXE

JAYDEN MYRICK, AKA SETTRIP, AKA JAYMAN

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a))**, for the said accused, in the County of Fulton and State of Georgia, on the 9th day of February, 2022, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: the **ATTEMPTED MURDER** of Rayshawn Bennett, AKA YFN Lucci, a rival gang member, as alleged in Count 40 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 43

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

KAHLIEFF ADAMS, AKA BOBBY HUNT

DAMEKION GARLINGTON, AKA DEE, AKA SXARFAXE

JAYDEN MYRICK, AKA SETTRIP, AKA JAYMAN

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(b))**, for the said accused, in the County of Fulton and State of Georgia, on the 9th day of February, 2022, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through a conspiracy to commit a violent offense, to wit: the **ATTEMPTED MURDER** Rayshawn Bennett, AKA YFN Lucci, a rival gang member, while Rayshawn Bennett was incarcerated at the Fulton County Jail, as alleged in Count 40 of this Indictment, with the intent to maintain or increase their status or position in the aforesaid criminal street gang, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 44

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY AKA QUA

TENQUARIUS MENDER, AKA NARD, AKA STUNNA,

with the offense of **POSSESSION OF WEAPON BY INCARCERATED INDIVIDUAL (O.C.G.A. § 42-5-18)**, for the said accused, in the County of Fulton and State of Georgia, on the 18th day of February, 2022, did, without lawful authority and while being incarcerated at the Fulton County Jail, possess a weapon, to wit: a shank, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 45

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

TENQUARIUS MENDER, AKA NARD, AKA STUNNA

with the offense of **POSSESSION OF A TELECOMMUNICATION DEVICE BY INCARCERATED INDIVIDUAL (O.C.G.A. § 42-5-18)**, for the said accused, in the County of Fulton and State of Georgia, on the 18th day of February, 2022, did, without lawful authority and while being incarcerated for a felony at the Fulton County Jail, possess a telecommunication device, to wit: a cell phone, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 46

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MARQUAVIUS HUEY, AKA QUA

TENQUARIUS MENDER, AKA NARD, AKA STUNNA

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a))**, for the said accused, in the County of Fulton and State of Georgia, on the 22nd day of February, 2022, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: **POSSESSION OF WEAPON BY INCARCERATED INDIVIDUAL (O.C.G.A. § 42-5-18) and POSSESSION OF A TELECOMMUNICATION DEVICE BY INCARCERATED INDIVIDUAL (O.C.G.A. § 42-5-18)**, as alleged in Counts 44 and 45 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 47

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

ANTONIO SUMLIN, AKA OBAMA

with the offense of **CONSPIRACY TO COMMIT A CRIME (O.C.G.A. § 16-4-8)**, for the said accused, in the County of Fulton and State of Georgia, on the 22nd day of February, 2022, did unlawfully join and participate in the existing YSL conspiracy to commit a crime, to wit: the **MURDER** of Rayshawn Bennett, AKA YFN Lucci, a rival gang member, while Rayshawn Bennett was incarcerated at the Fulton County Jail, by discussing how to get permission from Jeffrey Williams, AKA Young Thug, AKA Slime, to kill Rayshawn Bennett and what the payment would be to do so, an overt act having already been completed in the conspiracy, to wit: the attempted murder of Rayshawn Bennett as alleged in Count 40 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 48

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CHRISTIAN EPPINGER, AKA BHRIS

ANTONIO SUMLIN, AKA OBAMA

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a))**, for the said accused, in the County of Fulton and State of Georgia, on the 22nd day of February, 2022, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: the **CONSPIRACY TO COMMIT MURDER** of Rashawn Bennett AKA YFN Lucci, a rival gang member, as alleged in Count 47 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 49

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MILES FARLEY, AKA SLATO, AKA LIL MILES

