
BILL OF INDICTMENT
No. _____
In the Superior Court of Bryan County
State of Georgia
March Term, 2023

STATE OF GEORGIA

VS.

MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
MARQUIS JONES, AKA: "GRUDGE",
MICHAEL RANDOLPH, AKA: "CHOP",
DONOVAN SCOTT, AKA: "SOCKIT",
SHRON GILBERT, AKA: "HARD LEFT",
DEMON THOMPSON, AKA: "9 BALL",
PAUL GOSDEN, AKA: "WHITE COLLAR",
THERON SINGLETON, AKA: "D M B" AND "DO MY BEST",
LABARRON POLLOCK, AKA: "BOOTLEG",
JEMAR MACK, AKA: "GHOST" AND "GHOST RYDER"
AND
WHITNEY LENORE HOOKS, AKA: "SECRETS"

MELAUN ARTURI AIKEN, AKA: "DO WURK",

- Ct. 1: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4(a)
- Ct. 2: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4(a)
- Ct. 3: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (b)
- Ct. 4: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (b)
- Ct. 5: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4(d)
- Ct. 6: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (d)
- Ct. 7: CONSPIRACY TO COMMIT AGGRAVATED ASSAULT
O.C.G.A. 16-4-8 AND 16-5-21
- Ct. 8: CONSPIRACY TO COMMIT ROBBERY BY INTIMIDATION
O.C.G.A. 16-4-8 AND 16-8-40
- Ct. 9: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4(a)
- Ct. 10: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (a)
- Ct. 11: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (b)
- Ct. 12: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (b)
- Ct. 13: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (d)
- Ct. 14: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (d)
- Ct. 15: CONSPIRACY TO COMMIT AGGRAVATED ASSAULT
O.C.G.A. 16-4-8 AND 16-5-21
- Ct. 16: CONSPIRACY TO COMMIT ROBBERY BY INTIMIDATION
O.C.G.A. 16-4-8 AND 16-8-40
- Ct. 17: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4(a)
- Ct. 18: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (a)
- Ct. 19: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (a)
- Ct. 20: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (b)
- Ct. 21: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (b)
- Ct. 22: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (b)
- Ct. 23: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (d)
- Ct. 24: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (d)
- Ct. 25: VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT
O.C.G.A. 16-15-4 (d)
- Ct. 26: AGGRAVATED ASSAULT
O.C.G.A. 16-5-21

- Ct. 27: AGGRAVATED ASSAULT
O.C.G.A. 16-5-21
- Ct. 28: AGGRAVATED ASSAULT
O.C.G.A. 16-5-21
- Ct. 29: AGGRAVATED ASSAULT
O.C.G.A. 16-5-21
- Ct. 30: AGGRAVATED ASSAULT
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- Ct. 33: AGGRAVATED ASSAULT
O.C.G.A. 16-5-21
- Ct. 34: AGGRAVATED ASSAULT
O.C.G.A. 16-5-21
- Ct. 35: AGGRAVATED ASSAULT
O.C.G.A. 16-5-21
- Ct. 36: AGGRAVATED ASSAULT
O.C.G.A. 16-5-21
- Ct. 37: ATTEMPTED ARMED ROBBERY
O.C.G.A. 16-8-41
- Ct. 38: ATTEMPTED ARMED ROBBERY
O.C.G.A. 16-8-41
- Ct. 39: ATTEMPTED ARMED ROBBERY
O.C.G.A. 16-8-41
- Ct. 40: ATTEMPTED ARMED ROBBERY
O.C.G.A. 16-8-41
- Ct. 41: ATTEMPTED ARMED ROBBERY
O.C.G.A. 16-8-41
- Ct. 42: ATTEMPTED ARMED ROBBERY
O.C.G.A. 16-8-41
- Ct. 43: ATTEMPTED ARMED ROBBERY
O.C.G.A. 16-8-41
- Ct. 44: POSSESSION OF FIREARM DURING COMMISSION OF A FELONY
O.C.G.A. 16-11-106
- Ct. 45: POSSESSION OF FIREARM DURING COMMISSION OF A FELONY
O.C.G.A. 16-11-106

**LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
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**JOSEPH LEEKS, AKA: "AXEL",
MARQUIS JONES, AKA: "GRUDGE",
MICHAEL RANDOLPH, AKA: "CHOP",
DONOVAN SCOTT, AKA: "SOCKIT",**

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**DEMON THOMPSON, AKA: "9 BALL",
PAUL GOSDEN, AKA: "WHITE COLLAR",
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O.C.G.A. 16-4-8 AND 16-8-40

As to all defendants listed for each count in this indictment, we the Grand Jury of Bryant County issue an indictment as follows:

- Count 1: True BILL
- Count 2: True BILL
- Count 3: True BILL
- Count 4: True BILL
- Count 5: True BILL
- Count 6: True BILL
- Count 7: True BILL
- Count 8: True BILL
- Count 9: True BILL
- Count 10: True BILL
- Count 11: True BILL
- Count 12: True BILL
- Count 13: True BILL
- Count 14: True BILL
- Count 15: True BILL
- Count 16: True BILL
- Count 17: True BILL

STATE'S LIST OF WITNESSES:

Peter Delatorre
Richmond Hill Police Department

Lee Hoover
Bureau of Alcohol, Tobacco, and Firearms

Jeremy Sheetz
Bureau of Alcohol, Tobacco, and Firearms

Count 18: True BILL
Count 19: True BILL
Count 20: True BILL
Count 21: True BILL
Count 22: True BILL
Count 23: True BILL
Count 24: True BILL
Count 25: True BILL
Count 26: True BILL
Count 27: True BILL
Count 28: True BILL
Count 29: True BILL
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Count 36: True BILL

Count 37: True BILL
Count 38: True BILL
Count 39: True BILL
Count 40: True BILL
Count 41: True BILL
Count 42: True BILL
Count 43: True BILL
Count 44: True BILL
Count 45: True BILL



Returned in Open Court and filed in the Clerk's Office this

The 31st day of may, 2023.

Regina Curl
Dep

CLERK OF SUPERIOR COURT

CHRIS CARR
ATTORNEY GENERAL OF GEORGIA

STATE OF GEORGIA, BRYAN COUNTY

IN THE SUPERIOR COURT OF SAID COUNTY

THE GRAND JURORS SELECTED, CHOSEN AND SWORN FOR BRYAN COUNTY, TO-
WIT:

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COUNT 1

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
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LABARRON POLLOCK, AKA: "BOOTLEG",
JEMAR MACK, AKA: "GHOST" AND "GHOST RYDER"
WHITNEY LENORE HOOKS, AKA: "SECRETS"
individually and as parties to the commission of a crime,**

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 Bryan County and the State of Georgia, **between the 24th day of August, 2021, and the 15th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Aggravated Assault as alleged in count 7 of this Indictment being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 2

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
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LABARRON POLLOCK, AKA: "BOOTLEG",
JEMAR MACK, AKA: "GHOST" AND "GHOST RYDER"
WHITNEY LENORE HOOKS, AKA: "SECRETS"
individually and as parties to the commission of a crime,**

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 Bryan County and the State of Georgia, **between the 24th day of August, 2021, and the 15th day of June**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Robbery by Intimidation, as alleged in count 8 of this Indictment being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 3

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
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DONOVAN SCOTT, AKA: "SOCKIT",
SHRON GILBERT, AKA: "HARD LEFT",
DEMON THOMPSON, AKA: "9 BALL",
PAUL GOSDEN, AKA: "WHITE COLLAR",
THERON SINGLETON, AKA: "D M B" AND "DO MY BEST",
LABARRON POLLOCK, AKA: "BOOTLEG",
JEMAR MACK, AKA: "GHOST" AND "GHOST RYDER"
WHITNEY LENORE HOOKS, AKA: "SECRETS"
individually and as parties to the commission of a crime,**

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 Bryan County and the State of Georgia, **between the 24th day of August, 2021, and the 15th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal gang activity with the intent to maintain and increase their status in said gang* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Aggravated Assault, as alleged in count 7 of this Indictment being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 4

