

INDICTMENT

Clerk No. 2025CR/25ABCDEFGHI

LOWNDES COUNTY SUPERIOR COURT

THE STATE OF GEORGIA 1 CONSPIRACY TO VIOLATE THE
V. RACKETEER INFLUENCED AND CORRUPT
ORGANIZATIONS ACT O.C.G.A. §16-14-4(C)

ALEX PARRISH A/K/A FAT	2	VIOLATION OF THE GANG ACT O.C.G.A. § 16-15-4(A)
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ANTOINE TAYLOR A/K/A TWAN	3	VIOLATION OF THE GANG ACT O.C.G.A. § 16-15-4(B)
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CEDRIC JORDAN A/K/A TROUBLE	4	VIOLATION OF THE GANG ACT O.C.G.A. § 16-15-4(A)
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JAQUAN WALTON A/K/A MAN MAN	5	VIOLATION OF THE GANG ACT O.C.G.A. § 16-15-4(B)
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KIMONE GREEN 6 MURDER, O.C.G.A. § 16-5-1

TRAVIS WHITE
A/K/A TRAPP

8 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21

TSION CLAYTON
A/K/A STEPPA 9 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21

10 CRIMINAL DAMAGE TO PROPERTY, FIRST
DEGREE, O.C.G.A. § 16-7-22(b)(1)

11 POSSESSION OF FIREARM DURING
FELONY, O.C.G.A. § 16-11-106(B)

12 POSSESSION OF FIREARM DURING

GEORGIA LOWNDES COUNTY
Filed in office this

FEB 26 2025

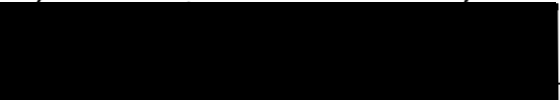
Bill C. Johnson
 Clerk Superior Court/State Court/
 Juvenile Court

FELONY, O.C.G.A. § 16-11-106(B)

- 13 VIOLATION OF THE GANG ACT
O.C.G.A. § 16-15-4(A)
- 14 VIOLATION OF THE GANG ACT
O.C.G.A. § 16-15-4(B)
- 15 VIOLATION OF THE GANG ACT
O.C.G.A. § 16-15-4(A)
- 16 VIOLATION OF THE GANG ACT
O.C.G.A. § 16-15-4(B)
- 17 MURDER, O.C.G.A. § 16-5-1
- 18 FELONY MURDER, O.C.G.A. § 16-5-1
- 19 ATTEMPTED MURDER, O.C.G.A. § 16-4-1 and
16-5-1
- 20 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21
- 21 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21
- 22 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21
- 23 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21
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- 27 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21
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- 31 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21
- 32 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21
- 33 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21
- 34 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21
- 35 AGGRAVATED ASSAULT, O.C.G.A. § 16-5-21
- 36 AGGRAVATED BATTERY, O.C.G.A. § 16-5-24
- 37 CRIMINAL DAMAGE TO PROPERTY, FIRST
DEGREE, O.C.G.A. § 16-7-22(b)(1)
- 38 CRIMINAL DAMAGE TO PROPERTY, FIRST
DEGREE, O.C.G.A. § 16-7-22(b)(1)
- 39 POSSESSION OF A FIREARM DURING
FELONY, O.C.G.A. § 16-11-106(B)
- 40 POSSESSION OF A FIREARM DURING
FELONY, O.C.G.A. § 16-11-106(B)
- 41 VIOLATION OF THE GANG ACT
O.C.G.A. § 16-15-4(A)
- 42 VIOLATION OF THE GANG ACT
O.C.G.A. § 16-15-4(B)
- 43 POSSESSION OF A FIREARM BY A
CONVICTED FELON, O.C.G.A. § 16-11-131(B)

44 CRIMINAL USE OF AN ARTICLE WITH AN
ALTERED IDENTIFICATION MARK, O.C.G.A.
§ 16-9-70(B)

True BILL Feb 26, 2025

Grand Jury Foreperson

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The defendant herein waives copy
of indictment, list of witnesses,
formal arraignment, and

Pleads _____ Guilty On Date: _____

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DEFENDANT

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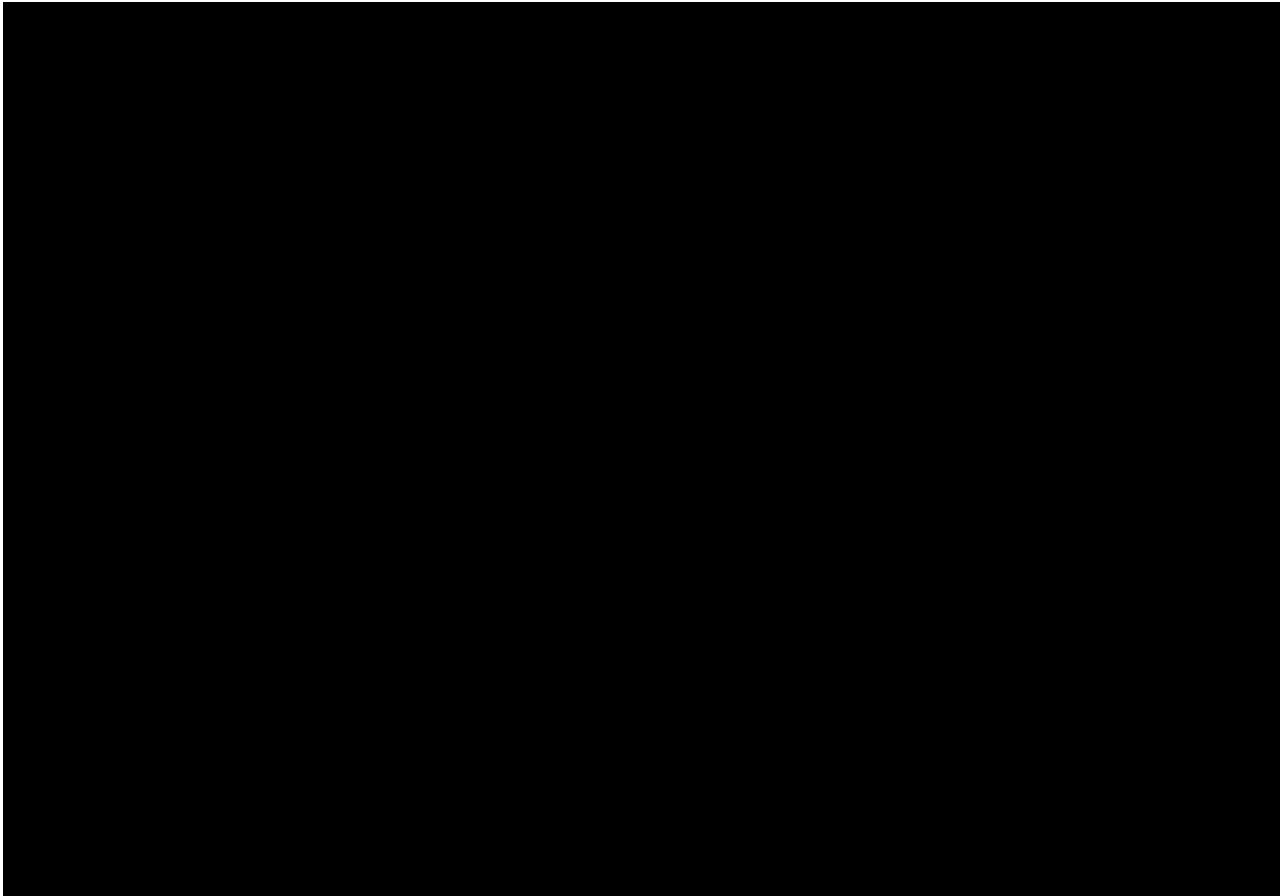
ATTORNEY FOR DEFENDANT

ATTORNEY FOR DEFENDANT

STATE OF GEORGIA, COUNTY OF LOWNDES

IN THE SUPERIOR COURT OF SAID COUNTY

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



COUNT 1

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

**ALEX PARRISH
A/K/A FAT**

**ANTOINE TAYLOR
A/K/A TWAN**

**CEDRIC JORDAN
A/K/A TROUBLE**

**JAQUAN WALTON
A/K/A MAN MAN**

KIMONE GREEN

**TRAVIS WHITE
A/K/A TRAPP**

**TSION CLAYTON
A/K/A STEPPA**

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, individually and as persons concerned in the commission of a crime, and together with unindicted co-conspirators known and unknown to the grand jury, in the State of Georgia, County of Lowndes, and elsewhere in the State of Georgia and Florida, on and between the 19th day of June, 2023 to present, did unlawfully conspire to acquire and maintain, directly and indirectly, an interest in and control of United States currency, weapons 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;

INTRODUCTION:

For almost a year, the enterprise 528 perpetrated and threatened violence against rival gangs and other people in the States of Georgia and Florida. During this time, 528's goals were to obtain money and property and to increase the reputation, power, and influence of 528. To accomplish these goals, the associates of 528 engaged in violence by shooting at rival gangs; robbing people of their money and property; and posting on their social media accounts messages, images, and videos promoting its readiness to engage in acts of violence. The Defendants charged in this indictment are associates of 528, and they knowingly and willfully joined a conspiracy to unlawfully effect the objectives of 528, which contained a common plan and purpose to commit two or more acts of Racketeering Activity in Lowndes County, Georgia, elsewhere in the State of Georgia, and the neighboring State of Florida.

The Enterprise

At all times relevant to this Count of the Indictment, the Defendants as well as other unindicted coconspirators known and unknown to the grand jury, unlawfully conspired to conduct and participate in a criminal enterprise, 528, in Lowndes County, Georgia, elsewhere in the State of Georgia, and in the State of Florida. Defendants, ALEX PARRISH, A/K/A FAT, ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, JAQUAN WALTON, A/K/A MAN MAN, KIMONE GREEN, TRAVIS WHITE, A/K/A TRAPP, TSION CLAYTON, A/K/A STEPPA, and other unindicted conspirators known and unknown to the Grand Jury constituted a criminal organization—528—whose associates engaged in various related criminal activities including, but not limited to, murder, aggravated assault, aggravated battery, robbery, theft, entering automobiles with the intent to commit theft; and firearms offenses.

528 constituted an enterprise as that term is defined in O.C.G.A. § 16-14-3(3), that is, a group of individuals associated in fact although not a legal entity. The Defendants and other associates of the enterprise had connections and relationships with one another and with the enterprise. The enterprise constituted an ongoing organization whose associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise operated in Lowndes County, Georgia, elsewhere in the State of Georgia, and the State of Florida. The enterprise operated for a period of time sufficient to permit its associates to pursue its objectives.

528 is a street gang originating in the Valdosta, Georgia area. 528 derives its name from the date in which associate Jamar “D-Rose” Walton was killed—May 28 of 2021. Several associates of 528 identify themselves as 528 with social media, examples of which include, but are not limited to, drafting their social media vanity name to include the numbers 528 and sharing pictures and videos with their followers captioned with, among other things, the numbers 528. Associates of 528 also routinely use a rose in their social media posts shared with their followers. The rose serves as a symbol for the enterprise, and pays homage to associate Jamar Walton, also known as D-Rose. Several associates of 528 engage in intentional disrespect of their rivals on social media by, for example, identifying a rival gang by name, such as 923, and posting a derogatory message directed at the associates of that rival gang.

The Conspiracy

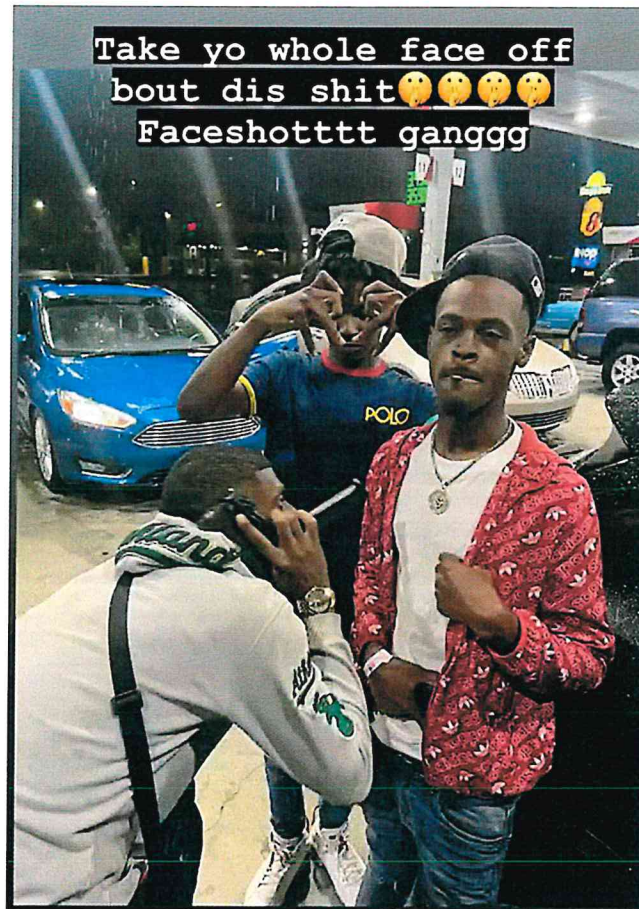
As associates of the enterprise 528, Defendants conspired to associate together and with others for the common purposes of illegally acquiring United States currency, weapons, and other personal property through a pattern of Racketeering Activity and conducting and participating in the enterprise through a pattern of Racketeering Activity. To effect the objectives of the conspiracy, the defendants engaged in the activities enumerated herein. The objectives of the conspiracy included but were not limited to:

- Acquiring United States currency, weapons, and other property through acts of Racketeering Activity, including, robbery and theft;
- Maintaining and increasing the reputation, power, and influence of the enterprise through acts of Racketeering Activity such as murder, assault, battery, and threats of violence against rival street gangs;
- Enhancing the reputation of the enterprise through the posting of messages, images, and videos promoting its readiness to engage in acts of violence.

Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy and to effect its objectives, Defendants and other unindicted co-conspirators known and unknown to the Grand Jury, committed overt acts, certain of which constitute Racketeering Activity. These acts include, but are not limited to, the following:

1. On or about June 19, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23SoldierG," a picture of himself, **JAQUAN WALTON, A/K/A MAN MAN**, and another associate of 528 displaying a firearm, captioned with the following phrase: "Take yo whole face off bout dis shit . . . Faceshotttt Ganggg," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



2. On or about June 24, 2023, **JAQUAN WALTON, A/K/A MAN MAN**, an associate of 528, in Lowndes County, Georgia, did commit the offense of murder when he did unlawfully, with malice aforethought, cause the death of Jaylon Smith, a human being, by shooting Jaylon Smith, in violation of O.C.G.A. § 16-5-1(a), 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;

3. On or about June 24, 2023, **JAQUAN WALTON, A/K/A MAN MAN**, an associate of 528, in Lowndes County, Georgia, did commit the felony offense of Aggravated Assault against the persons of Jaylon Smith and Jarvis Smith by shooting in the direction of said victims with a firearm, a deadly weapon, in violation 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;
4. On or about June 24, 2023, **JAQUAN WALTON, A/K/A MAN MAN**, an associate of 528, in Lowndes County, Georgia, did commit the offense of criminal damage to property in the first degree when he knowingly and without authority interfered with a white Nissan vehicle, in a manner so as to endanger human life by shooting a firearm in the direction of said property and striking it while people were inside, in violation of O.C.G.A. § 16-7-22(b)(1), an overt act in furtherance of the conspiracy;
5. On or about June 24, 2023, **JAQUAN WALTON, A/K/A MAN MAN**, an associate of 528, in Lowndes County, Georgia, did commit the felony offense of possession of a firearm during the commission of a felony, in that the said accused, did have on or within arm's reach of his person a firearm during the commission of the crime of murder and aggravated assault against the persons of Jaylon Smith and Jarvis Smith, in violation of O.C.G.A. § 16-11-106(b)(1), an overt act in furtherance of the conspiracy;
6. On or about July 3, 2023, **JAQUAN WALTON, A/K/A MAN MAN**, an associate of 528, did change the name of his social media account, from no name to "528footprint," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

Old Name Mr. pop2xans

New Name

Time 2023-05-24 05:09:14 UTC

Old Name

New Name 528footprint

Time 2023-07-03 04:52:33 UTC

Old Name 528footprint

New Name

Meta Platforms Business Record Page 11

528

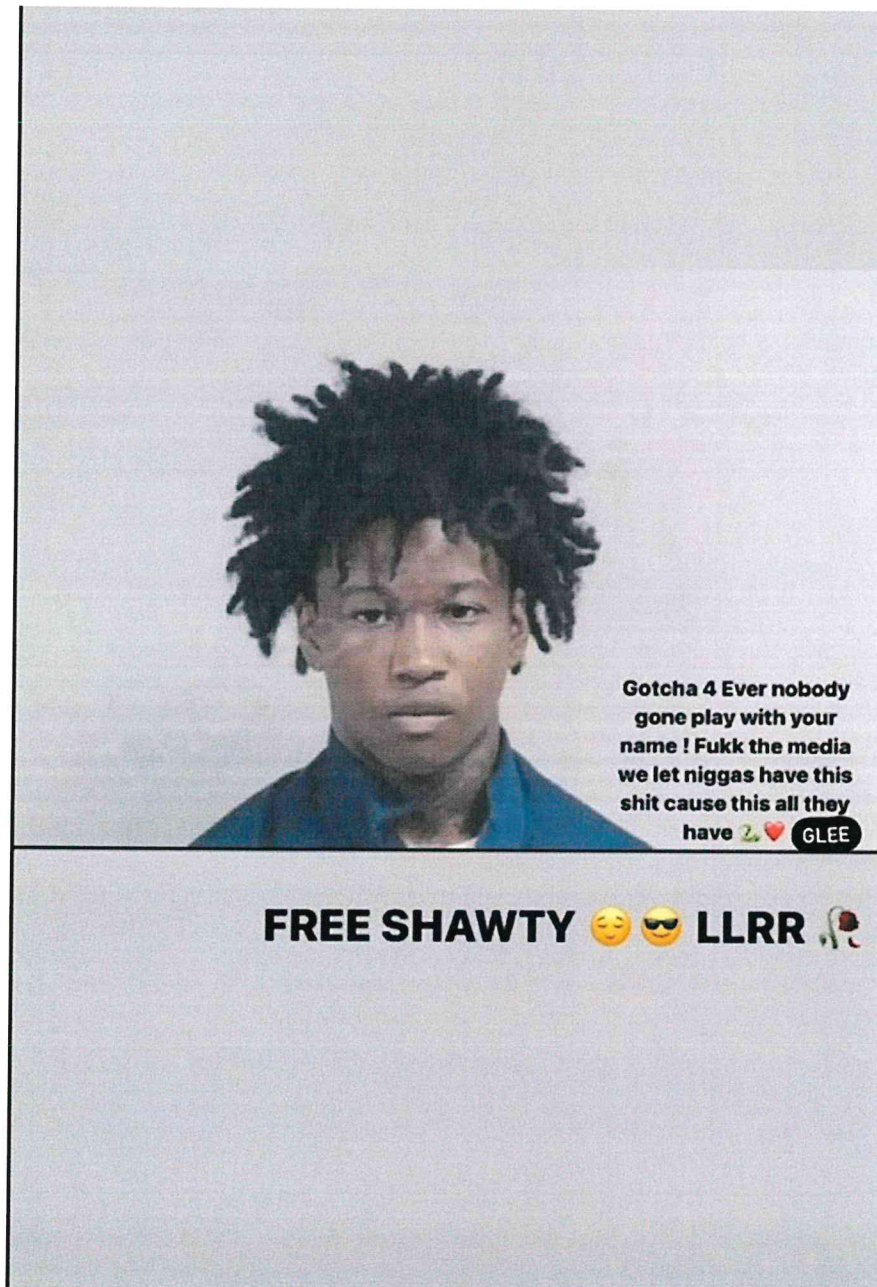
Time 2023-08-10 12:24:58 UTC

Old Name 528

New Name

Time 2023-08-15 15:11:41 UTC

7. On or about July 13, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23SteppaG," a picture on his story depicting **JAQUAN WALTON, A/K/A MAN MAN**, an associate of 528, captioned with the following phrase: "Gotcha 4 ever nobody gone play with your name ! fukk the media we let n***** have this shit cause this all they have . . . FREE SHAWTY . . . LLRR," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



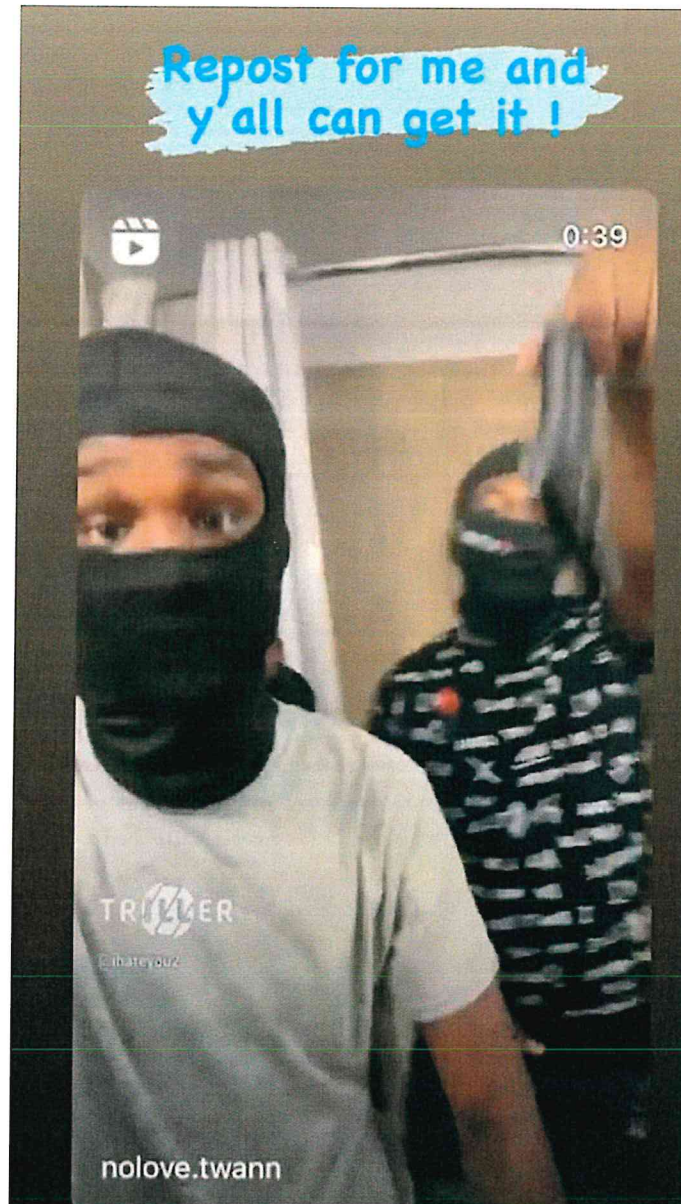
8. On or about July 17, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, in Lowndes County, Georgia, did commit the felony offense entering automobile or other motor vehicle with intent to commit theft or felony, by entering the automobile belonging to Melanie Starrine with the intent to commit a theft or felony, in violation of O.C.G.A. § 16-8-18, 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;
9. On or about August 8, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, did post to his social media account “mr.528trapp,” a picture depicting himself in possession of a firearm, along with **KIMONE GREEN**, an associate of 528, also in possession of a firearm, and captioned as follows: “Glocc babies . . . #fuccdaoppz #mosthated,” a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



