

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNTS 1-2: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 167-169, AND 171-173: VIOLATION OF  
STREET GANG TERRORISM AND PREVENTION  
ACT (O.C.G.A. 16-15-14)  
COUNTS 170 AND 174: ILLEGAL USE OF  
COMMUNICATION FACILITY (O.C.G.A. 16-13-32.,  
O.C.G.A. 16-5-1)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3:05

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

JOHN FLYTHE

INDICTMENT No. 2024RCCR 478  
RICHMOND COUNTY  
SUPERIOR COURT

In the matter of:

THE STATE  
VS.

DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH,  
DESMOND DEMMONS, A/K/A DEZ,  
DEVIN ALLEN-GLOVER, A/K/A RAMBO,  
TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,  
IONAS DOGGETT, A/K/A PLUG,  
DOMINICK RYANS, A/K/A DOMO,  
JMAR WILSON, A/K/A KUSSY,  
LECADRICK COLLIER, A/K/A KILO,  
JALEN LANDERS, A/K/A HECT G,  
LARRY MIMS, A/K/A KODAK, A/K/A BEAR,  
DMOND JACKSON, A/K/A MOND,  
EARL OVERTON A/K/A BJ BLAZIN,  
JOSHUA MCDANIEL, A/K/A JB,  
ELLIS MCDANIEL, A/K/A MAC,  
RICARDO MCBRIDE, A/K/A CARDO,  
JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,  
CHASE RUSSAW, A/K/A WAKEO,  
DEZMUND MAINOR, A/K/A DONK,  
JOSHUA DEMMONS,  
EDDIE REESE, A/K/A STRO,  
ANTONIO BUSH,  
CLIFFORD JONES, A/K/A CLIFF,  
MYLES THOMAS, A/K/A MR. INFINITY,  
TILSON MCCRAY, A/K/A TIP,  
BRYSON MCCRAY, A/K/A BMAN,  
DARIUS MILLER,  
MALIK TAYLOR, A/K/A RICH REGARDLESS,  
SARAINA LEWIS,  
SHEQUITTA LEWIS,  
and  
JANESSA FREEMAN, A/K/A NESSA

The Grand Jury for the March Term, 2024  
has found and does hereby return this

True Bill of Indictment.

This 16 day of April, 2024



ARRAIGNMENT

The Defendant:

DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH, waives formal  
arraignment, copy of Bill of indictment, list of  
witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Defendant

Defendant's Attorney

JURY VERDICT

We, the Jury, find the Defendant,  
DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Foreperson

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNTS 1 AND 4: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 19-20, 25-26, 175-178, 182-183 206-207 AND  
291-292: VIOLATION OF STREET GANG  
TERRORISM AND PREVENTION ACT (O.C.G.A.  
16-15-14)  
COUNTS 21-23: AGGRAVATED ASSAULT (O.C.G.A.  
16-5-21)  
COUNT 24: CRIMINAL DAMAGE TO PROPERTY  
IN THE FIRST DEGREE (O.C.G.A. 16-7-22)  
COUNTS 180 AND 181: THEFT BY RECEIVING  
STOLEN PROPERTY (16-8-7)  
COUNT 179: FLEEING OR ATTEMPTING TO  
ELUDE A POLICE OFFICER (O.C.G.A. 40-6-395)  
COUNTS 27-29: POSSESSION OF A FIREARM  
DURING THE COMMISSION OF A FELONY  
(O.C.G.A. 16-11-106)  
COUNT 213: POSSESSION OF AN ILLEGAL  
WEAPON (O.C.G.A. 16-11-123)  
COUNT 293: POSSESSION OF CONTRABAND BY  
AN INMATE (O.C.G.A. 42-4-13(b))  
COUNTS 184-185, 208-212: POSSESSION OF A  
FIREARM BY PERSON UNDER CONDITIONAL  
DISCHARGE (O.C.G.A. 16-11-131(b))

**INDICTMENT No. 2024RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
waives formal arraignment, copy of Bill of  
indictment, list of witnesses sworn before the  
Grand Jury, and pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO**  
as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Foreperson

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3:07

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNTS 1 AND 3: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 142-144, 147-149, 151-153, 156-158, 188-190,  
195-198, AND 201-203: VIOLATION OF STREET  
GANG TERRORISM AND PREVENTION ACT  
(O.C.G.A. 16-15-14)  
COUNT 150: CONSPIRACY TO COMMIT MURDER  
(O.C.G.A. 16-4-8, O.C.G.A. 16-5-1)  
COUNT 191: TRAFFICKING FENTANYL (O.C.G.A.  
16-13-31(b))  
COUNT 192: TRAFFICKING METHAMPHETAMINE  
(O.C.G.A. 16-13-31(e))  
COUNT 193: TRAFFICKING MARIJUANA (O.C.G.A.  
16-13-31(c))  
COUNT 194: POSSESSION OF COCAINE WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNTS 145: SALE OF MARIJUANA (O.C.G.A.  
16-13-30(j))  
COUNTS 146, 154, 155, AND 159: ILLEGAL USE OF A  
COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)  
COUNT 200: THEFT BY RECEIVING STOLEN  
PROPERTY (O.C.G.A. 16-8-7)  
COUNT 199: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)  
COUNTS 204 AND 205: POSSESSION OF A  
FIREARM BY A CONVICTED FELON (O.C.G.A.  
16-11-131(b))

**INDICTMENT No. 2024RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**DESMOND DEMMONS, A/K/A DEZ,** waives  
formal arraignment, copy of Bill of indictment,  
list of witnesses sworn before the Grand Jury,  
and pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**DESMOND DEMMONS, A/K/A DEZ,** as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Foreperson

**JOHN FLYTHE**

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD  
2024 APR 16 PM 3:07  
HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 30-31, 36-37, 214-215, AND 220-221:  
VIOLATION OF STREET GANG TERRORISM AND  
PREVENTION ACT (O.C.G.A. 16-15-14)  
COUNT 216: POSSESSION OF COCAINE WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNTS 218 AND 219: POSSESSION OF SCHEDULE  
I CONTROLLED SUBSTANCE WITH INTENT TO  
DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNTS 32 AND 217: POSSESSION MARIJUANA  
WITH INTENT TO DISTRIBUTE (O.C.G.A.  
16-13-30(j))  
COUNTS 33-35: POSSESSION OF SCHEDULE II  
CONTROLLED SUBSTANCE (O.C.G.A. 16-13-30(a))  
COUNT 39: FLEEING OR ATTEMPTING TO ELUDE  
A POLICE OFFICER (O.C.G.A. 40-6-395)  
COUNTS 38 AND 222: POSSESSION OF A FIREARM  
DURING THE COMMISSION OF A FELONY  
(O.C.G.A. 16-11-106)

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**TRAEON PERRY, A/K/A KLUTCH, A/K/A**  
**TJ,** waives formal arraignment, copy of Bill of  
indictment, list of witnesses sworn before the  
Grand Jury, and pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A**  
**TJ,** as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Foreperson

JOHN FLYTHE

OTN  
CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD  
2024 APR 16 PM 3: 07  
HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 11-12, 16-17, 127-128, 130-131, 133-134 AND  
234-235: VIOLATION OF STREET GANG  
TERRORISM AND PREVENTION ACT (O.C.G.A.  
16-15-14)  
COUNT 129: TRAFFICKING IN MARIJUANA  
(O.C.G.A. 16-13-31(c))  
COUNTS 13 AND 236: POSSESSION MARIJUANA  
WITH INTENT TO DISTRIBUTE (O.C.G.A.  
16-13-30(j))  
COUNT 15: THEFT BY RECEIVING STOLEN  
PROPERTY (O.C.G.A. 16-8-7)  
COUNTS 132 AND 135 IDENTITY FRAUD (O.C.G.A.  
16-9-121)  
COUNTS 18: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
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**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**IONAS DOGGETT, A/K/A PLUG**, waives  
formal arraignment, copy of Bill of indictment,  
list of witnesses sworn before the Grand Jury,  
and pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**IONAS DOGGETT, A/K/A PLUG**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Foreperson

OT  
CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD  
2024 APR 16 PM 3:08  
HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 237 AND 238: VIOLATION OF STREET  
GANG TERRORISM AND PREVENTION ACT  
(O.C.G.A. 16-15-14)  
COUNT 239: POSSESSION OF COCAINE WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(a))  
COUNTS 240: POSSESSION OF SCHEDULE IV  
CONTROLLED SUBSTANCE WITH INTENT TO  
DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNT 241: POSSESSION OF A SCHEDULE II  
CONTROLLED SUBSTANCE (O.C.G.A. 16-13-30(a))

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH,  
DESMOND DEMMONS, A/K/A DEZ,  
DEVIN ALLEN-GLOVER, A/K/A RAMBO,  
TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,  
IONAS DOGGETT, A/K/A PLUG,  
DOMINICK RYANS, A/K/A DOMO,  
JMAR WILSON, A/K/A KUSSY,  
LECADRICK COLLIER, A/K/A KILO,  
JALEN LANDERS, A/K/A HECT G,  
LARRY MIMS, A/K/A KODAK, A/K/A BEAR,  
DMOND JACKSON, A/K/A MOND,  
EARL OVERTON A/K/A BJ BLAZIN,  
JOSHUA MCDANIEL, A/K/A JB,  
ELLIS MCDANIEL, A/K/A MAC,  
RICARDO MCBRIDE, A/K/A CARDO,  
JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,  
CHASE RUSSAW, A/K/A WAKEO,  
DEZMUND MAINOR, A/K/A DONK,  
JOSHUA DEMMONS,  
EDDIE REESE, A/K/A STRO,  
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MYLES THOMAS, A/K/A MR. INFINITY,  
TILSON MCCRAY, A/K/A TIP,  
BRYSON MCCRAY, A/K/A BMAN,  
DARIUS MILLER,  
MALIK TAYLOR, A/K/A RICH REGARDLESS,  
SARAINA LEWIS,  
SHEQUITTA LEWIS,  
and  
JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**DOMINICK RYANS, A/K/A DOMO**, waives  
formal arraignment, copy of Bill of indictment,  
list of witnesses sworn before the Grand Jury,  
and pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**DOMINICK RYANS, A/K/A DOMO**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

CLERK OF SUPERIOR STATE  
AND JUVENILE COURT  
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HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 43-44 AND 47-48: VIOLATION OF STREET  
GANG TERRORISM AND PREVENTION ACT  
(O.C.G.A. 16-15-14)  
COUNT 45: TRAFFICKING IN FENTANYL (O.C.G.A.  
16-13-31(b))  
COUNT 46: POSSESSION MARIJUANA WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))  
COUNT 49: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
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2024 APR 16 PM 3: 08

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**JMAR WILSON, A/K/A KUSSY**, waives  
formal arraignment, copy of Bill of indictment,  
list of witnesses sworn before the Grand Jury,  
and pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**JMAR WILSON, A/K/A KUSSY**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

**JOHN FLYTHE**

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 40-41, 44-45, AND 47-48: VIOLATION OF  
STREET GANG TERRORISM AND PREVENTION  
ACT (O.C.G.A. 16-15-14)  
COUNT 42: TRAFFICKING IN FENTANYL (O.C.G.A.  
16-13-31(b))  
COUNT 43: POSSESSION MARIJUANA WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))  
COUNT 46: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)  
COUNT 49: POSSESSION OF A FIREARM BY A  
CONVICTED FELON (O.C.G.A. 16-11-131(b))

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
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HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**LECADRICK COLLIER, A/K/A KILO,**  
waives formal arraignment, copy of Bill of  
indictment, list of witnesses sworn before the  
Grand Jury, and pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**LECADRICK COLLIER, A/K/A KILO,** as  
to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Foreperson

JOHN FLYTHE



CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 8-9, 16-17, 74-75, 78-79, 81-82, 107-108,  
127-128, 130-131, AND 133-134: VIOLATION OF  
STREET GANG TERRORISM AND PREVENTION  
ACT (O.C.G.A. 16-15-14)  
COUNT 129: TRAFFICKING MARIJUANA (O.C.G.A.  
16-13-21(c))  
COUNT 13: POSSESSION MARIJUANA WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))  
COUNT 76 AND 109: SALE OF MARIJUANA  
(O.C.G.A. 16-13-30(j))  
COUNTS 77 AND 110: ILLEGAL USE OF  
COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)  
COUNT 14: CROSSING GUARD LINE WITH  
CONTRABAND (O.C.G.A. 42-4-13)  
COUNTS 132 AND 135 IDENTITY FRAUD (O.C.G.A.  
16-9-121)  
COUNTS 18 AND 80: POSSESSION OF A FIREARM  
DURING THE COMMISSION OF A FELONY  
(O.C.G.A. 16-11-106)  
COUNT 83: POSSESSION OF A FIREARM BY A  
FIRST OFFENDER PROBATIONER (O.C.G.A.  
16-11-131(b))

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**JALEN LANDERS, A/K/A HECT G,** waives  
formal arraignment, copy of Bill of indictment,  
list of witnesses sworn before the Grand Jury,  
and pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**JALEN LANDERS, A/K/A HECT G,** as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

OT  
CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
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HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 84-85, 112-113, 118-119, 121-122 AND  
124-125: VIOLATION OF STREET GANG  
TERRORISM AND PREVENTION ACT (O.C.G.A.  
16-15-14)  
COUNT 86: TRAFFICKING IN COCAINE (O.C.G.A.  
16-13-31(b))  
COUNT 114: POSSESSION OF COCAINE WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNTS 87-88, AND 117: POSSESSION OF  
SCHEDULE II CONTROLLED SUBSTANCE  
(O.C.G.A. 16-13-30(a))  
COUNT 115: POSSESSION OF SCHEDULE II  
CONTROLLED SUBSTANCE WITH INTENT TO  
DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNT 116: POSSESSION MARIJUANA WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))  
COUNTS 89 AND 111: FLEEING OR ATTEMPTING  
TO ELUDE A LAW ENFORCEMENT OFFICER  
(O.C.G.A. 40-6-395)  
COUNT 123: ATTEMPTED REMOVAL OF A  
WEAPON FROM A PUBLIC OFFICIAL (O.C.G.A.  
16-10-33)  
COUNT 120: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)  
COUNT 126: POSSESSION OF A FIREARM BY A  
FIRST OFFENDER OR PROBATIONER (O.C.G.A.  
16-13-30(b))

CLERK OF SUPERIOR COURT  
AND JUVENILE COURT  
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CLERK, RICHMOND CO. GA.

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH,  
DESMOND DEMMONS, A/K/A DEZ,  
DEVIN ALLEN-GLOVER, A/K/A RAMBO,  
TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,  
IONAS DOGGETT, A/K/A PLUG,  
DOMINICK RYANS, A/K/A DOMO,  
JMAR WILSON, A/K/A KUSSY,  
LECADRICK COLLIER, A/K/A KILO,  
JALEN LANDERS, A/K/A HECT G,  
LARRY MIMS, A/K/A KODAK, A/K/A BEAR,  
DMOND JACKSON, A/K/A MOND,  
EARL OVERTON A/K/A BJ BLAZIN,  
JOSHUA MCDANIEL, A/K/A JB,  
ELLIS MCDANIEL, A/K/A MAC,  
RICARDO MCBRIDE, A/K/A CARDO,  
JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,  
CHASE RUSSAW, A/K/A WAKEO,  
DEZMUND MAINOR, A/K/A DONK,  
JOSHUA DEMMONS,  
EDDIE REESE, A/K/A STRO,  
ANTONIO BUSH,  
CLIFFORD JONES, A/K/A CLIFF,  
MYLES THOMAS, A/K/A MR. INFINITY,  
TILSON MCCRAY, A/K/A TIP,  
BRYSON MCCRAY, A/K/A BMAN,  
DARIUS MILLER,  
MALIK TAYLOR, A/K/A RICH REGARDLESS,  
SARAINA LEWIS,  
SHEQUITTA LEWIS,  
and  
JANESSA FREEMAN, A/K/A NESSA

**ARRAIGNMENT**

The Defendant:

**LARRY MIMS, A/K/A KODAK, A/K/A  
BEAR**, waives formal arraignment, copy of Bill  
of indictment, list of witnesses sworn before the  
Grand Jury, and pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**LARRY MIMS, A/K/A KODAK, A/K/A  
BEAR**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Foreperson

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNTS 1 AND 5: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 175-177, 182-183, 306-308 AND 321-322:  
VIOLATION OF STREET GANG TERRORISM AND  
PREVENTION ACT (O.C.G.A. 16-15-14)  
COUNT 179: FLEEING OR ATTEMPTING TO  
ELUDE A LAW ENFORCEMENT OFFICER  
(O.C.G.A. 40-6-395)  
COUNT 180: THEFT BY RECEIVING STOLEN  
PROPERTY (O.C.G.A. 16-8-7)  
COUNTS 309-314: ARMED ROBBERY (O.C.G.A.  
16-8-41)  
COUNTS 315-320: POSSESSION OF A FIREARM  
DURING COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)  
COUNTS 186-187 AND 333: POSSESSION OF A  
FIREARM BY A CONVICTED FELON (O.C.G.A.  
16-11-131(b))

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
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2024 APR 16 PM 3: 08

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024RCCR478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**DMOND JACKSON, A/K/A MOND,** waives  
formal arraignment, copy of Bill of indictment, list  
of witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**DMOND JACKSON, A/K/A MOND,** as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 147-148, 160-161 AND 164-165: VIOLATION  
OF STREET GANG TERRORISM AND  
PREVENTION ACT (O.C.G.A. 16-15-14)  
COUNT 150: CONSPIRACY TO COMMIT MURDER  
(O.C.G.A. 16-4-8, O.C.G.A. 16-5-1)  
COUNT 162: AGGRAVATED ASSAULT ON A  
PEACE OFFICER (O.C.G.A. 16-5-1)  
COUNT 163: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)  
COUNT 166: POSSESSION OF A FIREARM BY A  
CONVICTED FELON (O.C.G.A. 16-11-131(b))

INDICTMENT No. 2024 RCCR 478  
RICHMOND COUNTY  
SUPERIOR COURT

In the matter of:

THE STATE  
VS.

DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH,  
DESMOND DEMMONS, A/K/A DEZ,  
DEVIN ALLEN-GLOVER, A/K/A RAMBO,  
TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,  
IONAS DOGGETT, A/K/A PLUG,  
DOMINICK RYANS, A/K/A DOMO,  
JMAR WILSON, A/K/A KUSSY,  
LECADRICK COLLIER, A/K/A KILO,  
JALEN LANDERS, A/K/A HECT G,  
LARRY MIMS, A/K/A KODAK, A/K/A BEAR,  
DMOND JACKSON, A/K/A MOND,  
EARL OVERTON A/K/A BJ BLAZIN,  
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TILSON MCCRAY, A/K/A TIP,  
BRYSON MCCRAY, A/K/A BMAN,  
DARIUS MILLER,  
MALIK TAYLOR, A/K/A RICH REGARDLESS,  
SARAINA LEWIS,  
SHEQUITTA LEWIS,  
and  
JANESSA FREEMAN, A/K/A NESSA

ARRAIGNMENT

The Defendant:

EARL OVERTON A/K/A BJ BLAZIN,  
waives formal arraignment, copy of Bill of  
indictment, list of witnesses sworn before the  
Grand Jury, and pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

JURY VERDICT

We, the Jury, find the Defendant,  
EARL OVERTON A/K/A BJ BLAZIN, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

OT  
CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3:09

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNTS 1 AND 6: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 136-137 AND 139-140: VIOLATION OF  
STREET GANG TERRORISM AND PREVENTION  
ACT (O.C.G.A. 16-15-14)  
COUNT 138: CONSPIRACY TO COMMIT  
TRAFFICKING COCAINE (O.C.G.A 16-4-8, O.C.G.A.  
16-13-31(b))  
COUNT 141: POSSESSION OF A FIREARM BY A  
CONVICTED FELON (O.C.G.A. 16-11-131(b))

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3:09

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**JOHN FLYTHE**

**ARRAIGNMENT**

The Defendant:

**JOSHUA MCDANIEL, A/K/A JB,** waives  
formal arraignment, copy of indictment, list  
of witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**JOSHUA MCDANIEL, A/K/A JB,** as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNTS 1 AND 7: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 63-64, 67-68 AND 90-91: VIOLATION OF  
STREET GANG TERRORISM AND PREVENTION  
ACT (O.C.G.A. 16-15-14)  
COUNTS 65, 69 AND 92: SALE COCAINE (O.C.G.A.  
16-13-30(b))  
COUNTS 66, 70 AND 93: ILLEGAL USE OF  
COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3: 09

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**ELLIS MCDANIEL, A/K/A MAC**, waives  
formal arraignment, copy of Bill of indictment, list  
of witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**ELLIS MCDANIEL, A/K/A MAC**, as to:

**Count 1:** \_\_\_\_\_

**Count 2:** \_\_\_\_\_

**Count 3:** \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

**JOHN FLYTHE**

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 242-243, 246-247 AND 249-250: VIOLATION  
OF STREET GANG TERRORISM AND  
PREVENTION ACT (O.C.G.A. 16-15-14)  
COUNT 244: POSSESSION OF COCAINE WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNT 245: POSSESSION MARIJUANA WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))  
COUNT 248: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)  
COUNT 251: POSSESSION OF A FIREARM BY A  
CONVICTED FELON (O.C.G.A. 16-11-131(b))

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3:09

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024RCCR478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH,  
DESMOND DEMMONS, A/K/A DEZ,  
DEVIN ALLEN-GLOVER, A/K/A RAMBO,  
TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,  
IONAS DOGGETT, A/K/A PLUG,  
DOMINICK RYANS, A/K/A DOMO,  
JMAR WILSON, A/K/A KUSSY,  
LECADRICK COLLIER, A/K/A KILO,  
JALEN LANDERS, A/K/A HECT G,  
LARRY MIMS, A/K/A KODAK, A/K/A BEAR,  
DMOND JACKSON, A/K/A MOND,  
EARL OVERTON A/K/A BJ BLAZIN,  
JOSHUA MCDANIEL, A/K/A JB,  
ELLIS MCDANIEL, A/K/A MAC,  
RICARDO MCBRIDE, A/K/A CARDO,  
JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,  
CHASE RUSSAW, A/K/A WAKEO,  
DEZMUND MAINOR, A/K/A DONK,  
JOSHUA DEMMONS,  
EDDIE REESE, A/K/A STRO,  
ANTONIO BUSH,  
CLIFFORD JONES, A/K/A CLIFF,  
MYLES THOMAS, A/K/A MR. INFINITY,  
TILSON MCCRAY, A/K/A TIP,  
BRYSON MCCRAY, A/K/A BMAN,  
DARIUS MILLER,  
MALIK TAYLOR, A/K/A RICH REGARDLESS,  
SARAINA LEWIS,  
SHEQUITTA LEWIS,  
and  
JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**RICARDO MCBRIDE, A/K/A CARDO,**  
waives formal arraignment, copy of Bill of  
indictment, list of witnesses sworn before the  
Grand Jury, and pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**RICARDO MCBRIDE, A/K/A CARDO,** as  
to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Foreperson

JOHN FLYTHE

NATALIE S. PAINE,  
DISTRICT ATTORNEY

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNTS 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 151 AND 152: VIOLATION OF STREET  
GANG TERRORISM AND PREVENTION ACT  
(O.C.G.A. 16-15-14)  
COUNTS 154 AND 155: ILLEGAL USE OF  
COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3:09

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**JAMES DAVIS, A/K/A DOLLA, A/K/A**  
**MAN MAN**, waives formal arraignment, copy of  
Bill of indictment, list of witnesses sworn before  
the Grand Jury, and pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**JAMES DAVIS, A/K/A DOLLA, A/K/A**  
**MAN MAN**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Foreperson

JOHN FLYTHE



CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)

**INDICTMENT No. 2024 Rccr 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**CHASE RUSSAW, A/K/A WAKEO,**  
waives formal arraignment, copy of Bill of  
indictment, list of witnesses sworn before the  
Grand Jury, and pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**CHASE RUSSAW, A/K/A WAKEO,** as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3: 09

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 252-253, 255-256 AND 258-259: VIOLATION  
OF STREET GANG TERRORISM AND  
PREVENTION ACT (O.C.G.A. 16-15-14)  
COUNT 254: POSSESSION MARIJUANA WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))  
COUNT 257: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)  
COUNT 260: POSSESSION OF A FIREARM BY A  
CONVICTED FELON (O.C.G.A. 16-11-131(b))

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3: 10

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

**INDICTMENT No. 2024RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**DEZMUND MAINOR, A/K/A DONK**, waives  
formal arraignment, copy of Bill of indictment, list  
of witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**DEZMUND MAINOR, A/K/A DONK**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

OTN:

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 261-262 AND 265-266: VIOLATION OF  
STREET GANG TERRORISM AND PREVENTION  
ACT (O.C.G.A. 16-15-14)  
COUNT 263: POSSESSION OF FENTANYL (O.C.G.A.  
16-13-30(a))  
COUNT 264: POSSESSION OF COCAINE (O.C.G.A.  
16-13-30(a))  
COUNT 268: POSSESSION OF AN ILLEGAL  
WEAPON (O.C.G.A. 16-11-123)  
COUNT 267: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3: 10

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

**INDICTMENT No. 2024RCcR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**JOSUA DEMMONS**, waives formal  
arraignment, copy of Bill of indictment, list of  
witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**JOSHUA DEMMONS**, as to:

**Count 1:** \_\_\_\_\_

**Count 2:** \_\_\_\_\_

**Count 3:** \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

OTN:

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 60 AND 61: VIOLATION OF STREET  
GANG TERRORISM AND PREVENTION ACT  
(O.C.G.A. 16-15-14)  
COUNT 62: POSSESSION OF A FIREARM BY A  
CONVICTED FELON (O.C.G.A. 16-11-131(b))

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3: 10

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**EDDIE REESE, A/K/A STRO**, waives formal  
arraignment, copy of Bill of indictment, list of  
witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**EDDIE REESE, A/K/A STRO**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

OTN:

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 283-284 AND 287-289: VIOLATION OF  
STREET GANG TERRORISM AND PREVENTION  
ACT (O.C.G.A. 16-15-14)  
COUNT 285: POSSESSION OF COCAINE WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNTS 286: POSSESSION OF  
METHAMPHETAMINE (O.C.G.A. 16-13-30(a))  
COUNT 290: THEFT BY RECEIVING STOLEN  
PROPERTY (O.C.G.A. 16-8-7)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3: 10

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

INDICTMENT No. 2024 RCCR 478  
RICHMOND COUNTY  
SUPERIOR COURT

In the matter of:

THE STATE  
VS.

DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH,  
DESMOND DEMMONS, A/K/A DEZ,  
DEVIN ALLEN-GLOVER, A/K/A RAMBO,  
TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,  
IONAS DOGGETT, A/K/A PLUG,  
DOMINICK RYANS, A/K/A DOMO,  
JMAR WILSON, A/K/A KUSSY,  
LECADRICK COLLIER, A/K/A KILO,  
JALEN LANDERS, A/K/A HECT G,  
LARRY MIMS, A/K/A KODAK, A/K/A BEAR,  
DMOND JACKSON, A/K/A MOND,  
EARL OVERTON A/K/A BJ BLAZIN,  
JOSHUA MCDANIEL, A/K/A JB,  
ELLIS MCDANIEL, A/K/A MAC,  
RICARDO MCBRIDE, A/K/A CARDO,  
JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,  
CHASE RUSSAW, A/K/A WAKEO,  
DEZMUND MAINOR, A/K/A DONK,  
JOSHUA DEMMONS,  
EDDIE REESE, A/K/A STRO,  
ANTONIO BUSH,  
CLIFFORD JONES, A/K/A CLIFF,  
MYLES THOMAS, A/K/A MR. INFINITY,  
TILSON MCCRAY, A/K/A TIP,  
BRYSON MCCRAY, A/K/A BMAN,  
DARIUS MILLER,  
MALIK TAYLOR, A/K/A RICH REGARDLESS,  
SARAINA LEWIS,  
SHEQUITTA LEWIS,  
and  
JANESSA FREEMAN, A/K/A NESSA

ARRAIGNMENT

The Defendant:

ANTONIO BUSH, waives formal arraignment,  
copy of Bill of indictment, list of witnesses sworn  
before the Grand Jury, and pleads \_\_\_\_\_  
guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

JURY VERDICT

We, the Jury, find the Defendant,  
ANTONIO BUSH, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

*Handwritten signature*

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 214-215, 220-221, 223-224, AND 229-230:  
VIOLATION OF STREET GANG TERRORISM AND  
PREVENTION ACT (O.C.G.A. 16-15-14)  
COUNT 216: POSSESSION OF COCAINE WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNTS 218 AND 219: POSSESSION OF SCHEDULE  
I CONTROLLED SUBSTANCE WITH INTENT TO  
DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNT 217: POSSESSION MARIJUANA WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))  
COUNTS 225-227: AGGRAVATED ASSAULT ON A  
PEACE OFFICER (O.C.G.A. 16-5-21)  
COUNT 228: INTERFERENCE WITH  
GOVERNMENT PROPERTY (O.C.G.A. 16-7-24-(a))  
COUNTS 222 AND 231-233: POSSESSION OF A  
FIREARM DURING THE COMMISSION OF A  
FELONY (O.C.G.A. 16-11-106)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3: 10

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

**INDICTMENT No. 2024RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**CLIFFORD JONES, A/K/A CLIFF**, waives  
formal arraignment, copy of Bill of indictment, list  
of witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**CLIFFORD JONES, A/K/A CLIFF**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

OTN:

**JOHN FLYTHE**

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNTS 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 156 AND 157: VIOLATION OF STREET  
GANG TERRORISM AND PREVENTION ACT  
(O.C.G.A. 16-15-4)  
COUNT 159: ILLEGAL USE OF COMMUNICATION  
FACILITY (O.C.G.A. 16-13-32.3)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3: 1 ~

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024RCCR478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEYV VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**MYLES THOMAS, A/K/A MR. INFINITY,**  
waives formal arraignment, copy of Bill of  
indictment, list of witnesses sworn before the  
Grand Jury, and pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 269-270, AND 272-274: VIOLATION OF  
STREET GANG TERRORISM AND PREVENTION  
ACT (O.C.G.A. 16-15-14)  
COUNT 271: TRAFFICKING MARIJUANA (O.C.G.A.  
16-13-31(c))  
COUNT 276: THEFT BY RECEIVING STOLEN  
PROPERTY (O.C.G.A. 16-8-7)  
COUNT 275: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3:10

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**TILSON MCCRAY, A/K/A TIP,** waives  
formal arraignment, copy of Bill of indictment, list  
of witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**TILSON MCCRAY, A/K/A TIP,** as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

JOHN FLYTHE



CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 277-278 AND 280-281: VIOLATION OF  
STREET GANG TERRORISM AND PREVENTION  
ACT (O.C.G.A. 16-15-14)  
COUNT 279: POSSESSION MARIJUANA WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))  
COUNT 282: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3:11

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**BRYSON MCCRAY, A/K/A BMAN,** waives  
formal arraignment, copy of Bill of indictment, list  
of witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**BRYSON MCCRAY, A/K/A BMAN,** as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 94-95, 101-102 AND 104-105: VIOLATION  
OF STREET GANG TERRORISM AND  
PREVENTION ACT (O.C.G.A. 16-15-14)  
COUNT 98: POSSESSION OF FENTANYL WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNT 97: POSSESSION OF COCAINE WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNT 96: POSSESSION OF  
METHAMPHETAMINE WITH INTENT TO  
DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNT 99: POSSESSION OF OXYCODONE WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNT 100: POSSESSION MARIJUANA WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))  
COUNT 103: POSSESSION OF A FIREARM DURING  
THE COMMISSION OF A FELONY (O.C.G.A.  
16-11-106)  
COUNT 106: POSSESSION OF A FIREARM BY A  
CONVICTED FELON (O.C.G.A. 16-11-106)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3:11

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

INDICTMENT No. 2024 RCCR 478  
RICHMOND COUNTY  
SUPERIOR COURT

In the matter of:

THE STATE  
VS.

DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH,  
DESMOND DEMMONS, A/K/A DEZ,  
DEVIN ALLEN-GLOVER, A/K/A RAMBO,  
TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,  
IONAS DOGGETT, A/K/A PLUG,  
DOMINICK RYANS, A/K/A DOMO,  
JMAR WILSON, A/K/A KUSSY,  
LECADRICK COLLIER, A/K/A KILO,  
JALEN LANDERS, A/K/A HECT G,  
LARRY MIMS, A/K/A KODAK, A/K/A BEAR,  
DMOND JACKSON, A/K/A MOND,  
EARL OVERTON A/K/A BJ BLAZIN,  
JOSHUA MCDANIEL, A/K/A JB,  
ELLIS MCDANIEL, A/K/A MAC,  
RICARDO MCBRIDE, A/K/A CARDO,  
JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,  
CHASE RUSSAW, A/K/A WAKEO,  
DEZMUND MAINOR, A/K/A DONK,  
JOSHUA DEMMONS,  
EDDIE REESE, A/K/A STRO,  
ANTONIO BUSH,  
CLIFFORD JONES, A/K/A CLIFF,  
MYLES THOMAS, A/K/A MR. INFINITY,  
TILSON MCCRAY, A/K/A TIP,  
BRYSON MCCRAY, A/K/A BMAN,  
DARIUS MILLER,  
MALIK TAYLOR, A/K/A RICH REGARDLESS,  
SARAINA LEWIS,  
SHEQUITTA LEWIS,  
and  
JANESSA FREEMAN, A/K/A NESSA

ARRAIGNMENT

The Defendant:

**DARRIUS MILLER**, waives formal  
arraignment, copy of Bill of indictment, list of  
witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

JURY VERDICT

We, the Jury, find the Defendant,  
**DARRIUS MILLER**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Foreperson

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 50-51, 54-55, 57-58, 294-295, 300-301, AND  
303-304: VIOLATION OF STREET GANG  
TERRORISM AND PREVENTION ACT (O.C.G.A.  
16-15-14)  
COUNT 52: TRAFFICKING METHAMPHETAMINE  
(O.C.G.A. 16-8-41)  
COUNTS 296: TRAFFICKING FENTANYL (O.C.G.A.  
16-13-31(b))  
COUNT 297: POSSESSION OF COCAINE WITH  
INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNT 298: POSSESSION OF  
METHAMPHETAMINE WITH INTENT TO  
DISTRIBUTE (O.C.G.A. 16-13-30(b))  
COUNTS 53 AND 299: POSSESSION MARIJUANA  
WITH INTENT TO DISTRIBUTE (O.C.G.A.  
16-13-30(j))  
COUNTS 56 AND 302: POSSESSION OF A FIREARM  
DURING THE COMMISSION OF A FELONY  
(O.C.G.A. 16-11-106)  
COUNTS 59 AND 305: POSSESSION OF A FIREARM  
BY A CONVICTED FELON (O.C.G.A. 16-11-106)

INDICTMENT No. 2024 RCCR 478  
RICHMOND COUNTY  
SUPERIOR COURT

In the matter of:

THE STATE  
VS.

DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH,  
DESMOND DEMMONS, A/K/A DEZ,  
DEVIN ALLEN-GLOVER, A/K/A RAMBO,  
TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,  
IONAS DOGGETT, A/K/A PLUG,  
DOMINICK RYANS, A/K/A DOMO,  
JMAR WILSON, A/K/A KUSSY,  
LECADRICK COLLIER, A/K/A KILO,  
JALEN LANDERS, A/K/A HECT G,  
LARRY MIMS, A/K/A KODAK, A/K/A BEAR,  
DMOND JACKSON, A/K/A MOND,  
EARL OVERTON A/K/A BJ BLAZIN,  
JOSHUA MCDANIEL, A/K/A JB,  
ELLIS MCDANIEL, A/K/A MAC,  
RICARDO MCBRIDE, A/K/A CARDO,  
JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,  
CHASE RUSSAW, A/K/A WAKEO,  
DEZMUND MAINOR, A/K/A DONK,  
JOSHUA DEMMONS,  
EDDIE REESE, A/K/A STRO,  
ANTONIO BUSH,  
CLIFFORD JONES, A/K/A CLIFF,  
MYLES THOMAS, A/K/A MR. INFINITY,  
TILSON MCCRAY, A/K/A TIP,  
BRYSON MCCRAY, A/K/A BMAN,  
DARIUS MILLER,  
MALIK TAYLOR, A/K/A RICH REGARDLESS,  
SARAINA LEWIS,  
SHEQUITTA LEWIS,  
and  
JANESSA FREEMAN, A/K/A NESSA

ARRAIGNMENT

The Defendant:

**MALIK TAYLOR, A/K/A RICH  
REGARDLESS**, waives formal arraignment,  
copy of Bill of indictment, list of witnesses sworn  
before the Grand Jury, and pleads \_\_\_\_\_  
guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

JURY VERDICT

We, the Jury, find the Defendant,  
**MALIK TAYLOR, A/K/A RICH  
REGARDLESS**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Foreperson

CLERK OF SUPERIOR STATE  
AND JUVENILE COURT  
FILED FOR RECORD

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HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 71 AND 72: VIOLATION OF STREET  
GANG TERRORISM AND PREVENTION ACT  
(O.C.G.A. 16-15-4)  
COUNT 73: THEFT BY CONVERSION (O.C.G.A.  
16-8-4)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3:11

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

**INDICTMENT No. 2024RCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A**  
**TRVPMONEY VDOUGH,**  
**DESMOND DEMMONS, A/K/A DEZ,**  
**DEVIN ALLEN-GLOVER, A/K/A RAMBO,**  
**TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,**  
**IONAS DOGGETT, A/K/A PLUG,**  
**DOMINICK RYANS, A/K/A DOMO,**  
**JMAR WILSON, A/K/A KUSSY,**  
**LECADRICK COLLIER, A/K/A KILO,**  
**JALEN LANDERS, A/K/A HECT G,**  
**LARRY MIMS, A/K/A KODAK, A/K/A BEAR,**  
**DMOND JACKSON, A/K/A MOND,**  
**EARL OVERTON A/K/A BJ BLAZIN,**  
**JOSHUA MCDANIEL, A/K/A JB,**  
**ELLIS MCDANIEL, A/K/A MAC,**  
**RICARDO MCBRIDE, A/K/A CARDO,**  
**JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,**  
**CHASE RUSSAW, A/K/A WAKEO,**  
**DEZMUND MAINOR, A/K/A DONK,**  
**JOSHUA DEMMONS,**  
**EDDIE REESE, A/K/A STRO,**  
**ANTONIO BUSH,**  
**CLIFFORD JONES, A/K/A CLIFF,**  
**MYLES THOMAS, A/K/A MR. INFINITY,**  
**TILSON MCCRAY, A/K/A TIP,**  
**BRYSON MCCRAY, A/K/A BMAN,**  
**DARIUS MILLER,**  
**MALIK TAYLOR, A/K/A RICH REGARDLESS,**  
**SARAINA LEWIS,**  
**SHEQUITTA LEWIS,**  
**and**  
**JANESSA FREEMAN, A/K/A NESSA**

**ARRAIGNMENT**

The Defendant:

**SARAINA LEWIS**, waives formal arraignment,  
copy of Bill of indictment, list of witnesses sworn  
before the Grand Jury, and pleads \_\_\_\_\_  
guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**SARAINA LEWIS**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_  
Foreperson

OTN:

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)  
COUNTS 71 AND 72: VIOLATION OF STREET  
GANG TERRORISM AND PREVENTION ACT  
(O.C.G.A. 16-15-4)  
COUNT 73: THEFT BY CONVERSION (O.C.G.A.  
16-8-4)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
FILED FOR RECORD

2024 APR 16 PM 3: 11

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

**INDICTMENT No. 2024 RccR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

DAVION HEATH, A/K/A VDOUGH, A/K/A  
TRVPMONEY VDOUGH,  
DESMOND DEMMONS, A/K/A DEZ,  
DEVIN ALLEN-GLOVER, A/K/A RAMBO,  
TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ,  
IONAS DOGGETT, A/K/A PLUG,  
DOMINICK RYANS, A/K/A DOMO,  
JMAR WILSON, A/K/A KUSSY,  
LECADRICK COLLIER, A/K/A KILO,  
JALEN LANDERS, A/K/A HECT G,  
LARRY MIMS, A/K/A KODAK, A/K/A BEAR,  
DMOND JACKSON, A/K/A MOND,  
EARL OVERTON A/K/A BJ BLAZIN,  
JOSHUA MCDANIEL, A/K/A JB,  
ELLIS MCDANIEL, A/K/A MAC,  
RICARDO MCBRIDE, A/K/A CARDO,  
JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN,  
CHASE RUSSAW, A/K/A WAKEO,  
DEZMUND MAINOR, A/K/A DONK,  
JOSHUA DEMMONS,  
EDDIE REESE, A/K/A STRO,  
ANTONIO BUSH,  
CLIFFORD JONES, A/K/A CLIFF,  
MYLES THOMAS, A/K/A MR. INFINITY,  
TILSON MCCRAY, A/K/A TIP,  
BRYSON MCCRAY, A/K/A BMAN,  
DARIUS MILLER,  
MALIK TAYLOR, A/K/A RICH REGARDLESS,  
SARAINA LEWIS,  
SHEQUITTA LEWIS,  
and  
JANESSA FREEMAN, A/K/A NESSA

**ARRAIGNMENT**

The Defendant:

**SHEQUITTA LEWIS**, waives formal  
arraignment, copy of Bill of indictment, list of  
witnesses sworn before the Grand Jury, and  
pleads \_\_\_\_\_ guilty.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Defendant

\_\_\_\_\_  
Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**SHEQUITTA LEWIS**, as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Foreperson

OTN: GJAW

JOHN FLYTHE

CHRISTOPHER CARR,  
ATTORNEY GENERAL

WITNESSES FOR THE STATE:  
LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR

COUNT 1: VIOLATION OF RACKETEER  
INFLUENCE AND CORRUPT ORGANIZATIONS  
ACT (O.C.G.A. 16-14-4)

CLERK OF SUPERIOR, STATE  
AND JUVENILE COURT  
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2024 APR 16 PM 3:11

HATTIE HOLMES SULLIVAN  
CLERK, RICHMOND CO., GA.

