

 **ORIGINAL**

FILED IN OPEN COURT  
U.S.D.C. - Atlanta

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA **FEB 08 2018**  
ROME DIVISION

By:  JAMES N. HATTEN, Clerk  
Deputy Clerk

UNITED STATES OF AMERICA

v.

JEFFREY ALAN BOURASSA,  
A/K/A "JB," "BABYFACE"  
AND "KID,"  
DAVID GENE POWELL,  
A/K/A "DAVO,"  
CHERI LEA RAU,  
GENEVIEVE WAITS,  
TOBY JAMES OGLETREE,  
VICTOR MANUEL DEJESUS,  
A/K/A "VG VIC,"  
RICHARD BRIAN SOSEBEE,  
A/K/A "DIRTY,"  
JONATHAN STUBBS,  
CHRISTOPHER JARMAN  
DAVIS,  
CHRISTOPHER STEVEN  
JONES, A/K/A "RED,"  
KAYLI BREWER,  
WILLIAM J. GOODMAN,  
A/K/A "JBEENLIVINGGOOD,"  
"JGOOD,"  
CODY RYAN TODD,  
KEVIN SCOTT SOSEBEE,  
A/K/A "SOSA"  
CHRISTOPHER MARLOW,  
A/K/A "LOKO,"  
JOSEPH M. PROPPS, JR.,  
A/K/A "JP,"  
MARC AVON LEFEVRE,  
A/K/A "GHOST,"  
CHRISTOPHER LASHER,  
A/K/A "RETTA,"

Criminal Indictment

No. **4 :18 - CR - 003**

**UNDER SEAL**

SAMANTHA MILLER,  
HAILEY DANIELLE  
SIZEMORE,  
BRITTANY NICOLE JONES,  
RANDALL ARTHUR LEE  
CHUMLEY, AND  
KELLY RAY SHIFLETT,  
DEFENDANTS

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

*(Conspiracy to Commit Racketeering - 18 U.S.C. § 1962(d))*

**BACKGROUND**

At all times relevant to this Indictment:

1. The Defendants, JEFFREY ALAN BOURASSA, a/k/a "J.B.", "Babyface," and "Kid," DAVID GENE POWELL, a/k/a "Davo," CHERI LEA RAU, TOBY JAMES OGLETREE, VICTOR MANUEL DEJESUS, a/k/a "VG Vic," RICHARD BRIAN SOSEBEE, a/k/a "DIRTY," JONATHAN STUBBS, CODY RYAN TODD, KEVIN SCOTT SOSEBEE, a/k/a "Sosa," and others known and unknown to the grand jury were members and associates of Ghost Face Gangsters (hereinafter "GFG"), a criminal organization whose members and associates engaged in drug distribution, and acts of violence involving murder, kidnapping, assault, and witness intimidation, and which operated both within the Georgia prison system and outside the prison system in the Northern District of Georgia, and elsewhere.

2. GFG, including its membership and associates, constituted an "Enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The



Enterprise constitutes an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise has engaged in, and its activities affected, interstate and foreign commerce.

**THE RACKETEERING ENTERPRISE**

3. From at least in or about the year 2000, up to and including the date of the filing of this Indictment, in the Northern District of Georgia, and elsewhere, **JEFFREY ALAN BOURASSA, a/k/a "J.B.," "Babyface," and "Kid," DAVID GENE POWELL, a/k/a "Davo," CHERI LEA RAU, TOBY JAMES OGLETREE, VICTOR MANUEL DEJESUS, a/k/a "VG Vic," RICHARD BRIAN SOSEBEE, a/k/a "Dirty," JONATHAN STUBBS, CODY RYAN TODD, AND KEVIN SCOTT SOSEBEE, a/k/a "Sosa,"** and others known and unknown to the grand jury, each being a person employed by, and associated with the enterprise, that is, GFG, engaged in, and the activities of which affect interstate and foreign commerce, knowingly and willfully combined, conspired, confederated, and agreed together and with one another to violate the racketeering laws of the United States, that is: Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the GFG enterprise, through a pattern of racketeering activity consisting of multiple acts and threats involving:

