

KITCHEN IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BYRON MONTRAIL PURDY
a/k/a "Lil B" or "Ghetto,"
DERRICK KENNEDY CRUMPTON
a/k/a "38,"
DEMARCUS DEON CRAWFORD
a/k/a "Trip,"
HENRY CURTIS COOPER
a/k/a "Big Hen,"
RICO TERRELL HARRIS
a/k/a "Big Brim,"
SHAMAR ANTHONY JAMES
a/k/a "Lionheart,"
DEMARIO DEMONT SPROUSE
a/k/a "Taco,"
ROBERT ELLIOTT JONES
a/k/a "Lil Rob" or "Mac Rob,"
DENTON SUGGS
a/k/a "Denny Mo" or "Diddy Mo,"
SANTIAGO MEGALE SHAW
a/k/a "Mac-T,"
TARIUS MONTEZ TAYLOR
a/k/a "T,"
TOMMY EARL CHAMPION, JR.
a/k/a "Duct Tape,"
CORY DEWAYNE BOWERS
a/k/a "Bear Wayne,"
GERALD EUGENE HAMPTON
a/k/a "G30,"
DANIEL LEE COLE
a/k/a "D-Money," and
TOMMY LEE WILKINS (HOLLOWAY)
a/k/a "Tommy Gunz,"

Defendants.

FILED UNDER SEAL

Cr. No. 16-20081 JTF

18 U.S.C. §1962(d)
21 U.S.C. § 846
18 U.S.C. § 1959(a)(5)
18 U.S.C. § 924(c)(1)(A)(iii)
18 U.S.C. § 2

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Conspiracy to Participate in Racketeering Activity

[18 U.S.C. § 1962 (d)]

Introduction

THE RACKETEERING ENTERPRISE: THE GANGSTER DISCIPLES

1. At various times relevant to this Indictment, the defendants, and others known and unknown to the Grand Jury, were members and associates of the Gangster Disciples, a criminal organization whose members and associates engaged in narcotics distribution, firearms trafficking, and acts involving murder, kidnaping, intimidation of witnesses and victims, and assault, and which operated throughout Alabama, Georgia, Illinois, and Tennessee, including the Western District of Tennessee, and elsewhere.

Structure and Operation of the Enterprise

2. The structure of the Gangster Disciples included, but was not limited to, the following:

a. The Gangster Disciples was a violent criminal gang which began in the Chicago, Illinois area. In the 1970's, the leaders of two different Chicago-based gangs, the Black Disciples and the Supreme Gangsters, aligned their respective groups and created the Gangster Disciples.

b. Once united, the Gangster Disciples began recruiting heavily in Chicago, within Illinois jails and prisons, and throughout the United States. By the mid-

1980's, the group had spread throughout the Midwestern and Eastern United States. The Gangster Disciples were active in approximately 35 states as of the date of this Indictment.

c. The Gangster Disciples were composed of both male and female members. Male members often referred to themselves as "Brothers of the Struggle" while female members referred to themselves as "Sisters of the Struggle." Male and female members shared the same gang identity and identical organizational structure, but generally operated separately and parallel to each other.

d. The Gangster Disciples had a detailed and uniform organizational structure, which is outlined - along with various rules, procedures, and codes of conduct - in a written "constitution" widely distributed to members throughout Tennessee and elsewhere.

e. The Gangster Disciples employed a highly-structured organization that bestowed upon its members certain titles indicative of the member's role or function within the gang. The Gangster Disciples used specific gang-developed terminology to describe meetings, subgroups and members. For example, meetings were called "deuces," and a subgroup under the leadership of a ranking Gangster Disciples member was called a "count," "zone," "region," or "deck." A member who was in good standing was considered to be "on count." The leadership of an individual "count" was referred to as the "first Coordinator" or "First C." "Count" meetings were often called "rounds" or "nines," and it was during these meetings that dues were collected, gang membership and business was discussed, gang literature was disseminated, and criminal activity

was discussed and/or planned.

f. The Gangster Disciples had a defined militaristic structure. Gangster Disciples members referred to the gang as the "Family." The title "Chairman" was reserved for the leader of the Gangster Disciples who is currently incarcerated but is believed to still communicate with and direct members of the gang. In addition to the rank of Chairman, Gangster Disciples used a corporate board-style group that collectively made decisions at the national level for the gang. "Board Members" at one time were primarily located in Chicago. In recent years, as the Gangster Disciples increased their presence throughout the country, Board Members had moved to, or had been appointed in, various regions. There were a number of active Gangster Disciples Board Members and each of those Board Members was responsible for Gangster Disciples' activities in various states or regions. Board Members maintained regular telephone contact with the various "Governors" and "Assistant Governors" in the states for which they were responsible. Board Members represented the upper level leadership of the Gangster Disciples and were responsible to the organization for the collection of dues, distribution of funds and general direction of the organization.

g. The Tennessee chapters of the Gangster Disciples were governed by a "Governor of Governors" who maintained a staff of subordinate gang members with the following rank structure: "Assistant Governor," "Regions," "Chief Enforcer," "Chief of Security," "Coordinators," "Treasurers," and "Secretaries." The gang in Memphis, Tennessee employed a similar hierarchy and structure. The Regions covered a certain geographic region and would disseminate information to the gang's governing bodies.