OTN:

**INDICTMENT No. 2024 RCCR 478**  
**RICHMOND COUNTY**  
**SUPERIOR COURT**

In the matter of:

**THE STATE**  
**VS.**

**DAVION HEATH, A/K/A VDOUGH, A/K/A TRVPMONEY VDOUGH, DESMOND DEMMONS, A/K/A DEZ, DEVIN ALLEN-GLOVER, A/K/A RAMBO, TRAEON PERRY, A/K/A KLUTCH, A/K/A TJ, IONAS DOGGETT, A/K/A PLUG, DOMINICK RYANS, A/K/A DOMO, JMAR WILSON, A/K/A KUSSY, LECADRICK COLLIER, A/K/A KILO, JALEN LANDERS, A/K/A HECT G, LARRY MIMS, A/K/A KODAK, A/K/A BEAR, DMOND JACKSON, A/K/A MOND, EARL OVERTON A/K/A BJ BLAZIN, JOSHUA MCDANIEL, A/K/A JB, ELLIS MCDANIEL, A/K/A MAC, RICARDO MCBRIDE, A/K/A CARDO, JAMES DAVIS, A/K/A DOLLA, A/K/A MAN MAN, CHASE RUSSAW, A/K/A WAKEO, DEZMUND MAINOR, A/K/A DONK, JOSHUA DEMMONS, EDDIE REESE, A/K/A STRO, ANTONIO BUSH, CLIFFORD JONES, A/K/A CLIFF, MYLES THOMAS, A/K/A MR. INFINITY, TILSON MCCRAY, A/K/A TIP, BRYSON MCCRAY, A/K/A BMAN, DARIUS MILLER, MALIK TAYLOR, A/K/A RICH REGARDLESS, SARAINA LEWIS, SHEQUITTA LEWIS,  
and  
JANESSA FREEMAN, A/K/A NESSA**

**JOHN FLYTHE**

**ARRAIGNMENT**

The Defendant:

**JANESSA FREEMAN, A/K/A NESSA,** waives formal arraignment, copy of Bill of indictment, list of witnesses sworn before the Grand Jury, and pleads \_\_\_\_\_ guilty.

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

Defendant

Defendant's Attorney

**JURY VERDICT**

We, the Jury, find the Defendant,  
**JANESSA FREEMAN, A/K/A NESSA,** as to:

Count 1: \_\_\_\_\_

Count 2: \_\_\_\_\_

Count 3: \_\_\_\_\_

This \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

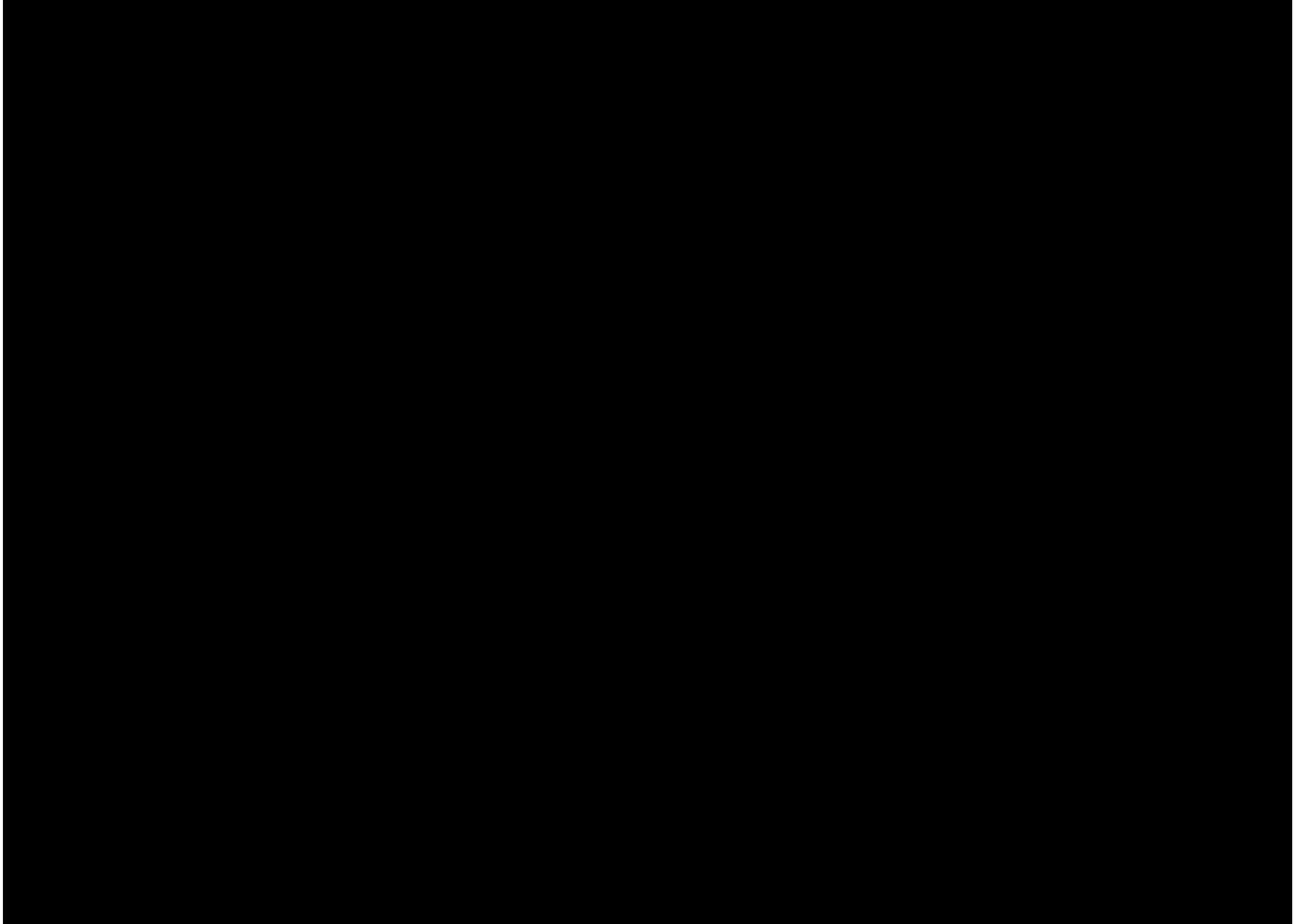
Foreperson

**INDICTMENT**

**IN THE SUPERIOR COURT OF RICHMOND COUNTY**

**STATE OF GEORGIA**

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



**COUNT 1**

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

**DAVION HEATH  
A/K/A VDOUGH  
A/K/A TRVPMONEYYY VDOUGH**

**DESMOND DEMMONS  
A/K/A DEZ**

**DEVIN ALLEN-GLOVER  
A/K/A RAMBO**

**TRAEON PERRY  
A/K/A KLUTCH  
A/K/A TJ**

**IONAS DOGGETT  
A/K/A PLUG**

**DOMINICK RYANS  
A/K/A DOMO**

**JMAR WILSON  
A/K/A KUSSY**

**LECADRICK COLLIER  
A/K/A KILO**

**JALEN LANDERS  
A/K/A HECT G**

**LARRY MIMS  
A/K/A KODAK  
A/K/A BEAR**

**DMOND JACKSON  
A/K/A MOND**

**EARL OVERTON  
A/K/A BJ BLAZIN**

**JOSHUA MCDANIEL  
A/K/A JB**



**ELLIS MCDANIEL  
A/K/A MAC**

**RICARDO MCBRIDE  
A/K/A CARDO**

**JAMES DAVIS  
A/K/A DOLLA  
A/K/A MAN MAN**

**CHASE RUSSAW  
A/K/A WAKEO**

**DEZMUND MAINOR  
A/K/A DONK**

**JOSHUA DEMMONS**

**EDDIE REESE  
A/K/A STRO**

**ANTONIO BUSH**

**CLIFFORD JONES  
A/K/A CLIFF**

**MYLES THOMAS  
A/K/A MR. INFINITY**

**TILSON MCCRAY  
A/K/A TIP**

**BRYSON MCCRAY  
A/K/A BMAN**

**DARIUS MILLER**

**MALIK TAYLOR  
A/K/A RICH REGARDLESS**

**SARAINA LEWIS**

**SHEQUITTA LEWIS**

**JANESSA FREEMAN  
A/K/A NESSA**

with the offense of **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. § 16-14-4(c)**, for that the said accused persons, in the County of Richmond and State of Georgia, between the 15<sup>th</sup> day of February, 2022 and the 10<sup>th</sup> day of April, 2024, did unlawfully conspire to acquire and maintain, directly and indirectly, an interest in and control of United States currency, weapons, controlled substances, 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

The enterprise Trvpmoneyy and its' associates sought to achieve objectives of power, influence, money, and control. To achieve those objectives, the enterprise, through its associates, engaged in aggravated assaults, drug and gun distribution, thefts, and other criminal activities to acquire United States Currency, weapons, controlled substances, and other proceeds across Richmond County, the Augusta Judicial Circuit, and the State of Georgia. The Defendants charged in this indictment are associates of Trvpmoneyy, and they did knowingly and willfully join a conspiracy to unlawfully effect the objectives of Trvpmoneyy, which contained a common plan and purpose to commit two or more acts of Racketeering Activity in Richmond County, Georgia and other areas of the State of Georgia.

## 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 and endeavored to conduct and participate in a criminal enterprise, Trvpmoneyy in Richmond County, Georgia, and elsewhere in the State of Georgia. Defendants, and other unindicted conspirators known and unknown to the Grand Jury constituted a criminal organization—Trvpmoneyy—whose associates engaged in various related criminal activities including, but not limited to aggravated assault, illegal firearm transactions, theft, armed robbery, possession of controlled substances and dealing controlled substances.

Trvpmoneyy 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 Richmond County, Georgia and elsewhere in the State of Georgia. The enterprise operated for a period of time sufficient to permit its associates to pursue its objectives.

### **1. History-**

Trvpmoneyy was formed in Richmond County, Georgia in 2020 by Davion Heath. As a criminal enterprise Trvpmoneyy associates with other large national gangs, primarily Inglewood Family Gangster Bloods and Nine Trey Gangster Bloods. Trvpmoneyy associates often use the numbers “185” and “1 9” to pay respect to their larger gang affiliations. In April of 2022, a violent conflict with associates of another Richmond County based enterprise, Loyalty Over Everything began and it continues today.

### **1. Identifiers-**

Trvpmoneyy associates use visual identifiers to include jewelry, tattoos, and numbers to identify themselves to one another, other gangs, and the community to represent and promote their enterprise. Trvpmoneyy associates will use identifiers common to the Bloods. For example, associates will use the color red and a red blood drop emoji on social media. Trvpmoneyy associates will also use their own unique identifiers to Trvpmoneyy. Trvpmoneyy associates will use the number 448 on social media, jewelry and in message to other associates, to signify how

the enterprise makes money. 448 is a common measurement for how many grams are in a pound and language use commonly in narcotic transactions. Trvpmoneyy associates will also use palm tree emojis on social media posts, symbolizing the distribution of marijuana. Associates will shorten Trvpmoneyy to "TM" when outwardly representing the enterprise on social media, text message communication and with their jewelry.

Trvpmoneyy routinely uses the numbers "185" and "1 9" on social media to influence their own status as associates in the enterprise. They will use the numbers "1 9", which is reference to the 1900 block of Murphy Road in Augusta, Georgia, which is a primary narcotic distribution area for the enterprise. "1 9" is often seen on associates clothing with "1 9" and on social medial posts. Trvpmoneyy associates will also often post and display "185" which is a reference to 92 Inglewood Family Gangster Bloods and Nine Trey Gangster Bloods working together, as they do in the enterprise. The number 185 is the product of 93 (a number associated with Nine Trey Gangster Blood) and 92 (a number associated with Inglewood Family Gangster Bloods).

Associates of Trvpmoneyy use jewelry to outwardly identify themselves. Several associates of Trvpmoneyy wear a chain with a pendant that states "TRVPMONEYYY." Some associates will wear a chain with a "TM" pendant. These jewelry pieces are important symbols to associates and are worn frequently in public posts.

## THE CONSPIRACY

As associates of the enterprise of Trvpmoneyy the Defendants conspire and associate together and with others for the common purpose of illegally obtaining United States currency, weapons, and property through a pattern of racketeering activity, as well as by, enhancing the enterprise by conducting and participating in the enterprise through a pattern of racketeering activity. To achieve these objectives, the defendants engaged in repeated criminal activity as enumerated below. Specifically, the objectives of the conspiracy by the associates of the enterprise are included but not limited to:

- Maintaining and increasing the reputation, power and influence of the enterprise through acts of racketeering activity, including assault and threats of violence;
- Maintaining and increasing the territory of the enterprise through acts of violence;
- Acquiring United States currency, weapons, and other property through acts of racketeering activity, including thefts, armed robberies, and the unlawful sale and distribution of drugs and guns; and
- Enhancing the reputation of the enterprise through the posting of messages and images promoting its size, profitability and readiness to engage in acts of violence and demonstrating the allegiance of their gangs.

**ACTS IN FUTUREANCE OF THE CONSPIRACY**

In furtherance of the conspiracy and to affect its objectives and purposes, the Defendants and other unindicted co-conspirators known and unknown to the Grand Jury, committed the following overt acts, certain of which constitute racketeering activity:

<b><u>Act</u></b>	<b><u>On or About</u></b>	<b><u>Scope of Conduct</u></b>
1.	02/15/2022	JALEN LANDERS AND IONAS DOGGETT, both being associates of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
2.	02/15/2022	JALEN LANDERS AND IONAS DOGGETT, both being associates of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a handgun, a firearm during the commission of possession of marijuana with intent to distribute, said crime being a felony and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
3.	02/15/2022	IONAS DOGGETT, being an associate of Trvpmoneyy, did commit the offense of theft by receiving stolen property, in that said accused did retain a Glock 26 firearm, the property of Antionio Doggett, which he should have known was stolen, and said firearm having not been retained with the intent to restore to the owner, in violation of O.C.G.A. §16-8-7, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xii) and an overt act in furtherance of the conspiracy.
4.	02/15/2022	JALEN LANDERS, being an associate of Trvpmoneyy, did commit the offense of crossing guard lines with contraband, in that said accused did unlawfully come inside the Richmond County Detention Center with Marijuana in his possession without the knowledge and consent of the jailer or law enforcement officer, in violation of O.C.G.A. §42-4-13, which is an overt act in furtherance of the conspiracy.
5.	04/15/2022	DEVIN ALLEN-GLOVER, being an associate of Trvpmoneyy, along with other known and unknown associates of Trvpmoneyy, did commit the offense of aggravated assault against the persons of Kanya Wright, Willie Mercy, and Zakee Hasan, by firing a weapon into the residence they were located inside, 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.

6.	04/15/2022	DEVIN ALLEN-GLOVER, being an associate of Trvpmoneyy, along with other known and unknown associates of Trvpmoneyy, did commit the offense of criminal damage to property in the first degree by knowingly and without authority damaging the residence of Willie Mency in a manner to endanger human life by shooting a firearm inside the residence while occupied , in violation of O.C.G.A. §16-15-4(a), and an overt act in furtherance of the conspiracy.
7.	04/15/2022	DEVIN ALLEN-GLOVER, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have on his person a firearm during the commission of aggravated assault and criminal damage to property in the first degree, and involving the persons of Kanya Wright, Willie Mency, and Zakee Hasan, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
8.	06/06/2022	LECADRICK COLLIER, being an associate of Trvpmoneyy, did post to the social media platform Instagram using his public account "trvpmoneyy.kilo" a photograph depicting himself with a firearm with a hashtag of TRVPMONEYYY, with other Trvpmoneyy associates commenting on the picture, which is an overt act in furtherance of the conspiracy.
9.	06/29/2022	CHASE RUSSAW, being an associate of Trvpmoneyy, along with other know associates of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
10.	06/29/2022	CHASE RUSSAW, being an associate of Trvpmoneyy, along with other know associates of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of his person a handgun, a firearm during the commission of possession of marijuana with intent to distribute, said crime being a felony and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
11.	07/13/2022	TRAEON PERRY, being an associate of Trvpmoneyy, did commit the offense of fleeing or attempting to elude a law enforcement officer, in that the said accused did flee from Deputy Parker Leathers with the Richmond County Sheriff's Office in an excess of 20 miles an hour over the posted speed limit, after haven been given audible and visual signals to bring his vehicle to a stop, in violation of O.C.G.A. §40-6-395, which is an overt act in furtherance of the conspiracy.



12.	07/13/2022	TRAEON PERRY, being an associate of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
13.	07/13/2022	TRAEON PERRY, being an associate of Trvpmoneyy, did possess oxycodone, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
14.	07/13/2022	TRAEON PERRY, being an associate of Trvpmoneyy, did possess hydrocodone, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
15.	07/13/2022	TRAEON PERRY, being an associate of Trvpmoneyy, did possess percocet, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
16.	07/13/2022	TRAEON PERRY, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of his person a handgun, a firearm during the commission of possession of marijuana and the controlled substances, to-wit: oxycodone, hydrocodone, and percocet, said crimes being a felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
17.	07/20/2022	JMAR WILSON AND LECADRICK COLLIER, both being associates of Trvpmoneyy, did commit the offense of trafficking fentanyl, in that said accused did possess more than 14 grams but less than 28 grams of fentanyl, a schedule I controlled substance, in violation of O.C.G.A. §16-13-31(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
18.	07/20/2022	JMAR WILSON AND LECADRICK COLLIER, both being associates of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
19.	07/20/2022	JMAR WILSON AND LECADRICK COLLIER, both being associates of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons

		a Glock, a firearm during the commission of possession of marijuana and the controlled substance, to-wit: fentanyl, said crimes being a felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
20.	07/20/2022	LECADRICK COLLIER, being an associate of Trvpmoneyy, did commit the offense of possession of a firearm by a convicted felon, in that said accused did possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
21.	09/08/2022	MALIK TAYLOR, being an associate of Trvpmoneyy, did commit the offense of trafficking methamphetamine, in that said accused did possess more than 28 grams of methamphetamine, a schedule II controlled substance, in violation of O.C.G.A. §16-13-31(e), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
22.	09/08/2022	MALIK TAYLOR, being an associate of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
23.	09/08/2022	MALIK TAYLOR, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a handgun, a firearm during the commission of possession of marijuana and the controlled substance, to-wit: methamphetamine, said crimes being a felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
24.	09/08/2022	MALIK TAYLOR, being an associate of Trvpmoneyy, did commit the offense of possession of a firearm by a convicted felon, in that said accused did possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
25.	11/11/2022	EDDIE REESE, being an associate of Trvpmoneyy, did commit the offense of possession of a firearm by a convicted felon, in that said accused did possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.