1. Murder, including attempted murder, and conspiracy to murder, in violation of Georgia law, O.C.G.A. § 16-5-1, § 16-4-1 and § 16-4-6 (attempt), and 16-4-8 (conspiracy);

2. Robbery in violation of Georgia law, O.C.G.A. § 16-8-40; 16-4-1; 16-4-8;
3. Kidnapping, in violation of Georgia law, O.C.G.A. § 16-5-40, and § 16-4-1;

Multiple offenses involving:

4. Distribution of controlled substances, including multiple grams of methamphetamine, cocaine, illegal prescription pills and marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 846;

Multiple acts indictable under:

5. Title 18, United States Code, Sections 1512 and 1513, relating to tampering with a witness;
6. Title 18, United States Code, Sections 1956 and 1957, relating to money laundering;
7. Title 18, United States Code, Section 1343 relating to wire fraud; and

4. It was part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

#### **PURPOSES OF THE ENTERPRISE**

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

1. Preserving and protecting the power of the Enterprise and its members and associates through murder, attempted murder, assaults with firearms, other acts of violence, and the threat of violence.
2. Enriching the members and associates of the Enterprise through, among other things, the distribution of narcotics, including methamphetamine, cocaine, illegal prescription pills and marijuana.
3. Promoting and enhancing the enterprise and its members and associates' activities.
4. Keeping members of the community and other GFG members in fear of the leaders, members, and associates through threats of violence and actual violence, thereby creating power and respect for GFG.
5. Providing financial support to GFG members, who were charged with, or in prison for, gang-related activities.
6. Providing contraband, such as drug money, illegal drugs and cell phones to incarcerated GFG members.
7. Furthering the enterprise through incarcerated GFG members ordering and facilitating illegal drug deals with GFG members and associates on the outside.



**MANNER AND MEANS OF THE ENTERPRISE**

6. Among the manner and means employed by GFG members and associates in conducting and participating in the conduct of the affairs of the Enterprise were the following:

1. Members and associates of the GFG enterprise committed, and conspired to commit, acts of violence, including murder, attempted murder, robbery, kidnaping, maiming and assault, to protect and expand GFG's criminal operations.
2. Members and associates of GFG sold narcotics, including methamphetamine, cocaine, marijuana, and prescription pills.
3. Members and associates of GFG obtained, possessed, and used firearms to show power and gain respect.
4. Members and associates of GFG orchestrated and facilitated illegal drug deals while in prison, by using GFG members on the outside to conduct the actual deals and send the drug money earned to incarcerated GFG members.
5. GFG members were expected to get, and often got, GFG tattoos to show loyalty and affiliation.
6. Members and associates of GFG created, maintained, and distributed GFG literature and bylaws for members to memorize and to recite upon command.

7. Members distributed sham and misleading GFG literature to confuse and mislead law enforcement as to the true purpose of GFG.
8. GFG Bookkeepers kept lists of all members and assigned them a GFG identifying number.
9. Members and associates of GFG smuggled contraband into prisons to incarcerated GFG members and associates, such as drug money, illegal drugs, and cell phones.
10. Members and associates of GFG set up video conference calls for those incarcerated and those "at the table," to discuss gang business; incarcerated GFG members and associates used contraband cell phones to call in to the video conference. GFG members "at the table" vote on decisions affecting the entire gang.
11. GFG leaders who were incarcerated gave orders to those on the outside, who would carry out the orders and report back to the leaders.
12. Incarcerated members and associates of GFG would make money by perpetuating financial fraud schemes using contraband telephones. Utilizing contraband smuggled cell phones, incarcerated GFG members and associates called victims in Georgia, Alabama and in other states claiming to be local law enforcement. GFG members and associates told victims that they had missed jury duty and there was a

warrant out for the victim's arrest. GFG members and associates told victims they could pay a fine to avoid arrest. GFG members and associates instructed the victims to obtain Green Dot cards and send the GFG members and associates the Green Dot card information. GFG members and associates would then work with other people on the outside to transfer the money from the Green Dot cards to them so the members and associates on the outside could obtain cash.