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
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LABARRON POLLOCK, AKA: "BOOTLEG",
JEMAR MACK, AKA: "GHOST" AND "GHOST RYDER"
WHITNEY LENORE HOOKS, AKA: "SECRETS"
individually and as parties to the commission of a crime,**

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 Bryan County and the State of Georgia, **between the 24th day of August, 2021, and the 15th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity with the intent to maintain and increase their status in said gang, activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Robbery by Intimidation, as alleged in count 8 of this Indictment being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 5

In the name and on behalf of the citizens of Georgia, charge and accuse:

MELAUN ARTURI AIKEN, AKA: "DO WURK"

individually and as party to the commission of a crime,

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 Bryan County and the State of Georgia, **between the 24th day of August, 2021, and the 15th day of June, 2022,** *being in the position of leadership of Outcast, a criminal street gang, did directly conspire to engage in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Aggravated Assault, as alleged in count 7 of this Indictment being contrary to the laws of said State, the good order, peace and dignity thereof.*

COUNT 6

In the name and on behalf of the citizens of Georgia, charge and accuse:

MELAUN ARTURI AIKEN, AKA: "DO WURK"

individually and as party to the commission of a crime,

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 Bryan County and the State of Georgia, **between the 24th day of August, 2021, and the 15th day of June, 2022,** *being in the position of leadership of Outcast, a criminal street gang, did directly conspire to engage in criminal street gang activity through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Robbery by Intimidation, as alleged in count 8 of this Indictment being contrary to the laws of said State, the good order, peace and dignity thereof.*

COUNT 7

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
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LABARRON POLLOCK, AKA: "BOOTLEG",
JEMAR MACK, AKA: "GHOST" AND "GHOST RYDER"
WHITNEY LENORE HOOKS, AKA: "SECRETS"**

individually and as parties to the commission of a crime,

with the offense of: **CONSPIRACY TO COMMIT AGGRAVATED ASSAULT
O.C.G.A. 16-4-8 AND 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **between the 24th day of August, 2021, and the 15th day of June, 2022**, did unlawfully conspire to commit the offense of Aggravated Assault in violation of OCGA 16-5-21 and 16-4-8 in furtherance of said conspiracy, and did conspire to make an assault upon the person of any located Chosen Few associate with the intent to rob their person of their vests and at least one of the below overt acts was done to effect the object of the conspiracy and all acts being contrary to the laws of said State, the good order, peace and dignity thereof:

(Count continued on next page)

A	On or about September 3, 2021, Outcast associates did drive through Bryan County, Georgia and made contact at Rachels Bar with Chosen Few associates in Chatham County, Georgia and gave a warning that Chosen Few associates did not belong “here”;
B	On or about September 4, 2021, Outcast associates did search for Chosen Few associates by conducting surveillance upon Southern Cycle Gear in Bryan County, Georgia
C	On or about September 4, 2021, Outcast associate did drive in Bryan County, Georgia and did go to Kings Ferry Park, in Chatham County Georgia where they confronted Chosen Few associates and delivered a statement that Chosen Few did not belong here;
D	On or about September 24, 2021, Outcast associates did drive motorcycles from Harley Davidson in Chatham County through Bryan County in pursuit of Lawrence Hooks before they beat Hooks with a chain in McIntosh County, Georgia;
E	On or about March 6, 2022, Outcast associate did conduct surveillance on Chosen Few in Richmond Hill at Hwy 17 and the Parker’s gas station, separate and distinct from all other acts taken in furtherance of this conspiracy;
F	On or about March 6, 2022, Outcast associate did conduct surveillance on Chosen Few in Richmond Hill, Bryan County, at I-95 Northbound, separate and distinct from all other acts taken in furtherance of this conspiracy;
G	On or about April 9, 2022, Outcast associates did meet at the Outcast clubhouse in Midway in Liberty County, Georgia, and did drive through Bryan County, Georgia to the SEGA Motorcycle Club Association Meeting in Chatham County where Outcast asserted their dominance of the southeast Georgia territory at the meeting

