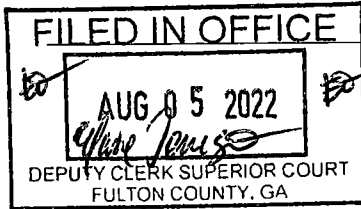


MM

**RE-INDICTMENT OF
22SC182273**

EJIS. Glanville



Clerk No. 22SC183572

FULTON SUPERIOR COURT

THE STATE OF GEORGIA

V.

**KAHLIEFF ADAMS
A/K/A BOBBY HUNT**

Count(s): 1,40,42,43

**MARTINEZ ARNOLD
A/K/A DUKE**

Count(s): 1,57,58,59,60,61,62

**DERONTAE BEBEE
A/K/A BEE**

A/K/A B

Count(s): 1,8,9,10,11,12,27,28

**DAMONE BLALOCK
A/K/A BALI**

Count(s): 1

**JAVARIS BRADFORD
A/K/A TUDA**

Count(s): 1,2

**JUSTIN COBB
A/K/A DUWAP**

Count(s): 1,2

**CORDARIUS DORSEY
A/K/A POLO**

A/K/A JUICY

Count(s): 1,55

**CHRISTIAN EPPINGER
A/K/A BHRIS**

Count(s): 1,27,28,29,31,32,33
34,35,36,37,38,39,47,48

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

MILES FARLEY A/K/A SLATO A/K/A LIL MILES Count(s): 1,49,50,51,54	13	THEFT BY RECEIVING STOLEN PROPERTY O.C.G.A. §16-8-7
JEVON FLEETWOOD A/K/A 4TRAY A/K/A PSYCHO Count(s): 1	14	ARMED ROBBERY O.C.G.A. §16-8-41
DAMEKION GARLINGTON A/K/A DEE A/K/A SXARFAXE Count(s): 1,40,42,43,49,50,51,54	15	ARMED ROBBERY O.C.G.A. §16-8-41
QUANTAVIOUS GRIER A/K/A UNFOONK Count(s): 1, 13	16	AGGRAVATED ASSAULT WITH A DEADLY WEAPON O.C.G.A. §16-5-21
MARQUAVIUS HUEY A/K/A QUA Count(s): 1,3,4,5,6,7,14,15,16,17, 18,19,20,21,22,23,44,45,46	17	AGGRAVATED ASSAULT WITH A DEADLY WEAPON O.C.G.A. §16-5-21
DEAMONTE KENDRICK A/K/A YAK GOTTI Count(s): 1,2,57,58,59,60,61,62,63	18	HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE O.C.G.A. §16-5-44.1
SERGIO KITCHENS A/K/A GUNNA Count(s): 1	19	POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106
WUNNIE LEE A/K/A SLIMELIFE SHAWTY Count(s): 1	20	POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106
DEMISE MCMULLEN A/K/A NARD Count(s): 1,2	21	PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)
TENQUARIUS MENDER A/K/A NARD A/K/A STUNNA Count(s): 1,44,45,46	22	PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(b)
	23	PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(c)
	24	VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT O.C.G.A. §16-13-30
	25	POSSESSION OF A FIREARM BY CONVICTED FELON O.C.G.A. §16-11-131
	26	PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)
	27	ARMED ROBBERY O.C.G.A. §16-8-41