13. Members and associates committed money laundering by using Green Dot cards and Paypal to conceal the source of proceeds obtained through illegal activity.
14. Gang leadership maintained internal discipline by issuing orders, including, but not limited to an "SOS" or a "cover up." "SOS" stands for "Smash on Sight." An "SOS" is a standing order to assault GFG members and associates who violated gang rules. GFG members and associates who ignored an "SOS" could be subject to violent consequences themselves for failure to carry out an order. A "cover up" order can mean an order to cover up a gang tattoo.



**STRUCTURE AND OPERATION OF THE ENTERPRISE**

7. The structure of GFG included, but was not limited to, the following:

1. The Ghost Face Gangsters are a criminal street/prison gang that formed as a whites-only gang in or about 2000 in the Cobb County, Georgia, Jail.
2. The group was originally organized by seven founding members known as "Pillars" within the prison system. All GFG members can trace their "bloodline" directly back to one of the seven founding "Pillars:" **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid;" DAVID GENE POWELL, a/k/a "Davo;" Joseph M. Propps, Jr. a/k/a "JP,"** all indicted herein, and others known and unknown to the Grand Jury.
3. Female leaders are termed a "First Lady." Those who have held the "First Lady" position have included, but are not limited to: **Genevieve Waits, Kayli Brewer, Samantha Miller and Hailey Danielle Sizemore.**
4. Since its founding, GFG has expanded outside of the prison system and its members and associates are found throughout the Northern District of Georgia, and elsewhere.
5. GFG has a detailed and uniform structure, in which members achieve various ranks and responsibilities within the enterprise. Ranks and titles include, but are not limited to, state-wide coordinator, state-wide bookkeeper, state-

wide policy and procedures, state-wide security, state-wide violator, state-wide structure board, state-wide education coordinator, state-wide living coordinator, state-wide communications coordinator, state-wide investigator, state-wide enforcement coordinator, state-wide recruiter, state-wide planning and strategy, state-wide treasury, state-wide legal coordinator, state-wide meeting coordinator, and state-wide current event coordinator.

6. Within the prison system, GFG structure includes, but is not limited to, the Capo (leader), chief of security, chief enforcer, chief violator, treasurer, bookkeeper, educator, and investigator.
7. GFG members recruit prospective members inside and outside of the prison system. New members are required to memorize gang literature and recite gang oaths upon demand. Prior to initiation into the gang, three GFG members physically beat the prospective member for 76 seconds, an act known as "3 for 76." Following the beat-in initiation, a GFG member sends the newly initiated GFG member's information to a state-wide bookkeeper, who would then assign the newly initiated GFG member a unique identifying number.
8. GFG members use robust symbolism in their identification as members of the enterprise. GFG members wear green

- clothing and use the color green frequently in social media posts and communications.
9. The number 7 has an important role in GFG and is used for identification, communication, and organization. GFG was founded by 7 "Pillars," the letter "G" is the 7<sup>th</sup> letter of the alphabet, the gang uses a seven pointed star as an identifying symbol, and members use phrases such as "on my seven," and "seven love" when speaking with each other. When calling a meeting, GFG call it a "7." Members also use the numbers "767" and "76.7," in their communications with each other. "767" correlates, alphanumerically, to the letters "GFG" in the alphabet. GFG uses "76.7" to show that a member was "brought into" the gang by one of the Pillars. This number gives the members special status within the gang. GFG members are expected to recite "the seven words of faith" which are "I am fully prepared for all consequences."
  10. GFG members commonly have tattoos using these various GFG symbols to show their loyalty and affiliation.
  11. Members of GFG use a series of codes to communicate with one another, and evade law enforcement. Some of these codes are "7 6 12", which stands alphanumerically for the letters G-F-L, which represents "Ghost Face love," "6:20," which stands for "forever true," "16:61", which stands for



affiliated forever and forever affiliated, "1919" stands for stay quiet, or secret silent, "13," which stands for "all crackers," representing GFG's status as a white gang.

12. Upon release from prison, GFG members are expected to maintain their role within the gang, and continue to commit criminal acts on behalf of the GFG enterprise.
13. Incarcerated GFG members regularly communicate with members and associates outside of prison to facilitate drug transactions, fraud, money laundering, and other illegal activity using smuggled cell phones, letters, and social media.