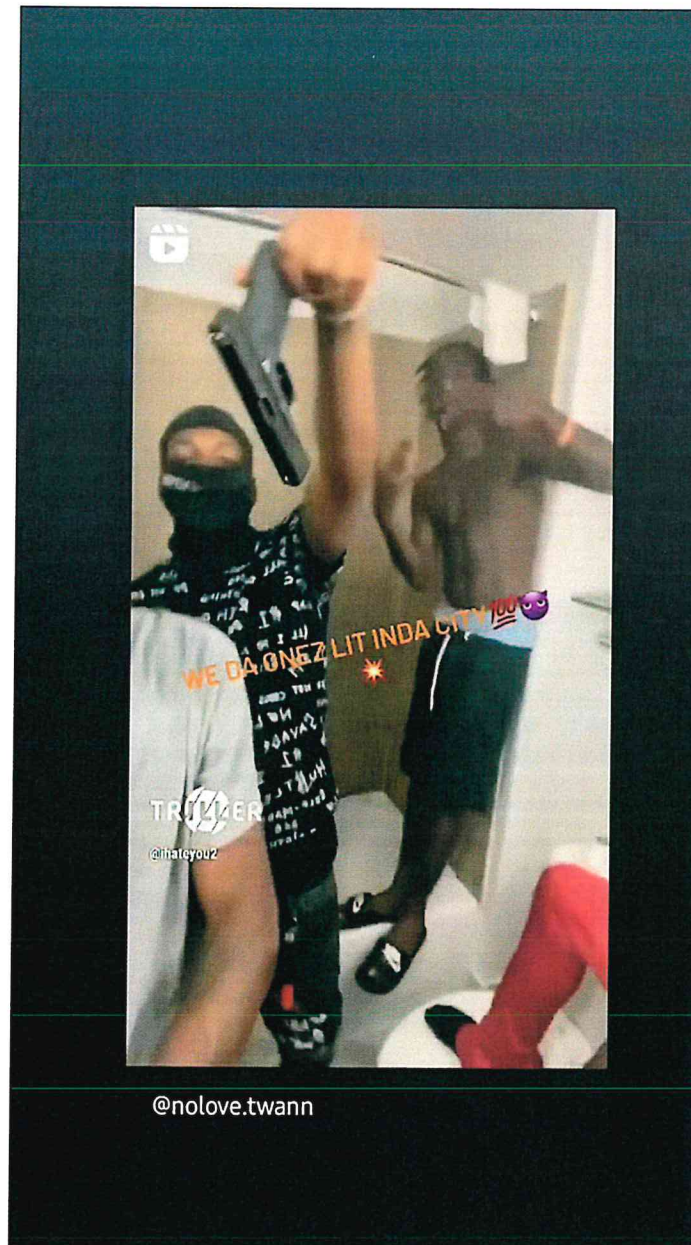
10. On or about August 13, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, did post to his social media account "mr.528trapp," a picture depicting himself in possession of a firearm, **ANTOINE TAYLOR, A/K/A TWAN**, **CEDRIC JORDAN, A/K/A TROUBLE**, **KIMONE GREEN**, and **TSION CLAYTON, A/K/A STEPPA**, associates of 528, captioned with the following: "4EVA SCREAMIN LLR...", a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



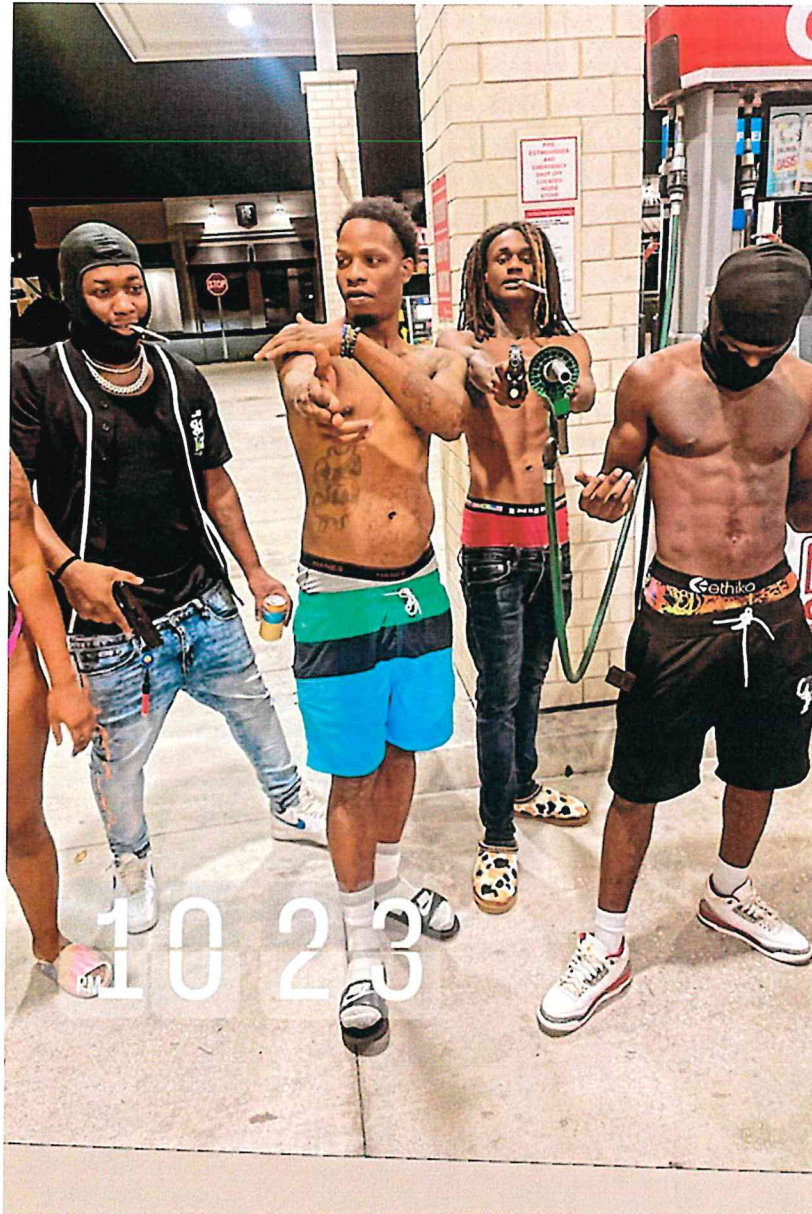
11. On or about August 17, 2023, **ANTOINE TAYLOR, A/K/A TWAN**, an associate of 528, did post to his social media account “nolove.twann,” a video on his story depicting himself with his face covered, along with **KIMONE GREEN, TRAVIS WHITE, A/K/A TRAPP, TSION CLAYTON, A/K/A STEPPA**, and other associates of 528, in possession of firearms and firearm parts and captioned as follows: “Repost for me and yall can get it” a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



12. On or about August 17, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, did post to his social media account "mr.528trapp," a video depicting himself with his face covered, along with **ANTOINE TAYLOR, A/K/A TWAN, KIMONE GREEN, TSION CLAYTON, A/K/A STEPPA**, and other associates of 528, in possession of firearms and firearm parts and captioned as follows: "we da onez lit inda city," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



13. On or about August 19, 2023, **ANTOINE TAYLOR, A/K/A TWAN**, an associate of 528, did post to his social media account “nolove.twann,” a picture on his story depicting himself pointing a handgun at the camera, along with **ALEX PARRISH, A/K/A FAT, CEDRIC JORDAN, A/K/A TROUBLE, AND TRAVIS WHITE, A/K/A TRAPP**, associates of 528, also in possession of firearms, a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



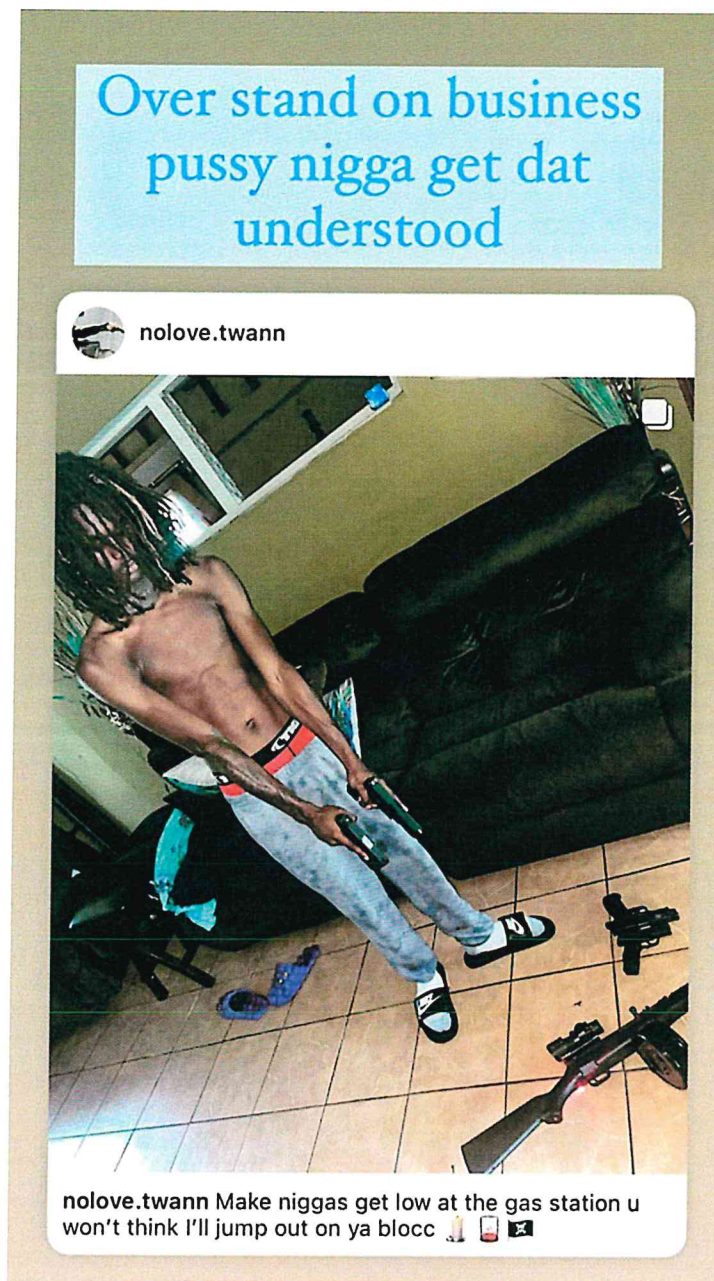
14. On or about August 19, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, in response to a message sent to his Facebook account, Luhh Trapp, asking what he was doing and why he was in Jacksonville stated the following “Makin money” and “we robbin ppl[.]” an overt act in furtherance of the conspiracy;
15. On or about August 19, 2023, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, KIMONE GREEN, and TRAVIS WHITE, A/K/A TRAPP**, associates of 528, along with other known and unknown associates of 528, while in the State of Florida, did commit the felony offense of robbery in the first degree by unlawfully; by force, violence, assault or putting in fear, take a laptop computer which may be the subject of larceny from the person or custody of Derick Taylor with the intent to either permanently or temporarily deprive Taylor of said property, and during the commission of the offense, said defendants possessed a firearm or destructive device, in violation of Fla. Stat., §§ 812.13(1) and (2)(a); 775.087, which is an act involving robbery chargeable under the laws of the State of Florida and which is punishable by imprisonment for more than one year constituting an act of Racketeering Activity under O.C.G.A. § 16-14-3(B) and an overt act in furtherance of the conspiracy;
16. On or about August 19, 2023, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, KIMONE GREEN, and TRAVIS WHITE, A/K/A TRAPP**, associates of 528, along with other known and unknown associates of 528, while in the State of Florida, did commit the felony offense of aggravated assault by intentionally and unlawfully threatening by word or act to do violence to the person of Matthew Wilson with the apparent ability to do so by pointing a firearm, a deadly weapon, at said victim without intent to kill and with intent to commit a felony, to wit: robbery, which created a well-founded fear in Wilson that violence was imminent, in violation of Fla. Stat., § 784.021(a), which is an act or threat involving murder, robbery, and theft chargeable under the laws of the State of Florida and which is punishable by imprisonment for more than one year constituting an act of Racketeering Activity under O.C.G.A. § 16-14-3(B) and an overt act in furtherance of the conspiracy;

17. On or about August 19, 2023, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, KIMONE GREEN, and TRAVIS WHITE, A/K/A TRAPP**, associates of 528, while in the State of Florida, did commit the felony offense of wire fraud by having devised or intending to devise a scheme or artifice to obtain money or property by means of false or fraudulent pretenses, representations, and promises, transmitted or caused to be transmitted by means of wire and radio, in interstate or foreign commerce, writings for the purpose of executing such scheme or artifice, to wit: messages on August 19, 2023, to Derick Taylor purporting a desire to buy a laptop computer but with the intention of robbing Taylor of such laptop, in violation of 18 U.S.C. § 1343, which is an act of Racketeering Activity under O.C.G.A. § 16-14-3(5)(C) and an overt act in furtherance of the conspiracy.
18. On or about August 20, 2023, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, KIMONE GREEN, and TRAVIS WHITE, A/K/A TRAPP**, associates of 528, along with other known and unknown associates of 528, while in the State of Florida, did commit the felony offense of robbery in the first degree by unlawfully; by force, violence, assault or putting in fear, take a cell phone which may be the subject of larceny from the person or custody of Hai Hong Van with the intent to either permanently or temporarily deprive Van of said property, and during the commission of the offense, said defendants possessed a firearm or destructive device, in violation of Fla. Stat., §§ 812.13(1) and (2)(a); 775.087, which is an act involving robbery chargeable under the laws of the State of Florida and which is punishable by imprisonment for more than one year constituting an act of Racketeering Activity under O.C.G.A. § 16-14-3(B) and an overt act in furtherance of the conspiracy;
19. On or about August 20, 2023, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, KIMONE GREEN, and TRAVIS WHITE, A/K/A TRAPP**, associates of 528, along with other known and unknown associates of 528, while in the State of Florida, did commit the felony offense of aggravated assault by intentionally and unlawfully threatening by word or act to do violence to the person of Hai Hong Van with the apparent ability to do so by pointing a firearm, a deadly weapon, at said victim without intent to kill and with intent to commit a felony, to wit: robbery, which created a well-founded fear in Van that violence was imminent, in violation of Fla. Stat., § 784.021(a), which is an act or threat involving murder, robbery, and theft chargeable under the laws of the State of Florida and which is punishable by imprisonment for more than one year constituting an act of Racketeering Activity under O.C.G.A. § 16-14-3(B) and an overt act in furtherance of the conspiracy;

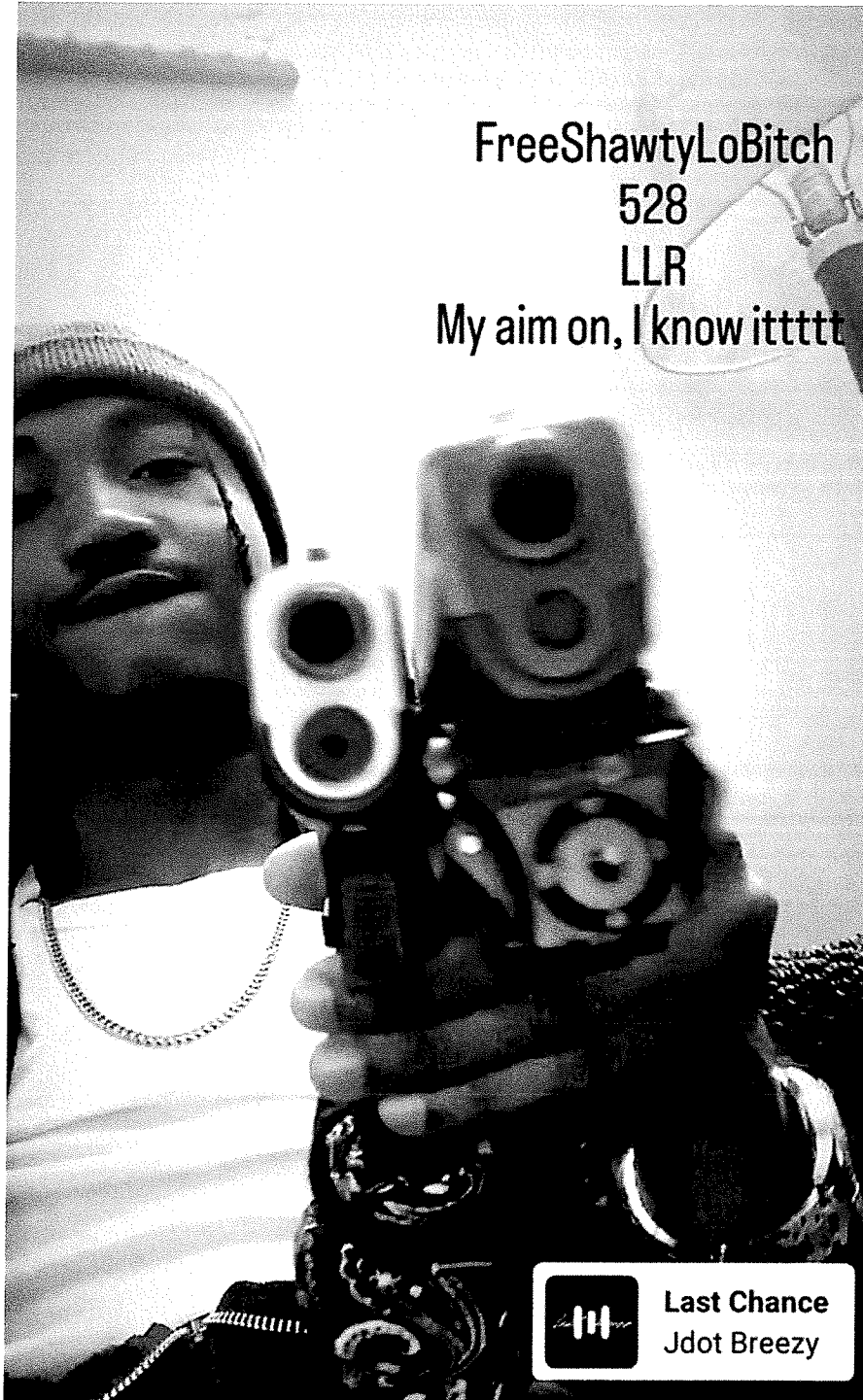
20. On or about August 20, 2023, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, KIMONE GREEN, and TRAVIS WHITE, A/K/A TRAPP**, associates of 528, along with other known and unknown associates of 528, while in the State of Florida, did commit the felony offense of wire fraud by having devised or intending to devise a scheme or artifice to obtain money or property by means of false or fraudulent pretenses, representations, and promises, transmitted or caused to be transmitted by means of wire and radio, in interstate or foreign commerce, writings for the purpose of executing such scheme or artifice, to wit: messages on August 20, 2023 to Hai Hong Van purporting a desire to buy a cellphone but with the intention of robbing Van of such cellphone, in violation of 18 U.S.C. § 1343, which is an act of Racketeering Activity under O.C.G.A. § 16-14-3(5)(C) and an overt act in furtherance of the conspiracy;
21. On or about August 20, 2023, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, KIMONE GREEN, and TRAVIS WHITE, A/K/A TRAPP**, associates of 528, along with other known and unknown associates of 528, while in the State of Florida, did commit the felony offense of attempted felony murder by shooting at and striking Dmitriy Voytukhov during the attempted robbery described in overt act 22, which could have, but did not, cause the death of Dmitriy Voytukhov, in violation of Fla. Stat., § 782.051(1), which is an act involving attempted murder chargeable under the laws of the State of Florida and which is punishable by imprisonment for more than one year constituting an act of Racketeering Activity under O.C.G.A. § 16-14-3(B) and an overt act in furtherance of the conspiracy;
22. On or about August 20, 2023, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, KIMONE GREEN, and TRAVIS WHITE, A/K/A TRAPP**, associates of 528, along with other known and unknown associates of 528, while in the State of Florida, did commit the felony offense of robbery in the first degree by unlawfully; by force, violence, assault or putting in fear, take an iPad which may be the subject of larceny from the person or custody of Dmitriy Voytukhov with the intent to either permanently or temporarily deprive Voytukhov of said property, and during the commission of the offense, said defendants possessed a firearm or destructive device, in violation of Fla. Stat., §§ 812.13(1) and (2)(a); 775.087, which is an act involving robbery chargeable under the laws of the State of Florida and which is punishable by imprisonment for more than one year constituting an act of Racketeering Activity under O.C.G.A. § 16-14-3(B) and an overt act in furtherance of the conspiracy;

23. On or about August 20, 2023, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, KIMONE GREEN, and TRAVIS WHITE, A/K/A TRAPP**, associates of 528, along with other known and unknown associates of 528, while in the State of Florida, did commit the felony offense of aggravated battery by actually and intentionally striking Dmitriy Voytukhov against his will with a deadly weapon, to wit: a firearm, by shooting Voytukhov in the arm, in violation of O.C.G.A. § 784.045(1)(a)(2), which is an act or threat involving murder, robbery, and theft chargeable under the laws of the State of Florida and which is punishable by imprisonment for more than one year constituting an act of Racketeering Activity under O.C.G.A. § 16-14-3(B) and an overt act in furtherance of the conspiracy;
24. On or about August 20, 2023, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, KIMONE GREEN, and TRAVIS WHITE, A/K/A TRAPP**, associates of 528, along with other known and unknown associates of 528, while in the State of Florida, did commit the felony offense of wire fraud by having devised or intending to devise a scheme or artifice to obtain money or property by means of false or fraudulent pretenses, representations, and promises, transmitted or caused to be transmitted by means of wire and radio, in interstate or foreign commerce, writings for the purpose of executing such scheme or artifice, to wit: messages on August 20, 2023 to Dmitriy Voytukhov purporting a desire to buy an iPad but with the intention of robbing Voytukhov of such iPad, in violation of 18 U.S.C. § 1343, which is an act of Racketeering Activity under O.C.G.A. § 16-14-3(5)(C) and an overt act in furtherance of the conspiracy;

25. On or about August 30, 2023, ANTOINE TAYLOR, A/K/A TWAN, an associate of 528, did post to his social media account "nolove.twann," a picture on his story depicting himself pointing two handguns at the ground at two more handguns and a rifle with a high capacity magazine and captioned as follows: "Over stand on business pussy n**** get dat understood" and "make n***** get low at the gas station u won't think I'll jump out on ya blocc," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