26.	01/04/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did possess cocaine and sell said cocaine, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
27.	01/04/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale of cocaine, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
28.	02/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did post to the social media platform Instagram using his public account "potmentdez_19trvp" a photograph depicting himself a red head with "19" on it and stating he is a shot caller with TM19, which is an overt act in furtherance of the conspiracy.
29.	03/28/2023	DAVION HEATH, being an associate of Trvpmoneyy, did exchange Instagram conversations with Kenneth Williams, a rival gang associate, threatening acts of violence against each other, which is an overt act in furtherance of the conspiracy.
30.	04/20/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did possess cocaine and sell said cocaine, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
31.	04/20/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale of cocaine, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
32.	05/19/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did possess an illegal weapon, in that said accused did have in his possession, a machine gun, a weapon which is designed to shoot more than six shots automatically by a single function of the trigger without manual reloading, in violation of O.C.G.A. §16-11-123, which is an overt act in furtherance of the conspiracy.
33.	05/19/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did unlawfully commit the offense of possession of a firearm by a convicted felon, by possessing a handgun, a firearm, after being convicted of a felony under

		the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
34.	05/21/2023	SARAINA LEWIS, being an associate of Trvpmoneyy, did use a phone to send text messages of the rental cars used in a Theft by Conversion she was committing, which is an overt act in furtherance of the conspiracy.
35.	05/21/2023- 10/04/2023	SHEQUITTA LEWIS and SARAINA LEWIS, both being associates of Trvpmoneyy, did commit the offense of Theft by Conversion, in that said accused did having lawfully obtained property, to-wit: vehicles, the property of AVIS Budget Car Rental, of twenty-five thousand dollars (\$25,000.00) or more, under a known legal obligation, to-wit: working for said company and leasing their cars for them did knowingly convert said property to her own use, in violation of O.C.G.A. §16-8-4, 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.
36.	05/22/2023	DAVION HEATH AND JOSHUA MCDANIEL, both being associates of Trvpmoneyy, did discuss the whereabouts of Ike Lang, a rival gang associate, for retaliatory purposes on Instagram, which is an overt act of in furtherance of the conspiracy.
37.	06/08/2023	JALEN LANDERS, being an associate of Trvpmoneyy, did possess marijuana and sell said marijuana, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
38.	06/08/2023	JALEN LANDERS, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a firearm during the commission of sale of marijuana, said crime being a felony and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
39.	06/08/2023	JALEN LANDERS, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale of marijuana, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
50.	06/08/2023	JALEN LANDERS, being an associate of Trvpmoneyy, did commit the offense of possession of a firearm by a first offender probationer, in that said accused did possess a firearm, after having been placed on probation as a first offender pursuant to Article 3 Chapter 8 of Title 42

		of the Official Code of Georgia Annotated for a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
51.	06/08/2023	LARRY MIMS, being an associate of Trvpmoneyy, did commit the offense of fleeing or attempting to elude a law enforcement officer, in that the said accused did flee from Deputy Michael Morton with the Richmond County Sheriff's Office in an excess of 20 miles an hour over the posted speed limit, after haven been given audible and visual signals to bring his vehicle to a stop, in violation of O.C.G.A. §40-6-395, which is an overt act in furtherance of the conspiracy.
52.	06/08/2023	LARRY MIMS, being an associate of Trvpmoneyy, did commit the offense of trafficking cocaine, in that said accused did possess more than 28 grams of a mixture containing at least ten percent (10%) cocaine, a schedule II controlled substance, in violation of O.C.G.A. §16-13-31(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
53.	06/08/2023	LARRY MIMS, being an associate of Trvpmoneyy, did possess oxycodone, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
54.	06/08/2023	LARRY MIMS, being an associate of Trvpmoneyy, did possess amphetamine, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
55.	06/26/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did possess cocaine and sell said cocaine, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
56.	06/26/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale of cocaine, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
57.	07/04/2023	DAVION HEATH, being an associate of Trvpmoneyy, did post to the social media platform Instagram using his public account "trvpmoneyy" a photograph depicting himself with a "TM" chain as well as putting

		TM in the caption, with other Trvpmoneyy associates commenting on said picture, which is an overt act in furtherance of the conspiracy.
58.	07/04/2023	IONAS DOGGETT, being an associate of Trvpmoneyy, did post to the social media platform Instagram using his public account "fseplugg" a photograph depicting himself with other Trvpmoneyy associates holding money and his TM chain, which is an overt act in furtherance of the conspiracy.
59.	07/08/2023	DARIUS MILLER, being an associate of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
60.	07/08/2023	DARIUS MILLER, being an associate of Trvpmoneyy, did possess methamphetamine with intent to distribute, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
61.	07/08/2023	DARIUS MILLER, being an associate of Trvpmoneyy, did possess cocaine with intent to distribute, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
62.	07/08/2023	DARIUS MILLER, being an associate of Trvpmoneyy, did possess fentanyl with intent to distribute, a schedule I controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
63.	07/08/2023	DARIUS MILLER, being an associate of Trvpmoneyy, did possess oxycodone with intent to distribute, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
64.	07/08/2023	DARIUS MILLER, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a handgun, a firearm during the commission of possession of marijuana and the controlled substances, to-wit: methamphetamine, cocaine, fentanyl, and oxycodone, said crimes being felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.

65.	07/08/2023	DARIUS MILLER, being an associate of Trvpmoneyy, did commit the offense of possession of a firearm by a convicted felon, in that said accused did possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
66.	07/12/2023	JALEN LANDERS, being an associate of Trvpmoneyy, did possess marijuana and sell said marijuana, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
67.	07/12/2023	JALEN LANDERS, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale of marijuana, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
68.	07/14/2023	LARRY MIMS, being an associate of Trvpmoneyy, did commit the offense of fleeing or attempting to elude a law enforcement officer, in that the said accused did flee from Deputy Parker Leathers with the Richmond County Sheriff's Office and being the proximate cause of an accident, after haven been given audible and visual signals to bring his vehicle to a stop, in violation of O.C.G.A. §40-6-395, which is an overt act in furtherance of the conspiracy.
69.	07/14/2023	LARRY MIMS, being an associate of Trvpmoneyy, did possess cocaine with intent to distribute, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
70.	07/14/2023	LARRY MIMS, being an associate of Trvpmoneyy, did possess oxycodone with intent to distribute, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
71.	07/14/2023	LARRY MIMS, being an associate of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
72.	07/14/2023	LARRY MIMS, being an associate of Trvpmoneyy, did possess dextroamphetamine, a schedule II controlled substance, in violation of

		O.C.G.A. §16-13-30(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
73.	07/14/2023	LARRY MIMS, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a handgun, a firearm during the commission of possession of marijuana and the controlled substances, to-wit: cocaine, oxycodone, and dextroamphetamine, said crimes being felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
74.	07/14/2023	LARRY MIMS, being an associate of Trvpmoneyy, did commit the offense of possession of a firearm by a first offender probationer, in that said accused did possess a handgun, a firearm, after having been placed on probation as a first offender pursuant to Article 3 Chapter 8 of Title 42 of the Official Code of Georgia Annotated for a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
75.	07/24/2023	JALEN LANDERS AND IONAS DOGGETT, both being associates of Trvpmoneyy, did meet with Marques Booth where a rifle and handgun are exchanged, after JALEN LANDERS had been placed on probation as a first offender pursuant to Article 3 Chapter 8 of Title 42 of the Official Code of Georgia Annotated for a felony under the laws of this State, which is an overt act in furtherance of the conspiracy.
76.	07/24/2023	JALEN LANDERS AND IONAS DOGGETT, both being associates of Trvpmoneyy, did possess over 10 pounds, a trafficking amount, of marijuana, a controlled substance, in violation of O.C.G.A. §16-13-31(c), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
77.	07/24/2023	JALEN LANDERS AND IONAS DOGGETT, both being associates of Trvpmoneyy, did willfully and fraudulently possess with intent to use identifying information concerning Mekhi Shakir Dior Pinckney and Victoria Day-Foster, specifically said persons' names and checking account numbers, in violation of O.C.G.A. §16-11-106, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xx) an overt act in furtherance of the conspiracy.
78.	07/24/2023	JALEN LANDERS, being an associate of Trvpmoneyy, both being associates of Trvpmoneyy, did willfully and fraudulently possess with intent to use identifying information concerning Darielle Washington, Kyler Haynes, and Linda Gordon, specifically said persons' names and



		debit card numbers, in violation of O.C.G.A. §16-11-106, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xx) an overt act in furtherance of the conspiracy.
79.	07/25/2023	JALEN LANDERS, IONAS DOGGETT, AND DEVIN ALLEN-GLOVER, all being associates of Trvpmoneyy, in Cobb County, Georgia, did possess firearms and cocaine which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
80.	07/30/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine with intent to distribute, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
81.	07/31/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine with intent to distribute, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
82.	08/04/2023	DESMOND DEMMONS AND JOSHUA MCDANIEL, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to discuss the sale and purchase of marijuana, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
83.	08/06/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine with intent to distribute, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
84.	08/06/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, in Clayton County, Georgia, did unlawfully possess over 28 grams, a trafficking amount of cocaine, a controlled substance, in violation of O.C.G.A.

#### COUNT 168

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DAVION HEATH** 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of September, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 170 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 169

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DAVION HEATH**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(d))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 20<sup>th</sup> day of September, 2023, being in position of leadership of Money Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 170 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 170

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DAVION HEATH**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 20<sup>th</sup> day of September, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

		§16-13-31(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
85.	08/07/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, did unlawfully conspire with Kenneth Sturgis to commit the offense of Trafficking Cocaine, and in furtherance of said conspiracy, the overt acts of Johsua McDaniel placing Kenneth Sturgis on a Grooms Transportation Bus to Atlanta, Joshua McDaniel buying over 28 grams of Cocaine, and then sending Kenneth Sturgis back to Augusta on the Grooms Transportation Bus with the Cocaine, with the intention of picking Kenneth Sturgis up at the bus station with the Cocaine, the acts by Joshua McDaniel were done to effect the object of the conspiracy O.C.G.A. §16-4-3 8 and §16-13-31(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
86.	08/07/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, did commit the offense of possession of a firearm by a convicted felon, in that said accused did possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
87.	08/09/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess marijuana and sell said marijuana, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
88.	08/09/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale of marijuana, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
89.	08/15/2023	CLIFFORD JONES, being an associate of Trvpmoneyy, did post to the social media platform Instagram using his public account “ggcliffmusic_” a photograph depicting himself and other another Trvpmoneyy associates wearing a TM chain, hash tagging “ganGG, which is an overt act in furtherance of the conspiracy.
90.	08/16/2023	IONAS DOGGETT, being an associate of Trvpmoneyy, in Wilkes County, Georgia, did possess over 10 pounds, a trafficking amount, of marijuana, a controlled substance, in violation of O.C.G.A. §16-13-31(c), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.

91.	08/17/2023	TRAEON PERRY, being an associate of Trvpmoneyy, did post to the social media platform Instagram using his public account "trvpmoneyy.klutxh" a photograph depicting himself with other Trvpmoneyy associates, with the caption "TM TM Gang my way", which is an overt act in furtherance of the conspiracy.
92.	08/20/2023	JALEN LANDERS, being an associate of Trvpmoneyy, with other known associates, in Jefferson County, Georgia, did commit aggravated assault while possessing a firearm as a person under probation as a First Offender, against Roshunda Washington, Rodney Lane, Rodney Moye, Edith Washington, Untavious Johnson, and Deneisha Smith, in violation of O.C.G.A. §16-11-106, O.C.G.A. §16-11-131(b), and 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.
93.	08/22/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine with intent to distribute, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
94.	08/22/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
95.	08/22/2023	DESMOND DEMMONS AND JMAR WILSON, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
96.	08/23/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering

		Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
97.	08/23/2023	DESMOND DEMMONS AND SHEQUITTA LEWIS, both being associates of Trvpmoneyy, did use a phone to discuss the rental car Theft by Conversion they were committing, a violation under O.C.G.A. §16-8-4, 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.
98.	08/24/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
99.	08/24/2023	DESMOND DEMMONS AND EDDIE REESE, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), and possession of cocaine with intent to distribute, a controlled substance under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
100.	08/25/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
101.	08/26/2023	DESMOND DEMMONS AND TRAEON PERRY, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
102.	08/27/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent

		to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
103.	08/28/2023	DESMOND DEMMONS AND RICARDO MCBRIDE, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine, a controlled substance, with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
104.	08/28/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
105.	08/29/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine, a controlled substance with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
106.	08/30/2023	DESMOND DEMMONS AND EARL OVERTON, both being associates of Trvpmoneyy, did unlawfully conspire together to commit the offense of murder against Christopher Ware, by communicating with each other over possible locations and going to those locations to attempt to locate said victim, in violation of O.C.G.A. §16-4-8 and 16-5-1, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(iv) and an overt act in furtherance of the conspiracy.
107.	08/31/2023	DESMOND DEMMONS AND JAMES DAVIS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
108.	09/01/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a

		communication facility, to facilitate the sale and purchase of marijuana to Brandon Borders, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
109.	09/01/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of two (2) pounds of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
110.	09/01/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute at 2450 Nordahl Drive, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
111.	09/01/2023	DESMOND DEMMONS AND JAMES DAVIS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
112.	09/01/2023	DESMOND DEMMONS AND SHEQUITTA LEWIS, both being associates of Trvpmoneyy, did use a phone to discuss the rental car Theft by Conversion they were committing, 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.
113.	09/05/2023	DESMOND DEMMONS AND MYLES THOMAS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
114.	09/05/2023	DESMOND DEMMONS AND DEZMUND MAINOR, both being associates of Trvpmoneyy, did unlawfully use a phone, a

		communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
115.	09/05/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), with Brendon Daniels, another Trvpmoneyy associate, in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
116.	09/05/2023	EARL OVERTON, being an associate of Trvpmoneyy, did make an assault upon Lajamy West by striking said victim with a firearm in violation of O.C.G.A. §16-5-1, 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.
117.	09/05/2023	EARL OVERTON, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have on his person a firearm during the commission of aggravated assault, involving the persons of Lajamy West, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
118.	09/05/2023	EARL OVERTON, being an associate of Trvpmoneyy, did commit the offense of possession of a firearm by a convicted felon, in that said accused did possess a handgun firearm, after having been convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
119.	09/05/2023	JANESSA FREEMAN AND DESMOND DEMMONS, both being associates of Trvpmoneyy, did use a phone to communicate about the transfer and transportation of money from DESMOND DEMMONS AND JANESSA FREEMAN, an overt act in furtherance of the conspiracy.
120.	09/30/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did post to the social media platform Instagram using his public account "one9trvp" a photograph depicting himself with a money and a TM chain, with the caption "Trvp House" and "19TM", with other Trvpmoneyy associates commenting on the picture, which is an overt act in furtherance of the conspiracy.
121.	09/08/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a



		communication facility, to facilitate possession of one (1) pound of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
122.	09/08/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of two (2) ounces of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
123.	09/08/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), with Brendon Daniels, another Trvpmoney associate, in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
124.	09/10/2023	DESMOND DEMMONS AND DEVIN-ALLEN GLOVER, both being associates of Trvpmoneyy, did discuss, via phone, giving DMOND JACKSON, another associate money to execute any associate of the rival gang, Loyalty Over Everything, which is an overt act of in furtherance of the conspiracy.
125.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of one (1) ounce of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
126.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute to Brendon Daniels, another Trvpmoneyy associate, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.

127.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of four (4) ounces of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
128.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of one (1) ounces of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), as well as pills, in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
129.	09/15/2023	DAVION HEATH, being an associate of Trvpmoneyy, along with other known and unknown associates of Trvpmoneyy, did commit the offense of aggravated assault against the person of Montrey Middleton, by striking him with their hands, 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.
130.	09/15/2023	CHASE RUSSAW, being an associate of Trvpmoneyy, did fly from Georgia to another airport outside of Georgia, to meet with a narcotic source of supply to exchange money at the request of DAVION HEATH, another associate of Trvpmoneyy, which is an overat act in furtherance of the conspiracy.
131.	09/15/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
132.	09/16/2023	DOMINICK RYANS, being an associate of Trvpmoneyy, in Burke County, Georgia, did possess cocaine with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
133.	09/16/2023	DOMINICK RYANS, being an associate of Trvpmoneyy, did possess methamphetamine with intent to distribute, a controlled substance, in

		Burke County, Georgia in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
134.	09/16/2023	DOMINICK RYANS, being an associate of Trvpmoneyy, did possess hydrocodone, with intent to distribute, a Schedule II controlled substance, in Burke County, Georgia in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
135.	09/16/2023	DOMINICK RYANS, being an associate of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in Burke County, Georgia in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
136.	09/17/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
137.	09/18/2023	DESMOND DEMMONS AND TILSON MCCRAY, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
138.	09/20/2023	DAVION HEATH, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, by directing Montrey Middleton to transport marijuana to Alabama, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
139.	09/20/2023	DAVION HEATH, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.

140.	9/21/2023	DAVION HEATH, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
141.	09/21/2023	JANESSA FREEMAN and DAVION HEATH, both being associates of Trvpmoneyy, did use a phone to discuss banking information for DAVION HEATH'S "business" account, an overt act in furtherance of the conspiracy.
142.	09/23/2023	JANESSA FREEMAN and DAVION HEATH, both being associates of Trvpmoneyy, did use a phone to discuss finding a Bank of America to get DAVION HEATH more money, an overt act in furtherance of the conspiracy.
143.	09/26/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
144.	09/27/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
145.	09/27/2023	DESMOND DEMMONS AND DEZMUND MAINOR, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
146.	09/28/2023	DESMOND DEMMONS AND DEZMUND MAINOR, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering

		Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
147.	09/28/2023	DESMOND DEMMONS AND DEZMUND MAINOR, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine, a controlled substance, with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
148.	09/28/2023	LECADRICK COLLIER, being an associate of Trvpmoneyy, did post to the social media platform Instagram using his public account "trvpmoneyy.kilo" a photograph depicting himself in prison with the caption "185 still stepping yeen gotta ask me where my weapon", which is an overt act in furtherance of the conspiracy.
149.	10/01/2023	DEVIN ALLEN-GLOVER AND DMOND JACKSON, both being associates of Trvpmoneyy, did unlawfully commit the offense of fleeing or attempting to elude a law enforcement officer, by fleeing over 20 miles over the posted speed limit from Georgia State Patrol Trooper Zachary Walker, in violation of O.C.G.A. §40-6-395, which is an overt act in furtherance of the conspiracy.
150.	10/01/2023	DEVIN ALLEN-GLOVER AND DMOND JACKSON, both being associates of Trvpmoneyy, did unlawfully commit the offense of theft by receiving stolen property, by retaining a FN-57 pistol, the property of Daquan Davis that they should have known was stolen and with no intent to return to the rightful owner, in violation of O.C.G.A. §16-8-7, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xii) and an overt act in furtherance of the conspiracy.
151.	10/01/2023	DEVIN ALLEN-GLOVER, being an associate of Trvpmoneyy, did unlawfully commit the offense of theft by receiving stolen property, by retaining a Dodge Charger, the property of Bryan Taylor that he should have known was stolen and with no intent to return to the rightful owner, in violation of O.C.G.A. §16-8-7, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xii) and an overt act in furtherance of the conspiracy.
152.	10/01/2023	DEVIN ALLEN-GLOVER, being an associate of Trvpmoneyy, did unlawfully commit the offense of possession of a firearm by person under conditional discharge, by possessing a AR-15 and a FN-57 pistol, after being placed on probation under the Conditional Discharge Statute for a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.

153.	10/01/2023	DMOND JACKSON, being an associate of Trvpmoneyy, did unlawfully commit the offense of possession of a firearm by convicted felon, by possessing a AR-15 and a FN-57 pistol, after being convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
154.	10/02/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), with Brendon Daniels, another Trvpmoney associate, in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
155.	10/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess over 10 pounds, a trafficking amount, of marijuana, a controlled substance, in violation of O.C.G.A. §16-13-31(c), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
156.	10/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess over 28 grams, a trafficking amount, of methamphetamine, a controlled substance, in violation of O.C.G.A. §16-13-31(e), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
157.	10/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess over 28 grams, a trafficking amount, of fentanyl, a controlled substance, in violation of O.C.G.A. §16-13-31(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
158.	10/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess cocaine with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
159.	10/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a handgun and Rifle, firearms during the commission of possession of marijuana and the controlled substances, to-wit: fentanyl, methamphetamine, and cocaine, said crimes being felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.

160.	10/04/2023	DESMOND DEMMONS, being associates of Trvpmoneyy, did unlawfully commit the offense of theft by receiving stolen property, by retaining a Radical Arms Rifle, the property of Daquan Davis that they should have known was stolen and with no intent to return to the rightful owner, in violation of O.C.G.A. §16-8-7, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xii) and an overt act in furtherance of the conspiracy.
161.	10/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did unlawfully commit the offense of possession of a firearm by a convicted felon, by possessing a handgun and a rifle, after being convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
162.	10/4/2023	DEVIN ALLEN-GLOVER, being an associate of Trvpmoneyy, did unlawfully commit the offense of possession of a firearm by person under conditional discharge, by possessing a M5 90A1 shotgun, a 12 gauge shotgun, a Remington .770 rifle, a Glock 23, and a Browning 20 gauge shotgun, after being placed on probation under the Conditional Discharge Statute for a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
163.	10/4/2023	DEVIN ALLEN-GLOVER, being an associate of Trvpmoneyy, did possess an illegal weapon, in that said accused did have in his possession a sawed-off shotgun, having a barrel length of less than 18 inches, in violation of O.C.G.A. §16-11-123, which is an overt act in furtherance of the conspiracy.
164.	10/04/2023	TRAEON PERRY AND CLIFFORD JONES, both being associates of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
165.	10/04/2023	TRAEON PERRY AND CLIFFORD JONES, both being associates of Trvpmoneyy, did possess cocaine with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
166.	10/04/2023	TRAEON PERRY AND CLIFFORD JONES, both being associates of Trvpmoneyy, did possess THC gummies, with intent to distribute, a Schedule I controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.