Because of its size and large number of gang members, the gang's chapter in the city of Memphis had its own Governor, Assistant Governor and staff structure similar to that found at the state level.

h. The Gangster Disciples appointed a Governor to manage gang activities in Tennessee. The Governor maintained regular telephone contact with his counterparts throughout the United States. The responsibilities of the Governor ranged from membership recruitment, communication with national leadership, enforcement of gang codes and rules, collection and disbursement of dues or funds, and approval of certain forms of criminal activity to be carried out by members of the gang or others who would be hired by or recruited by the gang to carry out its criminal activity. Because the Governor was the highest ranking Gangster Disciple within a state, he was responsible for coordinating much of the criminal activity that occurred within that state. In addition, Gangster Disciples Governors received updates from members regarding numbers of members per "count," members' participation in certain forms of criminal activity, and ongoing recruitment efforts being carried out by subordinate members.

i. An "Assistant Governor" reported directly to the Governor. He was responsible for collecting dues from the various "counts," ensuring that those who claimed membership were actually recognized by a "count," and recruited new members into the gang.

j. The "Literature Coordinator" was responsible to the Governor for maintaining literature such as contact lists, meeting minutes, membership applications and other documents. Literature Coordinators also conducted literature classes with

members in order to teach members about the gang, its codes, rules, regulations, and language that each member was required to learn and use.

k. The "Chief Enforcer" was responsible for enforcing the gang's codes, rules and regulations. Chief Enforcers were also responsible for the administration of punishment of members who violated gang rules and for ensuring that people who claim to be members of the Gangster Disciples were in fact members in good standing. Chief Enforcers often maintained close physical and verbal communication with the Governor and traveled with the Governor around the Governor's zone of responsibility.

l. The "Chief of Security" or "COS" was responsible for ensuring the security of fellow gang members, providing protection to the Governor, and for responding to requests from the Governor and others to provide security and protection during times when law enforcement or rival gangs were exerting pressure on the gang.

m. The "Treasurer" was responsible for assisting Gangster Disciples State Governors in collecting dues and funds from the "counts" and transporting or transmitting the funds to the Treasurer at the national level. A National Level Treasurer was responsible for assisting Board Members in collecting dues and funds from the states and managing the Gangster Disciples bank accounts.

n. The state of Tennessee was divided into specific area codes that defined the separate divisions or "sets" of the Gangster Disciples. The Knoxville, Tennessee set was known by its area code "865." The Chattanooga, Tennessee set was known by its area code "423." The Nashville, Tennessee set was known by its

area code "615." The Columbia, Tennessee set was known by its area code "931." The Jackson, Tennessee set was known by its area code "731." Finally, the Memphis, Tennessee set was known by its area code "901," and was also known as the location of the "second board" of the Gangster Disciples because of the sizable number of Gangster Disciples gang members whom resided in the Memphis area.

o. The Gangster Disciples further divided the above area codes into different zones and sections. The Memphis area or "901" was divided into four zones of control. The city of Memphis was called "Zone One." Chapel Hill and the rest of Shelby County, Tennessee was called "Zone Two." Fayette County was called "Zone Three," and Tipton County was called "Zone Four." Within each zone was a further division of command and control, called "Sections."

p. Memphis was commonly broken up geographically into North Memphis, South Memphis and East Memphis. The Gangster Disciples also created different sections or sets based on individual neighborhoods.

q. In Tennessee, Gangster Disciples members were generally recruited from the local neighborhood. In order to be considered for membership, a person had to be sponsored by another Gangster Disciples member. Once sponsored, a prospective member had to serve a probationary period of at least 30-days and had to be at least 16 years old. During this period, the prospect studied and learned the Gangster Disciples Constitution and other rules that governed the gang. While a prospect, the individual was considered part of the Gangster Disciples and entitled to the full protection of the enterprise. The prospect was called an "Outstanding Member."

The prospect was also subject to the rules and orders of the enterprise and his or her background would be checked for criminal arrests and convictions, other gang membership, loyalty to the Gangster Disciples, and willingness to follow rules and orders from superior gang members. Many prospects joined the gang by going through an initiation called a "beat in," during which they were subjected to a beating by other gang members for a predetermined period. Other Outstanding Members were instructed to assault an innocent, unsuspecting citizen in order to prove their toughness, dedication and willingness to follow orders. If the prospect's conduct during the probationary period was deemed satisfactory, he or she was admitted into the gang.

r. Symbolism played a large role in the Gangster Disciples' culture. The primary symbol with which the gang associated was a six-pointed figure, which resembles the Star of David. Graffiti that contained a heart with wings, an inverted shepherd's case, an inverted pyramid, or an inverted cross were also known as gang identifiers. Blue and black were the colors with which the gang identified.

The Racketeering Enterprise

3. The Gangster Disciples, including its leaders, members, and associates, constituted an "enterprise," as defined in Title 18, United States Code, Section 1961(4) (hereinafter "the enterprise"), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members and associates, including its prospects, functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. This enterprise was engaged in, and its activities affected, interstate and foreign commerce.

The Defendants

4. At various times relevant to this Indictment, the following individuals, among others, were members or associates of the Gangster Disciples in the various capacities set forth below:

a. **BYRON MONTRAIL PURDY**, a/k/a "Lil B" or "Ghetto," and **DERRICK KENNEDY CRUMPTON**, a/k/a "38," each held the rank of "Governor" or "Assistant Governor" of the Gangster Disciples enterprise in Tennessee, and directed other members and associates of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise's affairs. As leaders, **BYRON MONTRAIL PURDY**, a/k/a "Lil B" or "Ghetto," and **DERRICK KENNEDY CRUMPTON**, a/k/a "38," were responsible for, among other things, coordinating criminal activity with other Gangster Disciples gang leaders throughout the United States; supervising the criminal activities of the members and associates of the Gangster Disciples enterprise; issuing orders to kill rival gang members and subordinate gang members whom they believed had violated Gangster Disciples rules of conduct; and presiding over Gangster Disciples meetings where criminal activity was discussed, proceeds from criminal activity were collected including, but not limited to, collection of drug proceeds from subordinate gang members, and beatings of fellow Gangster Disciples gang members were administered. In addition, apart from supervising and directing the criminal activities of the members and associates of the Gangster Disciples enterprise, **BYRON MONTRAIL PURDY**, a/k/a "Lil B" or "Ghetto," and **DERRICK KENNEDY CRUMPTON**, a/k/a "38," also participated directly in the criminal activities of

the Gangster Disciples enterprise. Among their criminal activities were acts involving murder, kidnapping, assault, intimidation of witnesses and victims, narcotics distribution, and weapons trafficking.