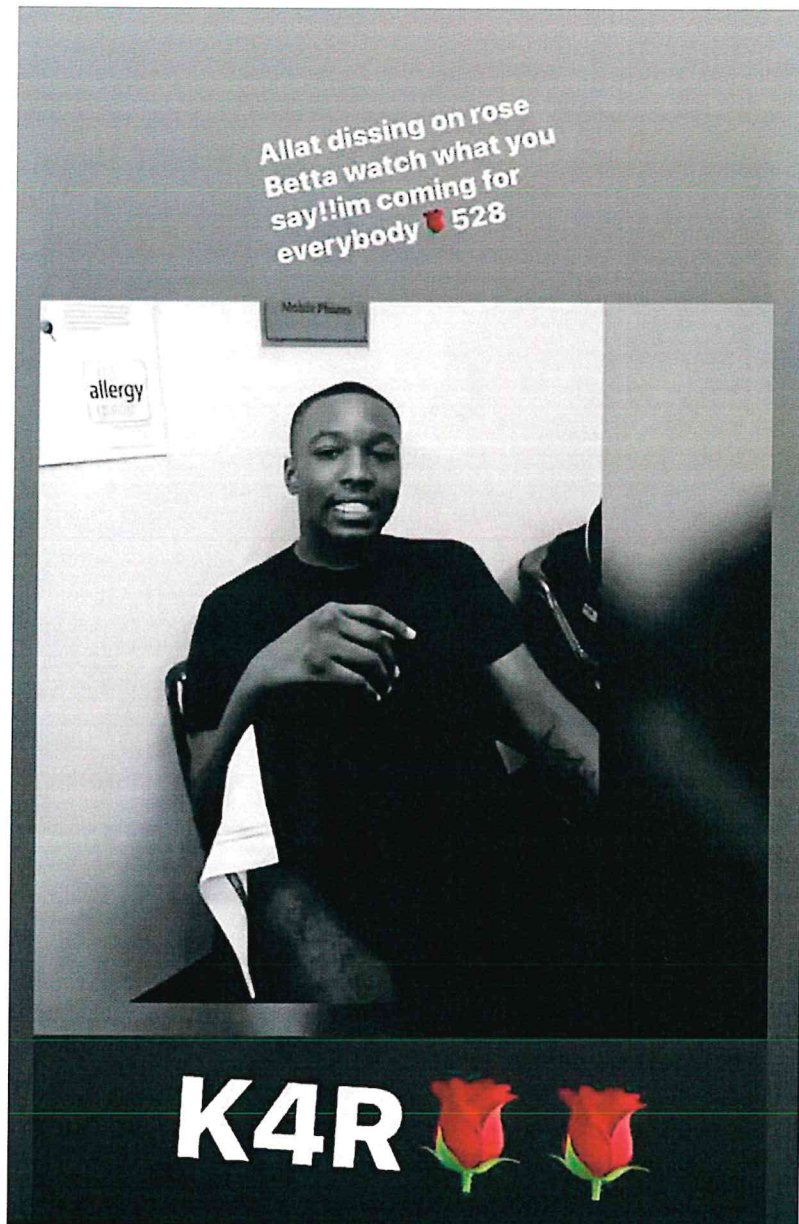


26. On or about September 2, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23SteppaG," a video on his story depicting himself pointing two handguns at the camera and captioned as follows: "FreeShawtyLoBitch 528 LLR My aim on, I know ittttt," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



27. On or about September 4, 2023, **ANTOINE TAYLOR, A/K/A TWAN** and **CEDRIC JORDAN, A/K/A TROUBLE**, associates of 528, in Colquitt County, Georgia, did commit the felony offense of wire fraud by having devised or intending to devise a scheme or artifice to obtain money or property by means of false or fraudulent pretenses, representations, and promises, transmitted or caused to be transmitted by means of wire and radio, in interstate or foreign commerce, writings for the purpose of executing such scheme or artifice, to wit: messages to Brittan Vinson-McClelland purporting a desire to buy a PlayStation 5 but with the intention of robbing McClelland of such property, in violation of 18 U.S.C. § 1343, which is an act of Racketeering Activity under O.C.G.A. § 16-14-3(5)(C) and an overt act in furtherance of the conspiracy.
28. On or about September 4, 2023, **ANTOINE TAYLOR, A/K/A TWAN** and **CEDRIC JORDAN, A/K/A TROUBLE**, associates of 528, in Colquitt County, Georgia, did commit the felony offense of armed robbery when they, with the intent to commit theft, took the property from the person of Steven Vinson-McClelland, to wit: a PlayStation 5, by use of an offensive weapon, a firearm, in violation of O.C.G.A. § 16-8-41(a), which is an act of Racketeering Activity under O.C.G.A. § 16-14-3(5)(A)(xiii) and (B) and an overt act in furtherance of the conspiracy;
29. On or about September 4, 2023, **ANTOINE TAYLOR, A/K/A TWAN** and **CEDRIC JORDAN, A/K/A TROUBLE**, associates of 528, in Colquitt County, Georgia, did commit the felony offense of Aggravated Assault against the person of Steven Vinson-McClelland by shooting in the direction of said victim with a firearm, a deadly weapon, in violation 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;

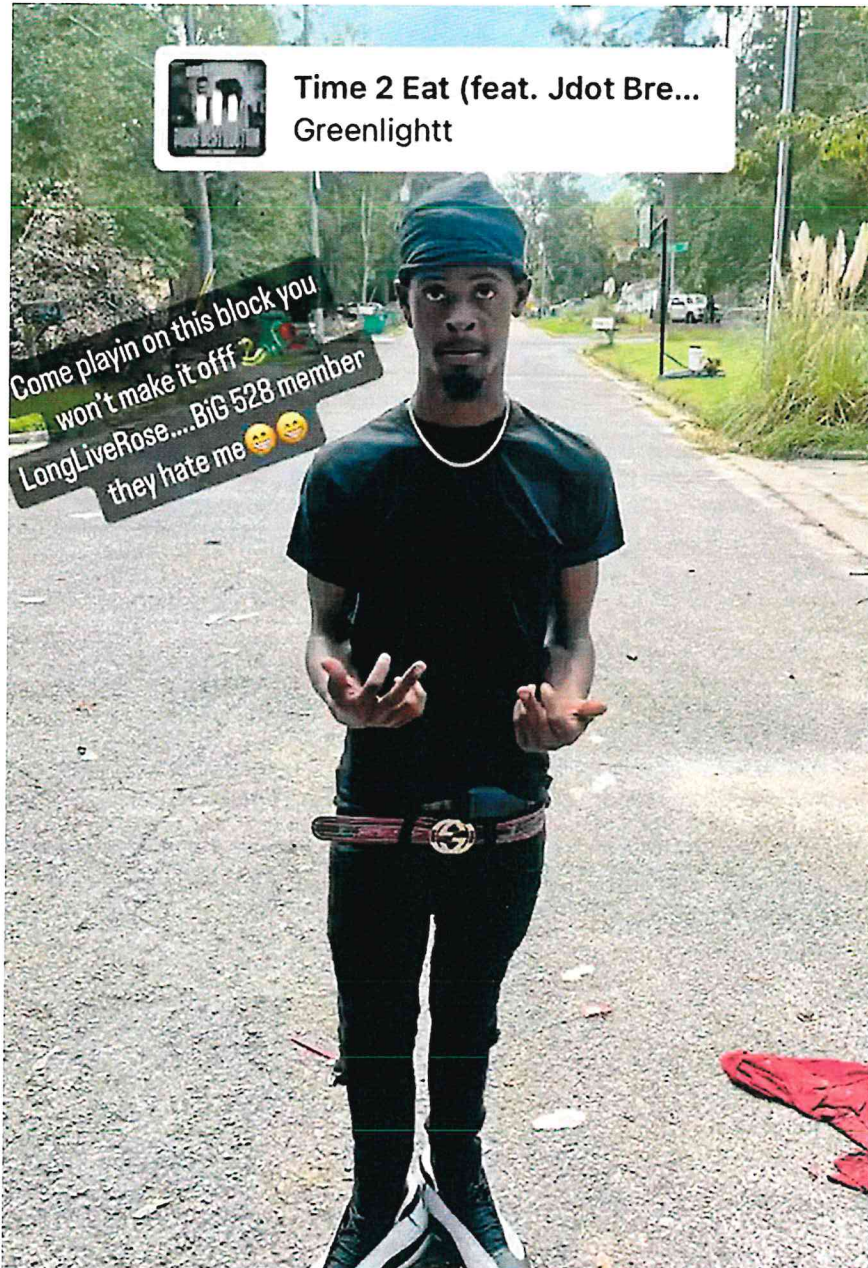
30. On or about September 7, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story of Jamar Walton, A/K/A D-Rose, captioned with the following: "Allat dissing on rose Betta watch what you say!! I'm coming for everybody . . . 528 K4R," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



31. On or about September 10, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23SteppaG," a video on his story depicting himself, **KIMONE GREEN**, and **TRAVIS WHITE, A/K/A TRAPP**, associates of 528, in possession of firearms and captioned as follows: "Influenced by allat cap ass music Eyes on the target bet I hit emm" a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



32. On or about September 11, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story of himself with a handgun in his waistband, captioned with the following: "Come playin on this block you won't make it off . . . LongLiveRose . . . BiG 528 member they hate me," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



33. On or about September 17, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story, captioned with the following: "Kill me if I'm a opp don't let me slide cause ain gone spare Shit!! . . . LongLiveRRose Bitch," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



34. On or about September 21, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story, captioned with the following: "Free Trouble & Free Twan," an overt act in furtherance of the conspiracy;

35. On or about September 25, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, did change the name of his social media account, from “trapp.23hreeshotz” to “mr.528trapp,” a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

Vanity Changes **Old Vanity**trapp.23hreeshotz
 New Vanitymr.528trapp
 Time2023-09-25 23:34:44 UTC
 User Initiatedtrue

 Old Vanitysob.trapp
 New Vanitytrapp.23hreeshotz
 Time2023-08-13 04:43:40 UTC
 User Initiated

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true

35. On or about September 25, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, did change the name of his social media account, from “trapp.23hreeshotz” to “mr.528trapp,” a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

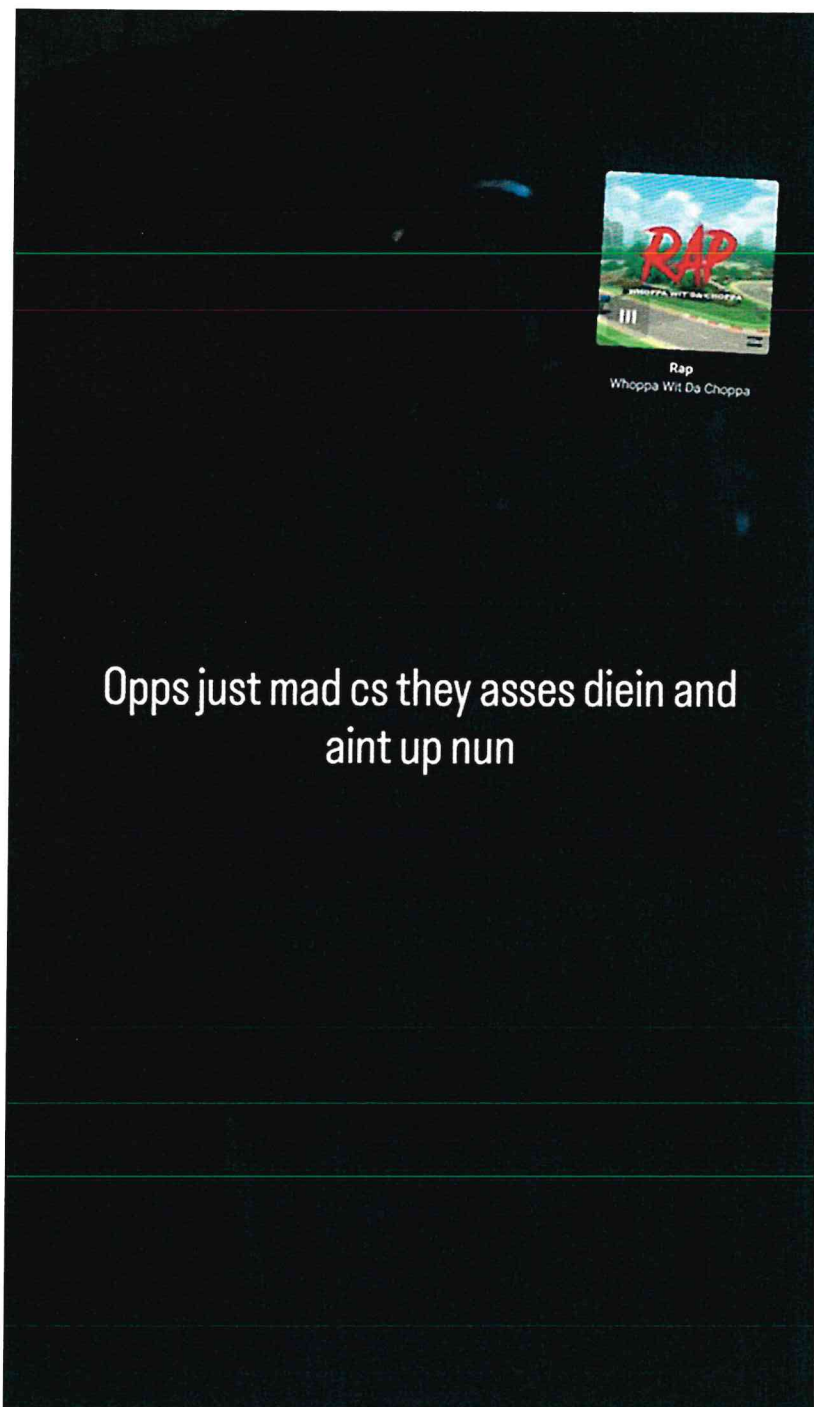
Vanity Changes Old Vanitytrapp.23hreeshotz
New Vanitymr.528trapp
Time2023-09-25 23:34:44 UTC
User Initiatedtrue

Old Vanitysob.trapp
New Vanitytrapp.23hreeshotz
Time2023-08-13 04:43:40 UTC
User Initiated

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true

36. On or about September 27, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23SteppaG," a video on his story captioned as follows: "Opp just mad cs they asses diein and aint up nun," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



37. On or about September 28, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23SteppaG," a picture on his story captioned as follows: "They hate 528 cs they aint neva get no getbacccc," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



They hate 528 cs they aint neva get
no getbacccc

38. On or about September 28, 2023, **KIMONE GREEN**, an associate of 528, did send the following messages utilizing his social media account "23Soldier556," to a group of known and unknown 528 associates, which included, **ALEX PARRISH, A/K/A FAT, ANTOINE TAYLOR, A/K/A TWAN, TRAVIS WHITE, A/K/A TRAPP, TSION CLAYTON, A/K/A STEPPA**, Ruffard Ellis, A/K/A Bank, Delicia Berrien, and Darius Sandifer, A/K/A Lil E, a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

Author 23soldier556 (Instagram: 61361455327)

Sent 2023-09-28 01:11:49 UTC

Body Ok then leave that shit alone my Nigga let's go kill some that's it that's all

Author 23soldier556 (Instagram: 61361455327)

Sent 2023-09-28 01:12:20 UTC

Body All da opps gotta die what we arguing with eachother for that shi be crazy

Author 23soldier556 (Instagram: 61361455327)

Sent 2023-09-28 01:12:35 UTC

Body It's to many opps still alive

Author 23soldier556 (Instagram: 61361455327)

Sent 2023-09-28 01:12:38 UTC

Body Jay black still ain dead

Author 23soldier556 (Instagram: 61361455327)

Sent 2023-09-28 01:12:44 UTC

Body Dudda still alive

Author 23soldier556 (Instagram: 61361455327)

Sent 2023-09-28 01:12:48 UTC

Body Lil black still here

Author 23soldier556 (Instagram: 61361455327)

Sent 2023-09-28 01:12:49 UTC

Body Savanna

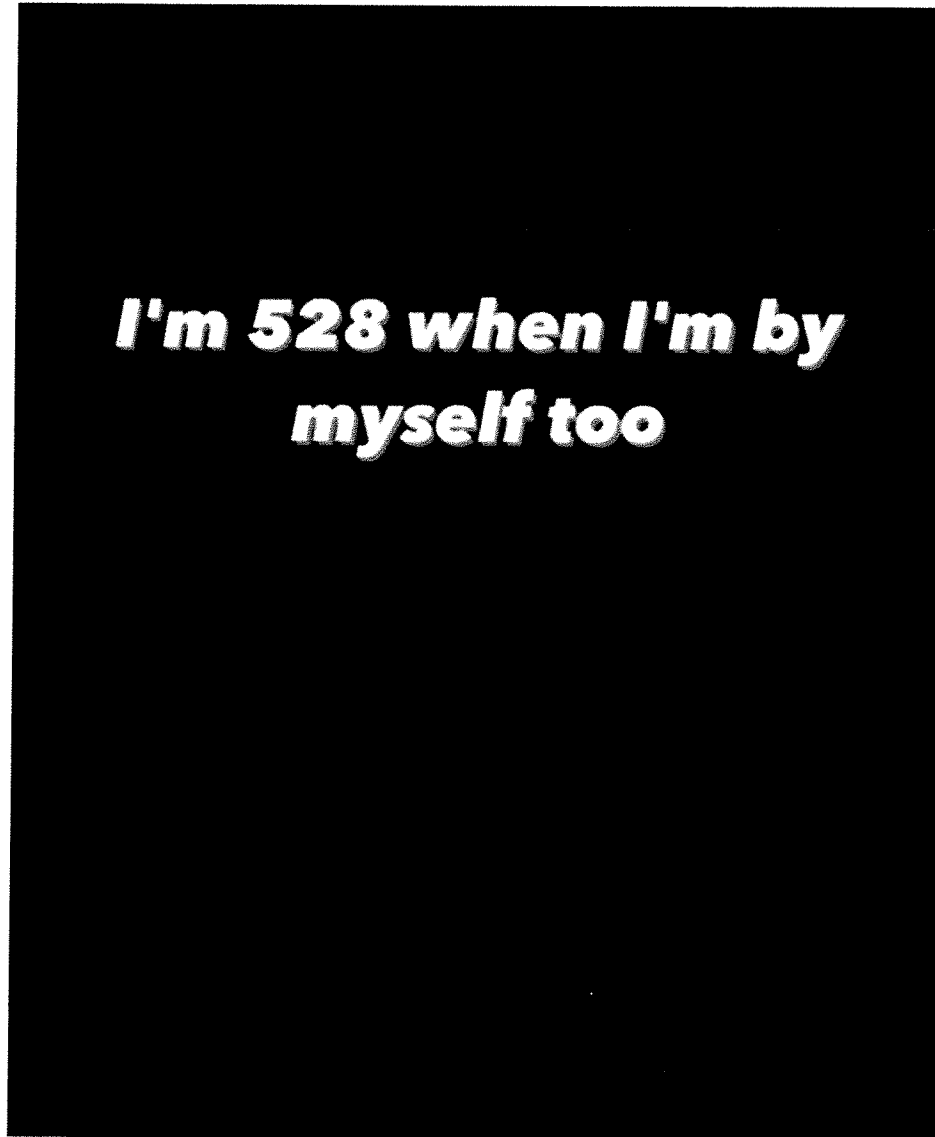
39. On or about September 29, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, did post to his social media account "mr.528trapp," a picture on his story captioned with the following: "They hate 528 cs they aint neva get no getbacccc," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



40. On or about October 5, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story showing five handguns held in a group by five hands and captioned with the following: "LongLiveRRose . . . 528TheClan," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

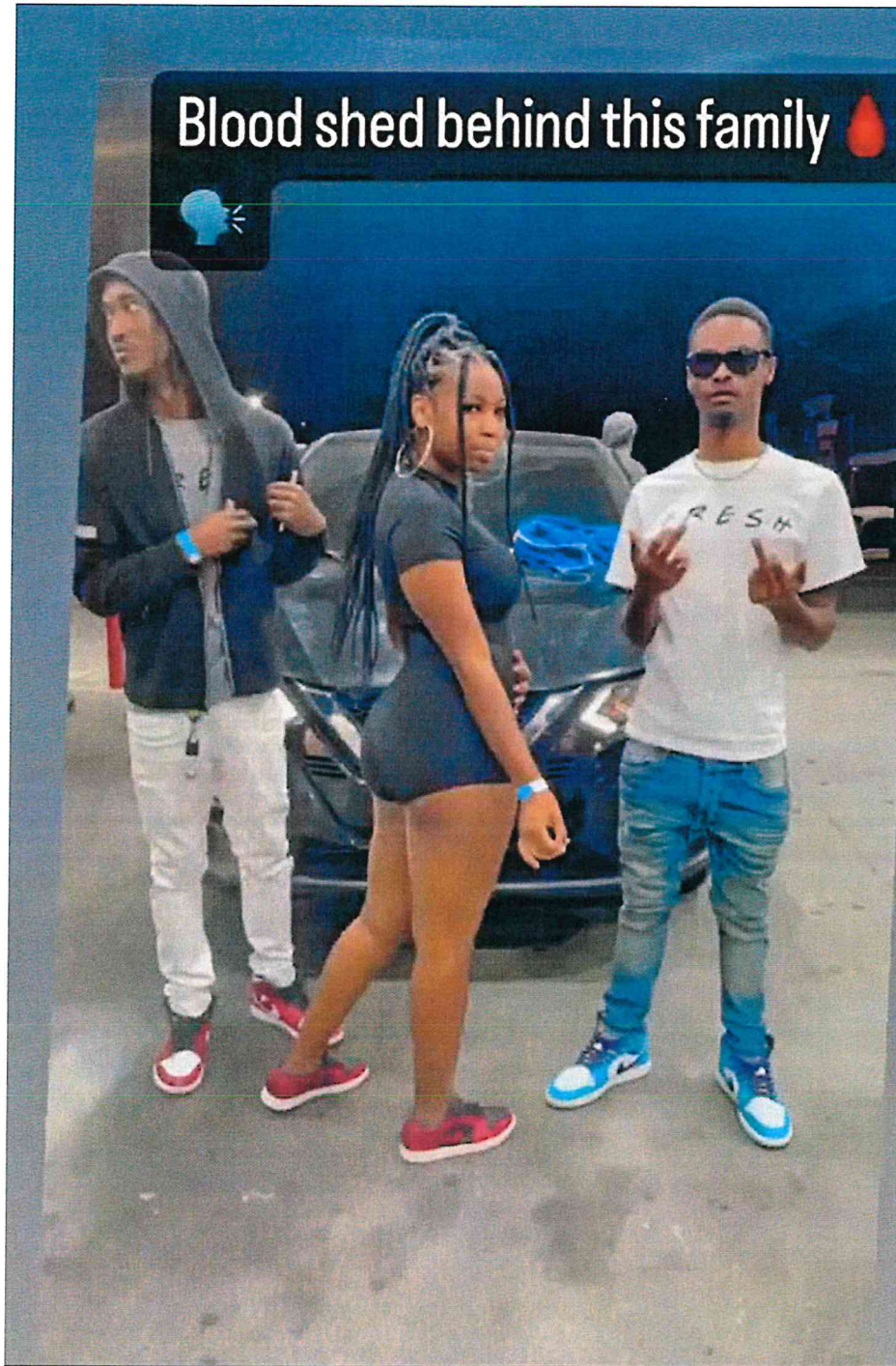


41. On or about October 6, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story, captioned with the following: "I'm 528 when I'm by myself too," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