### OVERT ACTS

8. In furtherance of the conspiracy, and to effect the objects and purposes thereof, the defendants and others not named as defendants herein committed various overt acts, including, but not limited to, the following:

1. GFG was formed by the seven Pillars in the Cobb County Jail in the year 2000 and has spread throughout the Georgia Prison System.
2. In or about 2001, while both were in prison, **DAVE GENE POWELL, a/k/a "Davo,"** tattooed the words "Ghost Face" on the inside right bicep of MD, one of the Pillars of GFG.

3. On or about March 22, 2002, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** sold approximately 14.06 grams of cocaine.
4. On or about March 26, 2002, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** sold approximately 27.88 grams of cocaine.
5. On or about May 9, 2002, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** possessed with intent to distribute approximately 60 grams of marijuana, two digital scales, zip-lock bags and a shotgun at his residence.
6. On or about January 24, 2004, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** shot CB in the shoulder with a firearm over a drug debt causing serious bodily harm.
7. On a date unknown, but in or about mid-2004 to early 2005, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** assisted by others, paid off a witness and CB, the victim of the shooting, to keep silent and not to testify about the shooting.
8. In or about late 2004 to early 2005, **CHERI LEA RAU** approached CB, the victim of the shooting, and attempted to persuade him not to testify against her son, **JEFFREY BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid."**

9. In or about 2005 or 2006, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** using a contraband smuggled cell phone while in prison, organized the pick up of approximately five pounds of methamphetamine to a third party.
10. On or about March 24, 2006, **DAVID GENE POWELL, a/k/a "Davo,"** and **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** conspired to purchase 1000 Xanax pills.
11. On or about March 24, 2006, **DAVID GENE POWELL, a/k/a "Davo,"** carjacked MA to get away from the scene after shooting at the drug dealer, fled in the stolen car, and was picked up by **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** and other GFG members and associates.
12. On or about June 8, 2006, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** and other GFG members possessed approximately 425.8 grams of marijuana, \$6,471, and a Smith & Wesson 9mm, a firearm, which was stolen from the Cobb County, GA, Sheriff's Office.
13. In or about July through August, 2008, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** and



**CHERI LEA RAU**, along with several other GFG members, sold large quantities of marijuana.

14. On or about July 3, 2008, **CHERI LEA RAU** and **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** imported large quantities Alprazolam (Xanax) from Argentina and sold the drugs in the Northern District of Georgia.
15. On or about July 31, 2008, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** shipped at least two boxes of marijuana from California to Hiram, Georgia.
16. On or about August 6, 2008, **CHERI LEA RAU** and **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** planned and discussed picking up drugs from a local P.O. Box; they then went to a post office and retrieved packages.
17. On or about August 30, 2008, **CHERI LEA RAU** and **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** aided by KM and JGB, withdrew drug money from a bank, and purchased certificates of deposit in the names of children to conceal the true owners of the money and the illegal source of the money.
18. In or about 2009, **DAVID GENE POWELL, a/k/a "Davo,"** recruited CH into GFG at Augusta State Medical prison; CH

was beaten into the gang by fighting **POWELL** and two other GFG inmates for 76 seconds.

19. In or about 2009, **DAVID GENE POWELL, a/k/a "Davo,"** made telephone calls from jail on a contraband cell phone to **Genevieve Waits**, ordering her to bring phones and drugs to the prison where the packages would then be thrown over the fence of the prison to him. During 2009 and 2010, while **DAVID GENE POWELL a/k/a "Davo,"** was in prison, **Genevieve Waits** would facilitate the delivery of multiple packages of drugs and cell phones to the prison for **POWELL**.
20. On or about November 23, 2009, CA, a Ghost Face gang member, along with others, shot and killed RN in retaliation for a home invasion at CA's house.
21. In or about February 2011, through August 2011, **DAVID GENE POWELL, a/k/a "Davo,"** with the help of corrupt prison guards, smuggled approximately 500 grams of methamphetamine into Phillips State Prison for sale.
22. On or about January 15, 2011, **Samantha Miller** attempted to smuggle marijuana into Calhoun State Prison for an inmate.
23. Between in or around 2010 and 2011, on numerous occasions, **Joseph McKinley Propps, Jr. a/k/a "JP,"** and **Marc Avon Lefevre, a/k/a "Ghost,"** sold quantities of

methamphetamine, cocaine, pills and **Marc Avon Lefevre, a/k/a "Ghost,"** sold firearms to others.