b. **DEMARCUS DEON CRAWFORD, a/k/a "Trip," HENRY CURTIS COOPER, a/k/a "Big Hen," and RICO TERRELL HARRIS, a/k/a "Big Brim,"** each held the rank of "Chief of Security of the State," "Chief Enforcer" or "Enforcer" of the Gangster Disciples enterprise in Tennessee, and directed other members and associates of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise's affairs. As leaders and gang enforcers, **DEMARCUS DEON CRAWFORD, a/k/a "Trip," HENRY CURTIS COOPER, a/k/a "Big Hen," and RICO TERRELL HARRIS, a/k/a "Big Brim,"** were responsible for, among other things, carrying out the orders of senior gang leaders; supervising the criminal activities of the members and associates of the Gangster Disciples enterprise; issuing orders to kill rival gang members and subordinate gang members whom they believed had violated Gangster Disciples rules of conduct; and presiding over Gangster Disciples meetings where criminal activity was discussed, proceeds from criminal activity were collected including, but not limited to, collection of drug proceeds from subordinate gang members; and beatings of fellow Gangster Disciples gang members were administered. In addition, apart from supervising and directing the criminal activities of the members and associates of the Gangster Disciples enterprise, **DEMARCUS DEON CRAWFORD, a/k/a "Trip," HENRY CURTIS COOPER, a/k/a "Big Hen," and RICO TERRELL HARRIS, a/k/a "Big Brim,"** also participated directly in the criminal activities of the

Gangster Disciples enterprise. Among their criminal activities were acts involving murder, kidnapping, assault, intimidation of witnesses and victims, narcotics distribution, and weapons trafficking.

c. **SHAMAR ANTHONY JAMES**, a/k/a "Lionheart," **ROBERT ELLIOTT JONES**, a/k/a "Lil Rob" or "Mac Rob," and **DANIEL LEE COLE**, a/k/a "D-Money," each held the rank of "Governor," "Assistant Governor" or "Assistant Education Coordinator" of the Gangster Disciples enterprise in a given region or city in Tennessee, and directed other members and associates of the enterprise in carrying out unlawful and other activities in furtherance of the conduct of the enterprise's affairs. As region and/or city leaders, **SHAMAR ANTHONY JAMES**, a/k/a "Lionheart," **ROBERT ELLIOTT JONES**, a/k/a "Lil Rob" or "Mac Rob," a/k/a "Jr.," and **DANIEL LEE COLE**, a/k/a "D-Money," were responsible for, among other things, supervising the criminal activities of the members and associates of the Gangster Disciples enterprise; issuing orders to kill rival gang members and subordinate gang members whom they believed had violated Gangster Disciples rules of conduct; and presiding over Gangster Disciples meetings where criminal activity was discussed, proceeds from criminal activity were collected including, but not limited to, collection of drug proceeds from subordinate gang members, and beatings of fellow Gangster Disciples gang members were administered. In addition, apart from supervising and directing the criminal activities of the members and associates of the Gangster Disciples enterprise, **SHAMAR ANTHONY JAMES**, a/k/a "Lionheart," **ROBERT ELLIOTT JONES**, a/k/a "Lil Rob" or "Mac Rob," and **DANIEL LEE COLE**, a/k/a "D-Money," also participated directly in the criminal activities

of the Gangster Disciples enterprise. Among their criminal activities were acts involving murder, kidnapping, assault, intimidation of witnesses and victims, narcotics distribution, and weapons trafficking.

d. **DEMARIO DEMONT SPROUSE**, a/k/a "Taco," **DENTON SUGGS**, a/k/a "Denny Mo" or "Diddy Mo," **SANTIAGO MEGALE SHAW**, a/k/a "Mac-T," **TOMMY EARL CHAMPION, JR.**, a/k/a "Duct Tape," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," **GERALD EUGENE HAMPTON**, a/k/a "G30," **TARIUS MONTEZ TAYLOR**, a/k/a "T," and **TOMMY LEE WILKINS (HOLLOWAY)**, a/k/a "Tommy Gunz," each held the rank of "Chief of Security," "Assistant Chief of Security," or "Security Team" and/or "Blackout Squad" member of the Gangster Disciples enterprise in a given region or city in Tennessee, and were responsible for, among other things, carrying out acts involving murder, assault, intimidation of witnesses and victims, and physical "disciplines" at the direction of senior Gangster Disciples gang leaders. In addition, **DEMARIO DEMONT SPROUSE**, a/k/a "Taco," **DENTON SUGGS**, a/k/a "Denny Mo," **SANTIAGO MEGALE SHAW**, a/k/a "Mac-T," **TOMMY EARL CHAMPION, JR.**, a/k/a "Duct Tape," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," **GERALD EUGENE HAMPTON**, a/k/a "G30," **TARIUS MONTEZ TAYLOR**, a/k/a "T," and **TOMMY LEE WILKINS (HOLLOWAY)**, a/k/a "Tommy Gunz," also participated directly in other criminal activities of the Gangster Disciples enterprise including, but not limited to, acts involving robbery, narcotics distribution, and weapons trafficking.