WALTER MURPHY
A/K/A DK
Count(s): 1

JAYDEN MYRICK
A/K/A SETTRIP
A/K/A JAYMAN
Count(s): 1,40,41,42,43

QUAMARVIOUS NICHOLS
A/K/A QUA
Count(s): 1,49,50,51,53,54,65

RODALIUS RYAN
A/K/A LIL ROD
Count(s): 1

ANTONIO SLEDGE
A/K/A MOUNK TOUNK
Count(s): 1,30

TRONTAVIOUS STEPHENS
A/K/A TICK
A/K/A SLUG
Count(s): 1

SHANNON STILLWELL
A/K/A SHANNON JACKSON
A/K/A SB
Count(s): 1,2,49,50,51,52,54,64

ANTONIO SUMLIN
A/K/A OBAMA
Count(s): 1,47,48,55

JEFFERY WILLIAMS
A/K/A YOUNG THUG
A/K/A SLIME
Count(s): 1,56,57,58,59,60,61,62

JIMMY WINFREY
A/K/A ROSCOE
Count(s): 1,24,25,26

- 28 HIJACKING A MOTOR VEHICLE IN THE FIRST DEGREE O.C.G.A. §16-5-44.1
- 29 POSSESSION OF FIREARM BY FIRST OFFENDER PROBATIONER O.C.G.A. §16-11-131
- 30 POSSESSION OF A FIREARM BY CONVICTED FELON O.C.G.A. §16-11-131
- 31 THEFT BY TAKING O.C.G.A. §16-8-2
- 32 ATTEMPTED MURDER O.C.G.A. §16-4-1
- 33 ATTEMPTED MURDER O.C.G.A. §16-4-1
- 34 POSSESSION OF FIREARM BY A FIRST OFFENDER PROBATIONER O.C.G.A. §16-11-131
- 35 POSSESSION OF FIREARM BY A FIRST OFFENDER PROBATIONER O.C.G.A. §16-11-131
- 36 POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106
- 37 POSSESSION OF FIREARM DURING COMMISSION OF A FELONY O.C.G.A. §16-11-106
- 38 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)
- 39 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(b)
- 40 ATTEMPTED MURDER O.C.G.A. §16-4-1
- 41 POSSESSION OF WEAPON BY INCARCERATED INDIVIDUAL O.C.G.A. § 42-5-18
- 42 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(a)
- 43 PARTICIPATION IN CRIMINAL STREET GANG ACTIVITY O.C.G.A. §16-15-4(b)

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

- 58 VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT O.C.G.A. §16-13-30
- 59 VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT O.C.G.A. §16-13-30
- 60 VIOLATION OF THE GEORGIA CONTROLLED SUBSTANCES ACT O.C.G.A. §16-13-30
- 61 POSSESSION OF FIREARM DURING COMMISSION OF A FELONY
O.C.G.A. §16-11-106
- 62 POSSESSION OF A MACHINE GUN
O.C.G.A. §16-11-160
- 63 POSSESSION OF FIREARM BY CONVICTED FELON PREVIOUSLY CONVICTED OF FELONY INVOLVING THE USE OR POSSESSION OF A FIREARM O.C.G.A. §16-11-133
- 64 POSSESSION OF FIREARM BY CONVICTED FELON PREVIOUSLY CONVICTED OF FELONY INVOLVING THE USE OR POSSESSION OF A FIREARM O.C.G.A. §16-11-133
- 65 POSSESSION OF FIREARM BY CONVICTED FELON PREVIOUSLY CONVICTED OF FELONY INVOLVING THE USE OR POSSESSION OF A FIREARM O.C.G.A. §16-11-133

True BILL

Aug. 5th, 2022

J.D. [Signature]

Grand Jury Foreperson

PERSONID:

FANI T. WILLIS, District Attorney

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

Defendant

Attorney for Defendant

Assistant District Attorney

This ___ day of _____,

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

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Attorney for Defendant

Assistant District Attorney

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Assistant District Attorney

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Defendant

Defendant

Defendant

Attorney for Defendant

Attorney for Defendant

Attorney for Defendant

Assistant District Attorney

Assistant District Attorney

Assistant District Attorney

This ___ day of _____,

This ___ day of _____,

This ___ day of _____,

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

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

1. THOMAS DAVID, Foreperson
2. JEFFREY HALLER, Asst. FP
3. CHRISTINE KOSMOS, Secretary
4. CAROLINE GECKER, Asst. Sec.
5. SETH ADAMS
6. LENE AGERSKOV
7. DENISE BROOKS
8. MICHAEL CAHN
9. LANCE DILORIO
10. KARYN FRANK
11. ABRIEL HORTON
- ~~12. LEONARD JAMES~~
- ~~13. DANIEL KNIGHT~~

14. RYAN MILLS
15. CARLETON MITCHELL
16. FRIMITIVA NAVA
- ~~17. EIDEL RODRIGUEZ~~
18. EDDIE SCOTT
19. EARNESHIA SHARP
20. CURTIS WHITAKER
- ~~21. YAKARAIYAS TARAHILA~~
22. DONNIELE ZACHARY
- ~~23. AMANDA ZYAS~~
- ~~24. DESTINEE PARLOW~~
25. WHITNEY LAWRENCE
26. TODD HENNING'S