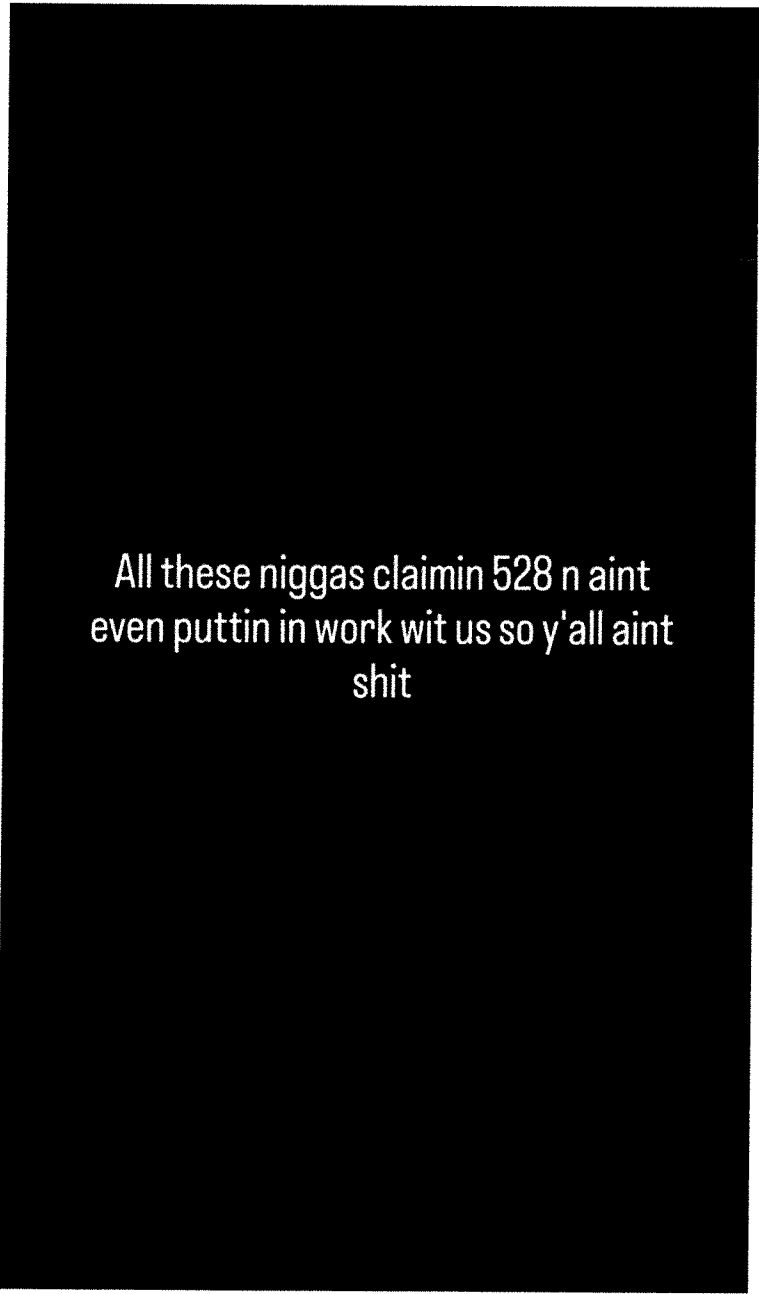


42. On or about October 6, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23Steppag," a picture on his story, captioned with the following: "I'm 528 when I'm by myself too," an overt act in furtherance of the conspiracy;

43. On or about October 8, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story depicting himself, **TSION CLAYTON, A/K/A STEPPA**, and Delicia Berrien, associates of 528, captioned with the following: "Blood shed behind this family," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

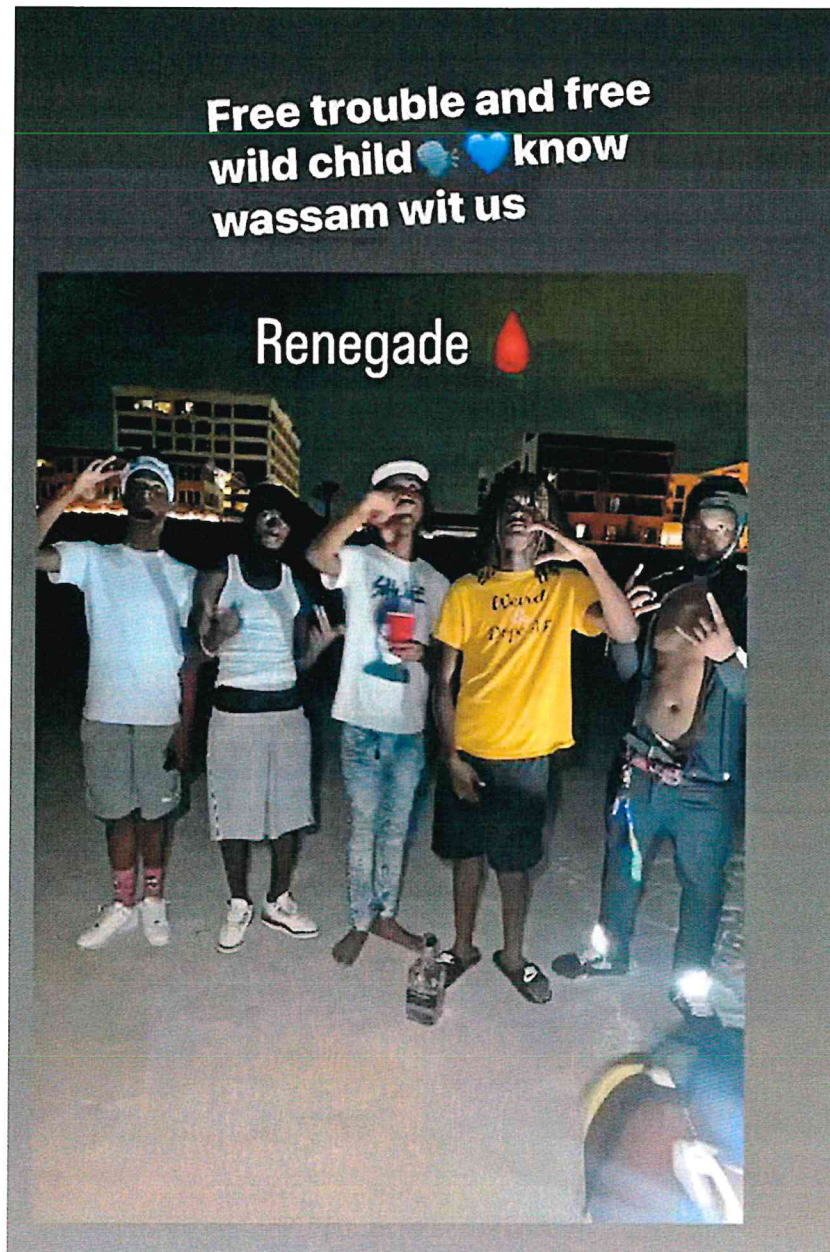


44. On or about October 9, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23Steppag," a picture on his story, captioned with the following: "All these n***** claimin 528 n aint even putting in work wit us so y'all aint shit," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

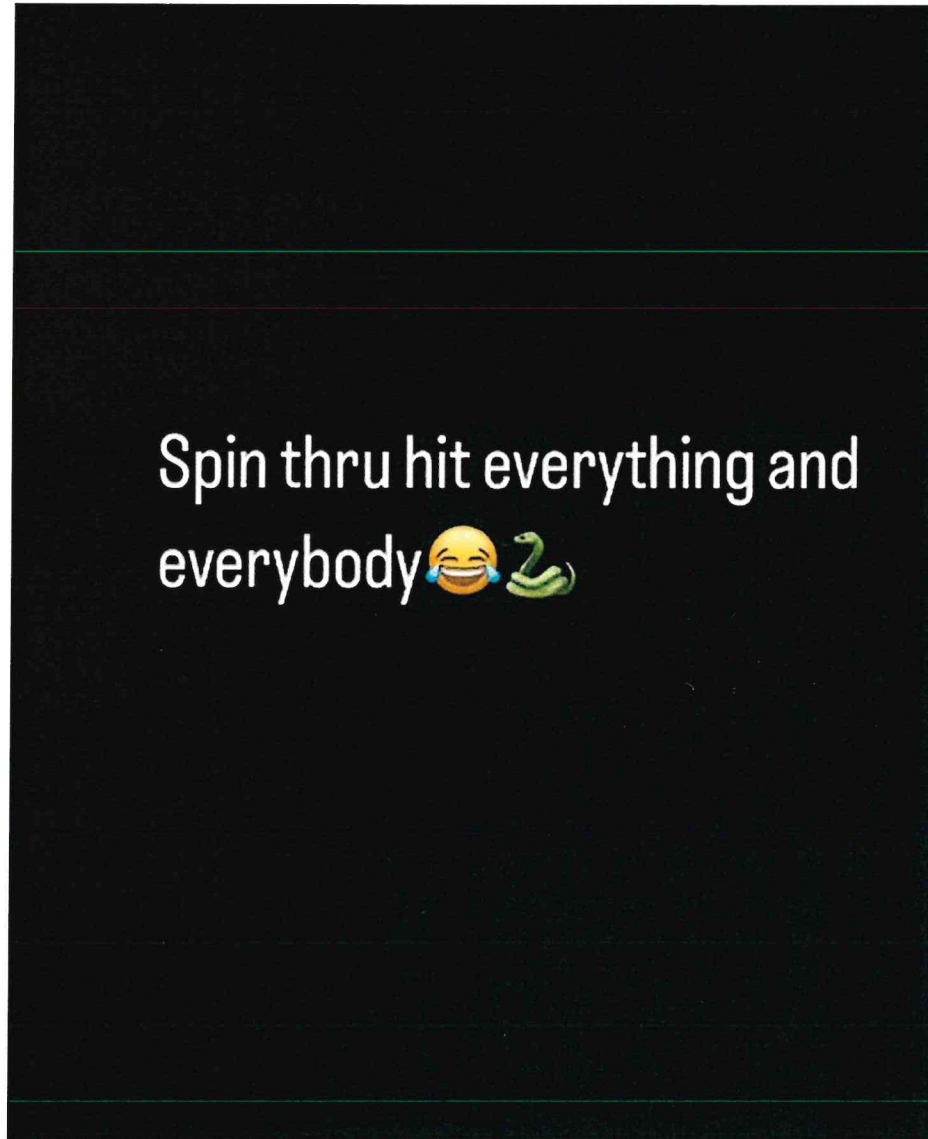


All these niggas claimin 528 n aint
even puttin in work wit us so y'all aint
shit

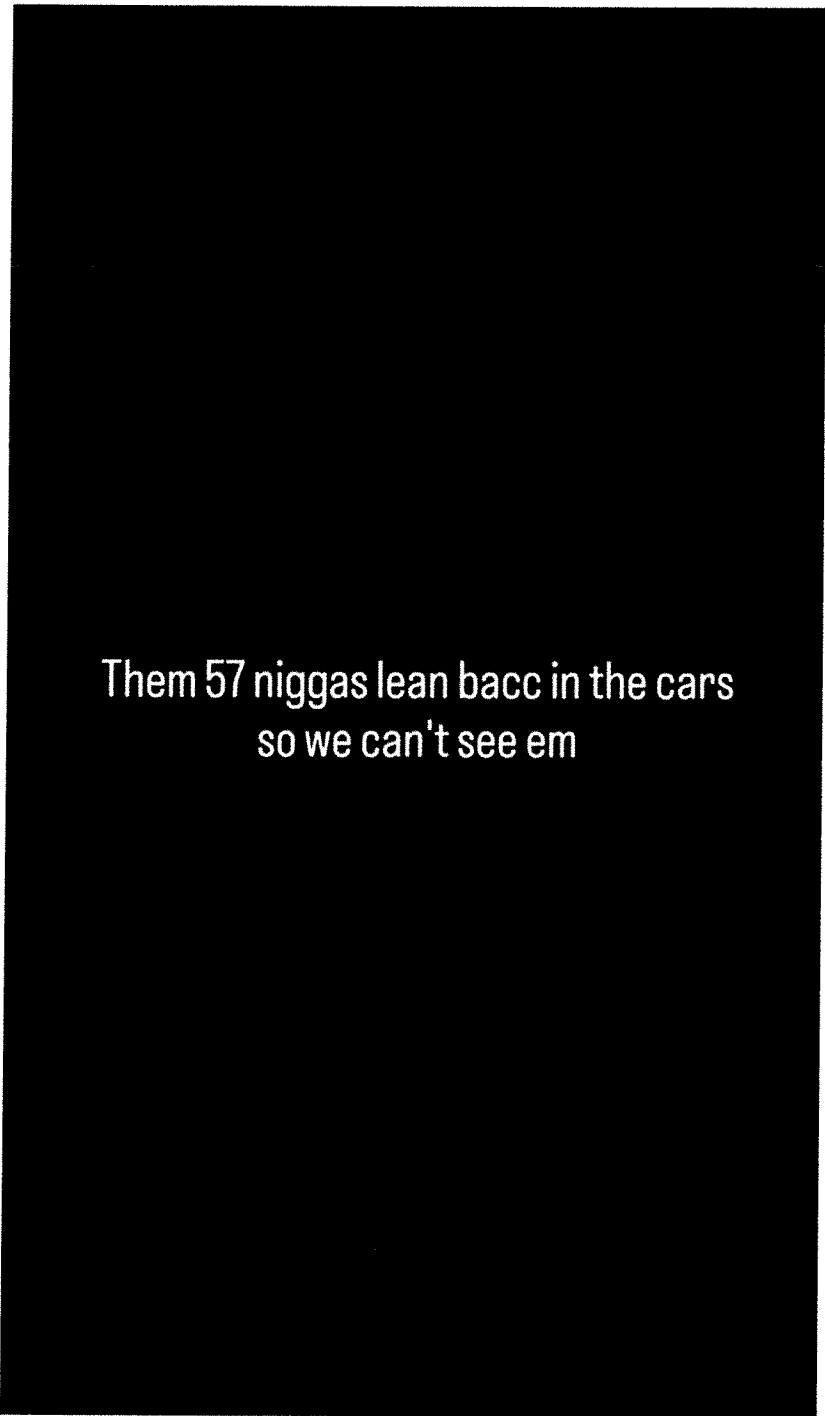
45. On or about October 11, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story depicting himself, **ANTOINE TAYLOR, A/K/A TWAN, CEDRIC JORDAN, A/K/A TROUBLE, TRAVIS WHITE, A/K/A TRAPP, and TSION CLAYTON, A/K/A STEPPA**, associates of 528, captioned with the following: "Free Trouble and free wild child . . . know wassam wit us Renegade," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



46. On or about October 22, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story, captioned with the following: "Spin thru hit everything and everybody," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



47. On or about October 23, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23Steppag," a picture on his story, captioned with the following: "Them 57 n***** lean back in the cars so we can't see em," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



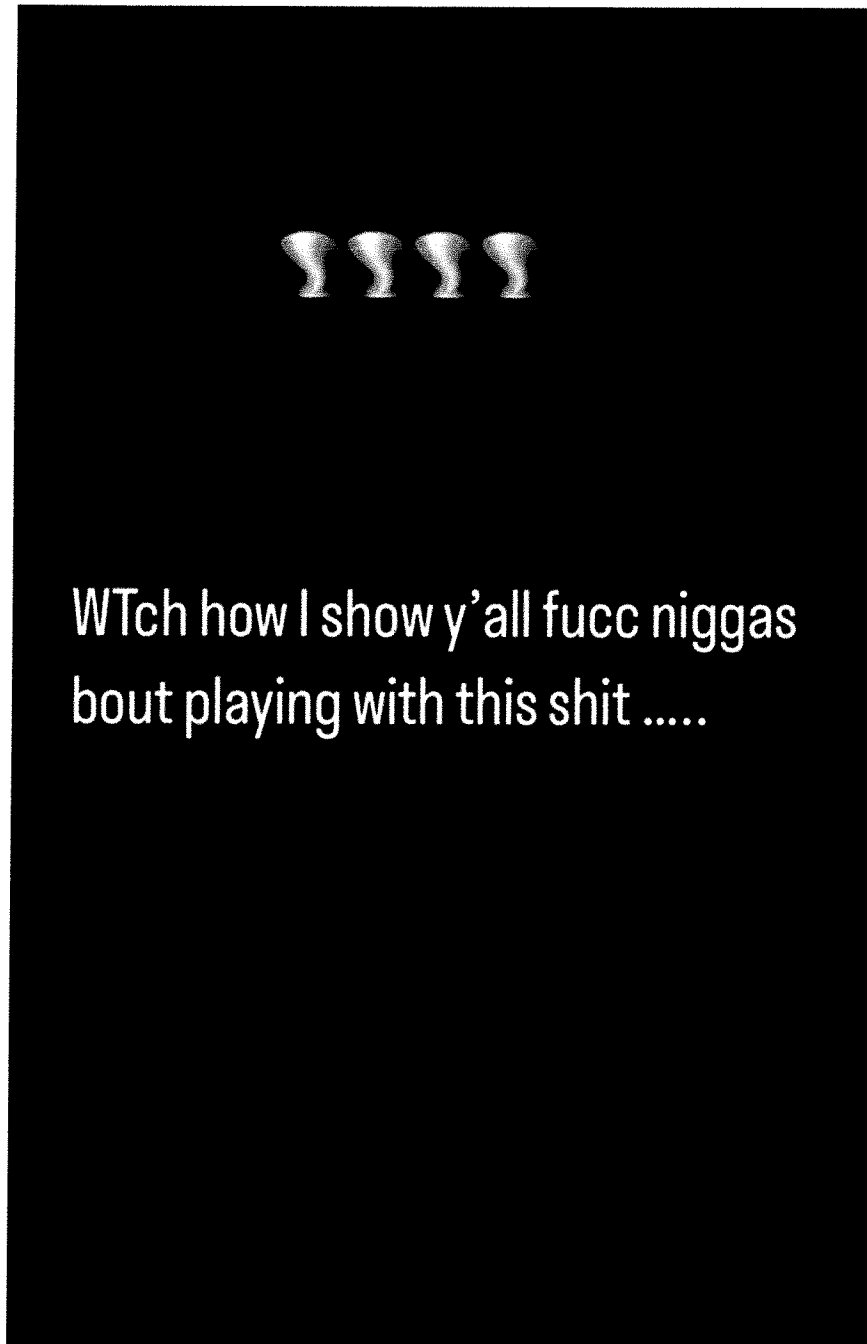
Them 57 niggas lean bacc in the cars
so we can't see em

48. On or about October 24, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, in Lowndes County, Georgia, did commit the felony offense entering automobile or other motor vehicle with intent to commit theft or felony, by entering the automobile belonging to Katrina Freeman with the intent to commit a theft or felony, in violation of O.C.G.A. § 16-8-18, 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;
49. On or about October 24, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, in Lowndes County, Georgia, did commit the felony offense entering automobile or other motor vehicle with intent to commit theft or felony, by entering the automobile belonging to Austin Wallace with the intent to commit a theft or felony, in violation of O.C.G.A. § 16-8-18, 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;
50. On or about October 24, 2023, **TRAVIS WHITE, A/K/A TRAPP**, an associate of 528, in Lowndes County, Georgia, did commit the felony offense of possession of a firearm during the commission of a felony, in that the said accused, did have on or within arm's reach of his person a firearm during the unlawful entry into the motor vehicles belonging to Katrina Freeman and Austin Wallace, in violation of O.C.G.A. § 16-11-106(b)(1), an overt act in furtherance of the conspiracy;

51. On or about October 24, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story depicting himself, **TRAVIS WHITE, A/K/A TRAPP**, and **TSION CLAYTON, A/K/A STEPPA**, associates of 528 holding handguns and captioned with the following: "free Luh Trapp," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



52. On or about October 25, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story captioned with the following: "WTch how I show y'all fucc n***** bout playing wit this shit," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

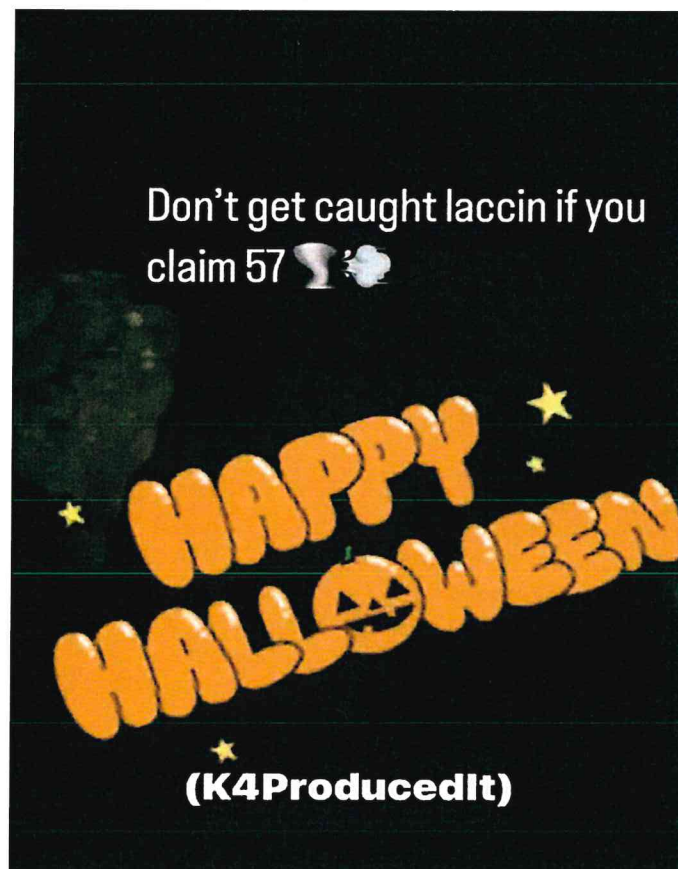


53. On or about October 27, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a video on his story depicting himself and fellow 528 associate, Darius Sandifer, A.K.A. Lil E, displaying a pistol, captioned with the following: "GBG [100] @528walkemdown," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