Purposes of the Enterprise

5. The purposes of the enterprise included, but were not limited to, the following:

a. Enriching the leaders, members, and associates of the enterprise through, among other things, the illegal trafficking of controlled substances and firearms.

b. Preserving and protecting the power, territory, operations, and proceeds of the enterprise through the use of threats, intimidation, violence, and destruction, including, but not limited to, acts involving murder, assault with a dangerous weapon, obstruction of justice, and other acts of violence.

c. Promoting and enhancing the enterprise and its members' and associates' activities.

d. Keeping victims in fear of the enterprise and in fear of its leaders, members, and associates through threats of violence and actual violence. The leaders, members, and associates of the enterprise undertook all steps necessary to prevent the detection of their criminal activities and sought to prevent and resolve the imposition of any criminal liabilities upon their leaders, members, and associates by the use of acts involving murder, violence, and intimidation directed against witnesses, victims, and others.

e. Providing support to gang members who were charged with or incarcerated for gang-related activities.

f. Preserving and protecting the financial proceeds of the enterprise

by laundering funds through prepaid bank, debit and credit cards.

Means and Methods of the Enterprise

6. The means and methods by which the members and associates conducted and participated in the affairs of the Gangster Disciples criminal enterprise included the following:

a. The members and associates of the enterprise attended regular meetings where criminal activity was discussed, financial proceeds from criminal activity were collected including, but not limited to, collection of drug proceeds from subordinate gang members for senior Gangster Disciples gang leaders, and disciplinary beatings of fellow Gangster Disciples gang members were administered.

b. To enforce discipline and the rules of the enterprise, members and associates of the enterprise engaged in a system of "violations," in which the defendants and others committed acts involving murder, physically assaulted, and threatened those members and associates of the enterprise who violated rules, questioned authority, or posed a threat to the leaders, members or associates, or purposes of the enterprise.

c. **BYRON MONTRAIL PURDY**, a/k/a "Lil B" or "Ghetto," **DERRICK CRUMPTON**, a/k/a "38," **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **HENRY CURTIS COOPER**, a/k/a "Hen," **RICO TERRELL HARRIS**, a/k/a "Big Brim," **SHAMAR ANTHONY JAMES**, a/k/a "Lionheart," **DEMARIO DEMONT SPROUSE**, a/k/a "Taco," **ROBERT ELLIOTT JONES**, a/k/a "Mac Rob," **DENTON SUGGS**, a/k/a "Denny Mo" or "Diddy Mo," **SANTIAGO MEGALE SHAW**, a/k/a "Mac-T," **TARIUS MONTEZ TAYLOR**,

a/k/a "T," **TOMMY EARL CHAMPION, JR.** a/k/a "Duct Tape," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," **GERALD EUGENE HAMPTON**, a/k/a "G30," **DANIEL LEE COLE**, a/k/a "D-Money," and **TOMMY LEE WILKINS (HOLLOWAY)**, a/k/a "Tommy Gunz," and others known and unknown to the Grand Jury, knowingly and intentionally conspired to distribute and possess with the intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, both schedule II controlled substances, and 1,000 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a schedule I controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a) (1) and 841 (b) (1) (A).

d. To generate income, Gangster Disciples gang members and associates engaged in illegal activities under the protection of the enterprise, including narcotics trafficking across state borders and other illegal activities.

e. For protection, attacks, and armed combat, Gangster Disciples gang members and associates acquired, carried and used firearms.

f. Members and associates of the enterprise employed and used gang-related terminology, symbols, phrases, and gestures to demonstrate affiliation with the gang.

g. To perpetuate the enterprise and to maintain and extend their power, members and associates of the enterprise committed and conspired to commit acts involving murder, intimidation, and assault against individuals who posed a threat

to the enterprise or jeopardized its operations, including rival gang members, Gangster Disciples gang members, associates, and witnesses to illegal activities of the enterprise.

h. Members and associates of the enterprise hid, misrepresented, concealed, and caused to be hidden, misrepresented, and concealed, the objectives of acts done in furtherance of the "enterprise," and used coded language and other means of communication to avoid detection and apprehension by law enforcement authorities.

The Racketeering Conspiracy

7. Beginning on a date unknown to the Grand Jury, but at least as of in or around 1996, and continuing through on or about the date of this Indictment, in the Western District of Tennessee, and elsewhere, the defendants **BYRON MONTRAIL PURDY**, a/k/a "Lil B" or "Ghetto," **DERRICK CRUMPTON**, a/k/a "38," **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **HENRY CURTIS COOPER**, a/k/a "Hen," **RICO TERRELL HARRIS**, a/k/a "Big Brim," **SHAMAR ANTHONY JAMES**, a/k/a "Lionheart," **DEMARIO DEMONT SPROUSE**, a/k/a "Taco," **ROBERT ELLIOTT JONES**, a/k/a "Mac Rob," **DENTON SUGGS**, a/k/a "Denny Mo" or "Diddy Mo," **SANTIAGO MEGALE SHAW**, a/k/a "Mac-T," **TARIUS MONTEZ TAYLOR**, a/k/a "T," **TOMMY EARL CHAMPION, JR.** a/k/a "Duct Tape," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," **GERALD EUGENE HAMPTON**, a/k/a "G30," **DANIEL LEE COLE**, a/k/a "D-Money," and **TOMMY LEE WILKINS (HOLLOWAY)**, a/k/a "Tommy Gunz," being persons employed by and associated with the Gangster Disciples, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, and others known and unknown to the Grand Jury, did knowingly and intentionally conspire to conduct and

participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as defined in Sections 1961 (1) and (5) of Title 18, United States Code, consisting of multiple acts involving murder, in violation of Tennessee Code Annotated, Sections 39-13-210, 39-12-101, and 39-12-103; multiple acts involving kidnapping, in violation of Tennessee Code Annotated, Sections 39-13-302, 39-12-101, and 39-12-103; multiple acts involving robbery, in violation of Tennessee Code Annotated, Sections 39-13-401, 39-12-101, and 39-12-103; and multiple acts of narcotics trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with the intent to distribute a controlled substance), 843 (use of communication facility), and 846 (conspiracy to distribute and possess with the intent to distribute a controlled substance). It was part of this conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