COUNT 1

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

MARTINEZ ARNOLD, AKA DUKE

DERONTAE BEBEE, AKA BEE, AKA B

DAMONE BLALOCK, AKA BALI

JAVARIS BRADFORD, AKA TUDA

JUSTIN COBB, AKA DUWAP

CORDARIUS DORSEY, AKA POLO, AKA JUICY

CHRISTIAN EPPINGER, AKA BHRIS

MILES FARLEY, AKA SLATO, AKA LIL MILES

JEVON FLEETWOOD, AKA 4TRAY, AKA PSYCHO

DAMEKION GARLINGTON, AKA DEE, AKA SXARFAXE

QUANTAVIOUS GRIER, AKA UNFOONK

MARQUAVIUS HUEY, AKA QUA

DEAMONTE KENDRICK, AKA YAK GOTTI

SERGIO KITCHENS, AKA GUNNA

WUNNIE LEE, AKA SLIMELIFE SHAWTY

DEMISE MCMULLEN, AKA NARD

TENQUARIUS MENDER, AKA NARD, AKA STUNNA

WALTER MURPHY, AKA DK

JAYDEN MYRICK, AKA SETTRIP, AKA JAYMAN

QUAMARVIOUS NICHOLS, AKA QUA

RODALIUS RYAN, AKA LIL ROD

ANTONIO SLEDGE, AKA MOUNK TOUNK

TRONTAVIOUS STEPHENS, AKA TICK, AKA SLUG

SHANNON STILLWELL, AKA SHANNON JACKSON, AKA SB

ANTONIO SUMLIN, AKA OBAMA

JEFFERY WILLIAMS, AKA YOUNG THUG, AKA SLIME

JIMMY WINFREY, AKA ROSCOE

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

Part 1 – The Conspiracy

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

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

Part 2 - The Enterprise

A. The Enterprise

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

B. YSL

1. History

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

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

2. Identifiers

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

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

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

3. Primary Locale


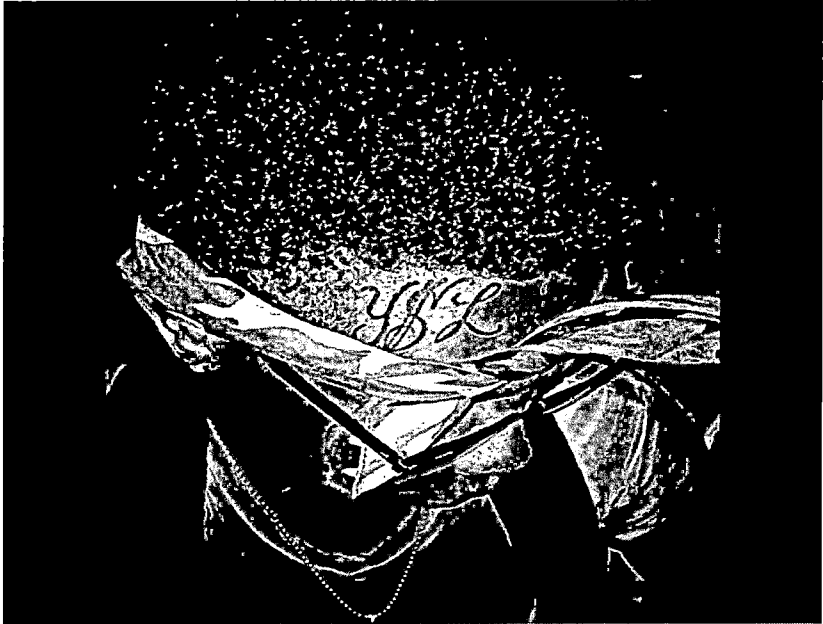


YSL associates are predominately active in Southeast Atlanta in the Cleveland Avenue area, but are expanding their activities into the surrounding metropolitan Atlanta area.