54. On or about October 29, 2023, **KIMONE GREEN** and **TSION CLAYTON, A/K/A STEPPA**, associates of 528, in Lowndes County, Georgia, did commit the felony the offense of murder when they did unlawfully, with malice aforethought, cause the death of Brianna Long, a human being, by shooting Brianna Long, in violation of O.C.G.A. § 16-5-1(a), 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;
55. On or about October 29, 2023, **KIMONE GREEN** and **TSION CLAYTON, A/K/A STEPPA**, associates of 528, in Lowndes County, Georgia, did commit the offense of Criminal Attempt to Commit Murder, in violation of O.C.G.A. § 16-4-1, 16-5-1, for that the said accused, with intent to commit the crime of Murder, in violation of O.C.G.A. § 16-5-1, did knowingly and intentionally perform an act which constituted a substantial step toward the commission of said crime, to-wit: shooting in the direction of Jastain Darrisaw, 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;
56. On or about October 29, 2023, **KIMONE GREEN** and **TSION CLAYTON, A/K/A STEPPA**, associates of 528, in Lowndes County, Georgia, did commit the offense of aggravated battery when they maliciously caused bodily harm to Joshua Dempsey by shooting Dempsey in the arm, which seriously disfigured his arm and deprived Dempsey of a member of his body by rendering his arm useless, in violation of 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;
57. On or about October 29, 2023, **KIMONE GREEN** and **TSION CLAYTON, A/K/A STEPPA**, associates of 528, in Lowndes County, Georgia, did commit the offense of aggravated assault when he made an assault upon the persons Brianna Long, Christopher Lager, Makayla Bell, Jastain Darrisaw, Bailey Teague, John Daniels, Britten Bennett, Don Wilson, McKenzie Falls, Peyton Gunn, Chance Lucas, Richard Lee, Christian Richardson, Marley Howell, Reggie Ross, and Eboni Tomblin, with a deadly weapon, to wit: a firearm, by shooting in said victims' direction, in violation of 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;

58. On or about October 29, 2023, **KIMONE GREEN** and **TSION CLAYTON, A/K/A STEPPA**, associates of 528, in Lowndes County, Georgia, did commit the felony offense of criminal damage to property in the first degree by knowingly and without authority interfering with the property of the Pier Bar, in a manner so as to endanger human life by shooting said property, with a firearm, with people inside, in violation of O.C.G.A. § 16-7-22, an overt act in furtherance of the conspiracy;
59. On or about October 29, 2023, **KIMONE GREEN** and **TSION CLAYTON, A/K/A STEPPA**, associates of 528, in Lowndes County, Georgia, did have on or within arm's reach of their person a firearm during the commission of the crimes murder, felony murder, aggravated assault, and criminal damage to property in the first degree, which are crimes against or involving the person of another, in violation of O.C.G.A. § 16-11-106(b)(1), an overt act in furtherance of the conspiracy;
60. On or about October 31, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story captioned with the following: "Don't get caught laccin if you claim 57 . . . Happy Halloween," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



61. On or about November 1, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a video on his story depicting himself, Darius Sandifer, A/K/A Lil E, and another associate of 528 in possession of handguns while riding in a vehicle and captioned with the following: "Whole gang blicked," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



62. On or about November 5, 2023 and November 19, 2023, **KIMONE GREEN**, an associate of 528, did send the following messages utilizing his social media account "23Soldier556," in response to a question of whether he had "smoke" with another gang, an overt act in furtherance of the conspiracy:

Author23soldier556 (Instagram: 61361455327)

Sent2023-11-05 06:26:33 UTC

Body Lil man he'll yea I'm still trynna figure out what that was bout niggas setting my lil brudda up having him come to that house knowing them Bangkrew Niggas was there and a Nigga put a stick on my brother I'm still trynna get some get back bout that shit ain gone lie cause they fw dem niggas and we just had a shootout with these Bangkrew niggas last night literally

Author23soldier556 (Instagram: 61361455327)

Sent2023-11-19 03:38:00 UTC

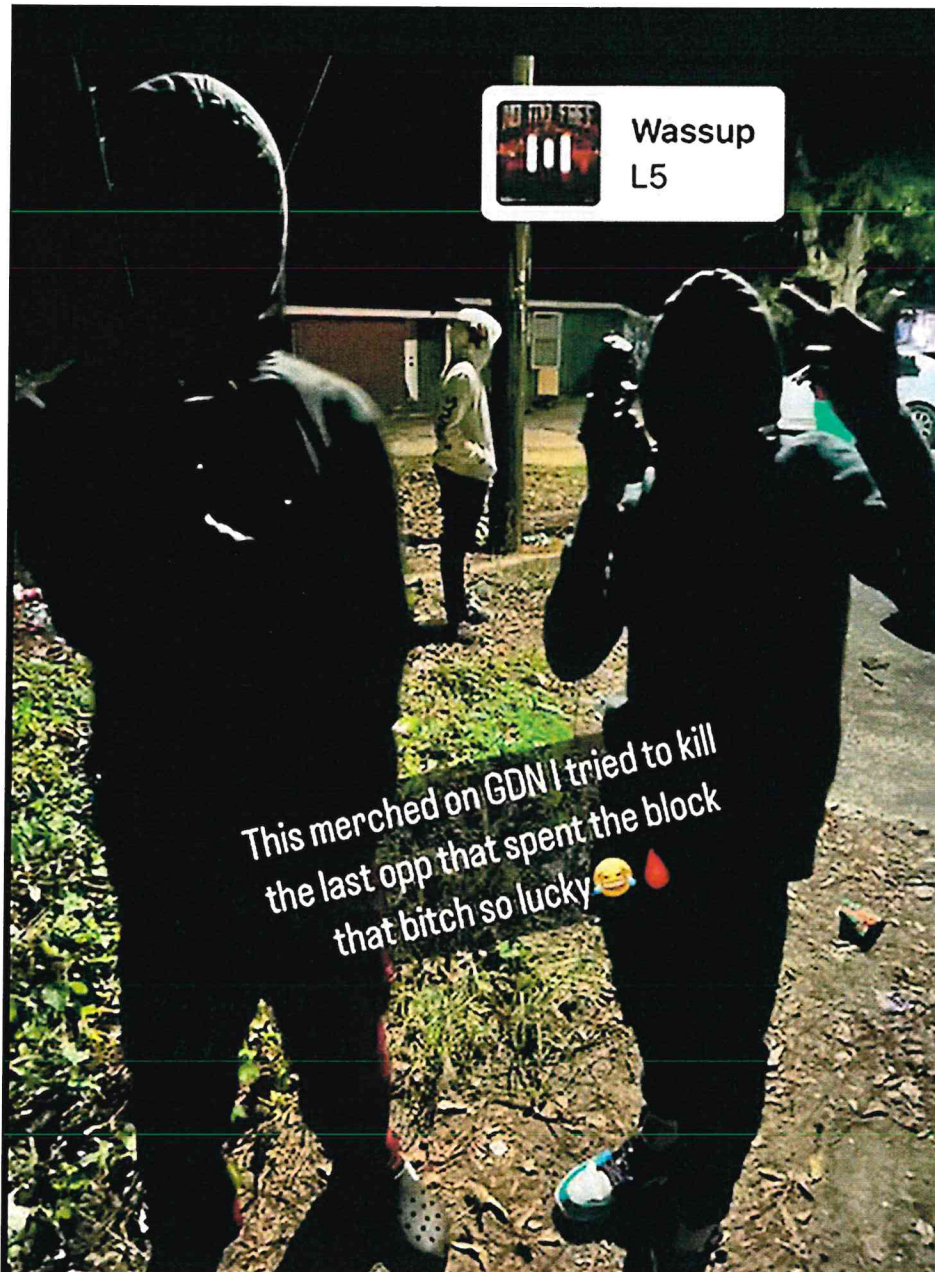
Body Don't let me find you

Author23soldier556 (Instagram: 61361455327)

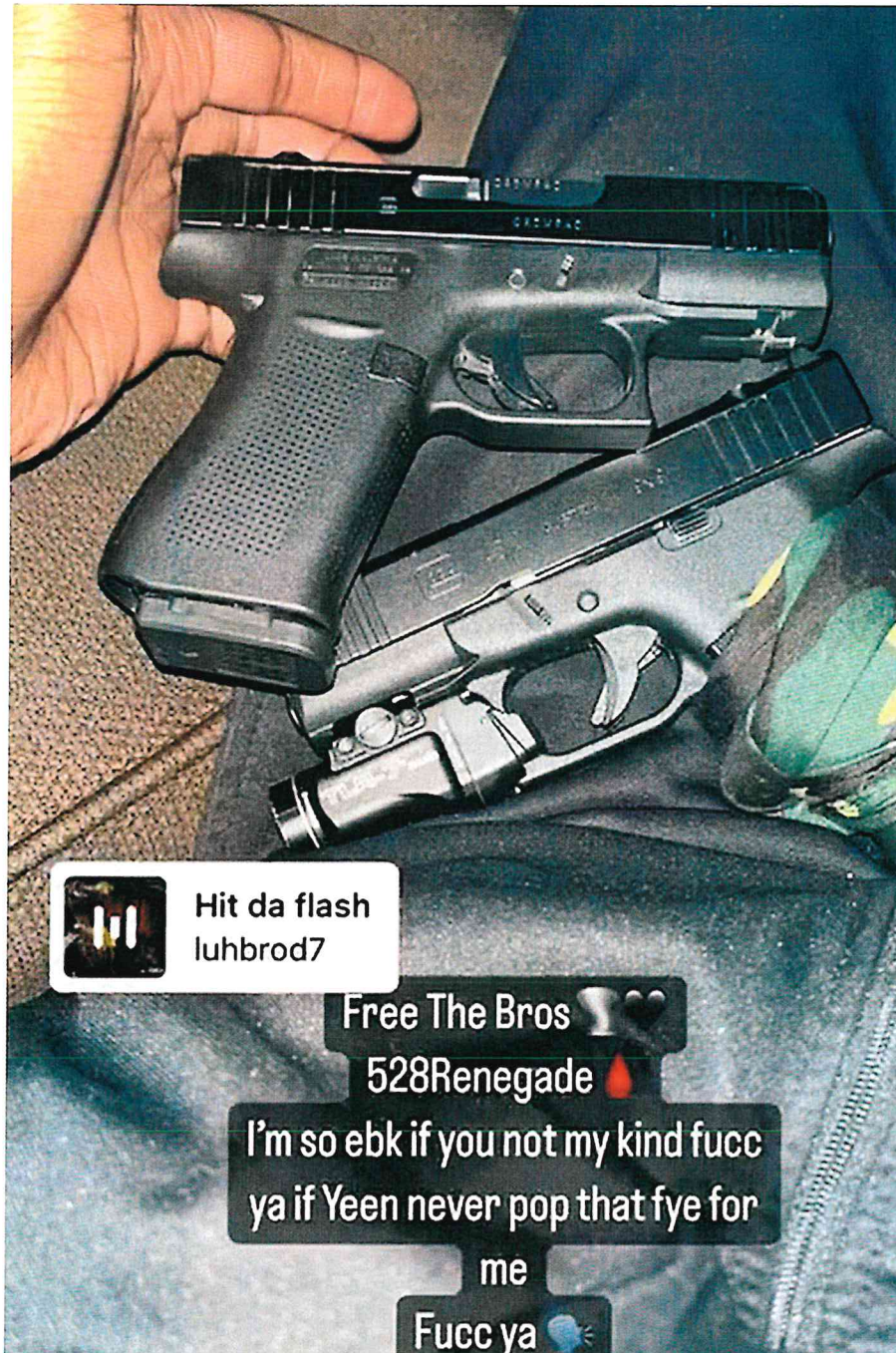
Sent2023-11-19 03:38:07 UTC

Body Y'all spent my lil brada I'm trynna kill some

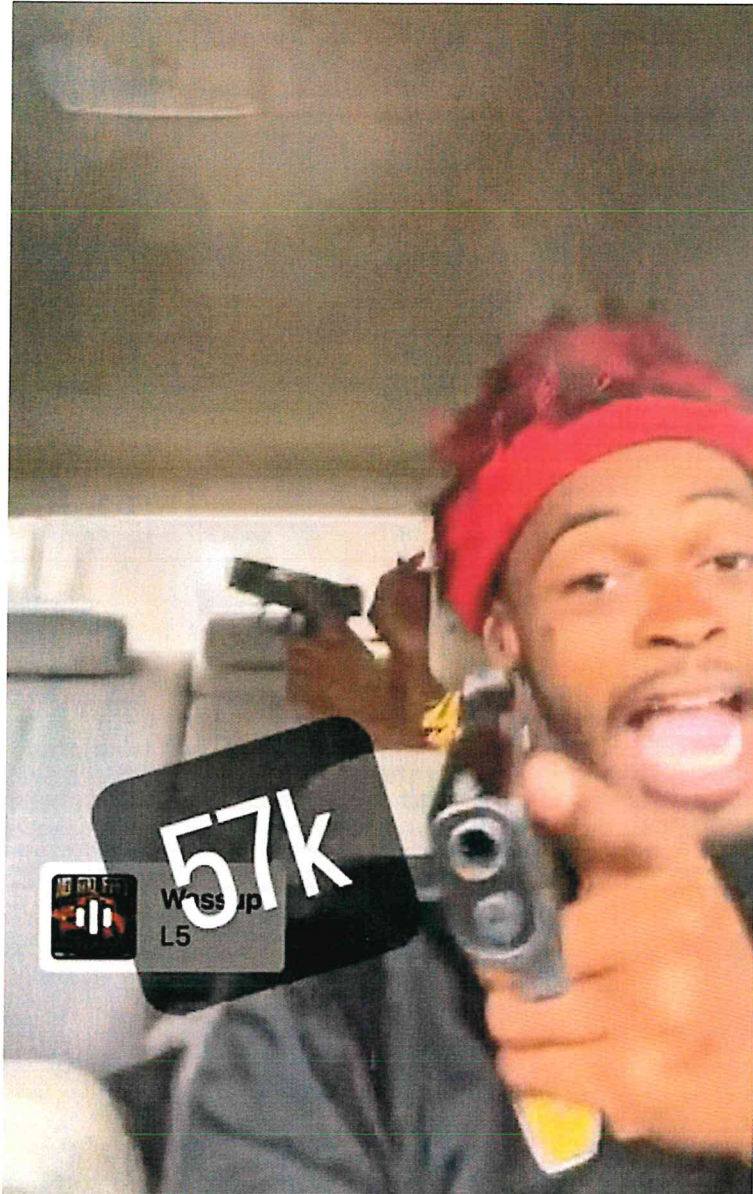
63. On or about November 12, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story depicting two individuals dressed in dark clothing and in possession of firearms captioned with the following: "This merched on GDN I tried to kill the las opp that spent the block that bitch so lucky," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



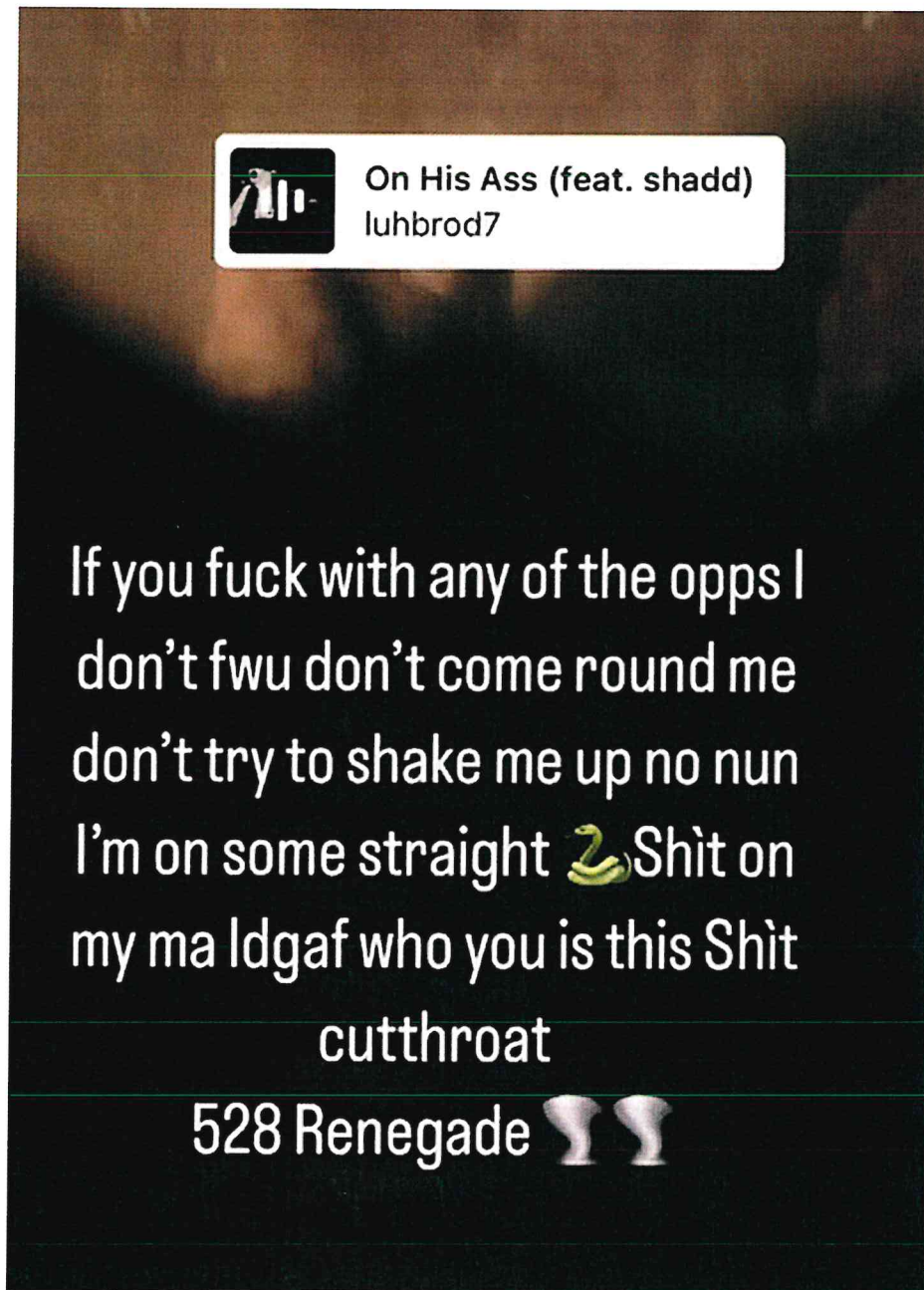
64. On or about November 14, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story depicting two handguns and captioned with the following: "Free The Bros . . . 528Renegade . . . I'm so ebk if you not my kind fucc ya if Yeen never pop that fye for me Fucc ya," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



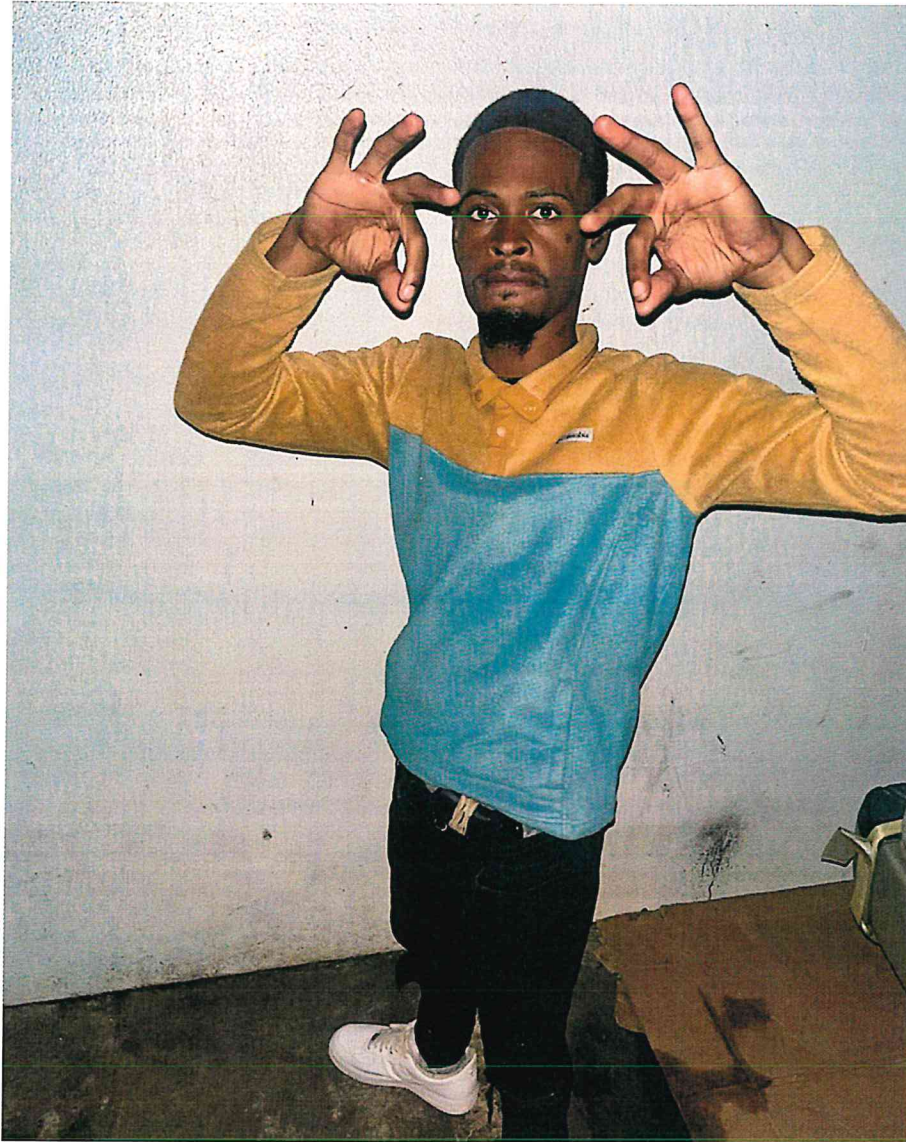
65. On or about November 16, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account “23Soldier556,” a video on his story depicting himself with a handgun, along with fellow 528 associate, Darius Sandifer, A/K/A Lil E, also in possession of a handgun, captioned as follows: “57K,” a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



66. On or about November 27, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story captioned with the following: "If you fuck with any of the opps I don't fwu don't come round me don't try to shake me up no nun I'm on some straight [snake emoji] shit on my ma Idgaf who you is this Shit cutthroat 528 Renegade," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



67. On or about November 28, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture depicting himself with a handgun in his hand and captioned as follows: "Walk down walk down hit the stick make the fucc N**** hit da ground . . .#23renegade," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



68. On or about November 30, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23Steppag," a picture on his story, captioned with the following: "Tha opps need some help, how you spin n keep getting sent back with stiches," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