167.	10/04/2023	TRAEON PERRY AND CLIFFORD JONES, both being associates of Trvpmoneyy, did possess Psilocybin, with intent to distribute, a Schedule I controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
168.	10/04/2023	TRAEON PERRY AND CLIFFORD JONES, both being associates of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a handgun, firearms during the commission of possession of marijuana and the controlled substances, to-wit: cocaine, THC gummies, and Psilocybin, said crimes being felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
169.	10/04/2023	CLIFFORD JONES, being an associate of Trvpmoneyy, did commit the offense of aggravated assault on a peace officer against the persons of William Walker, Jason Mathis, and William McClure, by firing a weapon at said officers while they were in the lawful execution of their duties with the Richmond County Sheriff's Office, 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.
170.	10/04/2023	CLIFFORD JONES, being an associate of Trvpmoneyy, did interfere with government property, in that said accused did damage a patrol vehicle belonging to the Richmond County Sheriff's Office by shooting said vehicle, in violation of O.C.G.A. §16-7-24(a), which is an overt act in furtherance of the conspiracy.
171.	10/04/2023	CLIFFORD JONES, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have on his persons a handgun, a firearm during the commission of aggravated assault on a peace officer, a felony involving William Walker, Jason Mathis, and William McClure, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
172.	10/04/2023	IONAS DOGGETT, being an associate of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
173.	10/04/2023	DOMINICK RYANS, being an associate of Trvpmoneyy, did possess cocaine with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under



		O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
174.	10/04/2023	DOMINICK RYANS, being an associate of Trvpmoneyy, did possess alprazolam with intent to distribute, a schedule IV controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
175.	10/04/2023	DOMINICK RYANS, being an associate of Trvpmoneyy, did possess oxycodone, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
176.	10/04/2023	RICARDO MCBRIDE, being an associate of Trvpmoneyy, did possess cocaine with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
177.	10/04/2023	RICARDO MCBRIDE, being an associate of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
178.	10/04/2023	RICARDO MCBRIDE, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a handgun, firearm during the commission of possession of marijuana and the controlled substance, to-wit: cocaine, said crimes being felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
179.	10/04/2023	RICARDO MCBRIDE, being an associate of Trvpmoneyy, did unlawfully commit the offense of possession of a firearm by a convicted felon, by possessing a handgun, after being convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
180.	10/04/2023	DEZMUND MAINOR, being an associate of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
181.	10/04/2023	DEZMUND MAINOR, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did

		have within arm's reach of their persons a Glock handgun, firearm during the commission of possession of marijuana with intent to distribute, said crime being felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
182.	10/04/2023	DEZMUND MAINOR, being an associate of Trvpmoneyy, did unlawfully commit the offense of possession of a firearm by a convicted felon, by possessing handgun, after being convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
183.	10/04/2023	JOSHUA DEMMONS, being an associate of Trvpmoneyy, did possess cocaine, a controlled substance, in violation of O.C.G.A. §16-13-30(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
184.	10/04/2023	JOSHUA DEMMONS, being an associate of Trvpmoneyy, did possess fentanyl, a controlled substance, in violation of O.C.G.A. §16-13-30(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
185.	10/04/2023	JOSHUA DEMMONS, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons two (2) handguns, firearms during the commission of possession of cocaine and fentanyl, controlled substances, said crime being felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
186.	10/04/2023	JOSHUA DEMMONS, being an associate of Trvpmoneyy, did possess an illegal weapon, in that said accused did have in his possession a silencer as defined by subsection (7) of Code Section 16-11-121 of the Official Code of Georgia, in violation of O.C.G.A. §16-11-123, which is an overt act in furtherance of the conspiracy.
187.	10/04/2023	TILSON MCCRAY, being an associate of Trvpmoneyy, did possess over 10 pounds, a trafficking amount, of marijuana, a controlled substance, in violation of O.C.G.A. §16-13-31(c), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
188.	10/04/2023	TILSON MCCRAY, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a, a firearm during the commission of trafficking marijuana, said crime being a felony and a violation of the

		Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
189.	10/04/2023	TILSON MCCRAY, being an associate of Trvpmoneyy, did unlawfully commit the offense of theft by receiving stolen property, by retaining a Glock 22, the property of Derek Waldrop that they should have known was stolen and with no intent to return to the rightful owner, in violation of O.C.G.A. §16-8-7, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xii) and an overt act in furtherance of the conspiracy.
190.	10/04/2023	BRYSON MCCRAY, being an associate of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
191.	10/04/2023	BRYSON MCCRAY, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a handgun, firearm during the commission of marijuana with intent to distribute, said crime being a felony and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
192.	10/04/2023	DAVION HEATH, being an associate of Trvpmoneyy, in Columbia County, Georgia, did possess over 10 pounds, a trafficking amount, of marijuana, a controlled substance, in violation of O.C.G.A. §16-13-31(c), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
193.	10/04/2023	DAVION HEATH, being an associate of Trvpmoneyy, in Columbia County, Georgia, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons three (3) handguns, firearms during the commission of trafficking marijuana, said crime being a felony and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
194.	10/04/2023	DAVION HEATH, being an associate of Trvpmoneyy, in Columbia County, Georgia, did commit the offense of possession of a firearm by a first offender probationer, in that said accused did possess three (3) handguns, firearms, after having been placed on probation as a first offender pursuant to Article 3 Chapter 8 of Title 42 of the Official Code of Georgia Annotated for a felony under the laws of this State, in

		violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
195.	10/04/2023	TILSON MCCRAY, being an associate of Trvpmoneyy, in Columbia County, Georgia, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
196.	10/04/2023	TILSON MCCRAY, being an associate of Trvpmoneyy, in Columbia County, Georgia, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a firearm during the commission of possession of marijuana with intent to distribute, said crime being a felony and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
197.	10/04/2023	MYLES THOMAS, being an associate of Trvpmoneyy, in Columbia County, Georgia, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
198.	10/07/2023	ANTONIO BUSH, being an associate of Trvpmoneyy, did possess cocaine with intent to distribute, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
199.	10/07/2023	ANTONIO BUSH, being an associate of Trvpmoneyy, did possess methamphetamine, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(a), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
200.	10/07/2023	ANTONIO BUSH, being an associate of Trvpmoneyy, did unlawfully commit the offense of theft by receiving stolen property, by retaining a Nissan Rouge, the property of AVIS that he should have known was stolen and with no intent to return to the rightful owner, in violation of O.C.G.A. §16-8-7, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xii) and an overt act in furtherance of the conspiracy.
201.	12/23/2023	DESMON ALLEN-GLOVER, being an associate of Trvpmoneyy, did unlawfully possess contraband by an inmate, by having on his person a dangerous weapon, a shank, while being an inmate at the Richmond

		County Jail, in violation of O.C.G.A. §42-4-13(b), which is an overt act in furtherance of the conspiracy.
202.	02/01/2024	MALIK TAYLOR, being an associate of Trvpmoneyy, did possess more than 14 grams but less than 28 grams, a trafficking amount, of fentanyl, a controlled substance, in violation of O.C.G.A. §16-13-31(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
203.	02/01/2024	MALIK TAYLOR, being an associate of Trvpmoneyy, did possess cocaine with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
204.	02/01/2024	MALIK TAYLOR, being an associate of Trvpmoneyy, did possess methamphetamine with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
205.	02/01/2024	MALIK TAYLOR, being an associate of Trvpmoneyy, did possess marijuana with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
206.	02/01/2024	MALIK TAYLOR, being an associate of Trvpmoneyy, did possess a firearm during the commission of a felony, in that said accused did have within arm's reach of their persons a handgun, a firearm during the commission of marijuana and the controlled substances, to-wit: fentanyl, cocaine, and methamphetamine, said crimes being felonies and a violation of the Georgia Controlled Substance Act, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
207.	02/01/2024	MALIK TAYLOR, being an associate of Trvpmoneyy, did unlawfully commit the offense of possession of a firearm by a convicted felon, by possessing a handgun, after being convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-131(b), which is an overt act in furtherance of the conspiracy.
208.	03/22/2024	JOSHUA DEMMONS, being an associate of Trvpmoneyy, did post to the social media platform Instagram using his public account "trvp_moneyy23" a photograph depicting himself with money on his head discussing how being out without the gang doesn't feel right, which is an overt act in furtherance of the conspiracy.

209.	03/24/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to TJ Mart/Lucky Food Mart, from Vatandeep Singh, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
210.	03/25/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to TJ Mart/Lucky Food Mart, from Vatandeep Singh, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
211.	03/28/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to TJ Mart/Lucky Food Mart, from Akheraj Bhati, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
212.	03/31/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to BP/Split Store Food Mart, from Kamal Kishore, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
213.	04/08/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to Dollar General Food Mart, from Cornell Harden, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
214.	04/10/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to TJ Mart/Lucky Food Mart, from Aritkummarr Bhatt, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
215.	03/24/2024- 04/10/2014	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Possession of a Firearm During the Commission of a Felony, in that he did have on his person a firearm during the commission of Armed Robbery, which is a felony, involving the

		persons of Vatandeep Singh, Akheraj Bhati, Kamal Kishore, Cornell Harden, and Architkummarr Bhatt, in violation of O.C.G.A. §16-11-106, which is an overt act in furtherance of the conspiracy.
216.	03/24/2024- 04/10/2014	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Possession of a Firearm During the Commission of a Felony, in that he did have on his person a firearm after having been convicted of a felony under the laws of this State, in violation of O.C.G.A. §16-11-103(b), which is an overt act in furtherance of the conspiracy.

The overt acts set forth above were committed in furtherance of the conspiracy. The overt acts occurred in Richmond County, Georgia unless specifically noted to have occurred elsewhere. The overt acts which also constitute racketeering activity have the same or similar intents, results, accomplices, victims or methods of commission or otherwise were interrelated by distinguishing characteristics and were not isolated acts.

## COUNT 2

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DAVION HEATH, A/K/A VDOUGH, A/K/A TRVPMONEYY VDOUGH** with the offense of **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. § 16-14-4(b)**, for that the said accused persons, in the County of Richmond and State of Georgia, between the 15<sup>th</sup> day of September, 2023 and the 4<sup>th</sup> day of October, 2023, while associated with an enterprise, to wit: Trvpmoneyy, did unlawfully conduct and participate, directly and indirectly, in such enterprise through a pattern of racketeering activity as described below and incorporated by reference as if fully set forth herein; contrary to the laws of the said State, the good order, peace and dignity thereof.

**Pattern of Racketeering Activity**

**DAVION HEATH, A/K/A VDOUGH, A/K/A TRVPMONEYYY VDOUGH** committed the acts enumerated below, which are chargeable by indictment under the laws of this State:

<b><u>Act</u></b>	<b><u>On or About</u></b>	<b><u>Scope of Conduct</u></b>
129.	09/15/2023	DAVION HEATH, being an associate of Trvpmoneyy, along with other known and unknown associates of Trvpmoneyy, did commit the offense of aggravated assault against the person of Montrey Middleton, by striking him with their hands, 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.
138.	09/20/2023	DAVION HEATH, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, by directing Montrey Middleton to transport marijuana to Alabama, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
139.	09/20/2023	DAVION HEATH, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
140.	9/21/2023	DAVION HEATH, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
192.	10/04/2023	DAVION HEATH, being an associate of Trvpmoneyy, in Columbia County, Georgia, did possess over 10 pounds, a trafficking amount, of marijuana, a controlled substance, in violation of O.C.G.A. §16-13-31(c), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.



The acts of racketeering activity occurred in Richmond County, Georgia unless specifically noted to have occurred elsewhere. These acts of racketeering activity had the same or similar intents, results, accomplices, victims, or methods of commission or otherwise were related by distinguishing characteristics and were not isolated acts.

**COUNT 3**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS, A/K/A DEZ** with the offense of **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. § 16-14-4(b)**, for that the said accused persons, in the County of Richmond and State of Georgia, between the 4<sup>th</sup> day of August, 2023 and the 4<sup>th</sup> day of October, 2023, while associated with an enterprise, to wit: Trvpmoneyy, did unlawfully conduct and participate, directly and indirectly, in such enterprise through a pattern of racketeering activity as described below and incorporated by reference as if fully set forth herein; contrary to the laws of the said State, the good order, peace and dignity thereof.

**Pattern of Racketeering Activity**

**DESMOND DEMMONS, A/K/A DEZ** committed the acts enumerated below, which are chargeable by indictment under the laws of this State:

<b><u>Act</u></b>	<b><u>On or About</u></b>	<b><u>Scope of Conduct</u></b>
82.	08/04/2023	DESMOND DEMMONS AND JOSHUA MCDANIEL, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to discuss the sale and purchase of marijuana, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.

87.	08/09/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess marijuana and sell said marijuana, a controlled substance, in violation of O.C.G.A. §16-13-30(j), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
88.	08/09/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale of marijuana, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
93.	08/22/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine with intent to distribute, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
94.	08/22/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
95.	08/22/2023	DESMOND DEMMONS AND JMAR WILSON, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
96.	08/23/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.

97.	08/23/2023	DESMOND DEMMONS AND SHEQUITTA LEWIS, both being associates of Trvpmoneyy, did use a phone to discuss the rental car Theft by Conversion they were committing, a violation under O.C.G.A. §16-8-4, 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.
98.	08/24/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
99.	08/24/2023	DESMOND DEMMONS AND EDDIE REESE, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), and possession of cocaine with intent to distribute, a controlled substance under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
100.	08/25/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
101.	08/26/2023	DESMOND DEMMONS AND TRAEON PERRY, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
102.	08/27/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering

		Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
103.	08/28/2023	DESMOND DEMMONS AND RICARDO MCBRIDE, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine, a controlled substance, with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
104.	08/28/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
105.	08/29/2023	DESMOND DEMMONS AND DOMINICK RYANS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine, a controlled substance with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
106.	08/30/2023	DESMOND DEMMONS AND EARL OVERTON, both being associates of Trvpmoneyy, did unlawfully conspire together to commit the offense of murder against Christopher Ware, by communicating with each other over possible locations and going to those locations to attempt to locate said victim, in violation of O.C.G.A. §16-4-8 and 16-5-1, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(iv) and an overt act in furtherance of the conspiracy.
107.	08/31/2023	DESMOND DEMMONS AND JAMES DAVIS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
108.	09/01/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale and purchase of marijuana to Brandon Borders, an act constituting a felony under O.C.G.A. §16-

		13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
109.	09/01/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of two (2) pounds of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
110.	09/01/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute at 2450 Nordahl Drive, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
111.	09/01/2023	DESMOND DEMMONS AND JAMES DAVIS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
112.	09/01/2023	DESMOND DEMMONS AND SHEQUITTA LEWIS, both being associates of Trvpmoneyy, did use a phone to discuss the rental car Theft by Conversion they were committing, 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.
113.	09/05/2023	DESMOND DEMMONS AND MYLES THOMAS, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
114.	09/05/2023	DESMOND DEMMONS AND DEZMUND MAINOR, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j),

		in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
115.	09/05/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), with Brendon Daniels, another Trvpmoney associate, in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
121.	09/08/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of one (1) pound of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
122.	09/08/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of two (2) ounces of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
123.	09/08/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), with Brendon Daniels, another Trvpmoney associate, in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
125.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of one (1) ounce of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
126.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a

		communication facility, to facilitate possession of marijuana with intent to distribute to Brendon Daniels, another Trvpmoneyy associate, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
127.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of four (4) ounces of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
128.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of one (1) ounces of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), as well as pills, in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
131.	09/15/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
136.	09/17/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
137.	09/18/2023	DESMOND DEMMONS AND TILSON MCCRAY, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering

		Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy
143.	09/26/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
144.	09/27/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
145.	09/27/2023	DESMOND DEMMONS AND DEZMUND MAINOR, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
146.	09/28/2023	DESMOND DEMMONS AND DEZMUND MAINOR, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
147.	09/28/2023	DESMOND DEMMONS AND DEZMUND MAINOR, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine, a controlled substance, with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
154.	10/02/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a



		felony under O.C.G.A. §16-13-30(j), with Brendon Daniels, another Trvpmoney associate, in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
155.	10/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess over 10 pounds, a trafficking amount, of marijuana, a controlled substance, in violation of O.C.G.A. §16-13-31(c), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
156.	10/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess over 28 grams, a trafficking amount, of methamphetamine, a controlled substance, in violation of O.C.G.A. §16-13-31(e), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
157.	10/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess over 28 grams, a trafficking amount, of fentanyl, a controlled substance, in violation of O.C.G.A. §16-13-31(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
158.	10/04/2023	DESMOND DEMMONS, being an associate of Trvpmoneyy, did possess cocaine with intent to distribute, a controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
160.	10/04/2023	DESMOND DEMMONS, being associates of Trvpmoneyy, did unlawfully commit the offense of theft by receiving stolen property, by retaining a Radical Arms Rifle, the property of Daquan Davis that they should have known was stolen and with no intent to return to the rightful owner, in violation of O.C.G.A. §16-8-7, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xii) and an overt act in furtherance of the conspiracy.

The acts of racketeering activity occurred in Richmond County, Georgia unless specifically noted to have occurred elsewhere. These acts of racketeering activity had the same or similar intents, results, accomplices, victims, or methods of commission or otherwise were related by distinguishing characteristics and were not isolated acts.

**COUNT 4**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER, A/K/A RAMBO** with the offense of **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. § 16-14-4(b)**, for that the said accused persons, in the County of Richmond and State of Georgia, between the 15<sup>th</sup> day of April, 2022 and the 1<sup>st</sup> day of October, 2023, while associated with an enterprise, to wit: Trvpmoneyy, did unlawfully conduct and participate, directly and indirectly, in such enterprise through a pattern of racketeering activity as described below and incorporated by reference as if fully set forth herein; contrary to the laws of the said State, the good order, peace and dignity thereof.

**Pattern of Racketeering Activity**

**DEVIN ALLEN-GLOVER, A/K/A RAMBO** committed the acts enumerated below, which are chargeable by indictment under the laws of this State:

<b><u>Act</u></b>	<b><u>On or About</u></b>	<b><u>Scope of Conduct</u></b>
5.	04/15/2022	DEVIN ALLEN-GLOVER, being an associate of Trvpmoneyy, along with other known and unknown associates of Trvpmoneyy, did commit the offense of aggravated assault against the persons of Kanya Wright, Willie Mency, and Zakee Hasan, by firing a weapon into the residence they were located inside, 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.
79.	07/25/2023	JALEN LANDERS, IONAS DOGGETT, AND DEVIN ALLEN-GLOVER, all being associates of Trvpmoneyy, in Cobb County, Georgia, did possess firearms and cocaine which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
93.	08/22/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a

		communication facility, to facilitate possession of cocaine with intent to distribute, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
102.	08/27/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
108.	09/01/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale and purchase of marijuana to Brandon Borders, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
109.	09/01/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of two (2) pounds of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
110.	09/01/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute at 2450 Nordahl Drive, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
121.	09/08/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of one (1) pound of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.

122.	09/08/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of two (2) ounces of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
125.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of one (1) ounce of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
126.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute to Brendon Daniels, another Trvpmoneyy associate, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
127.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of four (4) ounces of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
128.	09/11/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of one (1) ounces of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), as well as pills, in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
131.	09/15/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent

		to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
136.	09/17/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
143.	09/26/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
144.	09/27/2023	DESMOND DEMMONS AND DEVIN ALLEN-GLOVER, both being associates of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
150.	10/01/2023	DEVIN ALLEN-GLOVER AND DMOND JACKSON, both being associates of Trvpmoneyy, did unlawfully commit the offense of theft by receiving stolen property, by retaining a FN-57 pistol, the property of Daquan Davis that they should have known was stolen and with no intent to return to the rightful owner, in violation of O.C.G.A. §16-8-7, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xii) and an overt act in furtherance of the conspiracy.
151.	10/01/2023	DEVIN ALLEN-GLOVER, being an associate of Trvpmoneyy, did unlawfully commit the offense of theft by receiving stolen property, by retaining a Dodge Charger, the property of Bryan Taylor that he should have known was stolen and with no intent to return to the rightful owner, in violation of O.C.G.A. §16-8-7, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xii) and an overt act in furtherance of the conspiracy.

The acts of racketeering activity occurred in Richmond County, Georgia unless specifically noted to have occurred elsewhere. These acts of racketeering activity had the same or similar intents, results, accomplices, victims, or methods of commission or otherwise were related by distinguishing characteristics and were not isolated acts.

**COUNT 5**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON, A/K/A MOND** with the offense of **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. § 16-14-4(b)**, for that the said accused persons, in the County of Richmond and State of Georgia, between the 1<sup>st</sup> day of October, 2023 and the 10<sup>th</sup> day of April, 2024, while associated with an enterprise, to wit: Trvpmoneyy, did unlawfully conduct and participate, directly and indirectly, in such enterprise through a pattern of racketeering activity as described below and incorporated by reference as if fully set forth herein; contrary to the laws of the said State, the good order, peace and dignity thereof.

**Pattern of Racketeering Activity**

**DMOND JACKSON, A/K/A MOND** committed the acts enumerated below, which are chargeable by indictment under the laws of this State:

<u>Act</u>	<u>On or About</u>	<u>Scope of Conduct</u>
150.	10/01/2023	DEVIN ALLEN-GLOVER AND DMOND JACKSON, both being associates of Trvpmoneyy, did unlawfully commit the offense of theft by receiving stolen property, by retaining a FN-57 pistol, the property of Daquan Davis that they should have known was stolen and with no intent to return to the rightful owner, in violation of O.C.G.A. §16-8-7, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xii) and an overt act in furtherance of the conspiracy.
209.	03/24/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to

		take United States Currency belonging to TJ Mart/Lucky Food Mart, from Vatandeep Singh, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
210.	03/25/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to TJ Mart/Lucky Food Mart, from Vatandeep Singh, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
211.	03/28/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to TJ Mart/Lucky Food Mart, from Akheraj Bhati, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
212.	03/31/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to BP/Split Store Food Mart, from Kamal Kishore, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
213.	04/08/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to Dollar General Food Mart, from Cornell Harden, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.
214.	04/10/2024	DMOND JACKSON, being an associate of Trvpmoneyy, did commit the offense of Armed Robbery, in that said accused did use a firearm to take United States Currency belonging to TJ Mart/Lucky Food Mart, from Aritkummarr Bhatt, in violation of O.C.G.A. §16-8-41, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xiii) and an overt act in furtherance of the conspiracy.

The acts of racketeering activity occurred in Richmond County, Georgia unless specifically noted to have occurred elsewhere. These acts of racketeering activity had the same or similar intents, results, accomplices, victims, or methods of commission or otherwise were related by distinguishing characteristics and were not isolated acts.