COUNT 8

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
MARQUIS JONES, AKA: "GRUDGE",
MICHAEL RANDOLPH, AKA: "CHOP",
DONOVAN SCOTT, AKA: "SOCKIT",
SHRON GILBERT, AKA: "HARD LEFT",
DEMON THOMPSON, AKA: "9 BALL",
PAUL GOSDEN, AKA: "WHITE COLLAR",
THERON SINGLETON, AKA: "D M B" AND "DO MY BEST",
LABARRON POLLOCK, AKA: "BOOTLEG",
JEMAR MACK, AKA: "GHOST" AND "GHOST RYDER"
WHITNEY LENORE HOOKS, AKA: "SECRETS"**

individually and as parties to the commission of a crime,

**with the offense of CONSPIRACY TO COMMIT ROBBERY BY INTIMIDATION
O.C.G.A. 16-4-8 AND 16-8-40,**

for that the said accused in Bryan County and the State of Georgia, **between the 24th day of August, 2021, and the 15th day of June, 2022**, did unlawfully conspire to commit the offense of Robbery by Intimidation, in violation of OCGA 16-8-40 and 16-4-8 and in furtherance of said conspiracy, and did conspire to commit a theft of the motorcycle vests, aka cuts, from the person of any located Chosen Few associate by the use of intimidation through use of impending physical force and at least one of the below overt acts was done to effect the object of the conspiracy and all acts being contrary to the laws of said State, the good order, peace and dignity thereof:

(Count continued on next page)

A	On or about September 3, 2021, Outcast associates did drive through Bryan County, Georgia and made contact at Rachels Bar with Chosen Few associates in Chatham County, Georgia and gave a warning that Chosen Few associates did not belong “here”;
B	On or about September 4, 2021, Outcast associates did search for Chosen Few associates by conducting surveillance upon Southern Cycle Gear in Bryan County, Georgia
C	On or about September 4, 2021, Outcast associate did drive in Bryan County, Georgia and did go to Kings Ferry Park, in Chatham County Georgia where they confronted Chosen Few associates and delivered a statement that Chosen Few did not belong here;
D	On or about September 24, 2021, Outcast associates did drive motorcycles from Harley Davidson in Chatham County through Bryan County in pursuit of Lawrence Hooks before they beat Hooks with a chain in McIntosh County, Georgia;
E	On or about March 6, 2022, Outcast associate did search for Chosen Few Associates by conducting surveillance in Richmond Hill, Bryan County, Georgia at Hwy 17 and the Parker’s gas station, separate and distinct from all other acts taken in furtherance of this conspiracy;
F	On or about March 6, 2022, Outcast associate did conduct surveillance on Chosen Few in Richmond Hill, Bryan County, at I-95 Northbound, separate and distinct from all other acts taken in furtherance of this conspiracy;
G	On or about April 9, 2022, Outcast associates did meet at the Outcast clubhouse in Midway in Liberty County, Georgia, and did drive through Bryan County, Georgia to the SEGA Motorcycle Club Association Meeting in Chatham County where Outcast asserted their dominance of the southeast Georgia territory at the meeting

COUNT 9

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
MARQUIS JONES, AKA: "GRUDGE",
MICHAEL RANDOLPH, AKA: "CHOP",
DONOVAN SCOTT, AKA: "SOCKIT",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Aggravated Assault as alleged in Count 15 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 10

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
MARQUIS JONES, AKA: "GRUDGE",
MICHAEL RANDOLPH, AKA: "CHOP",
DONOVAN SCOTT, AKA: "SOCKIT",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Robbery by Intimidation as alleged in Count 16 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 11

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
MARQUIS JONES, AKA: "GRUDGE",
MICHAEL RANDOLPH, AKA: "CHOP",
DONOVAN SCOTT, AKA: "SOCKIT",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity with the intent to maintain and increase their status in said gang, activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Aggravated Assault as alleged in Count 15 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 12