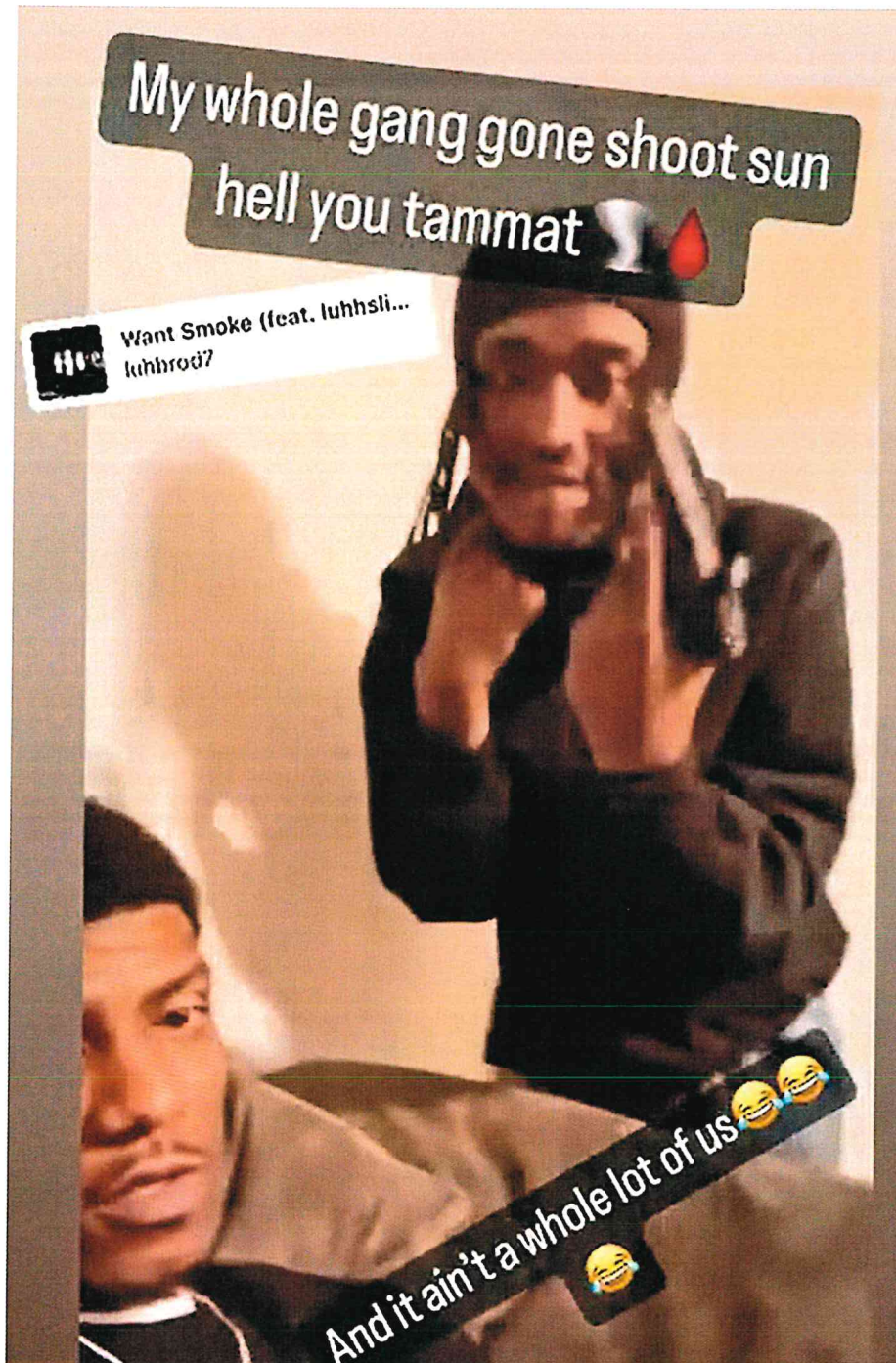
Tha opps need some help, how
you spin n keep gettin sent bacc
with stiches 😂😂😂😂😂

69. On or about December 1, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account “23Steppag,” a picture on his story depicting himself holding a firearm, captioned with the following: “Outside with my bitch erryday,” a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

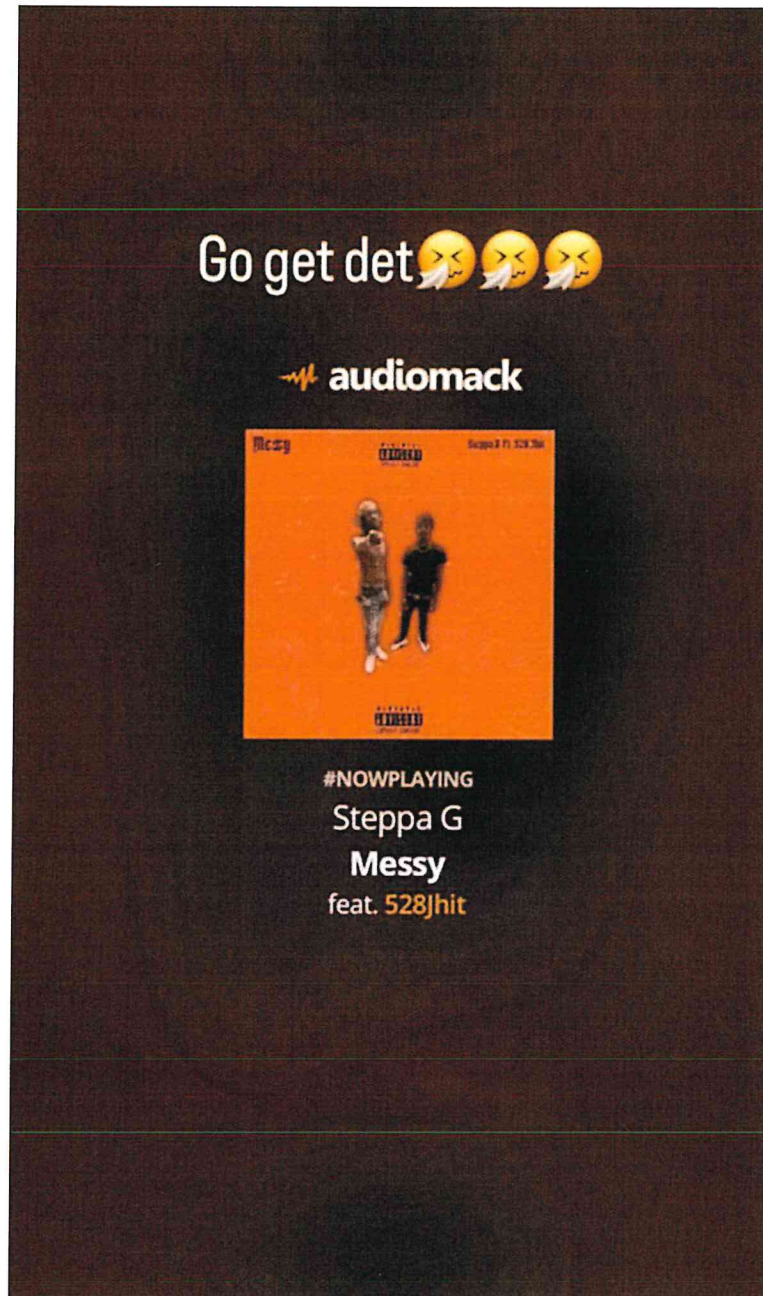
Outside with my bitch erryday



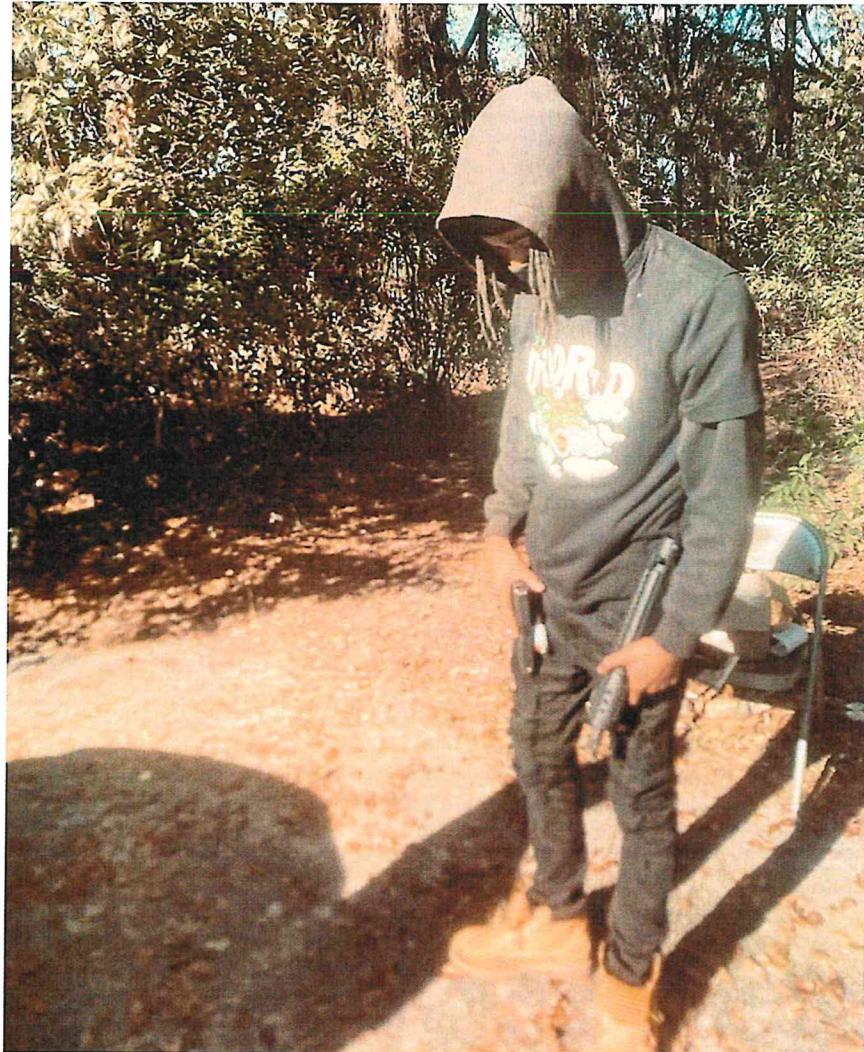
70. On or about December 2, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a video on his story depicting **ALEX PARRISH, A/K/A FAT, TSION CLAYTON, A/K/A STEPPA**, and Darius Sandifer, A/K/A Lil E, in possession of handguns and captioned with the following: "My whole gang gone shoot sun hell you tammat . . . And it ain't a whole lot of us," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



71. On or about December 6, 2023, **KIMONE GREEN**, an associate of 528, did post to his social media account “23Soldier556,” a picture on his story depicting a cover to a music album by “Steppa G”, which depicted **GREEN** and **TSION CLAYTON, A/K/A STEPPA** and captioned as follows: “Go get det,” a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



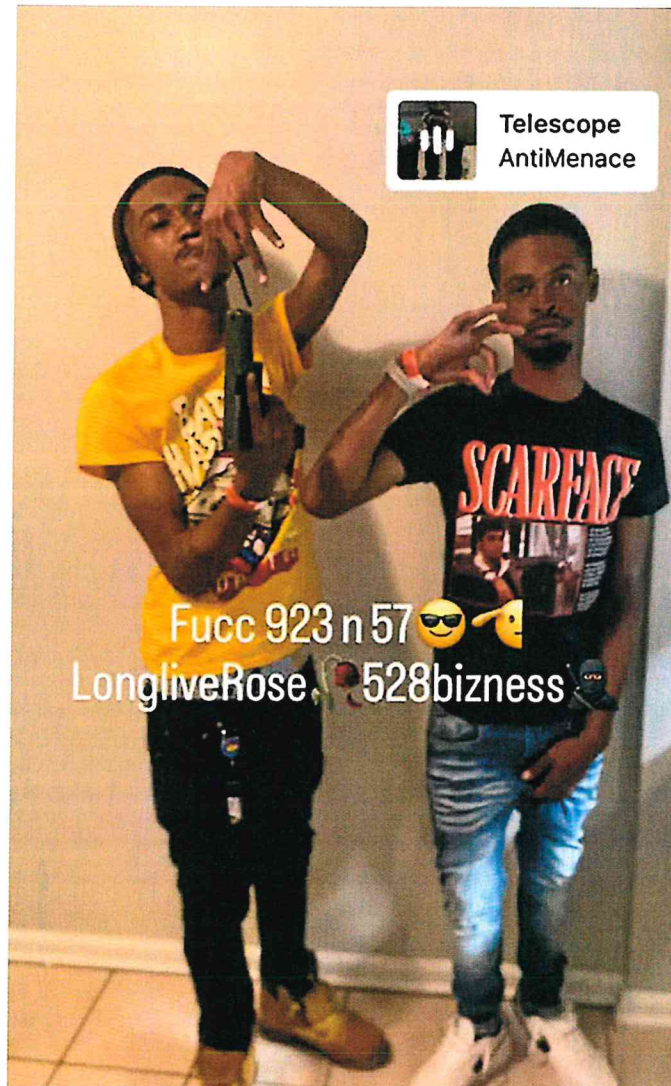
72. On or about December 18, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23Steppag," a picture depicting himself with two firearms and captioned with the following: "When I JumpOut Wit This Glizzy They See Nun But Flames . . . #23Renegadeeee," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



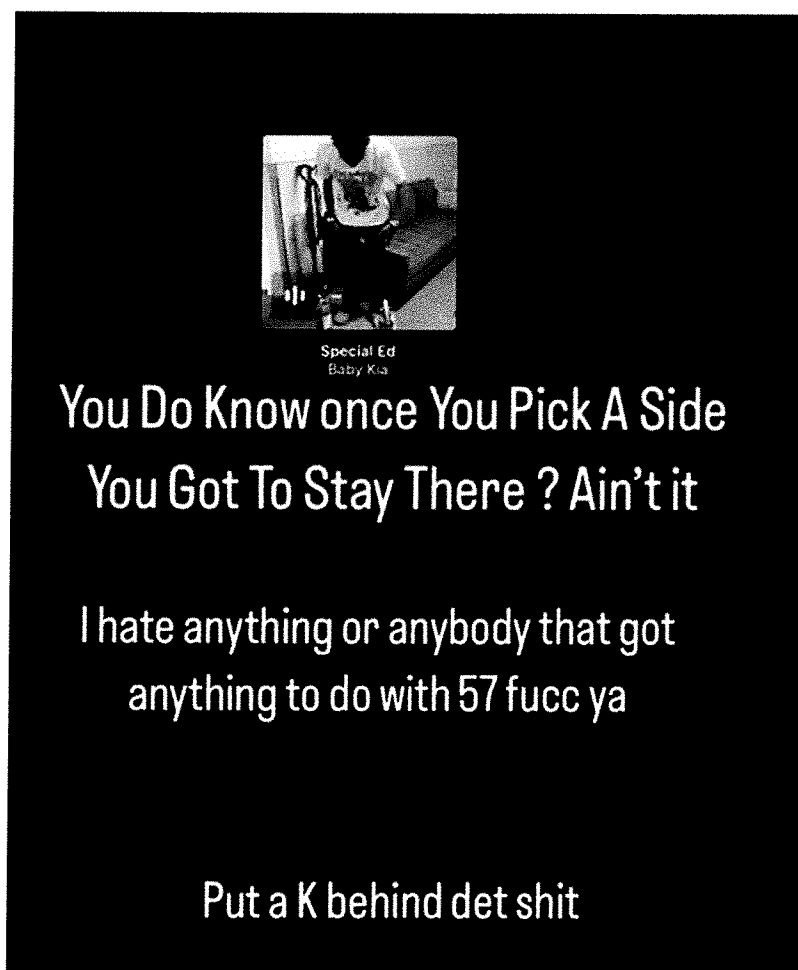
73. On or about December 24, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23Steppag," a picture depicting himself pointing a firearm at the camera, along with **KIMONE GREEN** and another individual, associates of 528, captioned with the following: "We just Got Tha Drop, That Boy Shit Dirty We Come N Mopppp whole lotta 23Renegad Shit . . . 5285LongLiveRose," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



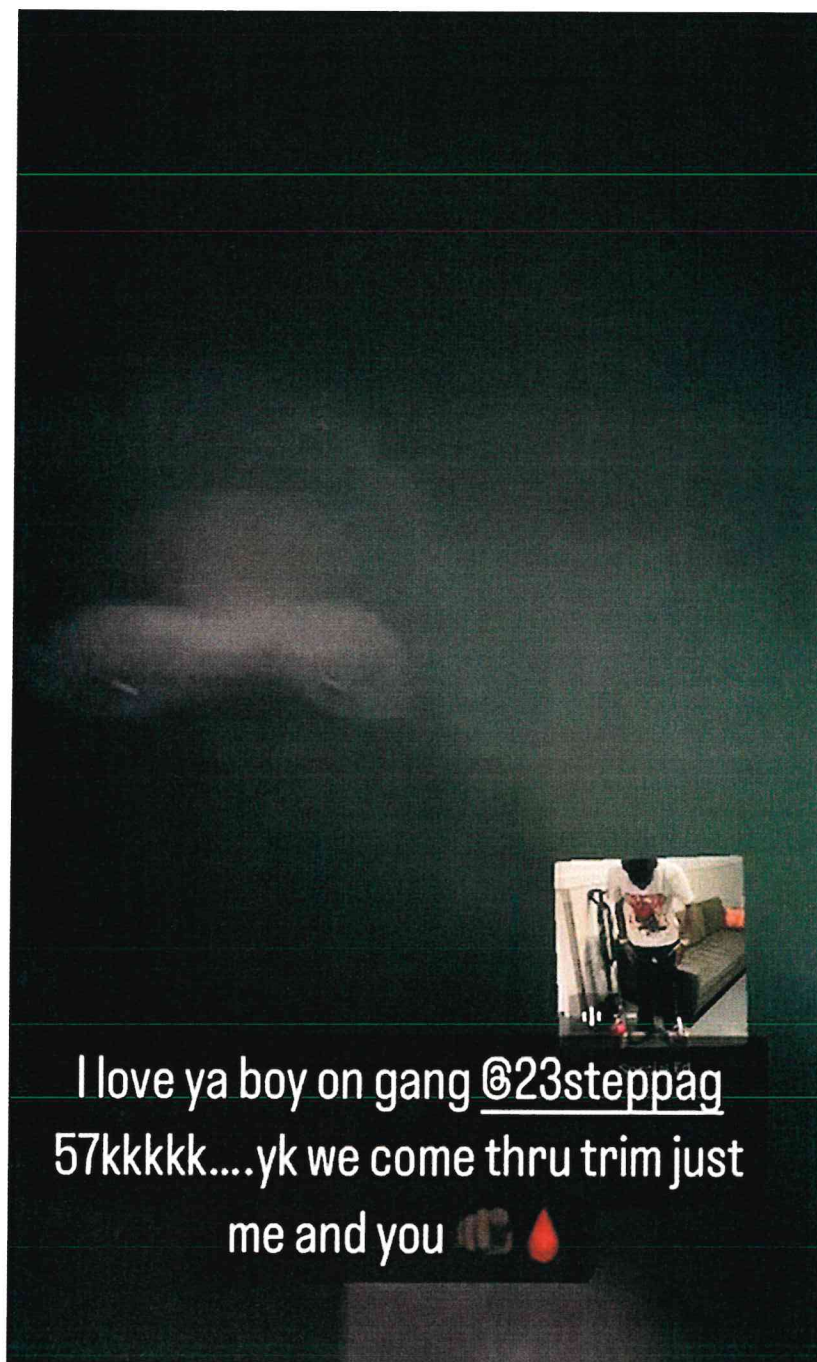
74. On or about December 31, 2023, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23Steppag," a video depicting himself pointing a firearm at his hand, along with **KIMONE GREEN**, an associate of 528, captioned with the following: "Fucc 923 n 57 . . . LongliveRose . . . 528bizness," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



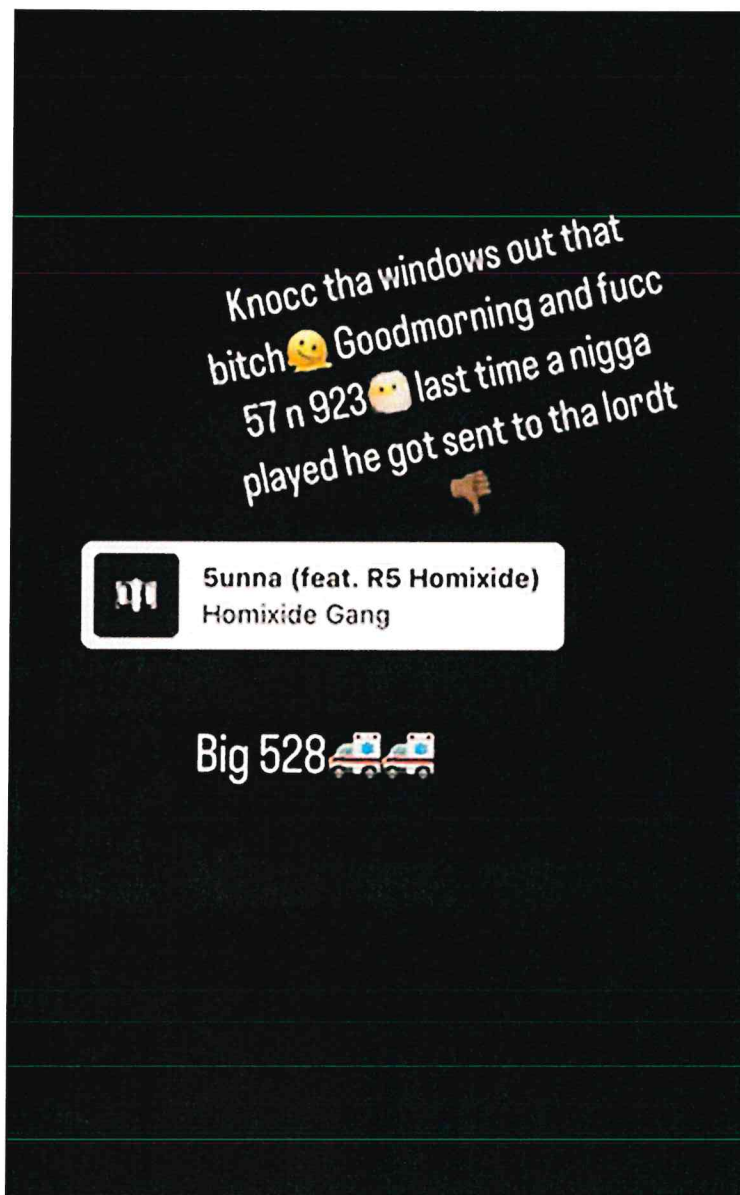
75. On or about January 4, 2024, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account "23Steppag," a picture on his story depicting a status from someone else that stated, "ian posting a song for no reason you better sit back and listen to them lyrics," and on the same day, **TSION CLAYTON, A/K/A STEPPA**, posted a picture of an album cover depicting himself and other associates of 528, including **ALEX PARRISH, A/K/A FAT, KIMONE GREEN, TRAVIS WHITE, A/K/A TRAPP**, and other known and unknown associates of 528 titled "528 Mob Ties Vol. I," and indicating that it was "Droppin Saturday @12pm," an overt act in furtherance of the conspiracy;
76. On or about January 5, 2024, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story captioned as follows: "You Do Know Once You Pick A Side You Got To Stay There? Ain't it I hate anything or anybody that got anything to do with 57 fucc ya Put a K behind det shit" a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