**COUNT 6**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA MCDANIEL, A/K/A JB** with the offense of **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. § 16-14-4(b)**, for that the said accused persons, in the County of Richmond and State of Georgia, between the 30<sup>th</sup> day of July, 2023 and the 7<sup>th</sup> day of August, 2024, while associated with an enterprise, to wit: Trvpmoneyy, did unlawfully conduct and participate, directly and indirectly, in such enterprise through a pattern of racketeering activity as described below and incorporated by reference as if fully set forth herein; contrary to the laws of the said State, the good order, peace and dignity thereof.

**Pattern of Racketeering Activity**

**JOSHUA MCDANIEL, A/K/A JB** committed the acts enumerated below, which are chargeable by indictment under the laws of this State:

<b><u>Act</u></b>	<b><u>On or About</u></b>	<b><u>Scope of Conduct</u></b>
80.	07/30/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine with intent to distribute, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
81.	07/31/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine with intent to distribute, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
82.	08/04/2023	DESMOND DEMMONS AND JOSHUA MCDANIEL, both being associates of Trvpmoneyy, did unlawfully use a phone, a



		communication facility, to discuss the sale and purchase of marijuana, an act constituting a felony under O.C.G.A. §16-13-30(j), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxvi) and an overt act in furtherance of the conspiracy.
83.	08/06/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate possession of cocaine with intent to distribute, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
84.	08/06/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, in Clayton County, Georgia, did unlawfully possess over 28 grams, a trafficking amount of cocaine, a controlled substance, in violation of O.C.G.A. §16-13-31(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
85.	08/07/2023	JOSHUA MCDANIEL, being an associate of Trvpmoneyy, did unlawfully conspire with Kenneth Sturgis to commit the offense of Trafficking Cocaine, and in furtherance of said conspiracy, the overt acts of Johsua McDaniel placing Kenneth Sturgis on a Grooms Transportation Bus to Atlanta, Joshua McDaniel buying over 28 grams of Cocaine, and then sending Kenneth Sturgis back to Augusta on the Grooms Transportation Bus with the Cocaine, with the intention of picking Kenneth Sturgis up at the bus station with the Cocaine, the acts by Joshua McDaniel were done to effect the object of the conspiracy O.C.G.A. §16-4-3 8 and §16-13-31(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.

The acts of racketeering activity occurred in Richmond County, Georgia unless specifically noted to have occurred elsewhere. These acts of racketeering activity had the same or similar intents, results, accomplices, victims, or methods of commission or otherwise were related by distinguishing characteristics and were not isolated acts.

**COUNT 7**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL, A/K/A MAC** with the offense of **VIOLATION OF RACKETEER INFLUENCED AND CORRUPT ORGANIZATIONS ACT, O.C.G.A. § 16-14-4(b)**, for that the said accused persons, in the County of Richmond and State of Georgia, between the 4<sup>th</sup> day of January, 2023 and the 30<sup>th</sup> day of June, 2023, while associated with an enterprise, to wit: Trvpmoneyy, did unlawfully conduct and participate, directly and indirectly, in such enterprise through a pattern of racketeering activity as described below and incorporated by reference as if fully set forth herein; contrary to the laws of the said State, the good order, peace and dignity thereof.

**Pattern of Racketeering Activity**

**ELLIS MCDANIEL, A/K/A MAC** committed the acts enumerated below, which are chargeable by indictment under the laws of this State:

<b><u>Act</u></b>	<b><u>On or About</u></b>	<b><u>Scope of Conduct</u></b>
26.	01/04/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did possess cocaine and sell said cocaine, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
27.	01/04/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale of cocaine, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
30.	04/20/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did possess cocaine and sell said cocaine, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.

31.	04/20/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale of cocaine, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
32.	05/19/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did possess an illegal weapon, in that said accused did have in his possession, a machine gun, a weapon which is designed to shoot more than six shots automatically by a single function of the trigger without manual reloading, in violation of O.C.G.A. §16-11-123, which is an overt act in furtherance of the conspiracy.
55.	06/26/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did possess cocaine and sell said cocaine, a schedule II controlled substance, in violation of O.C.G.A. §16-13-30(b), which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.
56.	06/26/2023	ELLIS MCDANIEL, being an associate of Trvpmoneyy, did unlawfully use a phone, a communication facility, to facilitate the sale of cocaine, a controlled substance, an act constituting a felony under O.C.G.A. §16-13-30(b), in violation of O.C.G.A. §16-13-32.3, which is an act of Racketeering Activity under O.C.G.A. §16-14-3(5)(A)(xxxiv) and an overt act in furtherance of the conspiracy.

The acts of racketeering activity occurred in Richmond County, Georgia unless specifically noted to have occurred elsewhere. These acts of racketeering activity had the same or similar intents, results, accomplices, victims, or methods of commission or otherwise were related by distinguishing characteristics and were not isolated acts.

### COUNT 8

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) and Crossing Guard Lines with Contraband under O.C.G.A. 42-4-13(d)(1)(A) as set forth and described in Counts 13 and 14 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 9

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) and Crossing Guard Lines with Contraband under O.C.G.A. 42-4-13(d)(1)(A) as set forth and described in Counts 13 and 14 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 10

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **IONAS DOGGET**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) and Crossing Guard Lines with Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 as set forth and described in Counts 13 and 15 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 11

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) and Crossing Guard Lines with Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 as set forth and described in Counts 13 and 15 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 12

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **IONAS DOGGETT**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(c))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, being associated with Trvpmoneyy, a criminal street gang, did directly and indirectly acquire and maintain an interest and control of a Glock 26, property of Antonio Doggett, through criminal gang activity, by theft in violation of Article 1 of Chapter 9 of Title 16, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 13

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 14

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, with the offense of **CROSSING GUARD LINE WITH CONTRABAND (O.C.G.A. 42-4-13)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, did unlawfully come inside the guard lines established at the Richmond County Detention Center with Marijuana in his possession without the knowledge and consent of the jailer or law enforcement officer, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 15

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **IONAS DOGGETT**, with the offense of **THEFT BY RECEIVING STOLEN PROPERTY (O.C.G.A. 16-8-7)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, did retain a firearm, to-wit: a Glock 26, the property of Antoinio Doggett, which he should have known was stolen, said firearm not having been retained with intent to restore to said owner, said offense constituting a felony as provided for in O.C.G.A. section 16-8-12, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 16

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 18 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 17

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 18 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 18

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of February, 2022, did have within arm's reach of their person a firearm, to-wit: a handgun, during the commission of the crime of possession of marijuana with intent to distribute, being a violation of the Georgia Controlled Substances Act, and which crime was felonies, contrary to the laws of said State, the good order, peace and dignity thereof.



### COUNT 19

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Aggravated Assault under O.C.G.A. 16-15-21 and Criminal Damage to Property in the First Degree under O.C.G.A. 16-7-22 as set forth and described in Counts 21-24 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 20

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Aggravated Assault under O.C.G.A. 16-15-21 and Criminal Damage to Property in the First Degree under O.C.G.A. 16-7-22 as set forth and described in Counts 21-24 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 21

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **AGGRAVATED ASSAULT (O.C.G.A. 16-5-21)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, did make an assault upon the person of Kanya Wright with a deadly weapon, to wit: a firearm by firing into the residence Kanya Wright was inside, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 22

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **AGGRAVATED ASSAULT (O.C.G.A. 16-5-21)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, did make an assault upon the person of Willie Mency with a deadly weapon, to wit: a firearm by firing into the residence Willie Mency was inside, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 23

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **AGGRAVATED ASSAULT (O.C.G.A. 16-5-21)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, did make an assault upon the person of Zakee Hasan with a deadly weapon, to wit: a firearm by firing into the residence Zakee Hasan was inside, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 24

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **CRIMINAL DAMAGE TO PROPERTY IN THE FIRST DEGREE (O.C.G.A. 16-7-22)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, did knowingly and without authority interfere with the property of Willie Mency, to-wit: her residence, in a manner as to endanger human life by firing into the residence while being occupied, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 25

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Counts 27-29 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 26

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Counts 27-29 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 27

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, did have on his person a firearm, during the commission of the crimes of Aggravated Assault and Criminal Damage of Property in the First Degree, said crimes involving the person of another, to-wit: Willie Mency, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 28

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, did have on his person a firearm, during the commission of the crime of Aggravated Assault, said crime involving the person of another, to-wit: Kanya Wright, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 29

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, 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 Richmond and the State of Georgia, on the 15<sup>th</sup> day of April, 2022, did have on his person a firearm, during the commission of the crime of Aggravated Assault, said crime involving the person of another, to-wit: Zakee Hasan, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 30

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY**, 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 Richmond and the State of Georgia, on the 13<sup>th</sup> day of July, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j), Possession of Oxycodone, Hydrocodone, and Percocet, all Schedule II Controlled Substance under O.C.G.A. 16-13-30(a) as set forth and described in Counts 32-35 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 31

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY**, 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 Richmond and the State of Georgia, on the 13<sup>th</sup> day of July, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j), Possession of Oxycodone, Hydrocodone, and Percocet, all Schedule II Controlled Substance under O.C.G.A. 16-13-30(a) as set forth and described in Counts 32-35 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 32

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 13<sup>th</sup> day of July, 2022, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 33

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY**, with the offense of **POSSESSION OF A SCHEDULE II CONTROLLED SUBSTANCE (O.C.G.A. 16-13-30(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 13<sup>th</sup> day of July, 2022, did unlawfully possess, Oxycodone, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 34

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY**, with the offense of **POSSESSION OF A SCHEDULE II CONTROLLED SUBSTANCE (O.C.G.A. 16-13-30(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 13<sup>th</sup> day of July, 2022, did unlawfully possess, Hydrocodone, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 35

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY**, with the offense of **POSSESSION OF A SCHEDULE II CONTROLLED SUBSTANCE (O.C.G.A. 16-13-30(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 13<sup>th</sup> day of July, 2022, did unlawfully possess, Percocet, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 36

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY**, 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 Richmond and the State of Georgia, on the 13<sup>th</sup> day of July, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 38 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 37

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY**, 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 Richmond and the State of Georgia, on the 13<sup>th</sup> day of July, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 38 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 38

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY**, 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 Richmond and the State of Georgia, on the 13<sup>th</sup> day of July, 2022, did have within arm's reach of his person a firearm, to-wit: a handgun, during the commission of crimes of possession of Marijuana and controlled substances, to-wit: Oxycodone, Hydrocodone, and Percocet, each being a violation of the Georgia Controlled Substances Act, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 39

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY**, with the offense of **FLEEING OR ATTEMPTING TO ELUDE A POLICE OFFICER (O.C.G.A. 40-6-395)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 13<sup>th</sup> day of July, 2022, did willfully flee and attempt to elude a pursuing police vehicle, after having been given an audible and a visual signal to bring his vehicle to a stop by an officer, to-wit: Deputy Parker Leathers with Richmond County Sheriff's Office, said officer at the time of giving such a signal being in uniform prominently displaying his badge of office and his vehicle being appropriately marked showing it to be an official police vehicle. It is further alleged that the accused did flee and attempt to elude said pursuing Police Officer while operating his vehicle in excess of 20 miles an hour above the posted speed limit, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 40

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JMAR WILSON AND LECADRICK COLLIER**, 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of July, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking Fentanyl under O.C.G.A. 16-13-31(b) and Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Counts 42 and 43 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.



#### COUNT 41

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JMAR WILSON AND LECADRICK COLLIER**, 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of July, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking Fentanyl under O.C.G.A. 16-13-31(b) and Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Counts 42 and 43 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 42

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JMAR WILSON AND LECADRICK COLLIER**, with the offense of **TRAFFICKING FENTANYL (O.C.G.A. 16-13-31(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 20<sup>th</sup> day of July, 2022, did unlawfully possess more than 14 grams but less than 28 grams of Fentanyl, a Schedule I Controlled Substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 43

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JMAR WILSON AND LECADRICK COLLIER**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 29<sup>th</sup> day of July, 2022, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 44

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JMAR WILSON AND LECADRICK COLLIER**, 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of July, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 46 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 45

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JMAR WILSON AND LECADRICK COLLIER**, 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of July, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 46 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 46

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JMAR WILSON AND LECADRICK COLLIER**, 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of July, 2022, did have within arm's reach of their person a firearm, to-wit: a handgun, during the commission of crimes of possession of Marijuana and controlled substances, to-wit: Fentanyl, each being a violation of the Georgia Controlled Substances Act, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 47

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LECADRICK COLLIER**, 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of July, 2022, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 49 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 48

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LECADRICK COLLIER**, 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of July, 2022, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 49 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 49

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LECADRICK COLLIER**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 20<sup>th</sup> day of July, 2022, did unlawfully possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 50

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of September, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking Methamphetamine under O.C.G.A. 16-13-31(e), and Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Counts 52 and 53 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 51

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of September, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking Methamphetamine under O.C.G.A. 16-13-31(e) and Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Counts 52 and 53 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 52

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, with the offense of **TRAFFICKING METHAMPHETAMINE (O.C.G.A. 16-13-31(e))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of September, 2022, did unlawfully possess more than 28 grams of Methamphetamine, a Schedule II Controlled Substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 53

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of September, 2022, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 54

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of September, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 56 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 55

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of September, 2022, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 56 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 56

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of September, 2022, did have within arm's reach of his person a firearm, to-wit: a handgun, during the commission of crimes of possession of Marijuana and controlled substances, to-wit: Methamphetamine, each being a violation of the Georgia Controlled Substances Act, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 57

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of September, 2022, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 59 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 58

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of September, 2022, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 59 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 59

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of September, 2022, did unlawfully possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 60

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **EDDIE REESE**, 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 Richmond and the State of Georgia, on the 11<sup>th</sup> day of November, 2022, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 62 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 61

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **EDDIE REESE**, 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 Richmond and the State of Georgia, on the 11<sup>th</sup> day of November, 2022, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 62 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 62

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **EDDIE REESE**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 11<sup>th</sup> day of November, 2022, did unlawfully possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 63

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of January, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Sale of Cocaine under O.C.G.A. 16-13-30(b) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 65 and 66 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.



#### COUNT 64

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of January, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of offenses of Sale of Cocaine under O.C.G.A. 16-13-30(b) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 65 and 66 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 65

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, with the offense of **SALE OF COCAINE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of January, 2023, did unlawfully sale cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 66

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of January, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate sale of marijuana, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 67

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of April, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Sale of Cocaine under O.C.G.A. 16-13-30(b) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 69 and 70 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 68

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of April, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of offenses of Sale of Cocaine under O.C.G.A. 16-13-30(b) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 69 and 70 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 69

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, with the offense of **SALE OF COCAINE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 20<sup>th</sup> day of April, 2023, did unlawfully sale cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 70

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 20<sup>th</sup> day of April, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate sale of marijuana, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 71

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **SHEQUITTA LEWIS AND SARAINA LEWIS**, 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 Richmond and the State of Georgia, between the dates of the 21<sup>st</sup> day of May, 2023 through the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Theft by Conversion under O.C.G.A. 16-8-4 as set forth and described in Count 73 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 72

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **SHEQUITTA LEWIS AND SARAINA LEWIS**, 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 Richmond and the State of Georgia, between the dates of the 21<sup>st</sup> day of May, 2023 through the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Theft by Conversion under O.C.G.A. 16-8-4 as set forth and described in Count 73 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 73

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **SHEQUITTA LEWIS AND SARAINA LEWIS**, with the offense of **THEFT BY CONVERSION (O.C.G.A. 16-8-4)**, for that the said accused, in the County of Richmond and the State of Georgia, between the dates of the 21<sup>st</sup> day of May, 2023 through the 4<sup>th</sup> day of October, 2023, having lawfully obtained property, to-wit: vehicles, the property of AVIS Budget Car Rental, of twenty-five thousand dollars (\$25,000.00) or more, under a known legal obligation, to-wit: working for said company and leasing their cars for them did knowingly convert said property to their own use, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 74

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Sale of Marijuana under O.C.G.A. 16-13-30(j) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 76 and 77 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 75

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Sale of Marijuana under O.C.G.A. 16-13-30(j) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 76 and 77 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 76

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, with the offense of **SALE OF MARIJUANA (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, did unlawfully sale marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 77

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate sale of marijuana, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 78

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 80 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 79

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 80 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 80

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, did have within arm's reach of his person a firearm, during the commission of the crime of sale of marijuana, being a violation of the Georgia Controlled Substances Act, and which was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 81

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of a Firearm by a First Offender Probationer under O.C.G.A. 16-11-131(b) as set forth and described in Count 83 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 82

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of a Firearm by a First Offender Probationer under O.C.G.A. 16-11-131(b) as set forth and described in Count 83 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 83

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, with the offense of **POSSESSION OF A FIREARM BY A FIRST OFFENDER PROBATIONER (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2022, while 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 a felony under the laws of the State of Georgia, did possess a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 84

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking in Cocaine under O.C.G.A. 16-13-31(a) and Possession of a Oxycodone and Amphetamine, both a Schedule II Controlled Substance under O.C.G.A. 16-13-30(a) as set forth and described in Counts 86-88 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 85

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking in Cocaine under O.C.G.A. 16-13-31(a) and Possession of a Oxycodone and Amphetamine, both a Schedule II Controlled Substance under O.C.G.A. 16-13-30(a) as set forth and described in Counts 86-88 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 86**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **TRAFFICKING IN COCAINE (O.C.G.A. 16-13-31(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, did possess more than twenty-eight (28) grams of a mixture containing at least ten percent (10%) Cocaine, a Schedule II Controlled Substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### **COUNT 87**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **POSSESSION OF A SCHEDULE II CONTROLLED SUBSTANCE (O.C.G.A. 16-13-30(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, did unlawfully possess, Oxycodone, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### **COUNT 88**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **POSSESSION OF A SCHEDULE II CONTROLLED SUBSTANCE (O.C.G.A. 16-13-30(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, did unlawfully possess, Amphetamine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 89

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **FLEEING OR ATTEMPTING TO ELUDE A POLICE OFFICER (O.C.G.A. 40-6-395)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, did willfully flee and attempt to elude a pursuing police vehicle, after having been given an audible and a visual signal to bring his vehicle to a stop by an officer, to-wit: Deputy Michael Morton with Richmond County Sheriff's Office, said officer at the time of giving such a signal being in uniform prominently displaying his badge of office and his vehicle being appropriately marked showing it to be an official police vehicle. It is further alleged that the accused did flee and attempt to elude said pursuing Police Officer while operating his vehicle in excess of 20 miles an hour above the posted speed limit, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 90

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, 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 Richmond and the State of Georgia, on the 26<sup>th</sup> day of June, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Sale of Cocaine under O.C.G.A. 16-13-30(b) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 92 and 93 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 91

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, 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 Richmond and the State of Georgia, on the 26<sup>th</sup> day of June, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of offenses of Sale of Cocaine under O.C.G.A. 16-13-30(b) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 92 and 93 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 92

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, with the offense of **SALE OF COCAINE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 26<sup>th</sup> day of June, 2023, did unlawfully sale cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 93

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ELLIS MCDANIEL**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 26<sup>th</sup> day of June, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate sale of marijuana, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 94

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Methamphetamine, Cocaine, Fentanyl, and Oxycodone, all with Intent to Distribute under O.C.G.A. 16-13-30(b) and Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Counts 96-100 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 95

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Methamphetamine, Cocaine, Fentanyl, and Oxycodone, all with Intent to Distribute under O.C.G.A. 16-13-30(b) and Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Counts 196-100 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 96

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, with the offense of **POSSESSION OF METHAMPHETAMINE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, did unlawfully possess, with intent to distribute, methamphetamine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 97

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, with the offense of **POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, did unlawfully possess, with intent to distribute, cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 98

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, with the offense of **POSSESSION OF A FENTANYL WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, did unlawfully possess, with intent to distribute, Fentanyl, a Schedule I controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 99

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, with the offense of **POSSESSION OF A OXYCODONE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, did unlawfully possess, with intent to distribute, Oxycodone, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 100

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 101

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 103 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 102

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 103 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 103

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, did have within arm's reach of his person a firearm, to-wit: a handgun, during the commission of crimes of possession of Marijuana and a controlled substance, to-wit: Methamphetamine, Cocaine, Fentanyl, and Oxycodone, each being a violation of the Georgia Controlled Substances Act, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 104

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 106 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 105

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 106 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 106

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DARIUS MILLER**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of July, 2023, did unlawfully possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.