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
MARQUIS JONES, AKA: "GRUDGE",
MICHAEL RANDOLPH, AKA: "CHOP",
DONOVAN SCOTT, AKA: "SOCKIT",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity with the intent to maintain and increase their status in said gang, activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Robbery by Intimidation as alleged in Count 16 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 13

In the name and on behalf of the citizens of Georgia, charge and accuse:

MELAUN ARTURI AIKEN, AKA: "DO WURK"

individually and as party to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022** *being in the position of leadership* of Outcast, a criminal street gang, did directly conspire to *engage in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Aggravated Assault, as alleged in Count 15 of this Indictment being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 14

In the name and on behalf of the citizens of Georgia, charge and accuse:

MELAUN ARTURI AIKEN, AKA: "DO WURK"

individually and as party to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022** *being in the position of leadership* of Outcast, a criminal street gang, did directly conspire to *engage in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Robbery by Intimidation, as alleged in Count 16 of this Indictment being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 15

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
MARQUIS JONES, AKA: "GRUDGE",
MICHAEL RANDOLPH, AKA: "CHOP",
DONOVAN SCOTT, AKA: "SOCKIT",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of: **CONSPIRACY TO COMMIT AGGRAVATED ASSAULT
O.C.G.A. 16-4-8 AND 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did unlawfully conspire with each other to commit the offense of Aggravated Assault in violation of OCGA 16-5-21 and 16-4-8 and in furtherance of said conspiracy, and did conspire to make an assault upon the person of any located Chosen Few associate with the intent to rob their person of their vests and at least one of the below overt acts was done to effect the object of the conspiracy and all acts being contrary to the laws of said State, the good order, peace and dignity thereof:

(Count continued on next page)

A	Melaun Aiken conducted surveillance and conveyed the location of Chosen Few associates while on I-95 in Bryan County, Georgia;
B	Melaun Aiken conducted surveillance and conveyed the location of Chosen Few associates while on Highway 17 in Bryan County, Georgia;
C	Melaun Aiken communicated that there were 8 Chosen Few associates located at Flaco's Tacos in Bryan County, Georgia;
D	Melaun Aiken conducted surveillance and conveyed the location of Chosen Few associates at the Red Roof Inn in Richmond Hill, Bryan County, Georgia;
E	Outcast associates did drive to Richmond Hill, Bryan County, Georgia in an effort to gather their forces prior to making contact with Chosen Few associates;
F	Outcast associates did walk behind the Red Roof Inn building in Richmond Hill, Bryan County, Georgia where Chosen Few associates were gathered in front of the building;
G	Outcast associates did drive to 2 sides of the Red Roof Inn in Richmond Hill, Bryan County, Georgia where Chosen Few associates were gathered in front of the building;
H	Outcast associates did carry firearms while walking on foot behind the Red Roof Inn building in Richmond Hill, Bryan County, Georgia where Chosen Few associates were gathered in front of the building;
I	An Outcast associate did point a shotgun at a Chosen Few associate in Richmond Hill, Bryan County, Georgia;
J	An Outcast associate did point a pistol at a Chosen Few associate in Richmond Hill, Bryan County, Georgia;
K	An Outcast associate did point a rifle at a Chosen Few associate in Richmond Hill, Bryan County, Georgia;
L	An Outcast associate did drive a truck into the parking lot of the Red Roof Inn building in Richmond Hill, Bryan County, Georgia within feet of striking Chosen Few associates whom were gathered in front of the building;
M	An Outcast associates did demand that Chosen Few associates give up their motorcycle vests in Richmond Hill, Bryan County, Georgia;
N	An Outcast associate did fire a pistol at a Chosen Few associate in Richmond Hill, Bryan County, Georgia;
O	An Outcast associate did fire a rifle at a Chosen Few associate in Richmond Hill, Bryan County, Georgia;
P	Outcast associates did provide transportation from the shooting scene in Bryan County Georgia to Liberty County Georgia to a hospital therein.