Overt Acts

8. In furtherance of the conspiracy and to achieve the objective thereof, the defendants, and others, performed and caused to be performed the following overt acts, among others, in the Western District of Tennessee, and elsewhere:

a. Beginning on an exact date unknown to the Grand Jury, but at least as of 2002 and continuing to the date of this Indictment, **BYRON MONTRAIL PURDY**, a/k/a "Lil B" or "Ghetto," **DERRICK CRUMPTON**, a/k/a "38," **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **HENRY CURTIS COOPER**, a/k/a "Hen," **RICO TERRELL HARRIS**, a/k/a "Big Brim," **SHAMAR ANTHONY JAMES**, a/k/a "Lionheart," **DEMARIO**

DEMONT SPROUSE, a/k/a "Taco," **ROBERT ELLIOTT JONES**, a/k/a "Mac Rob," **DENTON SUGGS**, a/k/a "Denny Mo" or "Diddy Mo," **SANTIAGO MEGALE SHAW**, a/k/a "Mac-T," **TARIUS MONTEZ TAYLOR**, a/k/a "T," **TOMMY EARL CHAMPION, JR.** a/k/a "Duct Tape," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," **GERALD EUGENE HAMPTON**, a/k/a "G30," **DANIEL LEE COLE**, a/k/a "D-Money," and **TOMMY LEE WILKINS (HOLLOWAY)**, a/k/a "Tommy Gunz," distributed cocaine, crack cocaine, heroin and marijuana.

b. On or about August 6, 2002, **BYRON MONTRAIL PURDY**, a/k/a "Lil B" or "Ghetto," and **DANIEL LEE COLE**, a/k/a "D-Money," and others known and unknown to the Grand Jury, attacked and severely injured a rival gang member.

c. On or about June 23, 2010, **BYRON MONTRAIL PURDY**, aka "Lil B" or "Ghetto," armed with a handgun shot and attempted to kill a rival gang member.

d. In or around 2012, **RICO TERRELL HARRIS**, a/k/a "Big Brim," assaulted a subordinate gang member as punishment for losing a firearm that belonged to the Gangster Disciples enterprise.

e. In or around June 2012, **DERRICK KENNEDY CRUMPTON**, a/k/a "38," and **RICO TERRELL HARRIS**, a/k/a "Big Brim," and others known and unknown to the Grand Jury, conspired to rob a narcotics trafficker who was believed to be transporting nine ounces of cocaine.

f. On or about June 24, 2012, **TOMMY EARL CHAMPION, JR.**, a/k/a "Duct Tape," and others known and unknown to the Grand Jury, kidnapped and tortured an individual whom the Gangster Disciples believed was a rival gang member.

g. In or around 2013, **DERRICK KENNEDY CRUMPTON**, a/k/a "38," and others known and unknown to the Grand Jury, attempted to kill an individual who was believed to have stolen narcotics from the Gangster Disciples enterprise.

h. In or around 2013, **DERRICK KENNEDY CRUMPTON**, a/k/a "38," and others known and unknown to the Grand Jury, ordered subordinate gang members to kill a member of a rival gang.

i. In or around May 2013, **DERRICK KENNEDY CRUMPTON**, a/k/a "38," **RICO TERRELL HARRIS**, a/k/a "Big Brim," **DEMARIO DEMONT SPROUSE**, a/k/a "Taco," and **DENTON SUGGS**, a/k/a "Denny Mo" or "Diddy Mo," and others known and unknown to the Grand Jury, planned to locate and kill rival Crip gang members.

j. In or around November 2013, **DEMARIO DEMONT SPROUSE**, a/k/a "Taco," and others known and unknown to the Grand Jury, ordered subordinate gang members to kill a narcotics trafficker whom the Gangster Disciples believed had sold substandard quality narcotics to the gang.

k. In or around November 2013, **DERRICK KENNEDY CRUMPTON**, a/k/a "38," **RICO TERRELL HARRIS**, a/k/a "Big Brim," **DEMARIO DEMONT SPROUSE**, a/k/a "Taco," and **DENTON SUGGS**, a/k/a "Denny Mo" or "Diddy Mo," and others known and unknown to the Grand Jury, assaulted a subordinate gang member whom the Gangster Disciples believed had sold a firearm that belonged to the Gangster Disciples enterprise.

l. In or around June 2014, **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," and others known and unknown to the Grand Jury, ordered subordinate gang

members to kill members of a rival gang.

m. On or about June 12, 2014, **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," and others known and unknown to the Grand Jury, armed with firearms, fired multiple rounds into a residence they believed housed several rival gang members with the expressed intent to kill those inside.

n. On or about November 10, 2014, **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," smashed a beer bottle over the head of an individual and threatened to kill the individual while **DANIEL LEE COLE**, a/k/a "D-Money," pointed a handgun at the individual's head because it was believed the individual had witnessed Gangster Disciples criminal activity.