24. On or about March 9, 2013, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** possessed marijuana and \$4800.00 in United States Currency.
25. On or about April 12, 2013, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** possessed marijuana, methamphetamine and \$1490.00 in United States Currency.
26. In or about October and November of 2013, **Genevieve Waits** sold methamphetamine on at least two occasions to GFG member MD.
27. On or about November 25, 2013, **Joseph Mckinley Propps, Jr, a/k/a "JP,"** possessed distribution amounts of methamphetamine with the intent to distribute, \$1800.00, and a quantity of marijuana.
28. On or about February 4, 2014, James Phillips (now deceased), a GFG member, shot at a Cobb County Police Officer five times causing serious bodily injury; Phillips stated to his GFG companion, "this is what it means to be Ghost Face," prior to shooting the officer.
29. On or about April 26, 2014, GFG member CDH, along with other GFG, used smuggled cell phones while in prison to



extort and defraud at least one victim in Rome, Georgia, of \$933.00.

30. On or about October 30, 2014, **Marc Avon Lefevre, a/k/a "Ghost,"** possessed with intent to distribute methamphetamine and other illegal drugs, including alprazolam, hydrocodone, oxycodone, and marijuana.
31. On or about June 12, 2014, GFG member CA, while in prison, coordinated with other GFG members to pay Gangster Disciple DG to shoot at the house of a witness in retaliation for testifying against CA in his trial for murder.
32. In or about 2014, HG was beaten into GFG by **Christopher Steven Jones a/k/a "Red,"** and two others for 76 seconds.
33. In or about 2014, while in prison, TW was beaten into GFG by 7 GFG for 76 seconds.
34. On or about April 20, 2015, **CHERI LEA RAU** sent a letter to a GFG Pillar (in prison) with a police report showing that Pillar **DAVID GENE POWELL, a/k/a "Davo,"** was willing to cooperate in a criminal incident against Pillar **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** to reveal the violation of GFG rules.
35. On or about November 20, 2015, **CHERI LEA RAU** mailed GFG literature to **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid"** (in custody).

36. In or about December of 2015, **JEFFREY ALAN BOURASSA**, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid," while in prison, promoted TW to the prison position of 1<sup>st</sup> Lt. Violator.
37. On or about January 21, 2016, **Genevieve Waits**, texted **Kayli Brewer**, who held the position of First Lady, that she (Brewer) needed to delete a photo from Facebook, advising "as u know with your position comes great responsibility and u are now under scrutiny from everyone...."
38. On or about February 7, 2016, **JEFFREY ALAN BOURASSA**, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid," while in prison, called **Kaylie Brewer** and told her to "step up and take over," and to "just listen to what I tell you." **Kayli Brewer** then sent a text to **Samantha Miller** that she is ready to "be in control and make shit happen."
39. On or about April 19, 2016, **Kayli Brewer** organized the "beat-in" of **JM**, a/k/a "Frog," which was video recorded, in which approximately three GFG members and associates physically assaulted **JM** a/k/a "Frog;" the film of the "beat-in" was found on **Kayli Brewer's** phone.
40. On or about July 5, 2016, **VICTOR MANUEL DeJESUS** carjacked a woman in Marietta, Georgia, at gunpoint, threatening to kill the victim; **DeJESUS** drove the stolen car

to pick up fellow GFG member **Christopher Marlow, a/k/a "Loko."**

41. On or about July 5, 2016, while **Christopher Marlow, a/k/a "Loko,"** drove the car and they fled from police in the carjacked car, **VICTOR MANUEL DeJESUS** shot at a pursuing deputy Sheriff.

42. In or about June, 2016, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** while in prison, promoted TW (then out of prison) to the position of Statewide Coordinator; **BOURASSA** instructed TW to create a statewide roster and assign Capos over the 12 regions of Georgia, as divided by a map used by the GA Department of Family and Children's Services.