COUNT 16

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
MARQUIS JONES, AKA: "GRUDGE",
MICHAEL RANDOLPH, AKA: "CHOP",
DONOVAN SCOTT, AKA: "SOCKIT",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of: **CONSPIRACY TO COMMIT ROBBERY BY INTIMIDATION
O.C.G.A. 16-8-40 AND 16-4-8,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did unlawfully conspire with each other to commit the offense of Robbery by Intimidation in violation of OCGA 16-8-40 and 16-4-8 and in furtherance of said conspiracy, did conspire to commit a theft of the motorcycle vests, aka cuts, from the person of any located Chosen Few associate by the use of intimidation through use of impending physical force and at least one of the below overt acts was done to effect the object of the conspiracy and at least one of the below overt acts was done to effect the object of the conspiracy and all acts being contrary to the laws of said State, the good order, peace and dignity thereof:

(Count continued on next page)

A	Melaun Aiken conducted surveillance and conveyed the location of Chosen Few associates while on I-95 in Bryan County, Georgia;
B	Melaun Aiken conducted surveillance and conveyed the location of Chosen Few associates while on Highway 17 in Bryan County, Georgia;
C	Melaun Aiken communicated that there were 8 Chosen Few associates located at Flaco's Tacos in Bryan County, Georgia;
D	Melaun Aiken conducted surveillance and conveyed the location of Chosen Few associates at the Red Roof Inn in Richmond Hill, Bryan County, Georgia;
E	Outcast associates did drive to Richmond Hill, Bryan County, Georgia in an effort to gather their forces prior to making contact with Chosen Few associates;
F	Outcast associates did walk behind the Red Roof Inn building in Richmond Hill, Bryan County, Georgia where Chosen Few associates were gathered in front of the building;
G	Outcast associates did drive to 2 sides of the Red Roof Inn in Richmond Hill, Bryan County, Georgia where Chosen Few associates were gathered in front of the building;
H	Outcast associates did carry firearms while walking on foot behind the Red Roof Inn building in Richmond Hill, Bryan County, Georgia where Chosen Few associates were gathered in front of the building;
I	An Outcast associate did point a shotgun at a Chosen Few associate in Richmond Hill, Bryan County, Georgia;
J	An Outcast associate did point a pistol at a Chosen Few associate in Richmond Hill, Bryan County, Georgia;
K	An Outcast associate did point a rifle at a Chosen Few associate in Richmond Hill, Bryan County, Georgia;
L	An Outcast associate did drive a truck into the parking lot of the Red Roof Inn building in Richmond Hill, Bryan County, Georgia within feet of striking Chosen Few associates whom were gathered in front of the building;
M	An Outcast associates did demand that Chosen Few associates give up their motorcycle vests in Richmond Hill, Bryan County, Georgia;
N	An Outcast associate did fire a pistol at a Chosen Few associate in Richmond Hill, Bryan County, Georgia;
O	An Outcast associate did fire a rifle at a Chosen Few associate in Richmond Hill, Bryan County, Georgia;
P	Outcast associates did provide transportation from the shooting scene in Bryan County Georgia to Liberty County Georgia to a hospital therein.

COUNT 17

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Aggravated Assault as alleged in Counts 26-36 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 18

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Attempt to Commit Armed Robbery as alleged in Counts 37-43 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 19

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Possession of Firearm During Commission of a Felony as alleged in Counts 44 and 45 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 20

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity with the intent to maintain and increase their status in said gang* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Aggravated Assault as alleged in Counts 26-36 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 21

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity with the intent to maintain and increase their status in said gang* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Attempt to Commit Armed Robbery as alleged in Counts 37-43 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 22

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, being associated with Outcast, a criminal street gang, did unlawfully *participate in criminal street gang activity with the intent to maintain and increase their status in said gang* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Possession of Firearm During Commission of a Felony as alleged in Counts 44 and 45 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 23

In the name and on behalf of the citizens of Georgia, charge and accuse

MELAUN ARTURI AIKEN, AKA: "DO WURK"

individually and as party to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, *being in the position of leadership* of Outcast, a criminal street gang, did directly conspire to *engage in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Aggravated Assault, as alleged in Counts 26-36 this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 24