o. In or around 2015, **ROBERT ELLIOTT JONES**, a/k/a "Mac Rob," declared Covington, Tennessee as "GD Land" and issued a green light to a subordinate gang member to kill rival gang members located within Covington, Tennessee.

p. In or around January 2015, **DERRICK KENNEDY CRUMPTON**, a/k/a "38," **RICO TERRELL HARRIS**, a/k/a "Big Brim," **SHAMAR ANTHONY JAMES**, a/k/a "Lionheart," and **TOMMY LEE WILKINS (HOLLOWAY)**, a/k/a "Tommy Gunz," and others known and unknown to the Grand Jury, extorted money and drugs from a rival gang member as a condition for their ordering subordinate Gangster Disciples not to testify against the rival gang member.

q. On or about January 7, 2015, in a recorded telephone call,

DERRICK KENNEDY CRUMPTON, a/k/a "38," told an unidentified female, "Man baby, this is what I'm telling you – when this first started it was alright. It some nigga I had robbed some niggas before I went to jail. I had token like six to eight hundred dollars from-em. I shot uh--- I shot both of his trucks. I shot one of his trucks with his girl in it."

r. On or about January 26, 2015, in a recorded telephone call, **DENTON SUGGS**, a/k/a "Denny Mo," asked **DERRICK KENNEDY CRUMPTON**, a/k/a "38," for a firearm. **SUGGS** said "Why you constantly won't give me no gun?" **CRUMPTON** responded, "Say no more." To which **SUGGS** replied, "I need one for real, on everything I love. On my momma I need one."

s. On or about February 6, 2015, **DERRICK KENNEDY CRUMPTON**, a/k/a "38," and a fellow unidentified gang member discussed killing a rival gang member because he shot at subordinate Gangster Disciples gang members.

t. On or about February 7, 2015, **BYRON MONTRAIL PURDY**, a/k/a "Lil B" or "Ghetto," and **DANIEL LEE COLE**, a/k/a "D-Money," assembled a group of subordinate gang members and ordered them to kill an individual who refused to recant statements made to law enforcement that incriminated a senior member of the Gangster Disciples.

u. On or about February 7, 2015, **BYRON MONTRAIL PURDY**, a/k/a "Lil B" or "Ghetto," used a firearm to shoot and attempt to kill numerous passengers in a fleeing vehicle who the Gangster Disciples enterprise believed had reported gang-related criminal activity to law enforcement.

v. On or about February 12, 2015, in a recorded telephone call,

DEMARIO DEMONT SPROUSE, a/k/a "Taco," told **DERRICK KENNEDY CRUMPTON**, a/k/a "38," that he was going to "throw down" on a rival gang member and said, "Just come and grab my motherf*ucking gun. I'm trying to keep from going to his house and blowing his ass off 38." CRUPMTON replied, "If you need me on standby, I'm going where my gun at right now."

w. On or about March 27, 2015, in a recorded telephone call, **DERRICK KENNEDY CRUMPTON**, a/k/a "38," told an unidentified female, "Me and Lil Tommy went trying to shoot the dude and burn his momma and his daddy house up...when we pulled up, it was two police cars."

x. On or about March 28, 2015, **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," smashed a beer bottle over the head of an individual who was believed to be a rival gang member.

y. In or around April 2015, **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," and others known and unknown to the Grand Jury, ordered subordinate gang members to kill a rival gang member who the Gangster Disciples believed had disrespected the gang during a nightclub encounter.

z. In or around April 2015, **HENRY CURTIS COOPER**, a/k/a "Hen," ordered subordinate gang members to "get violent" against rival gang members who the Gangster Disciples believed had disrespected or stolen from the enterprise.

aa. On or about April 24, 2015, **BYRON MONTRAIL PURDY**, aka "Lil B" or "Ghetto," and **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," ordered subordinate gang members armed with firearms to travel from Tennessee to Chicago, Illinois, for the

expressed purpose of confronting Chicago's Gangster Disciples leadership.

bb. On or about May 11, 2015, **HENRY CURTIS COOPER**, a/k/a "Hen," and another Gangster Disciples gang member, agreed to distribute a quantity of Xanax, commonly referred to as "Bars," to a rival gang, as restitution for the theft of narcotics by subordinate gang members.

cc. On or about May 18, 2015, in a recorded telephone call, **HENRY CURTIS COOPER**, a/k/a "Big Hen," ordered a subordinate gang member to kill another gang member and said "I want his mother f*cking ass man." I don't give a f*ck how you get him."

dd. On or about May 21, 2015, **HENRY CURTIS COOPER**, a/k/a "Hen," and another Gangster Disciples gang member, agreed to inflict violence upon subordinate gang members who failed to traffic in narcotics or engage in acts of violence for the benefit of the Gangster Disciples enterprise.

ee. On or about May 23, 2015, in a recorded telephone call, **HENRY CURTIS COOPER**, a/k/a "Hen," told a subordinate gang member, "that I'm goanna shoot up any two-door cutlass I see."

ff. On or about June 9, 2015, in a recorded telephone call, **ROBERT ELLIOTT JONES**, a/k/a "Lil Rob" or "Mac Rob," told **HENRY CURTIS COOPER**, a/k/a "Hen," that the Treasurer of Section Four stole \$2,300 from the "box," that he was "looking for all money stealers" and would send a picture of the thief around to all gang members.

gg. On or about June 24, 2015, in a recorded telephone call, **HENRY**

CURTIS COOPER, a/k/a "Hen," told a subordinate gang member about an area that they could rob at night.