### **COUNT 107**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 12<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Sale of Marijuana under O.C.G.A. 16-13-30(j) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 109 and 110 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### **COUNT 108**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, 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 Richmond and the State of Georgia, on the 12<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Sale of Marijuana under O.C.G.A. 16-13-30(j) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 109 and 110 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 109**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, with the offense of **SALE OF MARIJUANA (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 12<sup>th</sup> day of July, 2023, did unlawfully sale marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 110

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 12<sup>th</sup> day of July, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate sale of marijuana, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 111

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **FLEEING OR ATTEMPTING TO ELUDE A POLICE OFFICER (O.C.G.A. 40-6-395)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, did willfully flee and attempt to elude a pursuing police vehicle, after having been given an audible and a visual signal to bring his vehicle to a stop by an officer, to-wit: Deputy Parker Leathers with Richmond County Sheriff's Office, said officer at the time of giving such a signal being in uniform prominently displaying his badge of office and his vehicle being appropriately marked showing it to be an official police vehicle. It is further alleged that the accused is the proximate cause of an accident, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 112

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Cocaine, Oxycodone, both with Intent to Distribute under O.C.G.A. 16-13-30(b), Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j), and Possession of Dextroamphetamine, a Schedule II Controlled Substance under O.C.G.A. 16-13-30(a) as set forth and described in Counts 114-117 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 113

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Cocaine, Oxycodone, both with Intent to Distribute under O.C.G.A. 16-13-30(b), Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j), and Possession of Dextroamphetamine, a Schedule II Controlled Substance under O.C.G.A. 16-13-30(a) as set forth and described in Counts 114-117 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.<sup>7</sup>

#### COUNT 114

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, did unlawfully possess with intent to distribute Cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 115

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **POSSESSION OF A SCHEDULE II CONTROLLED SUBSTANCE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, did unlawfully possess with intent to distribute Oxycodone, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 116

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 117

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **POSSESSION OF A SCHEDULE II CONTROLLED SUBSTANCE (O.C.G.A. 16-13-30(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of June, 2023, did unlawfully possess, Dextroamphetamine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 118

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 120 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 119

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 120 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 120

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, did have on his person a firearm, to-wit: a handgun, during the commission of the crimes of possession of marijuana and controlled substances, to-wit: cocaine, oxycodone, and dextroamphetamine, each being a violation of the Georgia Controlled Substances Act, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 121

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Attempted Removal of a Weapon from a Public Official under O.C.G.A. 16-10-33 as set forth and described in Count 123 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 122

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Attempted Removal of a Weapon from a Public Official under O.C.G.A. 16-10-33 as set forth and described in Count 123 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 123

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **ATTEMPTED REMOVAL OF A WEAPON FROM A PUBLIC OFFICIAL (O.C.G.A. 16-10-33)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, did knowingly attempt to remove a taser from the possession of Deputy Parker Leathers, a peace officer lawfully acting within the course and scope of the officer's employment, said accused knowing and having reason to know Deputy Parker Leathers was a peace officer, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 124

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm by a First Offender Probationer under O.C.G.A. 16-11-131(b) as set forth and described in Count 126 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 125

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, 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 Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm by a First Offender Probationer under O.C.G.A. 16-11-131(b) as set forth and described in Count 126 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 126

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **LARRY MIMS**, with the offense of **POSSESSION OF A FIREARM BY A FIRST OFFENDER PROBATIONER (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 14<sup>th</sup> day of July, 2023, while 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 a felony under the laws of the State of Georgia, did possess a handgun, a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 127

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 24<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense Trafficking Marijuana under O.C.G.A. 16-13-31(c) as set forth and described in Count 129 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.



### COUNT 128

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 24<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense Trafficking Marijuana under O.C.G.A. 16-13-31(c) as set forth and described in Count 129 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 129

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, with the offense of **TRAFFICKING MARIJUANA (O.C.G.A. 16-13-31(c))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 24<sup>th</sup> day of July, 2023, did unlawfully possess more than 10 pounds of Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 130

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 24<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Identity Fraud under O.C.G.A. 16-9-121 as set forth and described in Count 132 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 131

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 24<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Identity Fraud under O.C.G.A. 16-9-121 as set forth and described in Count 132 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 132

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, with the offense of **IDENTITY FRAUD (O.C.G.A. 16-9-11)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 24<sup>th</sup> day of July, 2023, without authorization and consent, did willfully and fraudulently possess with intent to use identifying information concerning Mekhi Shakir Dior Pinckney and Victoria Day-Foster, specifically said persons' names and checking account numbers, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 133

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 24<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Identity Fraud under O.C.G.A. 16-9-121 as set forth and described in Count 135 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 134

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 24<sup>th</sup> day of July, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Identity Fraud under O.C.G.A. 16-9-121 as set forth and described in Count 135 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 135

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JALEN LANDERS AND IONAS DOGGETT**, with the offense of **POSSESSION OF A FIREARM BY A FIRST OFFENDER PROBATIONER (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 24<sup>th</sup> day of July, 2023, without authorization and consent, did willfully and fraudulently possess with intent to use identifying information concerning Darielle Washington, Kyler Haynes, and Linda Gordon specifically said persons' names and debit card numbers, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 136

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA MCDANIEL**, 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 Richmond and the State of Georgia, on the 7<sup>th</sup> day of August, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Conspiracy to Commit Trafficking Cocaine under O.C.G.A. 16-4-8 and 16-13-31(b) as set forth and described in Count 138 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 137

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA MCDANIEL**, 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 Richmond and the State of Georgia, on the 7<sup>th</sup> day of August, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Conspiracy to Commit Trafficking Cocaine under O.C.G.A. 16-4-8 and 16-13-31(b) as set forth and described in Count 138 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 138

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA MCDANIEL**, with the offense of **CONSPIRACY TO COMMIT TRAFFICKING COCAINE (O.C.G.A. 16-4-8, 16-13-31(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 7<sup>th</sup> day of August, 2023, did unlawfully conspire with Kenneth Sturgis to commit the offense of Trafficking Cocaine, and in furtherance of said conspiracy, the overt acts of Johsua McDaniel placing Kenneth Sturgis on a Grooms Transportation Bus to Atlanta, Joshua McDaniel buying over 28 grams of Cocaine, and then sending Kenneth Sturgis back to Augusta on the Grooms Transportation Bus with the Cocaine, with the intention of picking Kenneth Sturgis up at the bus station with the Cocaine, the acts by Joshua McDaniel were done to effect the object of the conspiracy, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 139

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA MCDANIEL**, 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 Richmond and the State of Georgia, on the 7<sup>th</sup> day of August, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense Possession of a Firearm by a Convicted Felon under O.C.G.A. 16-11-131(b) as set forth and described in Count 141 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 140

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA MCDANIEL**, 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 Richmond and the State of Georgia, on the 7<sup>th</sup> day of August, 2023, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 141 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 141

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA MCDANIEL**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 7<sup>th</sup> day of August, 2023, did unlawfully possess a FN Herstal Five-Seven handgun, firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 142

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, 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 Richmond and the State of Georgia, on the 9<sup>th</sup> day of August, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Sale of Marijuana under O.C.G.A. 16-13-30(j) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 145 and 146 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 143

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, 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 Richmond and the State of Georgia, on the 9<sup>th</sup> day of August, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Sale of Marijuana under O.C.G.A. 16-13-30(j) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 145 and 146 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 144

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(d))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 9<sup>th</sup> day of August, 2023, being in position of leadership of Money Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Sale of Marijuana under O.C.G.A. 16-13-30(j) and Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 145 and 146 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 145

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **SALE OF MARIJUANA (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 9<sup>th</sup> day of August, 2023, did unlawfully sale marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 146

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 9<sup>th</sup> day of August, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate sale of marijuana, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 147

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS AND EARL OVERTON**, 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 Richmond and the State of Georgia, on the 30<sup>th</sup> day of August, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Conspiracy to Commit Murder under O.C.G.A. 16-4-8 and 16-5-1 as set forth and described in Count 150 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 148

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS AND EARL OVERTON**, 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 Richmond and the State of Georgia, on the 30<sup>th</sup> day of August, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Conspiracy to Commit Murder under O.C.G.A. 16-4-8 and 16-5-1 as set forth and described in Count 150 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 149

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(d))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 30<sup>th</sup> day of August, 2023, being in position of leadership of Money Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Conspiracy to Commit Murder under O.C.G.A. 16-4-8 and 16-5-1 as set forth and described in Count 150 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 150

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS AND EARL OVERTON**, with the offense of **CONSPIRACY TO COMMIT MURDER (O.C.G.A. 16-4-8, 16-5-1)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 30<sup>th</sup> day of August, 2023, did unlawfully conspire with each other to commit the offense of Murder, and in furtherance of said conspiracy, the overt acts of Earl Overton calling Desmond Demmons to discuss and receive permission to commit said crime, Desmond Demmons giving Earl Overton permission to commit said crime, Earl Overton and Desmond Demmons discussing possible locations and people associated with victim, Christopher Ware, and Earl Overton driving over to a location he believed to be associated with victim, Christopher Ware, by Desmond Demmons and Earl Overton were done to effect the object of the conspiracy, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 151

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS AND JAMES DAVIS**, 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 Richmond and the State of Georgia, on the 31<sup>st</sup> day of August, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 154 and 155 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 152

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS AND JAMES DAVIS**, 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 Richmond and the State of Georgia, on the 31<sup>st</sup> day of August, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 154 and 155 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 153

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS** with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(d))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 31<sup>st</sup> day of August, 2023, being in position of leadership of Money Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Counts 154 and 155 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 154

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS AND JAMES DAVIS**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 31<sup>st</sup> day of August, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 155

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS AND JAMES DAVIS**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>st</sup> day of September, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 156

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS AND MYLES THOMAS**, 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 Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 159 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 157

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS AND MYLES THOMAS**, 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 Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 159 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 158

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS** with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(d))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, being in position of leadership of Money Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 159 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 159

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS AND MYLES THOMAS**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 160

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **EARL OVERTON**, 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 Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Aggravated Assault under O.C.G.A. 16-5-21 and Possession of a Firearm During the Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Counts 162 and 163 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 161

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **EARL OVERTON**, 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 Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Aggravated Assault under O.C.G.A. 16-5-21 and Possession of a Firearm During the Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Counts 162 and 163 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 162

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **EARL OVERTON**, with the offense of **AGGRAVATED ASSAULT (O.C.G.A. 16-5-21)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, did make an assault upon the person of Lajamy West with a deadly weapon, to wit: a firearm by striking Lajamy West with said firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 163

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **EARL OVERTON**, 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 Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, did have on his person a firearm, during the commission of the crimes of Aggravated Assault said crimes involving the person of another, to-wit: Lajamy West, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 164

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **EARL OVERTON**, 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 Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense Possession of a Firearm by a Convicted Felon under O.C.G.A. 16-11-131(b) as set forth and described in Count 166 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 165

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **EARL OVERTON**, 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 Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 166 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 166

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **EARL OVERTON**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 5<sup>th</sup> day of September, 2023, did unlawfully possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 167

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DAVION HEATH**, 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 Richmond and the State of Georgia, on the 20<sup>th</sup> day of September, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 170 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 171

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DAVION HEATH**, 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 Richmond and the State of Georgia, on the 21<sup>st</sup> day of September, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 174 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 172

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DAVION HEATH** 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 Richmond and the State of Georgia, on the 21<sup>st</sup> day of September, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 174 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 173

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DAVION HEATH**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(d))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 21<sup>st</sup> day of September, 2023, being in position of leadership of Money Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Illegal Use of Communication Facility under O.C.G.A. 16-13-32.3 as set forth and described in Count 174 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.



#### COUNT 174

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DAVION HEATH**, with the offense of **ILLEGAL USE OF COMMUNICATION FACILITY (O.C.G.A. 16-13-32.3)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 21<sup>st</sup> day of September, 2023, did knowingly and intentionally use a phone, a communication facility, to facilitate possession of marijuana with intent to distribute, an act constituting a felony under O.C.G.A. 16-13-30(j), contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 175

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER AND DMOND JACKSON**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 and Fleeing or Attempting to Elude a Police Officer under O.C.G.A. 40-6-395 as set forth and described in Count 179-181 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 176

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER AND DMOND JACKSON**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 and Fleeing or Attempting to Elude a Police Officer under O.C.G.A. 40-6-395 as set forth and described in Counts 179-181 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 177**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER AND DMOND JACKSON**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(c))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>st</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did directly and indirectly acquire and maintain an interest and control of a FN-57 pistol, property of Daquan Davis, through criminal gang activity, by theft in violation of Article 1 of Chapter 9 of Title 16, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT 178**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(c))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>st</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did directly and indirectly acquire and maintain an interest and control of a Dodge Charger, property of Bryan Taylor, through criminal gang activity, by theft in violation of Article 1 of Chapter 9 of Title 16, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 179

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER AND DMOND JACKSON**, with the offense of **FLEEING OR ATTEMPTING TO ELUDE A POLICE OFFICER (O.C.G.A. 40-6-395)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>st</sup> day of October, 2023, did willfully flee and attempt to elude a pursuing police vehicle, after having been given an audible and a visual signal to bring his vehicle to a stop by an officer, to-wit: Trooper Zachary Walker with the Georgia State Patrol, said officer at the time of giving such a signal being in uniform prominently displaying his badge of office and his vehicle being appropriately marked showing it to be an official police vehicle. It is further alleged that the accused did flee and attempt to elude said pursuing Police Officer while operating his vehicle in excess of 20 miles an hour above the posted speed limit, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 180

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER AND DMOND JACKSON**, with the offense of **THEFT BY RECEIVING STOLEN PROPERTY (O.C.G.A. 16-8-7)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>st</sup> day of October, 2023, did retain a firearm, to-wit: a FN-57 pistol, the property of Daquan Davis, which they should have known was stolen, said firearm not having been retained with intent to restore to said owner, said offense constituting a felony as provided for in O.C.G.A. section 16-8-12, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 181

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **THEFT BY RECEIVING STOLEN PROPERTY (O.C.G.A. 16-8-7)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>st</sup> day of October, 2023, did retain stolen property, to-wit: a Dodge Charger, the property of Bryan Taylor, with the value of greater than \$25,000, which he should have known was stolen, said firearm not having been retained with intent to restore to said owner, said offense constituting a felony as provided for in O.C.G.A. section 16-8-12, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 182

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER AND DMOND JACKSON**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm by a Convicted Felon or Probation under Conditional Discharge O.C.G.A. 16-11-131(b) as set forth and described in Counts 170-171 and 184-187 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 183

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER AND DMOND JACKSON**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm by a Convicted Felon or Probation under Conditional Discharge O.C.G.A. 16-11-131(b) as set forth and described in Counts 170-171 and 184-187 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 184

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **POSSESSION OF A FIREARM BY A PROBATIONER UNDER CONDITONAL DISCHARGE (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>th</sup> day of October, 2023, while on probation under a Conditional Discharge pursuant to the Official Code of Georgia Annotated 16-13-2(a) and (c) imposed by a court of competent jurisdiction, for a felony under the laws of the State of Georgia, did possess a AR-15, a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 185

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **POSSESSION OF A FIREARM BY A PROBATIONER UNDER CONDONAL DISCHARGE (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>th</sup> day of October, 2023, while on probation under a Conditional Discharge pursuant to the Official Code of Georgia Annotated 16-13-2(a) and (c) imposed by a court of competent jurisdiction, for a felony under the laws of the State of Georgia, did possess a FN-57 pistol, a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 186

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>th</sup> day of October, 2023, did unlawfully possess a AR-15, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 187

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>th</sup> day of October, 2023, did unlawfully possess a FN-57 pistol, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 188

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking Fentanyl under O.C.G.A. 16-13-31(b), Trafficking Methamphetamine under O.C.G.A. 16-13-31(e), Trafficking Marijuana under O.C.G.A. 16-13-31(c), and Possession of Cocaine with Intent to Distribute under O.C.G.A. 16-13-30(b) as set forth and described in Counts 191-194 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 189

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking Fentanyl under O.C.G.A. 16-13-31(b), Trafficking Methamphetamine under O.C.G.A. 16-13-31(e), Trafficking Marijuana under O.C.G.A. 16-13-31(c), and Possession of Cocaine with Intent to Distribute under O.C.G.A. 16-13-30(b) as set forth and described in Counts 191-194 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 190

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(d))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being in position of leadership of Money Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking Fentanyl under O.C.G.A. 16-13-31(b), Trafficking Methamphetamine under O.C.G.A. 16-13-31(e), Trafficking Marijuana under O.C.G.A. 16-13-31(c), and Possession of Cocaine with Intent to Distribute under O.C.G.A. 16-13-30(b) as set forth and described in Counts 191-194 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 191

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **TRAFFICKING FENTANYL (O.C.G.A. 16-13-31(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess more than 28 grams of Fentanyl, a Schedule I Controlled Substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 192

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **TRAFFICKING METHAMPHETAMINE (O.C.G.A. 16-13-31(e))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess more than 28 grams of Methamphetamine, a Schedule II Controlled Substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.



### COUNT 193

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **TRAFFICKING MARIJUANA (O.C.G.A. 16-13-31(e))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess more than 10 pounds of Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 194

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess with intent to distribute, cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 195

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 and Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 as set forth and described in Counts 199 and 200 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 196

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 and Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 as set forth and described in Counts 199 and 200 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 197

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(c))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did directly and indirectly acquire and maintain an interest and control of a Radical Arms rifle, property of Daquan Davis, through criminal gang activity, by theft in violation of Article 1 of Chapter 9 of Title 16, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 198

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(d))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being in position of leadership of Money Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 and Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 as set forth and described in Counts 199 and 200 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 199

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did have within arm's reach of his person firearms, to-wit: a handgun and a rifle, during the commission of the crimes of possession of Marijuana and controlled substances, to-wit: Fentanyl, Methamphetamine, and Cocaine, each being a violation of the Georgia Controlled Substances Act, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 200

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **THEFT BY RECEIVING STOLEN PROPERTY (O.C.G.A. 16-8-7)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did retain a firearm, to-wit: a Radical Arms rifle, the property of Daquan Davis, which he should have known was stolen, said firearm not having been retained with intent to restore to said owner, said offense constituting a felony as provided for in O.C.G.A. section 16-8-12, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 201

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Counts 204-205 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 202

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Counts 204-205 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 203

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(d))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being in position of leadership of Money Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of a Firearm by a Convicted Felon under O.C.G.A. 16-11-131(b) as set forth and described in Counts 204-205 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 204

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess a Glock 21 handgun, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 205

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DESMOND DEMMONS**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess a Radical Arms rifle, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 206

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Firearm by a Probationer under Conditional Discharge O.C.G.A. 16-11-131(b) and Possession of an Illegal Weapon under O.C.G.A. 16-11-123 as set forth and described in Counts 208-213 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 207

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER** 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Firearm by a Probationer under Conditional Discharge O.C.G.A. 16-11-131(b) and Possession of an Illegal Weapon under O.C.G.A. 16-11-123 as set forth and described in Counts 208-213 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 208

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **POSSESSION OF A FIREARM BY A PROBATIONER UNDER CONDITONAL DISCHARGE (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, while on probation under a Conditional Discharge pursuant to the Official Code of Georgia Annotated 16-13-2(a) and (c) imposed by a court of competent jurisdiction, for a felony under the laws of the State of Georgia, did possess a M5 90A1 shotgun, a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 209

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **POSSESSION OF A FIREARM BY A PROBATIONER UNDER CONDITONAL DISCHARGE (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, while on probation under a Conditional Discharge pursuant to the Official Code of Georgia Annotated 16-13-2(a) and (c) imposed by a court of competent jurisdiction, for a felony under the laws of the State of Georgia, did possess a 12 gauge shotgun, a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 210

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **POSSESSION OF A FIREARM BY A PROBATIONER UNDER CONDITONAL DISCHARGE (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, while on probation under a Conditional Discharge pursuant to the Official Code of Georgia Annotated 16-13-2(a) and (c) imposed by a court of competent jurisdiction, for a felony under the laws of the State of Georgia, did possess a Remington .770 rifle, a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 211

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **POSSESSION OF A FIREARM BY A PROBATIONER UNDER CONDITONAL DISCHARGE (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, while on probation under a Conditional Discharge pursuant to the Official Code of Georgia Annotated 16-13-2(a) and (c) imposed by a court of competent jurisdiction, for a felony under the laws of the State of Georgia, did possess a Glock 23, a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 212

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **POSSESSION OF A FIREARM BY A PROBATIONER UNDER CONDITONAL DISCHARGE (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, while on probation under a Conditional Discharge pursuant to the Official Code of Georgia Annotated 16-13-2(a) and (c) imposed by a court of competent jurisdiction, for a felony under the laws of the State of Georgia, did possess a Browning 20 gauge shotgun, a firearm, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 213

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **POSSESSION OF AN ILLEGAL WEAPON (O.C.G.A. 16-11-123)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did knowingly have in his possession, a sawed-off shotgun, having a barrel length of less than 18 inches, contrary to the laws of said State, the good order, peace and dignity thereof.