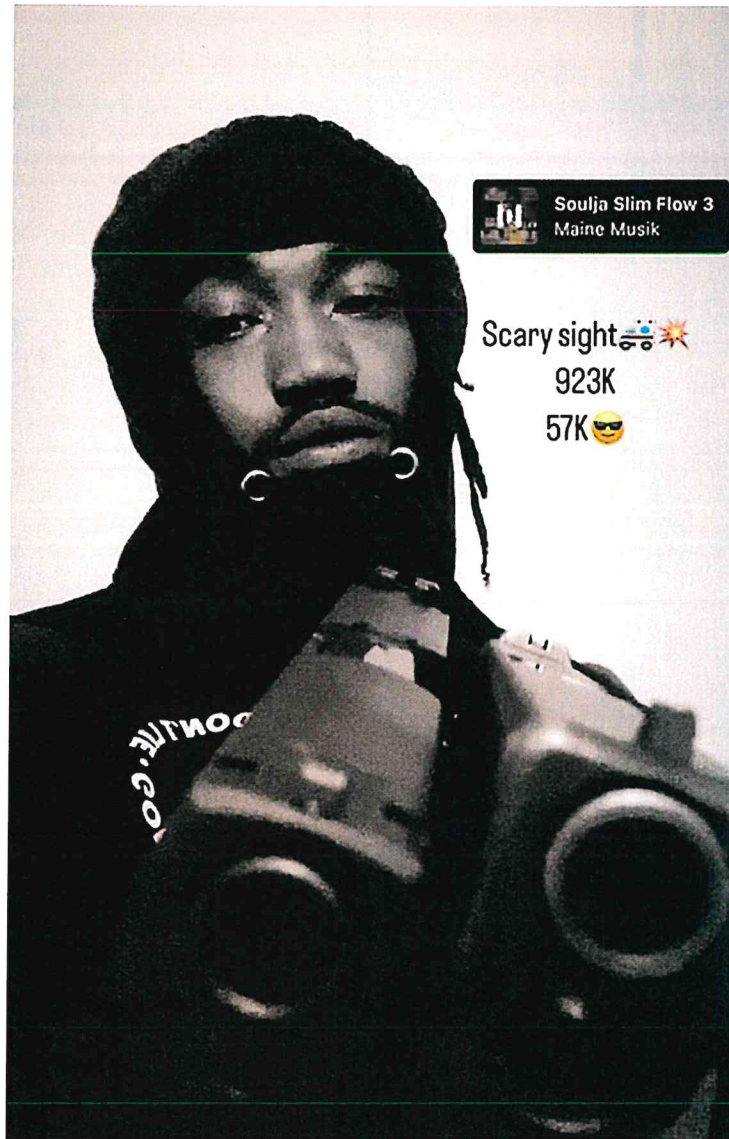
77. On or about January 9, 2024, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a video on his story depicting himself and **TSION CLAYTON, A/K/A STEPPA**, and associate of 528, dressed in dark clothing with masks in front of their face while in possession of a firearms captioned as follows: "I love ya boy on gang @23steppag 57kkkk . . . yk we come thru trim just me and you," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



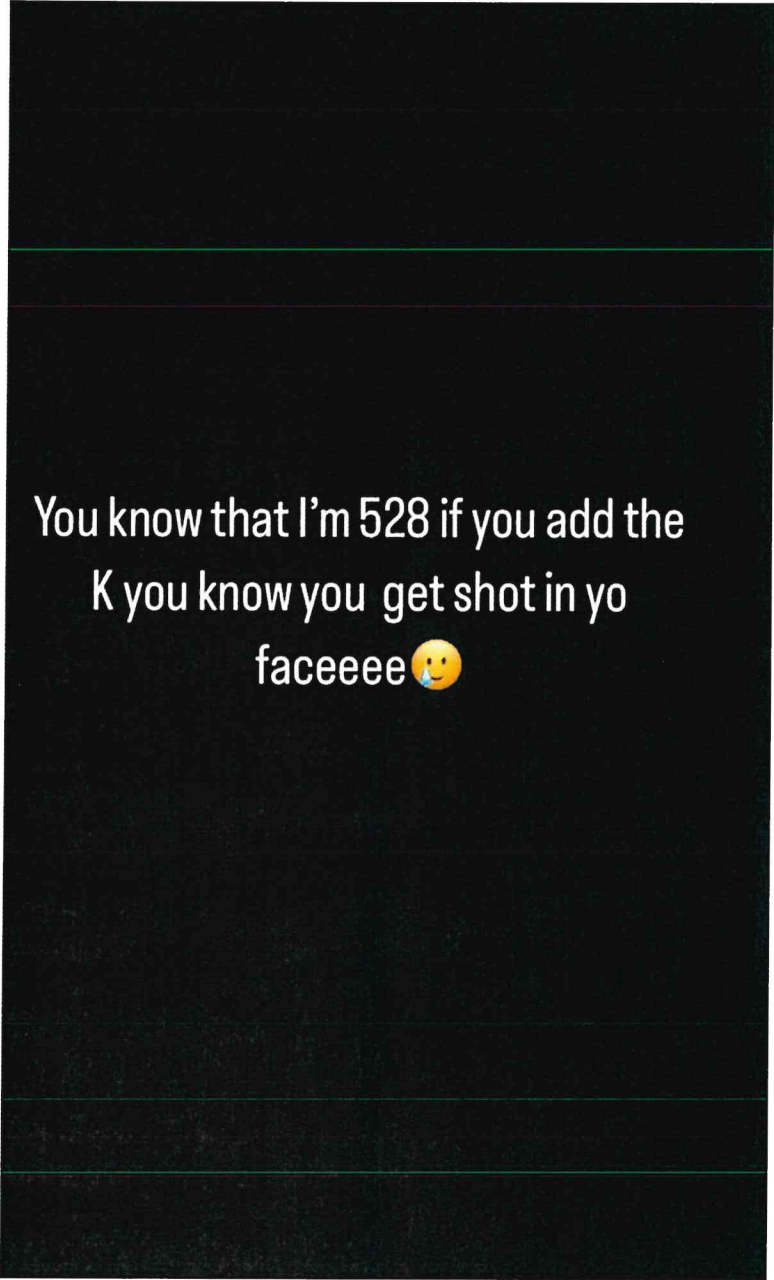
78. On or about January 10, 2024, TSION CLAYTON, A/K/A STEPPA, an associate of 528, did post to his social media account "23Steppag," a video to his story captioned with the following: "Knocc tha windows out that bitch . . . Goodmorning and fucc 57 n 923 . . . last time a n**** played he got sent to tha lordt . . . Big 528," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



79. On or about January 11, 2024, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, did post to his social media account “23Steppag,” a video to his story depicting himself pointing two firearms at the camera and captioned with the following: “Scary sight . . . 923K 57K,” a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



80. On or about January 13, 2024, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story captioned as follows: "You know that I'm 528 if you add the K you know you get shot in yo faceeee," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



You know that I'm 528 if you add the
K you know you get shot in yo
faceeee 🤪

81. On or about January 19, 2024, **ALEX PARRISH, A/K/A FAT**, an associate of 528 did send the following messages to another associate of 528 using his social media account "23fatdedit," an overt act in furtherance of the conspiracy;

Author23fatdedit (Instagram: 64048718371)

Sent2024-01-19 08:48:17 UTC

BodyYooo

Author23fatdedit (Instagram: 64048718371)

Sent2024-01-19 08:48:18 UTC

Body556luhhcobi wasn't notified about this message because they're in quiet mode.

Author23fatdedit (Instagram: 64048718371)

Sent2024-01-19 08:48:25 UTC

Body

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You up m ?

Author__deleted__bhiebefijjbaaacgh (Instagram: 59922140366)

Sent2024-01-19 14:40:10 UTC

BodyI was sleep twin

Author23fatdidit (Instagram: 64048718371)

Sent2024-01-19 15:21:13 UTC

BodyI tried to catch lil slime Lastnight y'all might not know who that is

Author23fatdidit (Instagram: 64048718371)

Sent2024-01-19 15:21:36 UTC

BodyHe was there that night when bangcrew spent us and tonio died...

Author23fatdidit (Instagram: 64048718371)

Sent2024-01-19 15:22:10 UTC

BodyHe da one that had walked thru and den after that Dets when them boys went to bussin from every corner

Author__deleted__bhiebefijjbaaacgh (Instagram: 59922140366)

Sent2024-01-19 15:22:20 UTC

BodyDats why I called ya last night I was trying spin

Author23fatdidit (Instagram: 64048718371)

Sent2024-01-19 15:23:14 UTC

BodyI'm sayin it's Friday let's walk thru the OPPS shi tonight if we ion see nun shi we can just flame a house fuck it

Author__deleted__bhiebefijjbaaacgh (Instagram: 59922140366)

Sent2024-01-19 15:23:24 UTC

Body

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Bet

Author__deleted__bhiebefijjbaaacgh (Instagram: 59922140366)

Sent2024-01-19 15:23:44 UTC

BodyWe walking thru where ?

Author23fatdidit (Instagram: 64048718371)

Sent2024-01-19 15:24:24 UTC

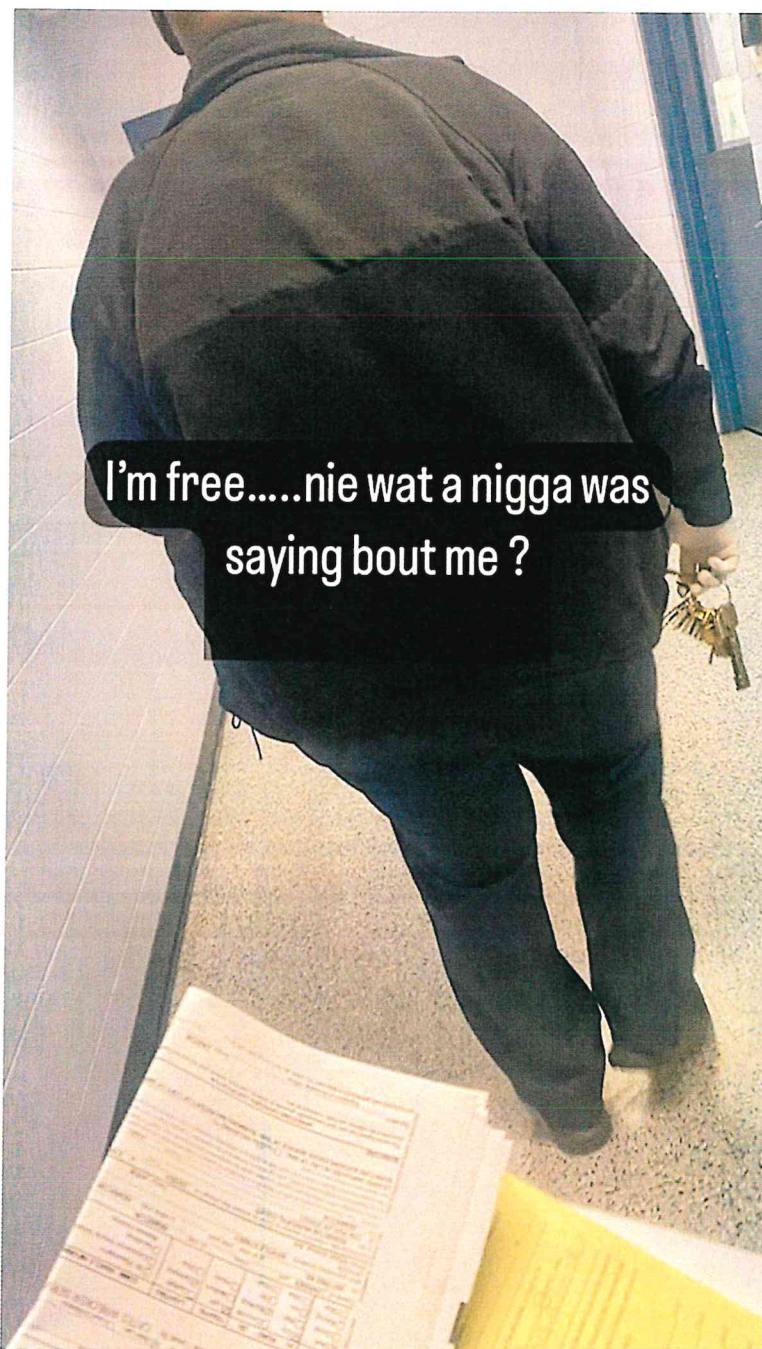
BodyAin gone cap we gone catch some Fasure in ora Lee west dem lil niggas be out I just gotta make sure these the right lil niggas me and you gone spin thru in the day time to see Wassam

Author__deleted__bhiebefijjbaaacgh (Instagram: 59922140366)

Sent2024-01-19 15:24:50 UTC

BodyReacted ❤️ to your message

82. On or about January 20, 2024, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story captioned as follows: "I'm free . . . nie wat a n**** was saying about me," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



83. On or about January 21, 2024, **ALEX PARRISH, A/K/A FAT**, an associate of 528, did send the following messages to another associate of 528 using his social media account "23fatdedit," an overt act in furtherance of the conspiracy;

Sent 2024-01-21 23:07:40 UTC

Body I'm sayin twinn

Author bigsobrod (Instagram: 55819174785)

Sent 2024-01-21 23:07:50 UTC

Body Fgo

Author 23fatdedit (Instagram: 64048718371)

Sent 2024-01-21 23:08:03 UTC

Body You say I can call you if I'm trynna spin some I'm trynna do that lk you gone get off wit me

Author bigsobrod (Instagram: 55819174785)

Sent 2024-01-21 23:08:31 UTC

Body On who

Author

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bigsobrod (Instagram: 55819174785)

Sent 2024-01-21 23:08:43 UTC

Body N when

Author 23fatdedit (Instagram: 64048718371)

Sent 2024-01-21 23:08:51 UTC

Body Bangcrew and tn

Author bigsobrod (Instagram: 55819174785)

Sent 2024-01-21 23:09:42 UTC

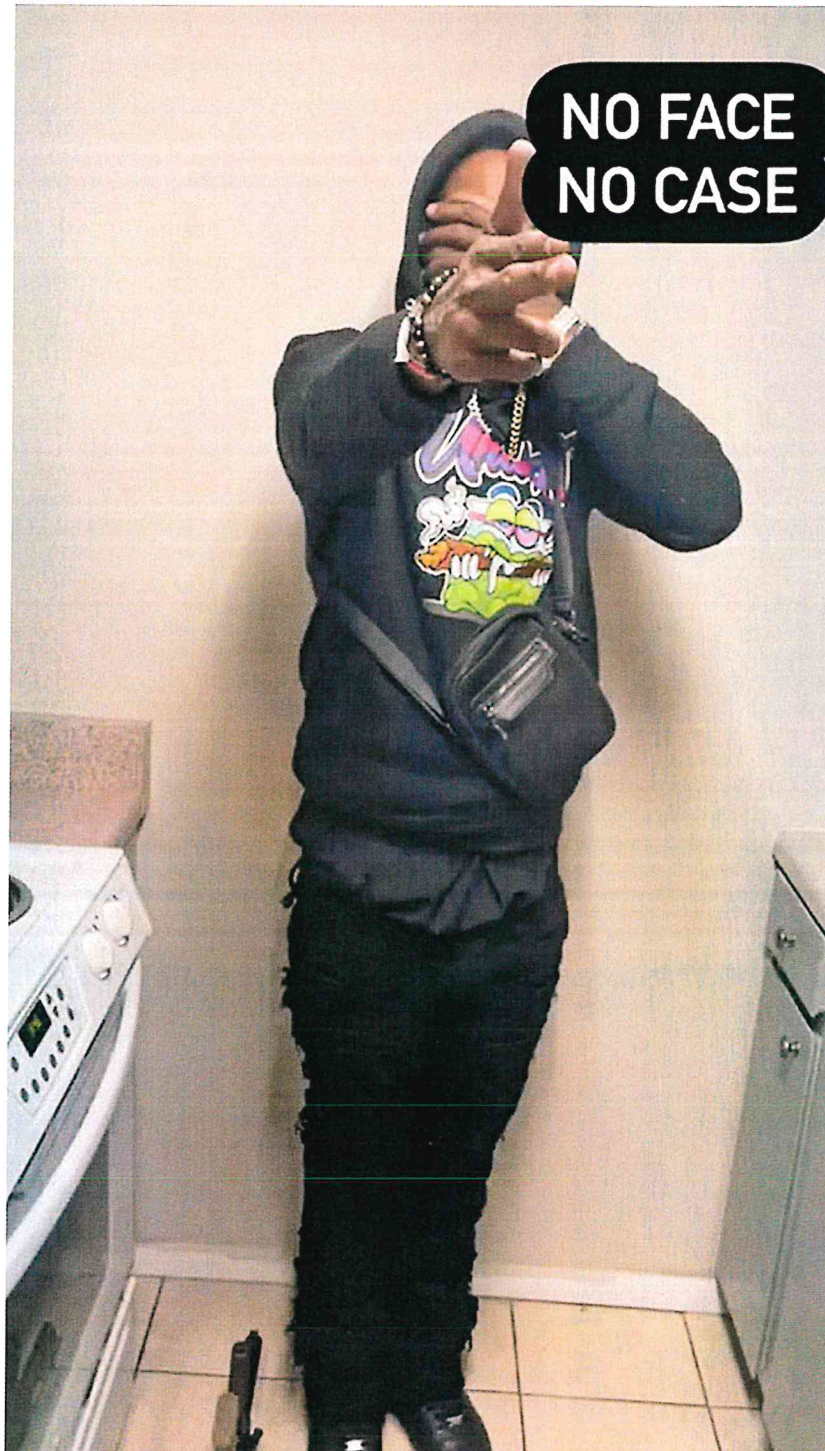
Body What time ima see how my schedule looking today twin but lmk what time

Author 23fatdedit (Instagram: 64048718371)

Sent 2024-01-21 23:09:58 UTC

Body Like 9:00

84. On or about February 8, 2024, **ALEX PARRISH, A/K/A FAT**, an associate of 528, did post to his social media account "23fatdidit," a video on his story depicting himself with a rifle at his feet and captioned as follows: "No Face No Case," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



85. On or about February 8, 2024, **ALEX PARRISH, A/K/A FAT**, an associate of 528, did post to his social media account "23fatdidit," a picture depicting himself and **KIMONE GREEN**, an associate of 528, in possession of firearms and captioned as follows: "We will knock off any n**** in yo crew," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

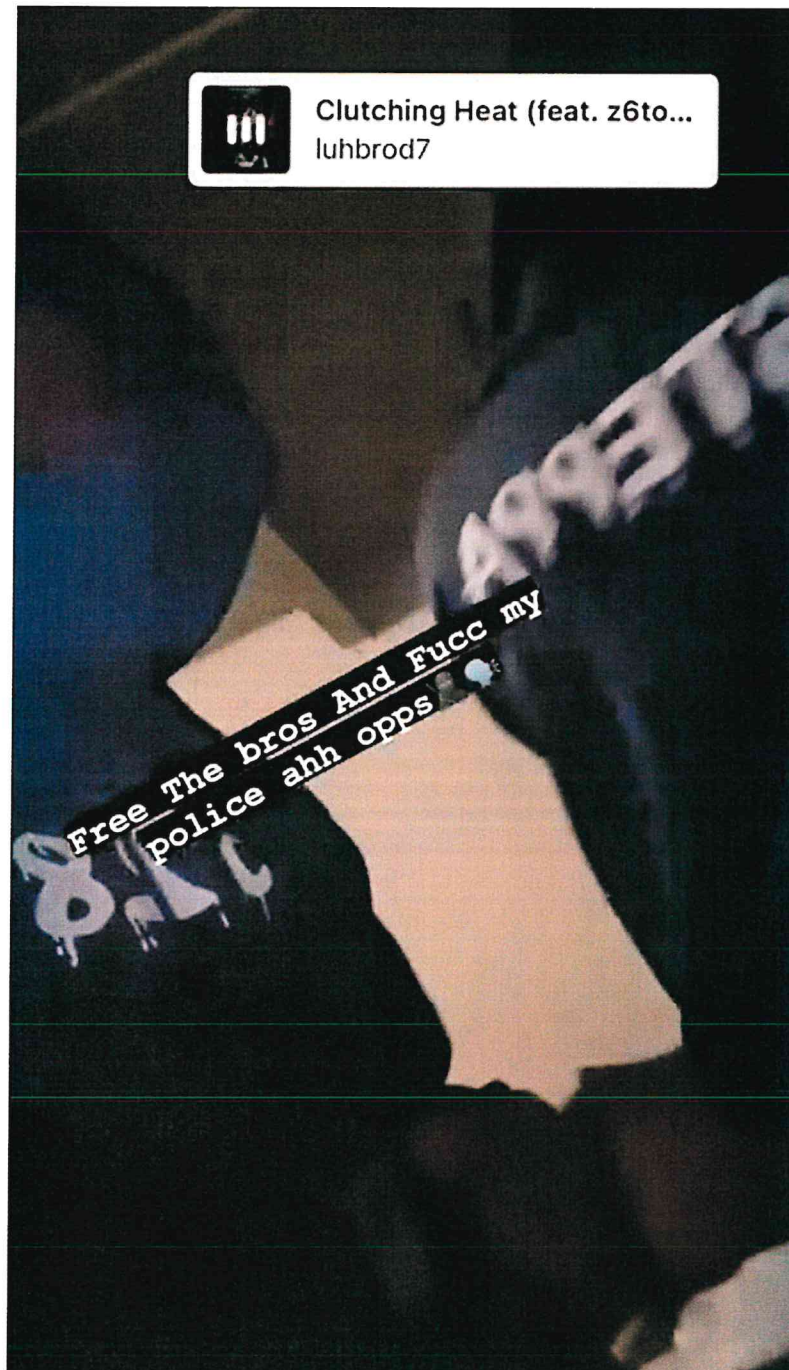


86. On or about February 13, 2024, **ALEX PARRISH, A/K/A FAT**, an associate of 528, did post to his social media account "23fatdidit," a picture depicting himself, **KIMONE GREEN**, and **TSION CLAYTON, A/K/A STEPPA**, associates of 528, captioned as follows: "We ain't neva stole chit we took it . . . 528," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