hh. On or about July 4, 2015, **SANTIAGO MEGALE SHAW**, a/k/a "Mac-T," and others known and unknown to the Grand Jury, used firearms to shoot at a rival gang member in retaliation for what the Gangster Disciples perceived as disrespect against the Gangster Disciples enterprise.

ii. On or about July 10, 2015, **HENRY CURTIS COOPER**, a/k/a "Hen," sold and distributed a quantity of pills containing Hydrocodone.

jj. On or about July 21, 2015, **SANTIAGO MEGALE SHAW**, a/k/a "Mac-T," and others known and unknown to the Grand Jury, armed themselves with firearms and drove to a location with the intent to kill a rival gang member whom the Gangster Disciples believed had disrespected the gang.

kk. On or about July 24, 2015, **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," ordered some "beans" (Hydrocodone) from **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," so he could sell them to "the white guys at work."

ll. On or about August 4, 2015, **DERRICK KENNEDY CRUMPTON**, a/k/a "38," sold and distributed over 50 grams of heroin.

mm. In or around December 2015, **ROBERT ELLIOTT JONES**, a/k/a "Mac Rob," ordered the killing of a subordinate gang member whom the Gangster Disciples believed had cooperated with law enforcement.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO

Conspiracy to Distribute and Possess with Intent to Distribute Cocaine and Marijuana [21 U.S.C. § 846]

9. Beginning on a date unknown to the Grand Jury, but at least as of 2004, and continuing through on or about the date of this Indictment, in the Western District of Tennessee, and elsewhere, the defendants **BYRON MONTRAIL PURDY**, a/k/a "Lil B" or "Ghetto," **DERRICK CRUMPTON**, a/k/a "38," **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **HENRY CURTIS COOPER**, a/k/a "Hen," **RICO TERRELL HARRIS**, a/k/a "Big Brim," **SHAMAR ANTHONY JAMES**, a/k/a "Lionheart," **DEMARIO DEMONT SPROUSE**, a/k/a "Taco," **ROBERT ELLIOTT JONES**, a/k/a "Mac Rob," **DENTON SUGGS**, a/k/a "Denny Mo" or "Diddy Mo," **SANTIAGO MEGALE SHAW**, a/k/a "Mac-T," **TARIUS MONTEZ TAYLOR**, a/k/a "T," **TOMMY EARL CHAMPION, JR.** a/k/a "Duct Tape," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," **GERALD EUGENE HAMPTON**, a/k/a "G30," **DANIEL LEE COLE**, a/k/a "D-Money," and **TOMMY LEE WILKINS (HOLLOWAY)**, a/k/a "Tommy Gunz," and others known and unknown to the Grand Jury, did unlawfully, knowingly, and willfully conspire and agree with each other, and with other persons both known and unknown to the Grand Jury, to distribute and possess with the intent to distribute a controlled substance, to wit, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, and 280 grams or more of a mixture and substance containing a detectable amount of cocaine base, both schedule II controlled substances, and 1,000 kilograms and more of a mixture and substance containing a detectable amount of marijuana, a schedule I

controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a) (1), 841 (b) (1) (A), and 841 (b)(1)(B).

COUNT THREE
Attempted Murder of C.M
[18 U.S.C. §§ 1959 (a) (5) and 2]

10. At all times relevant to this Indictment, the Gangster Disciples, including its leaders, members, and associates, as more fully described in Paragraphs One through Six of this Indictment, which are re-alleged and incorporated by reference as though fully set forth herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which was engaged in and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members and associates, including its prospects, functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

11. At all times relevant to this Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841, 843, and 846, and acts involving kidnaping, robbery, and murder, in violation of Tennessee Code Annotated.

12. On or about June 12, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants **DEMARCUS**

DEON CRAWFORD, a/k/a "Trip," TOMMY EARL CHAMPION JR., a/k/a "Duct Tape," GERALD EUGENE HAMPTON, a/k/a "G30," CORY DEWAYNE BOWERS, a/k/a "Bear Wayne," and TARIUS MONTEZ TAYLOR, a/k/a "T," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder C.M., in violation of Tennessee Code Annotated, Sections 39-13-210 and 39-12-101.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and 2.

COUNT FOUR

Using and Carrying a Firearm During and in Relation to a Crime of Violence
[18 U.S.C. §§ 924(c) (1) (A) (iii) and 2]

13. On or about June 12, 2014, in the Western District of Tennessee, the defendants **DEMARCUS DEON CRAWFORD, a/k/a "Trip," TOMMY EARL CHAMPION JR., a/k/a "Duct Tape," GERALD EUGENE HAMPTON, a/k/a "G30," CORY DEWAYNE BOWERS, a/k/a "Bear Wayne," and TARIUS MONTEZ TAYLOR, a/k/a "T,"** along with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence, for which the defendants may be prosecuted in a court of the United States, as alleged in Count THREE of the Indictment, which is incorporated by reference herein, and did in the course of such offense discharge a firearm.

In violation of Title 18, United States Code, Sections 924(c) (1) (A) (iii) and 2.

COUNT FIVE
Attempted Murder of D.M.
[18 U.S.C. §§ 1959 (a) (5) and 2]

14. Paragraphs TEN and ELEVEN of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

15. On or about June 12, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder D.M., in violation of Tennessee Code Annotated, Sections 39-13-210 and 39-12-101.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and 2.

COUNT SIX
Using and Carrying a Firearm During and in Relation to a Crime of Violence
[18 U.S.C. §§ 924(c) (1) (A) (iii) and 2]

16. On or about June 12, 2014, in the Western District of Tennessee, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," along with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of

violence, for which the defendants may be prosecuted in a court of the United States, as alleged in Count FIVE of the Indictment, which is incorporated by reference herein, and did in the course of such offense discharge a firearm.