In the name and on behalf of the citizens of Georgia, charge and accuse

MELAUN ARTURI AIKEN, AKA: "DO WURK"

individually and as party to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, *being in the position of leadership* of Outcast, a criminal street gang, did directly conspire to *engage in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Attempt to Commit Armed Robbery as alleged in Counts 37-43 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 25

In the name and on behalf of the citizens of Georgia, charge and accuse

MELAUN ARTURI AIKEN, AKA: "DO WURK"

individually and as party to the commission of a crime,

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 Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, *being in the position of leadership* of Outcast, a criminal street gang, did directly conspire to *engage in criminal street gang activity* through the commission of at least one of the offenses enumerated in paragraph 1 of OCGA 16-15-3, Possession of Firearm During Commission of a Felony as alleged in Counts 44 and 45 of this Indictment, all being contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 26

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
JOSEPH LEEKS, AKA: "AXEL",
MARQUIS JONES, AKA: "GRUDGE",
MICHAEL RANDOLPH, AKA: "CHOP",
DONOVAN SCOTT, AKA: "SOCKIT",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **Erik Polanco** with a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 27

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **Kendrick Brown** with a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 28

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **Carlos Montes** with a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 29

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **Victor Lopez** a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 30

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **Marcus Greene** with a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 31

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **John Inferredra** with a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 32

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **Jason Reitzke** with a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 33

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **William Dye** with a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 34

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **Brenda Dye** with a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 35

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **James Flowers** with a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 36

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **AGGRAVATED ASSAULT, O.C.G.A. 16-5-21,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did make an assault upon the person of **Stacey Flowers** with a firearm, a deadly weapon, through threatening actions which reasonably caused apprehension and fear of immediately receiving a violent injury, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 37

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **ATTEMPTED ARMED ROBBERY, O.C.G.A. 16-8-41,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, with the intent to commit a theft, did unlawfully attempt to take a motorcycle vest which was property of **Erik Polanco** from his person, an act which constitutes a substantial step towards the commission of Armed Robbery, by the use of a firearm which is a deadly and offensive weapon, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 38

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **ATTEMPTED ARMED ROBBERY, O.C.G.A. 16-8-41,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, with the intent to commit a theft, did unlawfully attempt to take a motorcycle vest which was property of **Kendrick Brown** from his person, an act which constitutes a substantial step towards the commission of Armed Robbery, by the use of a firearm which is a deadly and offensive weapon, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 39

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **ATTEMPTED ARMED ROBBERY, O.C.G.A. 16-8-41,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, with the intent to commit a theft, did unlawfully attempt to take a motorcycle vest which was property of **Carlos Montes** from his person, an act which constitutes a substantial step towards the commission of Armed Robbery, by the use of a firearm which is a deadly and offensive weapon, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 40

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **ATTEMPTED ARMED ROBBERY, O.C.G.A. 16-8-41,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, with the intent to commit a theft, did unlawfully attempt to take a motorcycle vest which was property of **Victor Lopez** from his person, an act which constitutes a substantial step towards the commission of Armed Robbery, by the use of a firearm which is a deadly and offensive weapon, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 41

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **ATTEMPTED ARMED ROBBERY, O.C.G.A. 16-8-41,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, with the intent to commit a theft, did unlawfully attempt to take a motorcycle vest which was property of **Marcus Greene** from his person, an act which constitutes a substantial step towards the commission of Armed Robbery, by the use of a firearm which is a deadly and offensive weapon, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 42

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **ATTEMPTED ARMED ROBBERY,
O.C.G.A. 16-8-41,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, with the intent to commit a theft, did unlawfully attempt to take a motorcycle vest which was property of **John Inferrerra** from his person, an act which constitutes a substantial step towards the commission of Armed Robbery, by the use of a firearm which is a deadly and offensive weapon, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 43

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **ATTEMPTED ARMED ROBBERY,
O.C.G.A. 16-8-41,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, with the intent to commit a theft, did unlawfully attempt to take a motorcycle vest which was property of **Jason Reitzke** from his person, an act which constitutes a substantial step towards the commission of Armed Robbery, by the use of a firearm which is a deadly and offensive weapon, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 44