Part 3 - Acts in Furtherance of the Conspiracy


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

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

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

9	04/20/2014	<p>Defendant JEFFERY WILLIAMS, an associate of YSL, did appear in a video released on social media titled "Eww," where Defendant states "Red just like Elmo but I never fuckin giggle," "YSL won't fold, pick his ass off from the balcony," "YSL, wipe a nigga nose," "I'ma fuck for the cash then she getting robbed by Tick," "In a Bentley on West Lee getting trailed by sniper," "All I ever wanted was the money, put your hands in the air if you dare, any motherfucker to step over here, F&N put em in a wheel chair," an overt act in furtherance of the conspiracy.</p>
10	07/13/2014	<p>Defendant WALTER MURPHY, an associate of YSL, did pose for a photo released on Murphy's Instagram account with the letters "YSL" tattooed on his forehead, an overt act in furtherance of the conspiracy.</p> <div data-bbox="548 688 1318 730">  ysl_dk ... </div> <div data-bbox="527 751 1344 1375">  </div> <div data-bbox="555 1390 1307 1432">  </div> <div data-bbox="555 1444 1144 1579"> <p> Liked by yungri5hnigga and 148 others ysl_dk ¥\$£ 4 life View all 5 comments July 13, 2014</p> </div>

11	09/18/2014	<p>Defendant MARTINEZ ARNOLD, an associate of YSL, did commit the felony offense of AGGRAVATED ASSAULT WITH A DEADLY WEAPON, to wit: a firearm, an object which when used offensively against a person is likely to result in serious bodily injury, against the person of Michael Castellini, by shooting at, toward and in the direction of Michael Castellini with said firearm, in violation of Georgia law pursuant to O.C.G.A. § 16-5-21, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(A)(v), and an overt act in furtherance of the conspiracy.</p>
12	09/27/2014	<p>Defendant DAMEKION GARLINGTON, an associate of YSL, did pose for a photo released on Garlington’s Instagram account holding what appears to be an AK-47 variant firearm, with a red bandana tied around his face, an overt act in furtherance of the conspiracy.</p>  <p>The image is a screenshot of an Instagram post. On the left, there is a dark, grainy photograph of a person wearing a dark hoodie and holding a large, dark-colored rifle. The person's face is obscured by a red bandana. On the right side of the screenshot, the Instagram interface is visible, showing the user's profile picture and name 'skar_faxe', a 'Follow' button, and a list of comments. The comments include: 'skar_faxe Drako get a nigga mind right' (371w), 'profitent wh92p' (369w Reply), 'skar_faxe How @_jlkizzy' (368w Reply), 'skar_faxe @_labonitaaa west up' (368w Reply), and 'gabriellaaa.gabriellaaa DM me' (368w Dm). At the bottom of the screenshot, it shows '148 likes' and the date 'SEPTEMBER 27, 2014'.</p>
13	10/12/2014	<p>Defendant TRONTAVIOUS STEPHENS, an associate of YSL, did pose for a photo released on social media wearing a “YSL” pendant, with the caption, “Y\$L slimelife,” an overt act in furtherance of the conspiracy.</p>

14	11/03/2014	<p>Defendant JEFFERY WILLIAMS, an associate of YSL, did pose for a photo released on social media wearing red clothing, and flashing a YSL gang hand sign, an overt act in furtherance of the conspiracy.</p>  <p>Id 845298192952925942 Taken 2014-11-03 04:03:38 UTC Status 0 - Active Url http://photos-b.ak.instagram.com/hphotos-ak-xpf1451-2885-15/10755847_1583926168507345_1905022022_n.jpg Source library Filter 24 - Amara Uploaded to 172.56.19.181 Is Published true Shared By true Author Caption Id 845298192952925942 Date Created 2014-11-03 04:03:38 UTC Status Active Text @YSL05X r loved by me!!! PHOTO BY: @wspaduke1</p>
15	01/03/2015	<p>Defendants DAMEKION GARLINGTON and JEFFERY WILLIAMS, associates of YSL, did pose for a photo released on Garlington's Instagram account with the caption, "we ain't going back and forth," an overt act in furtherance of the conspiracy.</p>
16	01/07/2015	<p>Defendant JEFFERY WILLIAMS, an associate of YSL, did rent a 2014 silver Infiniti Q50 sedan from HERTZ Rent-A-Car, which was used in the commission of the MURDER of Donovan Thomas, Jr., an associate of a rival gang, on the 10th day of January, 2015, which is an act of racketeering activity under O.C.G.A. § 16-14-3 (5)(B), and an overt act in furtherance of the conspiracy.</p>

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

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