43. During the summer of 2016, **Marc Avon Lefevre, a/k/a "Ghost,"** while in prison, coordinated at least four separate methamphetamine sales to BP (who was outside the prison).

44. During in or around the summer of 2016, BP traveled to Virginia and New York to conduct at least six methamphetamine sales on behalf of **Lefevre.**

45. Between April 10, 2016 and April 23, 2016, **Marc Avon Lefevre, a/k/a "Ghost,"** while in prison sent text messages to **Kayli Brewer** ordering a violation and request to "blacklist," or remove someone from GFG.



46. On or about April 14, 2016, **Samantha Miller** sent a text message to **Kayli Brewer** stating that they (Miller and Brewer) need to send Pillar **DAVID GENE POWELL a/k/a "Davo"** a "package," and for **Kayli Brewer** to send the money to **POWELL'S** mother.
47. On or about April 20, 2016, **Marc Avon Lefevre, a/k/a "Ghost,"** while in prison, sent a text message to **Kayli Brewer** stating that **Lefevre** needed a copy of the "new lit" to pass out.
48. On or about May 3, 2016, **Samantha Miller** sent a text message to **Kayli Brewer** stating that **Kayli Brewer** is "approved to do whatever she wants to do."
49. On or about May 5, 2016, **Christopher Lasher, a/k/a "Retta,"** sent a text message to **Kayli Brewer** about beating another person who falsely claimed to be a Capo; **Kayli Brewer** responded via text message, instructing **Lasher** to "...bust him up and cover his ass up."
50. On or about May 14, 2016, **GFG CB** requested permission via text message from **Kayli Brewer** to "smash on site" another member.
51. On or about May 9, 2016, **Genevieve Waits** sent a text message to **Kayli Brewer** about a person they believed was a snitch; **Waits** instructed **Brewer** to "smash him and tell him to quit claiming."

52. On or about July 15, 2016, **Christopher Lasher, a/k/a "Retta,"** and another GFG member JB (not Bourassa) planned to pick up illegal drugs; **Lasher** was then seen at JB's house.
53. On or about July 15, 2016, **Christopher Lasher, a/k/a "Retta,"** later traveled to a motel room where other GFG members were located to sell drugs.
54. On or about August 22, 2016, **Christopher Lasher, a/k/a "Retta,"** possessed illegal drugs.
55. In or around December, 2016, **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** while in prison, ordered GFG member **JONATHAN STUBBS** to cut off victim GFG member JBB's tattoo and to beat him out of the gang because victim JBB violated GFG rules.
56. In or around December, 2016, upon order of **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** **JONATHAN STUBBS** and **Christopher Jarman Davis** kidnaped victim JBB.
57. In December of 2016, upon order of **JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** and **JONATHAN STUBBS** held victim JBB at gunpoint, and **Christopher Jarman Davis**, using a knife, forcibly cut off victim JBB's GFG tattoo, causing serious bodily harm.

58. In October of 2016, **JEFFRY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** while in prison, told GFG TW to take a GFG pillar seat at the table.
59. On October 29, 2016, **RICHARD BRIAN SOSEBEE, a/k/a "Dirty,"** and another person, ED, conspired to conduct an illegal drug transaction with a third person, MC.
60. On October 29, 2016, during the drug transaction described above, **RICHARD BRIAN SOSEBEE, a/k/a "Dirty,"** shot MC in the eye, causing serious bodily injury.
61. On or about October 29, 2016, **RICHARD BRIAN SOSEBEE, a/k/a "Dirty,"** and ED fled from the police after the shooting.
62. On or about December 2, 2016, **CODY RYAN TODD** and other GFG members kidnaped GFG member CKG because CKG had violated GFG rules.
63. On or about December 2, 2016, **CODY RYAN TODD** and other GFG members beat CKG causing serious bodily injury by kicking him and beating him in the head until he was unconscious, and by attempting to pull out his teeth with pliers.
64. On or about December 12, 2016, **Marc Avon Lefevre, a/k/a "Ghost,"** while in prison at Wheeler State Prison, claimed he was in charge of writing GFG policy and by-laws; **Lefevre** also possessed a "shank" in his cell.