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **POSSESSION OF FIREARM DURING COMMISSION OF A
FELONY, O.C.G.A. 16-11-106,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did unlawfully have on their person a rifle, a shotgun, and a handgun, all firearms, during the commission of the crime of Aggravated Assault, a felony, as alleged in counts 26-36 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

COUNT 45

In the name and on behalf of the citizens of Georgia, charge and accuse:

**MELAUN ARTURI AIKEN, AKA: "DO WURK",
LEE ALAN MOLE, AKA: "TRENCH",
TAURUS MARQUIS SIMMONS, AKA: "REPEAT",
TERRANCE DONITA POTTER, AKA: "CHATTER BOX",
EDDIE LATSON, AKA: "STASH",
SHRON GILBERT, AKA: "HARD LEFT",**

individually and as parties to the commission of a crime,

with the offense of **POSSESSION OF FIREARM DURING COMMISSION OF A
FELONY, O.C.G.A. 16-11-106,**

for that the said accused in Bryan County and the State of Georgia, **on or about the 17th day of June, 2022**, did unlawfully have on their person a rifle, a shotgun, and a handgun, all firearms, during the crime of Criminal Attempted Armed Robbery, a felony, as alleged in counts 37-43 of this Indictment, contrary to the laws of said State, the good order, peace and dignity thereof.

Peter Delatorre, Prosecutor

Chris Carr
Attorney General

Michael Tabarrok
Assistant Attorney General

ARRAIGNMENT AND PLEA

The defendant, **MELAUN ARTURI AIKEN, AKA "DO WURK"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **MELAUN ARTURI AIKEN, AKA "DO WURK"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **LEE ALAN MOLE, AKA "TRENCH"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **LEE ALAN MOLE, AKA "TRENCH"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **TAURUS MARQUIS SIMMONS, AKA "REPEAT"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **TAURUS MARQUIS SIMMONS, AKA "REPEAT"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **TERRANCE DONITA POTTER, AKA "CHATTER BOX"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **TERRANCE DONITA POTTER, AKA "CHATTER BOX"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **EDDIE LATSON, AKA "STASH"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **EDDIE LATSON, AKA "STASH"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **JOSEPH LEEKS, AKA "AXEL"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **JOSEPH LEEKS, AKA "AXEL"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **MARQUIS JONES, AKA "GRUDGE"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **MARQUIS JONES, AKA "GRUDGE"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **MICHAEL RANDOLPH, AKA "CHOP"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **MICHAEL RANDOLPH, AKA "CHOP"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **DONOVAN SCOTT, AKA "SOCKIT"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **DONOVAN SCOTT, AKA "SOCKIT"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **SHRON GILBERT, AKA "HARD LEFT"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **SHRON GILBERT, AKA "HARD LEFT"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **DEMON THOMPSON, AKA "9 BALL"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **DEMON THOMPSON, AKA "9 BALL"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **PAUL GOSDEN, AKA "WHITE COLLAR"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **PAUL GOSDEN, AKA "WHITE COLLAR"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **THERON SINGLETON, AKA "D M B" AND "DO MY BEST"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **THERON SINGLETON, AKA "D M B" AND "DO MY BEST"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **LABARRON POLLOCK, AKA "BOOTLEG"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **LABARRON POLLOCK, AKA "BOOTLEG"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **JEMAR MACK, AKA "GHOST" AND "GHOST RYDER"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **JEMAR MACK, AKA "GHOST"**,

This _____ day of _____, _____.

Foreman

ARRAIGNMENT AND PLEA

The defendant, **WHITNEY LENORE HOOKS, AKA "SECRETS"**, waives formal arraignment, indictment by Grand Jury, and pleads _____.

This _____ day of _____, _____.

Defendant

Defendant's Attorney

Attorney General of Georgia

VERDICT

We, the jury, find the defendant, **WHITNEY LENORE HOOKS, AKA "SECRETS"**,

This _____ day of _____, _____.

Foreman