DAMEKION GARLINGTON, AKA DEE, AKA SXARFAXE

QUAMARVIOUS NICHOLS, AKA QUA

SHANNON STILLWELL, AKA SHANNON JACKSON, AKA SB

with the offense of **MURDER (O.C.G.A. § 16-5-1)**, for the said accused, in the County of Fulton and State of Georgia, on the 14th day of March, 2022, did unlawfully and with malice aforethought, cause the death of Shymel Drinks, a rival gang member, a human being, by shooting him with a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 50

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MILES FARLEY, AKA SLATO, AKA LIL MILES

DAMEKION GARLINGTON, AKA DEE, AKA SXARFAXE

QUAMARVIOUS NICHOLS, AKA QUA

SHANNON STILLWELL, AKA SHANNON JACKSON, AKA SB

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(a))**, for the said accused, in the County of Fulton and State of Georgia, on the 14th day of March, 2022, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal gang activity through the commission of at least one of the offenses enumerated in paragraph (1) of O.C.G.A. § 16-15-3, to wit: the **MURDER** of Shymel Drinks, a rival gang member, as alleged in Count 49 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 51

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MILES FARLEY, AKA SLATO, AKA LIL MILES

DAMEKION GARLINGTON, AKA DEE, AKA SXARFAXE

QUAMARVIOUS NICHOLS, AKA QUA

SHANNON STILLWELL, AKA SHANNON JACKSON, AKA SB

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(b))**, for the said accused, in the County of Fulton and State of Georgia, on the 14th day of March, 2022, did unlawfully, while associated with a criminal street gang, to wit: YSL, participate in criminal street gang activity through the commission of a violent offense, to wit: the **MURDER** of Shymel Drinks, a rival gang member, as alleged in Count 49 of this Indictment, with the intent to maintain or increase their status or position in the aforesaid criminal street gang, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 52

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse

SHANNON STILLWELL, AKA SHANNON JACKSON, AKA SB

with the offense of **POSSESSION OF FIREARM BY CONVICTED FELON PREVIOUSLY CONVICTED OF FELONY INVOLVING THE USE OR POSSESSION OF A FIREARM (O.C.G.A. § 16-11-133)**, for the said accused, in the County of Fulton and State of Georgia, on the 14th day of March, 2022, after having been convicted of felonies involving the use or possession of a firearm in Indictment 15SC140132, in the Superior Court of Fulton County, Georgia, for the offenses of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE** and **POSSESSION OF A FIREARM BY A CONVICTED FELON**, on the 10th day of March, 2016; and Indictment 19SC173371, in the Superior Court of Fulton County, Georgia, for the offense of **POSSESSION OF A FIREARM BY CONVICTED FELON**, on the 17th day of January, 2020, did possess or have within arm's reach of his person a firearm during the commission of a crime against or involving the person of another, to wit: the **MURDER** of Shymel Drinks, a rival gang member, as alleged in Count 49 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 53

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse

QUAMARVIOUS NICHOLS, AKA QUA

with the offense of **POSSESSION OF FIREARM BY CONVICTED FELON PREVIOUSLY CONVICTED OF FELONY INVOLVING THE USE OR POSSESSION OF A FIREARM (O.C.G.A. § 16-11-133)**, for the said accused, in the County of Fulton and State of Georgia, on the 14th day of March, 2022, after having been convicted of felonies involving the use or possession of a firearm in Indictment 17SC153307, in the Superior Court of Fulton County, Georgia, for the offenses of **POSSESSION OF MDMA WITH INTENT TO DISTRIBUTE** and **POSSESSION OF A FIREARM BY A CONVICTED FELON**, on the 27th day of March, 2018; and Indictment 18SC162953, in the Superior Court of Fulton County, Georgia, for the offense of **POSSESSION OF A FIREARM BY CONVICTED FELON**, on the 6th day of November, 2020, did possess or have within arm's reach of his person a firearm during the commission of a crime against or involving the person of another, to wit: the **MURDER** of Shymel Drinks, a rival gang member, as alleged in Count 49 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 54