In violation of Title 18 United States Code, Sections 924(c) (1) (A) (iii) and 2.

COUNT SEVEN
Attempted Murder of A.F.
[18 U.S.C. §§ 1959 (a) (5) and 2]

17. Paragraphs TEN and ELEVEN of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

18. On or about June 12, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder A.F., in violation of Tennessee Code Annotated, Sections 39-13-210 and 39-12-101.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and 2.

COUNT EIGHT
Using and Carrying a Firearm During and in Relation to a Crime of Violence
[18 U.S.C. §§ 924 (c) (1) (A) (iii) and 2]

19. On or about June 12, 2014, in the Western District of Tennessee, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION**

JR., a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," along with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence, for which the defendants may be prosecuted in a court of the United States, as alleged in Count SEVEN of the Indictment, which is incorporated by reference herein, and did in the course of such offense discharge a firearm.

In violation of Title 18, United States Code, Sections 924(c) (1) (A) (iii) and 2.

COUNT NINE
Attempted Murder of T.P.
[18 U.S.C. §§ 1959 (a) (5) and 2]

20. Paragraphs TEN and ELEVEN of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

21. On or about June 12, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder T.P., in violation of Tennessee Code Annotated, Sections 39-13-210 and 39-12-101.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and 2.

COUNT TEN

Using and Carrying a Firearm During and in Relation to a Crime of Violence
[18 U.S.C. §§924 (c) (1) (A) (iii) and 2]

22. On or about June 12, 2014, in the Western District of Tennessee, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," along with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence, for which the defendants may be prosecuted in a court of the United States, as alleged in Count NINE of the Indictment, which is incorporated by reference herein, and did in the course of such offense discharge a firearm.

In violation of Title 18, United States Code, Sections 924(c) (1) (A) (iii) and 2.

COUNT ELEVEN

Attempted Murder of T.K.
[18 U.S.C. §§ 1959 (a) (5) and 2]

23. Paragraphs TEN and ELEVEN of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

24. On or about June 12, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," and others known and unknown to

the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder T.K., in violation of Tennessee Code Annotated, Section and 39-13-210 and 39-12-101.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and 2.

COUNT TWELVE

Using and Carrying a Firearm During and in Relation to a Crime of Violence
[18 U.S.C. §§ 924(c) (1) (A) (iii) and 2]

25. On or about June 12, 2014, in the Western District of Tennessee, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," along with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence, for which the defendants may be prosecuted in a court of the United States, as alleged in Count ELEVEN of the Indictment, which is incorporated by reference herein, and did in the course of such offense discharge a firearm.

In violation of Title 18, United States Code, Sections 924(c) (1) (A) (iii) and 2.

COUNT THIRTEEN

Attempted Murder of R.N.
[18 U.S.C. §§ 1959 (a) (5) and 2]

26. Paragraphs TEN and ELEVEN of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

27. On or about June 12, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster

Disciples, an enterprise engaged in racketeering activity, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder R.N., in violation of Tennessee Code Annotated, Sections 39-13-210 and 39-12-101.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and 2.

COUNT FOURTEEN

Using and Carrying a Firearm During and in Relation to a Crime of Violence
[18 U.S.C. §§ 924(c) (1) (A) (iii) and 2]

28. On or about June 12, 2014, in the Western District of Tennessee, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," along with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence, for which the defendants may be prosecuted in a court of the United States, as alleged in Count THIRTEEN of the Indictment, which is incorporated by reference herein, and did in the course of such offense discharge a firearm.

In violation of Title 18, United States Code, Sections 924(c) (1) (A) (iii) and 2.

COUNT FIFTEEN
Attempted Murder of F.B.
[18 U.S.C. §§ 1959 (a) (5) and 2]

29. Paragraphs TEN and ELEVEN of this Indictment are re-alleged and incorporated by reference as though set forth fully herein.

30. On or about June 12, 2014, in the Western District of Tennessee, for the purpose of gaining entrance to and maintaining and increasing position in the Gangster Disciples, an enterprise engaged in racketeering activity, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," and others known and unknown to the Grand Jury, aiding and abetting each other, did intentionally and knowingly attempt to murder F.B., in violation of Tennessee Code Annotated, Sections 39-13-210 and 39-12-101.

All in violation of Title 18, United States Code, Sections 1959(a) (5) and 2.

COUNT SIXTEEN
Using and Carrying a Firearm During and in Relation to a Crime of Violence
[18 U.S.C. §§ 924(c) (1) (A) (iii) and 2]

31. On or about June 12, 2014, in the Western District of Tennessee, the defendants **DEMARCUS DEON CRAWFORD**, a/k/a "Trip," **TOMMY EARL CHAMPION JR.**, a/k/a "Duct Tape," **GERALD EUGENE HAMPTON**, a/k/a "G30," **CORY DEWAYNE BOWERS**, a/k/a "Bear Wayne," and **TARIUS MONTEZ TAYLOR**, a/k/a "T," along with others known and unknown to the Grand Jury, aiding abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence, for which the

defendants may be prosecuted in a court of the United States, as alleged in Count FIFTEEN of the Indictment, which is incorporated by reference herein, and did in the course of such offense discharge a firearm.

In violation of Title 18 United States Code, Sections 924(c) (1) (A) (iii) and 2.

A TRUE BILL:

FOREPERSON

DATE: _____

DATE: _____

UNITED STATES ATTORNEY



**CHIEF, ORGANIZED CRIME & GANG
SECTION, U.S. DEPARTMENT OF
JUSTICE**