#### COUNT 214

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY AND CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j), Possession of Cocaine with Intent to Distribute under O.C.G.A. 16-13-30(b), and Possession THC Gummies and Psilocybin, both a Schedule I Controlled Substance with Intent to Distribute under O.C.G.A. 16-13-30(b) as set forth and described in Counts 216-219 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 215

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY AND CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j), Possession of Cocaine with Intent to Distribute under O.C.G.A. 16-13-30(b), and Possession THC Gummies and Psilocybin, both a Schedule I Controlled Substance with Intent to Distribute under O.C.G.A. 16-13-30(b) as set forth and described in Counts 216-219 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 216

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY AND CLIFFORD JONES**, with the offense of **POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 217

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY AND CLIFFORD JONES**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 218

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY AND CLIFFORD JONES**, with the offense of **POSSESSION OF A SCHEDULE I CONTROLLED SUBSTANCE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, THC Gummies, a Schedule I controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT 219**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY AND CLIFFORD JONES**, with the offense of **POSSESSION OF A SCHEDULE I CONTROLLED SUBSTANCE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, Psilocybin, a Schedule I controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

**COUNT 220**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY AND CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 222 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 221

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY AND CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 222 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 222

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TRAEON PERRY AND CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did have within arm's reach of his person a firearm, to-wit: a handgun, during the commission of crimes of possession of Marijuana and controlled substances, to-wit: Cocaine, THC, and Psilocybin, each being a violation of the Georgia Controlled Substances Act, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 223

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Aggravated Assault on a Peace Officer under O.C.G.A. 16-15-21 and Interference with Government Property under O.C.G.A. 16-7-24(a) as set forth and described in Counts 225-228 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 224

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Aggravated Assault on a Peace Officer under O.C.G.A. 16-15-21 and Interference with Government Property under O.C.G.A. 16-7-24(a) as set forth and described in Counts 225-228 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 225

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, with the offense of **AGGRAVATED ASSAULT ON A PEACE OFFICER (O.C.G.A. 16-5-21)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did knowingly make an assault upon Investigator William Walker, a peace officer with the Richmond County Sheriff's Office, with a deadly weapon, to wit: a firearm by shooting in the direction of Investigator William Walker, while said officers was engaged in the performance of his official duties, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 226

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, with the offense of **AGGRAVATED ASSAULT ON A PEACE OFFICER (O.C.G.A. 16-5-21)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did knowingly make an assault upon Deputy Jason Mathis, a peace officer with the Richmond County Sheriff's Office, with a deadly weapon, to wit: a firearm by shooting in the direction of Deputy Jason Mathis, while said officers was engaged in the performance of his official duties, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 227

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, with the offense of **AGGRAVATED ASSAULT ON A PEACE OFFICER (O.C.G.A. 16-5-21)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did knowingly make an assault upon Deputy William McClure, a peace officer with the Richmond County Sheriff's Office, with a deadly weapon, to wit: a firearm by shooting in the direction of Deputy William McClure, while said officers was engaged in the performance of his official duties, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 228

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, with the offense of **INTERFERENCE WITH GOVERNMENT PROPERTY (O.C.G.A. 16-7-24(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did damage government property, to-wit: a Richmond County Sheriff's Office Patrol Car, the property of the Richmond County Sheriff's Office by shooting said patrol car, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 229

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 231-233 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 230

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 231-233 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 231

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did have on his person a handgun, a firearm, during the commission of the crime of Aggravated Assault on a Peace Officer, said crime involving the person of another, to-wit: William Walker, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 232

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did have on his person a handgun, a firearm, during the commission of the crime of Aggravated Assault on a Peace Officer, said crime involving the person of another, to-wit: Jason Mathis, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 233

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **CLIFFORD JONES**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did have on his person a firearm, during the commission of the crime of Aggravated Assault on a Peace Officer, said crime involving the person of another, to-wit: William McClure, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.



#### COUNT 234

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Count 236 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 235

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **IONAS DOGGETT**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Count 236 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 236

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **IONAS DOGGETT**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 237

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DOMINICK RYANS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Cocaine and Alprazolam a Schedule IV Controlled Substance, both with Intent to Distribute under O.C.G.A. 16-13-30(b) and Possession of a Oxycodone, a Schedule II Controlled Substance under O.C.G.A. 16-13-30(a) as set forth and described in Counts 239-241 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 238

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DOMINICK RYANS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Cocaine and Alprazolam a Schedule IV Controlled Substance, both with Intent to Distribute under O.C.G.A. 16-13-30(b) and Possession of a Oxycodone, a Schedule II Controlled Substance under O.C.G.A. 16-13-30(a) as set forth and described in Counts 239-241 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 239

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DOMINICK RYANS**, with the offense of **POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 240

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DOMINICK RYANS**, with the offense of **POSSESSION OF A SCHEDULE IV CONTROLLED SUBSTANCE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, Alprazolam, a Schedule IV controlled substance, this compound is structurally derived from 1,4-benzodiazepine by substitution at the 5-position with a phenyl ring, the compound is further modified in the following ways: 1) no substitution at the 2-position with a ketone; 2) no substitution at the 3- position with a hydroxyl group or ester group; 3) substitution at the 1,2-position with a fused triazole ring, which itself has been further substituted; 4) no substitution at the 1,2-position with a fused imidazole ring; 5) no substitution at the 4,5-position with a fused oxazolidine ring; 6) no substitution at the 4,5-position with the fused oxazine ring; 7) no substitution at the 7-position with a nitro group; 8) substitution at the 7-position with a halogen group; 9) no substitution at the 1-position with an alkyl group, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 241

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DOMINICK RYANS**, with the offense of **POSSESSION OF A SCHEDULE II CONTROLLED SUBSTANCE (O.C.G.A. 16-13-30(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, Oxycodone, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 242

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **RICARDO MCBRIDE**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Cocaine with Intent to Distribute under O.C.G.A. 16-13-30(b) and Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Counts 244 and 245 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 243

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **RICARDO MCBRIDE**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Cocaine with Intent to Distribute under O.C.G.A. 16-13-30(b) and Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Counts 244 and 245 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 244

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **RICARDO MCBRIDE**, with the offense of **POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 245

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **RICARDO MCBRIDE**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 246

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **RICARDO MCBRIDE**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 248 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 247

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **RICARDO MCBRIDE**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 248 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 248

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **RICARDO MCBRIDE**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did have within arm's reach of his person a firearm, to-wit: a handgun during the commission of crimes of possession of Marijuana and a controlled substance, to-wit: Cocaine, each being a violation of the Georgia Controlled Substances Act, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 249

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **RICARDO MCBRIDE**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 251 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 250

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **RICARDO MCBRIDE**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 251 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 251

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **RICARDO MCBRIDE**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 252

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEZMUND MAINOR**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Count 254 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 253

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEZMUND MAINOR**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Count 254 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 254

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEZMUND MAINOR**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 255

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEZMUND MAINOR**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 257 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.



#### COUNT 256

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEZMUND MAINOR**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 257 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 257

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEZMUND MAINOR**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did have within arm's reach of his person a firearm, to-wit: a handgun during the commission of the crime of possession of Marijuana with intent to distribute, being a violation of the Georgia Controlled Substances Act, and which was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 258

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEZMUND MAINOR**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 260 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 259

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEZMUND MAINOR**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 260 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 260

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEZMUND MAINOR**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 261

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Fentanyl under O.C.G.A. 16-13-30(a) and Possession of Cocaine under O.C.G.A. 16-13-30(a) as set forth and described in Counts 263 and 264 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 262

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Fentanyl under O.C.G.A. 16-13-30(a) and Possession of Cocaine under O.C.G.A. 16-13-30(a) as set forth and described in Counts 263 and 264 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 263

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA DEMMONS**, with the offense of **POSSESSION OF FENTANYL (O.C.G.A. 16-13-30(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, Cocaine, a Schedule I controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 264

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA DEMMONS**, with the offense of **POSSESSION OF COCAINE (O.C.G.A. 16-13-30(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, Cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 265

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 and Possession of an Illegal Weapon under O.C.G.A. 16-11-123 as set forth and described in Counts 267 and 268 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 266

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 and Possession of an Illegal Weapon under O.C.G.A. 16-11-123 as set forth and described in Counts 267 and 268 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 267**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA DEMMONS**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did have within arm's reach of his person firearms, to-wit: handguns, during the commission of crimes of possession of controlled substances, to-wit: Fentanyl and Cocaine, each being a violation of the Georgia Controlled Substances Act, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

#### **COUNT 268**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **JOSHUA DEMMONS**, with the offense of **POSSESSION OF AN ILLEGAL WEAPON (O.C.G.A. 16-11-123)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did knowingly have in his possession, a silencer, as defined in subsection (7) of Code Section 16-11-121 of the Official Code of Georgia, contrary to the laws of said State, the good order, peace and dignity thereof.

#### **COUNT 269**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TILSON MCCRAY**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Trafficking Marijuana under O.C.G.A. 16-13-31(c) as set forth and described in Count 271 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 270

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TILSON MCCRAY**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Trafficking Marijuana under O.C.G.A. 16-13-31(c) as set forth and described in Count 271 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 271

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TILSON MCCRAY**, with the offense of **TRAFFICKING MARIJUANA (O.C.G.A. 16-13-31(c))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess more than 10 pounds of Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 272

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TILSON MCCRAY**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 and Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 as set forth and described in Counts 275 and 276 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 273

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TILSON MCCRAY**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 and Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 as set forth and described in Counts 275 and 276 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 274

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TILSON MCCRAY**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(c))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did directly and indirectly acquire and maintain an interest and control of a Glock 22 firearm, property of Derek Waldrop, through criminal gang activity, by theft in violation of Article 1 of Chapter 9 of Title 16, contrary to the laws of said State, the good order, peace and dignity thereof.

#### **COUNT 275**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TILSON MCCRAY**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did have within arm's reach of his person a firearm, to-wit: a handgun, during the commission of the crime of trafficking Marijuana, a violation of the Georgia Controlled Substances Act, and which crimes was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

#### **COUNT 276**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **TILSON MCCRAY**, with the offense of **THEFT BY RECEIVING STOLEN PROPERTY (O.C.G.A. 16-8-7)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did retain a firearm, to-wit: a Glock 22, the property of Derek Waldrop, which he should have known was stolen, said firearm not having been retained with intent to restore to said owner, said offense constituting a felony as provided for in O.C.G.A. section 16-8-12, contrary to the laws of said State, the good order, peace and dignity thereof.

#### **COUNT 277**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **BRYSON MCCRAY**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Count 279 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.



#### COUNT 278

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **BRYSON MCCRAY**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-30(j) as set forth and described in Count 279 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 279

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **BRYSON MCCRAY**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 280

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **BRYSON MCCRAY**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 282 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 281

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **BRYSON MCCRAY**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 282 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 282

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **BRYSON MCCRAY**, 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 Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did have within arm's reach of his person a firearm, to-wit: a handgun, during the commission of the crime of possession of Marijuana with intent to distribute, being a violation of the Georgia Controlled Substances Act, and which was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 283

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ANTONIO BUSH** 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 Richmond and the State of Georgia, on the 7<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Cocaine with Intent to Distribute under O.C.G.A. 16-13-30(b) and Possession of Methamphetamine under O.C.G.A. 16-13-30(a) as set forth and described in Counts 285 and 286 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 284

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ANTONIO BUSH**, 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 Richmond and the State of Georgia, on the 7<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Possession of Cocaine with Intent to Distribute under O.C.G.A. 16-13-30(b) and Possession of Methamphetamine under O.C.G.A. 16-13-30(a) as set forth and described in Counts 285 and 286 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 285

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ANTONIO BUSH**, with the offense of **POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 7<sup>th</sup> day of October, 2023, did unlawfully possess with intent to distribute, cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 286

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ANTONIO BUSH**, with the offense of **POSSESSION OF METHAMPHETAMINE (O.C.G.A. 16-13-30(a))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 7<sup>th</sup> day of October, 2023, did unlawfully possess less than 2 grams of methamphetamine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 287

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ANTONIO BUSH** 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 Richmond and the State of Georgia, on the 7<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 as set forth and described in Count 290 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 288

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ANTONIO BUSH**, 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 Richmond and the State of Georgia, on the 7<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Theft by Receiving Stolen Property under O.C.G.A. 16-8-7 as set forth and described in Count 290 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 289

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ANTOINIO BUSH**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(c))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 7<sup>th</sup> day of October, 2023, being associated with Trvpmoneyy, a criminal street gang, did directly and indirectly acquire and maintain an interest and control of a Nissan Rogue, property of AVIS, through criminal gang activity, by theft in violation of Article 1 of Chapter 9 of Title 16, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 290

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **ANTONIO BUSH**, with the offense of **THEFT BY RECEIVING STOLEN PROPERTY (O.C.G.A. 16-8-7)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 7<sup>th</sup> day of October, 2023, did retain stolen property, to-wit: a Nissan Rouge, the property of AVIS, with the value of greater than \$5000, which he should have known was stolen, said firearm not having been retained with intent to restore to said owner, said offense constituting a felony as provided for in O.C.G.A. section 16-8-12, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 291

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, 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 Richmond and the State of Georgia, on the 23<sup>rd</sup> day of December, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Contraband by Inmate under O.C.G.A. 42-4-13(b) as set forth and described in Count 293 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 292

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, 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 Richmond and the State of Georgia, on the 23<sup>rd</sup> day of December, 2023, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Contraband by Inmate under O.C.G.A. 42-4-13(b) as set forth and described in Count 293 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 293

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DEVIN ALLEN-GLOVER**, with the offense of **POSSESSION OF CONTRABAND BY INMATE (O.C.G.A. 42-4-13(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 23<sup>rd</sup> day of December, 2023, did unlawfully possess a dangerous weapon, to wit: a shank, while an inmate of the Richmond County Jail, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 294

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking Fentanyl under O.C.G.A. 16-13-31(b), Possession of Methamphetamine and Possession of Cocaine, both with Intent to Distribute under O.C.G.A. 16-13-30(b), and Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-20(j) as set forth and described in Counts 296-297 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 295

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Trafficking Fentanyl under O.C.G.A. 16-13-31(b), Possession of Methamphetamine and Possession of Cocaine, both with Intent to Distribute under O.C.G.A. 16-13-30(b), and Possession of Marijuana with Intent to Distribute under O.C.G.A. 16-13-20(j) as set forth and described in Counts 296-299 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 296

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, with the offense of **TRAFFICKING FENTANYL (O.C.G.A. 16-13-31(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 4<sup>th</sup> day of October, 2023, did unlawfully possess more than 14 grams but less than 28 grams of Fentanyl, a Schedule I Controlled Substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 297

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, with the offense of **POSSESSION OF COCAINE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, did unlawfully possess with intent to distribute, cocaine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 298

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, with the offense of **POSSESSION OF METHAMPHETAMINE WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, did unlawfully possess with intent to distribute, methamphetamine, a Schedule II controlled substance, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 299

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, with the offense of **POSSESSION OF MARIJUANA WITH INTENT TO DISTRIBUTE (O.C.G.A. 16-13-30(j))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, did unlawfully possess, with intent to distribute, Marijuana, in violation of the Georgia Controlled Substance Act, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 300

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 302 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.



### COUNT 301

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Possession of Firearm During Commission of a Felony under O.C.G.A. 16-11-106 as set forth and described in Count 302 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 302

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, did have within arm's reach of his person a firearm, to-wit: a handgun, during the commission of crimes of possession of Marijuana and controlled substances, to-wit: Fentanyl, Methamphetamine, and Cocaine, each being a violation of the Georgia Controlled Substances Act, and which crimes were felonies, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 303

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 305 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 304

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, 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 Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, being associated with Trvpmoneyy, 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 under O.C.G.A. 16-11-131(b) as set forth and described in Count 305 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 305

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **MALIK TAYLOR**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-131(b))**, for that the said accused, in the County of Richmond and the State of Georgia, on the 1<sup>st</sup> day of February, 2024, did unlawfully possess a handgun, a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 306

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, 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 Richmond and the State of Georgia, between the 24<sup>th</sup> day of March 2024 through the 10<sup>th</sup> day of April 2024, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Armed Robbery under O.C.G.A. 16-8-41, Possession of a Firearm During the Commission of Felony O.C.G.A. 16-11-106 as set forth and described in Counts 308-320 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 307

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, 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 Richmond and the State of Georgia, between the 24<sup>th</sup> day of March 2024 through the 10<sup>th</sup> day of April 2024, being associated with Trvpmoneyy, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offenses of Armed Robbery under O.C.G.A. 16-8-41, Possession of a Firearm During the Commission of Felony O.C.G.A. 16-11-106 as set forth and described in Counts 308-320 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 308

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, with the offense of **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT (O.C.G.A. 16-15-4(c))**, for that the said accused, in the County of Richmond and the State of Georgia, between the 24<sup>th</sup> day of March 2024 through the 10<sup>th</sup> day of April 2024, being associated with Trvpmoneyy, a criminal street gang, did directly and indirectly acquire and maintain an interest and control of money, property of Dollar General, TJ Mart/Lucky Food Mart, and BP/Split Stop, through criminal gang activity, by theft in violation of Article 1 of Chapter 9 of Title 16, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 309

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, with the offense of **ARMED ROBBERY (O.C.G.A. 16-8-41)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 24<sup>th</sup> day of March, 2023, with the intent to commit a theft, did unlawfully take United States Currency, the property of TJ Mart/Lucky Food Mart, from the immediate presence of Vatandeep Singh, by use of a firearm, an offensive weapon contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 310

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, with the offense of **ARMED ROBBERY (O.C.G.A. 16-8-41)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 25<sup>th</sup> day of March, 2023, with the intent to commit a theft, did unlawfully take United States Currency and Vatandeep Singh cellphone, the property of TJ Mart/Lucky Food Mart, from the immediate presence of Vatandeep Singh, by use of a firearm, an offensive weapon contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 311

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, with the offense of **ARMED ROBBERY (O.C.G.A. 16-8-41)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 28<sup>th</sup> day of March, 2023, with the intent to commit a theft, did unlawfully take United States Currency, the property of TJ Mart/Lucky Food Mart from the immediate presence of Akheraj Bhati, by use of a firearm, an offensive weapon contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 312

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, with the offense of **ARMED ROBBERY (O.C.G.A. 16-8-41)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 31<sup>st</sup> day of March, 2023, with the intent to commit a theft, did unlawfully take United States Currency, the property of BP/Split Stop from the immediate presence of Kamal Kishore, by use of a firearm, an offensive weapon contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 313

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, with the offense of **ARMED ROBBERY (O.C.G.A. 16-8-41)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 8<sup>th</sup> day of April, 2023, with the intent to commit a theft, did unlawfully take United States Currency, the property of Dollar General, from the immediate presence of Cornell Harden, by use of a firearm, an offensive weapon contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 314

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, with the offense of **ARMED ROBBERY (O.C.G.A. 16-8-41)**, for that the said accused, in the County of Richmond and the State of Georgia, on the 10<sup>th</sup> day of April, 2023, with the intent to commit a theft, did unlawfully take United States Currency, the property of TJ Mart/Lucky Food Mart, from the immediate presence of Architkummarr Bhatt, by use of a firearm, an offensive weapon contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 315

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, 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 Richmond and the State of Georgia, on the 24<sup>th</sup> day of March, 2023, did have on his person a firearm, during the commission of a crime, to: wit: Armed Robbery, said crime involving the person of another, to-wit: Vatandeep Singh, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

#### COUNT 316

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, 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 Richmond and the State of Georgia, on the 25<sup>th</sup> day of March, 2023, did have on his person a firearm, during the commission of a crime, to: wit: Armed Robbery, said crime involving the person of another, to-wit: Vatandeep Singh, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 317

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, 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 Richmond and the State of Georgia, on the 28<sup>th</sup> day of March, 2023, did have on his person a firearm, during the commission of a crime, to: wit: Armed Robbery, said crime involving the person of another, to-wit: Akheraj Bhati, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 318

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, 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 Richmond and the State of Georgia, on the 31<sup>th</sup> day of March, 2023, did have on his person a firearm, during the commission of a crime, to: wit: Armed Robbery, said crime involving the person of another, to-wit: Kamal Kishore, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 319

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, 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 Richmond and the State of Georgia, on the 8<sup>th</sup> day of April, 2023, did have on his person a firearm, during the commission of a crime, to: wit: Armed Robbery, said crime involving the person of another, to-wit: Cornell Harden, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 320

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, 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 Richmond and the State of Georgia, on the 10<sup>th</sup> day of April, 2023, did have on his person a firearm, during the commission of a crime, to-wit: Armed Robbery, said crime involving the person of another, to-wit: Architkummarr Bhatt, and which crime was a felony, contrary to the laws of said State, the good order, peace and dignity thereof.

### COUNT 321

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, 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 Richmond and the State of Georgia, between the 24<sup>th</sup> day of March 2024 through the 10<sup>th</sup> day of April 2024, being associated with Trvpmoneyy, 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 O.C.G.A. 16-11-131 (b) as set forth and described in Count 333 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.



**COUNT 322**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, 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 Richmond and the State of Georgia, between the 24<sup>th</sup> day of March 2024 through the 10<sup>th</sup> day of April 2024, being associated with Trvpmoneyy, 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 O.C.G.A. 16-11-131 (b) as set forth and described in Count 333 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 333**

The Grand Jurors aforesaid, chosen and sworn for the County of Richmond in the name and on behalf of the citizens of Georgia further charge and accuse **DMOND JACKSON**, with the offense of **POSSESSION OF A FIREARM BY A CONVICTED FELON (O.C.G.A. 16-11-106)**, for that the said accused, in the County of Richmond and the State of Georgia, between the 24<sup>th</sup> day of March 2024 through the 10<sup>th</sup> day of April 2024, did unlawfully possess a firearm, after having been convicted of a felony under the laws of this State, contrary to the laws of said State, the good order, peace and dignity thereof.

MARCH TERM 2024

LT. JULIO CONCEPCION, PROSECUTOR  
SGT. KYLE GOULD, PROSECUTOR  
INV. ADAM GREEN, PROSECUTOR  
CHRISTOPHER CARR, ATTORNEY GENERAL