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

MILES FARLEY, AKA SLATO, AKA LIL MILES

DAMEKION GARLINGTON, AKA DEE, AKA SXARFAXE

QUAMARVIOUS NICHOLS, AKA QUA

SHANNON STILLWELL, AKA SHANNON JACKSON, AKA SB

with the offense of **POSSESSION OF FIREARM DURING COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for the said accused, in the County of Fulton and State of Georgia, on the 14th day of March, 2022, did unlawfully have on and within arm's reach of accused's person a firearm during the commission of a felony against and involving the person of another, to wit: the **MURDER** of Shymel Drinks, as alleged in Count 49 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 55

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

CORDARIUS DORSEY, AKA POLO, AKA JUICY

ANTONIO SUMLIN, AKA OBAMA

with the offense of **CONSPIRACY TO COMMIT A CRIME (O.C.G.A. § 16-4-8)**, for the said accused, in the County of Fulton and State of Georgia, on the 27th day of April, 2022, did unlawfully join into a conspiracy to commit a crime, to wit: the **MURDER** of Harold Clements, a fellow gang member, a human being, an overt act having been completed when Dorsey provided Sumlin the phone number for Harold Clements so Sumlin could set up the murder, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 56

And the Grand Jurors aforesaid, in the name and behalf of the citizens of Georgia, do charge and accuse:

JEFFERY WILLIAMS, AKA YOUNG THUG, AKA SLIME

with the offense of **PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY (O.C.G.A. § 16-15-4(d))**, for the said accused, in the County of Fulton and State of Georgia, on or between the 12th day of May, 2018, and the 8th day of May, 2022, while occupying a position of organizer, supervisor, or other position of management or leadership of the criminal street gang YSL, did engage in, directly or indirectly, or conspire to engage in any one of the following acts of criminal street gang activity of YSL, to wit: **MURDER, AGGRAVATED ASSAULT WITH A DEADLY WEAPON, ARMED ROBBERY, HIJACKING A MOTOR VEHICLE, SALE OF MARIJUANA, POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE, THEFT BY RECEIVING A FIREARM, and POSSESSION OF A WEAPON BY A CONVICTED FELON**, contrary to the laws of said State, the good order, peace and dignity thereof.

FANI T. WILLIS, DISTRICT ATTORNEY

Related Clerk No:

Complaint #:

Defendant	DA #	Booking	Race	Sex	Birthdate	OTN	Agency
ADAMS, KAHLIEFF	22DA04922		Black	Male	08/23/1997		

WITNESS LIST

MICHAEL SPRINKEL- FCDA

MARISSA VIVERITO - FCDA

FULTON COUNTY SUPERIOR COURT
REQUEST FOR RELATED ASSIGNMENT
UNDER LOCAL RULE 3 (c)

The case listed below is related under Local Rule 3 (a) to other cases pending or previously heard in this Court:

I. INDICTMENT # _____ DATE _____

DEFENDANTS: State v Kahlieff Adams, et. al.

OFFENSE(S): _____

(PENDING) RELATED CASES - INDICTMENT SAME DATE

#1 INDICTMENT # _____ DATE _____

DEFENDANT: _____

OFFENSE: _____

#2 INDICTMENT# _____

DEFENDANT: _____

OFFENSE: _____

LIST THE PREVIOUSLY ASSIGNED CASE THAT REQUIRES THIS CASE BE ASSIGNED UNDER THE RELATED CASE RULE: (See instructions and priorities on back of this form)

INDICTMENT # 10SC92020 DATE 6/11/2010

DEFENDANT: Quantavius Grier

REASON: IDENTICAL ACCUSED PENDING CASE

CASE RISING FROM SAME CRIMINAL TRANSACTION

JUDGE Ural Glanville

OPEN (UNTRIED)

UNDER SENTENCE/PROBATION

DATE 5/9/2022

REQUESTED BY: [Signature]