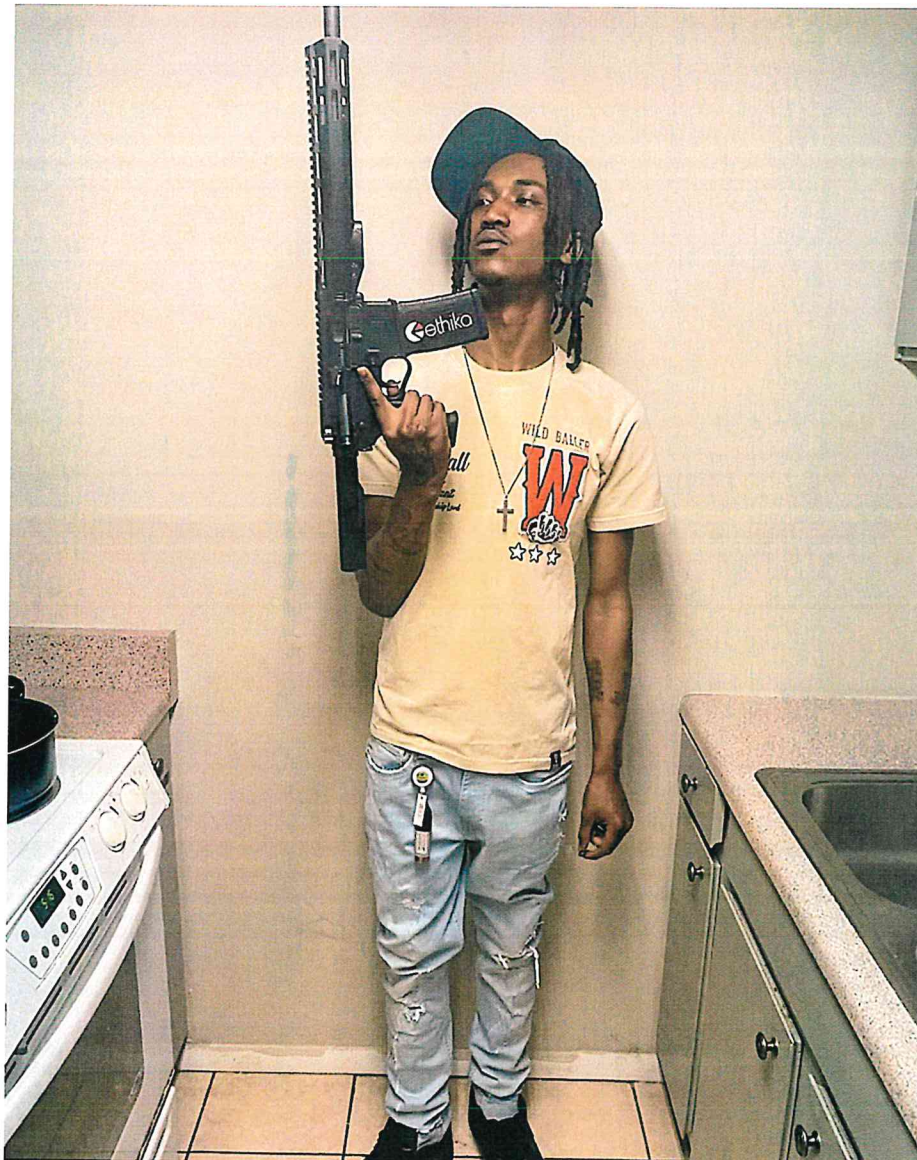


87. On or about February 14, 2024, **KIMONE GREEN** and **TSION CLAYTON, A/K/A STEPPA**, associates of 528, did have in their possession three pistols and one 5.56x45mm/.223 cal. AR style rifle, which at the time **CLAYTON** was wearing a hooded sweatshirt that said "528" on it, an overt act in furtherance of the conspiracy;

88. On or about February 21, 2024, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a video on his story depicting himself and **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, in possession of firearms wearing black sweatshirts with 528 on it and captioned as follows: "Free The bros And Fucc my police ahh opps," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



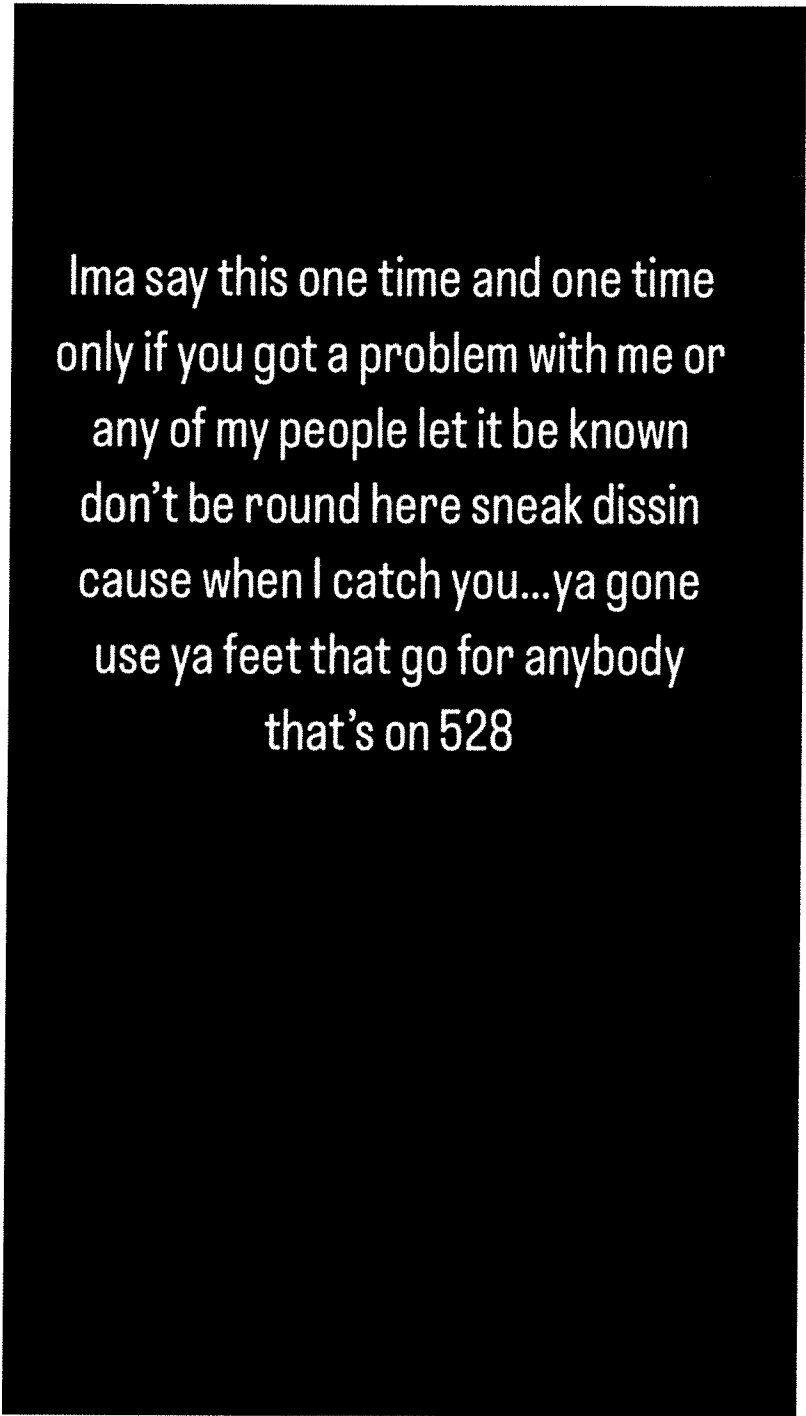
89. On or about March 9, 2024, **TSION CLAYTON, A/K/A STEPPA**, an associate 528, did post to his social media account "23SteppaG," a picture depicting himself holding a rifle and captioned as follows: "Talks with tha choppa like who we gone snatch today . . . #528bizness," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



90. On or about March 17, 2024, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story depicting himself and **TSION CLAYTON, A/K/A STEPPA**, an associate 528, both in possession of firearms and captioned as follows: "Catch a opp Gone and send em uppp," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



91. On or about April 14, 2024, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story captioned as follows: "Ima say this one time and one time only if you got a problem with me or any of my people let it be known don't be round here sneak dissin cause when I catch you. . . you gone use ya feet that go for anybody that's on 528," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;

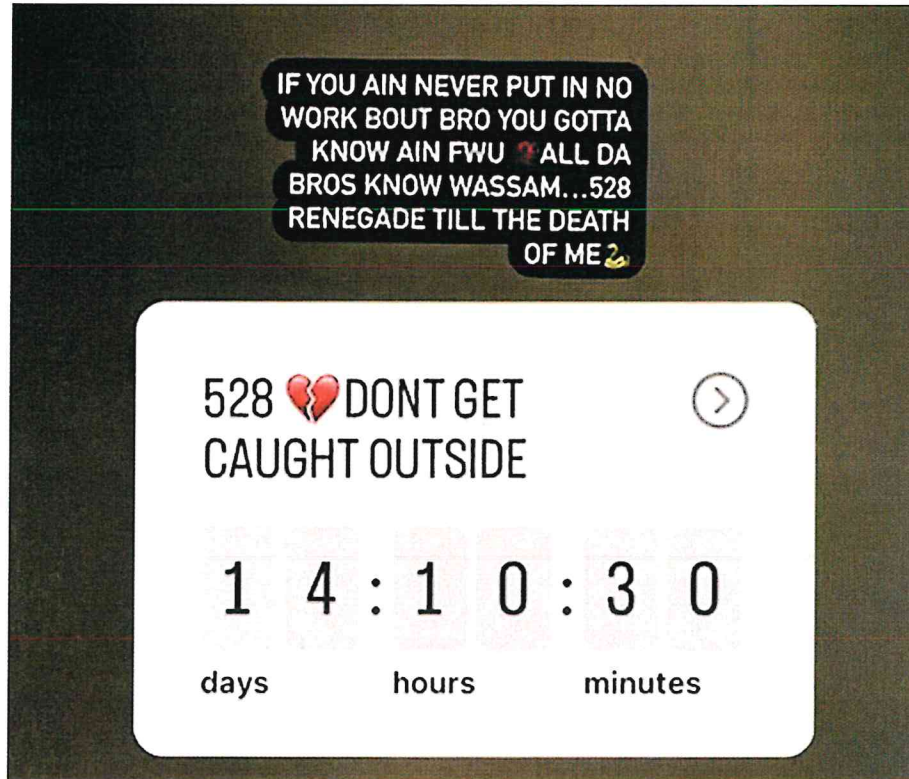


Ima say this one time and one time
only if you got a problem with me or
any of my people let it be known
don't be round here sneak dissin
cause when I catch you...ya gone
use ya feet that go for anybody
that's on 528

92. On or about April 30, 2024, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story captioned as follows: "Shit Kutthroat on my ma 528 be da gang," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



93. On or about May 13, 2024, **KIMONE GREEN**, an associate of 528, did post to his social media account "23Soldier556," a picture on his story captioned as follows: "If you ain never put in no work bout bro you gotta know ain fwu 100 . . . all da bros know wassam . . . 528 Renegade till the death of me," a picture of said act is included and incorporated by reference, an overt act in furtherance of the conspiracy;



94. On or about May 22, 2024, **KIMONE GREEN**, an associate of 528, while in a vehicle with **TSION CLAYTON, A/K/A STEPPA** and **ALEX PARRISH, A/K/A FAT**, associates of 528, did possess a firearm, an overt act in furtherance of the conspiracy;
95. On or about May 22, 2024, **TSION CLAYTON, A/K/A STEPPA**, an associate of 528, in Lowndes County, Georgia, did unlawfully, possess a firearm after having previously pled guilty and being placed on probation as a first offender pursuant to Article 3 of Chapter 8 of Title 42 of the Official Code of Georgia Annotated imposed by a court of competent jurisdiction, for the offense of false statements, a felony under the laws of this State, in Lowndes County Superior Court case no. 2024CR35 on May 2, 2024, an overt act in furtherance of the conspiracy;

96. On or about May 22, 2024, **ALEX PARRISH, A/K/A FAT**, an associate of 528, in Lowndes County, Georgia, did possess a firearm, to wit: handgun, knowing the manufacturer's name plate, serial number, and any other distinguishing number or identification mark had been removed for the purpose of concealing or destroying the identity of such article, in violation of O.C.G.A. § 16-9-70(b), which is an act of Racketeering Activity under O.C.G.A. § 16-14-3(5)(A)(xviii) and an overt act in furtherance of the conspiracy;

97. On or about May 22, 2024, **ALEX PARRISH, A/K/A FAT**, an associate of 528, in Lowndes County, Georgia, unlawfully possessed a firearm after having previously been convicted of a felony on October 13, 2022, in Lowndes County Superior Court case no. 2022CR996 for the offense of possession of methamphetamine, and 2018CR0595, for Sale of a Schedule I controlled substance, on July 31, 2018, in violation of O.C.G.A. § 16-11-131(b), 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 and similar intents, results, accomplices, victims, and methods of commission and otherwise were interrelated by distinguishing characteristics and were not isolated acts.

COUNT 2

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. § 16-15-4(a))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, being associated with 528, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of malice murder and felony murder, as set forth and described in Counts 6 and 7 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 3

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. § 16-15-4(b))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, being associated with 528, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of malice murder and felony murder as set forth and described in Counts 6 and 7 of this Indictment, with the intent to maintain and increase his status in said gang, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 4

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. § 16-15-4(a))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, being associated with 528, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Aggravated Assault, as set forth and described in Counts 8 and 9 of this Indictment and Criminal Damage to Property in the First Degree, as set forth and described in Count 10 of this Indictment contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 5

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. § 16-15-4(b))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, being associated with 528, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Aggravated Assault, as set forth and described in Counts 8 and 9 of this Indictment and Criminal Damage to Property in the First Degree, as set forth and described in Count 10 of this Indictment, with the intent to maintain and increase his status in said gang, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 6

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **MALICE MURDER (O.C.G.A. § 16-5-1)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, did unlawfully with malice aforethought, cause the death of Jaylon Smith, a human being, by shooting him with a firearm, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 7

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **FELONY MURDER (O.C.G.A. § 16-5-1)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, did unlawfully, while in the commission of a felony, Aggravated Assault, as set forth and described in Counts 8 and 9 of this Indictment, and Criminal Damage to Property in the First Degree, as set forth and described in Count 10 of this Indictment, did cause the death of Jaylon Smith, a human being, by shooting him, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 8

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, did unlawfully, make an assault upon the person of Jaylon Smith with a deadly weapon, to wit: a firearm, by discharging said firearm in his direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 9

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, did unlawfully, make an assault upon the person of Jarvis Smith with a deadly weapon, to wit: a firearm, by discharging said firearm in his direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 10

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **CRIMINAL DAMAGE TO PROPERTY IN THE FIRST DEGREE (O.C.G.A. § 16-7-22(a)(1))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, did unlawfully and without authority interfere with a Nissan Altima, in a manner so as to endanger the human life of Jarvis Smith and Jaylon Smith by shooting a firearm in the direction of and striking said Nissan Altima while Jarvis Smith and Jaylon Smith were inside, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 11

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, did unlawfully have on his person a firearm during the commission of the crime Murder as set forth and described in Count 6 of this Indictment, said crime being against and involving the person of another and which crimes were a felony, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 12

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

**JAQUAN WALTON
A/K/A MAN MANN**

with the offense of **POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 24th day of June, 2023, did unlawfully have on his person a firearm during the commission of the crime Aggravated Assault, as set forth and described in Counts 8 and 9 of this Indictment, and Criminal Damage to Property in the First Degree, as set forth and described in Count 10 of this Indictment, said crimes being against and involving the person of another and which crimes were a felony, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 13

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

**KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA**

with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. § 16-15-4(a))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, being associated with 528, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of malice murder and felony murder, as set forth and described in Counts 17 and 18 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 14

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. § 16-15-4(b))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, being associated with 528, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of malice murder and felony murder, as set forth and described in Counts 17 and 18 of this Indictment, with the intent to maintain and increase their status in said gang, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 15

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. § 16-15-4(a))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, being associated with 528, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Criminal Attempt to Commit Murder, as set forth and described in Count 19 of this Indictment, Aggravated Assault, as set forth and described in Counts 20 through 35 of this Indictment, Aggravated Battery, as set forth and described in Count 36 of this Indictment, and Criminal Damage to Property in the First Degree, as set forth and described in Counts 37 and 38 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 16

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. § 16-15-4(b))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, being associated with 528, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Criminal Attempt to Commit Murder, as set forth and described in Count 19 of this Indictment, Aggravated Assault, as set forth and described in Counts 20 through 35 of this Indictment, Aggravated Battery, as set forth and described in Count 36 of this Indictment, and Criminal Damage to Property in the First Degree, as set forth and described in Counts 37 and 38 of this Indictment, with the intent to maintain and increase their status in said gang, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 17

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **MALICE MURDER (O.C.G.A. § 16-5-1)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully with malice aforethought, cause the death of Brianna Long, a human being, by shooting her with a firearm, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 18

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **FELONY MURDER (O.C.G.A. § 16-5-1)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, while in the commission of the felony Criminal Attempt to Commit Murder, as set forth and described in Count 19 of this Indictment, Aggravated Assault, as set forth and described in Counts 20 through 35 of this Indictment, Aggravated Battery, as set forth and described in Count 36 of this Indictment, and Criminal Damage to Property in the First Degree, as set forth and described in Counts 37 and 38 of this Indictment, did cause the death of Brianna Long, a human being, by shooting her, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 19

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **CRIMINAL ATTEMPT TO COMMIT MURDER (O.C.G.A. § 16-4-1, 16-5-1)**, for that the said accused, in the County of Lowndes and the State of Georgia, on the 29th day of October, 2023, with intent to commit the crime of Murder, did knowingly and intentionally perform an act which constituted a substantial step toward the commission of said crime, to-wit: shooting in the direction of Jastain Darrisaw with a firearm, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 20

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Brianna Long with a deadly weapon, to wit: a firearm, by discharging said firearm in her direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 21

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Jastain Darrisaw with a deadly weapon, to wit: a firearm, by discharging said firearm in his direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 22

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of MaKayla Bell with a deadly weapon, to wit: a firearm, by discharging said firearm in her direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 23

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Bailey Teague with a deadly weapon, to wit: a firearm, by discharging said firearm in her direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 24

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of John Daniels with a deadly weapon, to wit: a firearm, by discharging said firearm in her direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 25

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Britten Bennett with a deadly weapon, to wit: a firearm, by discharging said firearm in his direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 26

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of McKenzie Falls with a deadly weapon, to wit: a firearm, by discharging said firearm in her direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 27

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Don Wilson with a deadly weapon, to wit: a firearm, by discharging said firearm in his direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 28

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Christopher Lager with a deadly weapon, to wit: a firearm, by discharging said firearm in his direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 29

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Chance Lucas with a deadly weapon, to wit: a firearm, by discharging said firearm in his direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 30

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Richard Lee with a deadly weapon, to wit: a firearm, by discharging said firearm in his direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 31

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Christian Richardson with a deadly weapon, to wit: a firearm, by discharging said firearm in her direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 32

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Marlie Howell with a deadly weapon, to wit: a firearm, by discharging said firearm in her direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 33

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Reggie Ross with a deadly weapon, to wit: a firearm, by discharging said firearm in his direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 34

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Eboni Tomblin with a deadly weapon, to wit: a firearm, by discharging said firearm in her direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 35

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED ASSAULT (O.C.G.A. § 16-5-21)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully, make an assault upon the person of Joshua Dempsey with a deadly weapon, to wit: a firearm, by discharging said firearm in his direction, contrary to the laws of said state the good order, peace, and dignity thereof;

COUNT 36

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **AGGRAVATED BATTERY (O.C.G.A. § 16-5-24)**, for that the said accused in the County of Laurens and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully and maliciously cause Joshua Dempsey bodily harm by shooting him and rendering his left arm useless and seriously disfiguring his body by leaving scars, contrary to the laws of said State, the good order, peace, and dignity thereof;

COUNT 37

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **CRIMINAL DAMAGE TO PROPERTY IN THE FIRST DEGREE (O.C.G.A. § 16-7-22(b)(1))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully and without authority interfere with a gray Ford Fusion, in a manner so as to endanger the human life of the patrons and employees in the Pier Bar and the parking lot behind the Pier Bar by shooting a firearm in the direction of said patrons and employees and striking said Ford Fusion, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 38

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **CRIMINAL DAMAGE TO PROPERTY IN THE FIRST DEGREE (O.C.G.A. § 16-7-22(b)(1))**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully and without authority interfere with the property of the Pier Bar, in a manner so as to endanger the human life of the patrons and employees in the Pier Bar and the parking lot behind the Pier Bar by shooting a firearm in the direction of said patrons and employees and striking said Pier Bar, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 39

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully have on their person a firearm during the commission of the crime malice murder, as set forth and described in Count 17 of this Indictment, said crime being against and involving the person of another and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 40

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

KIMONE GREEN
and
TSION CLAYTON
A/K/A STEPPA

with the offense of **POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY (O.C.G.A. § 16-11-106)**, for that the said accused in the County of Lowndes and the State of Georgia, on or about the 29th day of October, 2023, did unlawfully have on their person a firearm during the commission of the crime Criminal Attempt to Commit Murder, as set forth and described in Count 19 of this Indictment, Aggravated Assault, as set forth and described in Counts 20 through 35 of this Indictment, Aggravated Battery, as set forth and described in Count 36 of this Indictment, and Criminal Damage to Property in the First Degree, as set forth and described in Counts 37 and 38 of this Indictment, said crimes being against and involving the person of another and which crimes were a felony, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 41

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

**ALEX PARRISH
A/K/A FAT**

with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. § 16-15-4(a))**, for that the said accused, in the County of Lowndes and the State of Georgia, on the 22nd day of May, 2024, being associated with 528, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of a Firearm by a Convicted Felon as set forth and described in Count 43 of this Indictment, and Criminal Use of an Article with an Altered Identification Mark, as set forth and described in Count 44 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 42

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

**ALEX PARRISH
A/K/A FAT**

with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. § 16-15-4(b))**, for that the said accused, in the County of Lowndes and the State of Georgia, on the 22nd day of May, 2024, being associated with 528, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of a Firearm by a Convicted Felon as set forth and described in Count 43 of this Indictment, and Criminal Use of an Article with an Altered Identification Mark as set forth and described in Count 44 of this Indictment, with the intent to maintain and increase his status in said gang, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 43

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

**ALEX PARRISH
A/K/A FAT**

with the offense of **POSSESSION OF FIREARM BY A CONVICTED FELON (O.C.G.A. § 16-11-131(b))**, for that the said accused, in the County of Laurens and the State of Georgia, on the 22nd day of May, 2024, did unlawfully possess a firearm after having previously been convicted of a felony in Lowndes County Superior Court case no. 2022CR996 for Possession of Methamphetamine, a felony, on October 13, 2022, and 2018CR0595 for Sale of a Schedule I controlled substance, a felony, on July 31, 2018, contrary to the laws of said State, the good order, peace and dignity thereof;

COUNT 44

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

**ALEX PARRISH
A/K/A FAT**

with the offense of **CRIMINAL USE OF AN ARTICLE WITH AN ALTERED IDENTIFICATION MARK (O.C.G.A. § 16-9-70(b))**, for that the said accused, in the County of Lowndes and the State of Georgia, on the 22nd day of May 2024, did unlawfully receive, dispose of, conceal, and have in his possession, a firearm, knowing the manufacturer's name plate, serial number, or any other distinguishing number or identification mark had been removed for the purpose of concealing or destroying the identify of such firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

**CHRISTOPHER CARR
GEORGIA ATTORNEY GENERAL**

and

**BRAD SHEALY
DISTRICT ATTORNEY
SOUTHERN JUDICIAL CIRCUIT**

Witnesses Appearing Before the Grand Jury:

Zachary Johnson, Georgia Bureau of Investigation

Casey Roberts, Georgia Attorney General's Office