65. On or about February 13, 2017, **JONATHAN STUBBS** committed an armed carjacking in Chattanooga, TN.
66. On or about February 7, 2017, **JEFFREY ALAN BOURASSA**, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid," while in custody at the Georgia Hayes State prison, possessed GFG literature in his cell, including a roster of current GFG members and their inmate numbers.
67. On or about March 8, 2017, **WILLIAM J. GOODMAN**, a/k/a "J. Been livin' good," a/k/a "Jgood," aided and abetted by other GFG members, attempted to murder TG by stabbing him in the neck and back, causing serious bodily harm, because **GOODMAN** thought TG had violated GFG rules.
68. In or about 2017, **TOBY JAMES OGLETREE**, while in prison, collected money from other GFG members to put in their "green box" to take care of other GFG members.
69. In or about 2017, **TOBY JAMES OGLETREE**, while in prison, sent money to his wife via Green Dot Cards; she maintained the money outside the prison and distributed it as **OGLETREE** directed; some of the money came from the "phone scam" fraud conducted by inmates on contraband cell phones.
70. On or about April 22, 2017, **Samantha Miller** set up a video meeting with incarcerated GFG Pillars **DAVID GENE**

**POWELL, a/k/a "Davo,"** and **Joseph M. Propps, Jr., a/k/a "JP,"** with those on the outside, including **GFG Hailey Danielle Sizemore** and other GFG members, to discuss gang business and appoint leaders.

71. On or about May 7, 2017, and on or about July 19, 2016, **TOBY JAMES OGLETREE** distributed methamphetamine in the Valdosta State prison; on these two dates **OGLETREE** was transported to either Atlanta Medical Center South or Georgia Medical Center for treatment, and he arranged to have someone drop methamphetamine into the van he rode in while the van was parked outside the medical center; on these two trips, **OGLETREE** has brought in quantities of 4 oz. and then 8 oz.
72. On or about May 17, 2017, **DAVID GENE POWELL, a/k/a "Davo,"** spoke with two other GFG members on a three-way call from prison coordinated by **Samantha Miller**; **POWELL** warned the GFG members that he ruled with an iron fist, and that if he had any trouble he would have others follow his orders and "have it dealt with."
73. In or about June of 2017, **Christopher Steven Jones, a/k/a "Red,"** while in prison, directed GFG members **TZ** and **JH**, who were outside the prison, to conduct at least twenty methamphetamine transactions of 4 - 6 oz. each time, in excess of 500 grams.

74. On or about June 13, 2017, GFG Member **RD** and an accomplice known to the grand jury murdered two Baldwin Correctional Officers.
75. On or about July 8, 2017, **Randall Arthur Lee Chumley** possessed a firearm after having been convicted of a felony offense.
76. On or about August 5, 2017, **Joseph M. Propps, a/k/a "JP,"** while in prison, sent a photo of what appeared to be a bag of methamphetamine to another GFG, and offered to supply him with methamphetamine.
77. On or about September 29, 2017, GFG member **SS** murdered Polk County Detective Kristen Hearn.
78. On or about November 24, 2017, **Hailey Danielle Sizemore**, acting as a "First Lady," contacted TW and directed him to violate another GFG member.
79. On or about November 26, 2017, **Christopher Steven Jones, a/k/a "Red,"** while in prison, contacted TW, told him he had spoken with **Hailey Danielle Sizemore**, and ordered him to make sure the violation against the GFG member happened.
80. On or about November 26, 2017, **Christopher Steven Jones, a/k/a "Red,"** sent \$160.00 on a Green Dot card to TW for travel expenses incurred while looking for the GFG member to violate.



81. On or about December 3, 2017, TW went to the home of **Hailey Danielle Sizemore** for a "7;" **Sizemore** had methamphetamine and marijuana in a drawer; **Sizemore** asked TW if he knew anyone who would like to buy the drugs.
82. On or about December 11, 2017, **KEVIN SCOTT SOSEBEE**, a/k/a "**Sosa**," shot at a police officer who pulled over a car in which **SOSEBEE** was riding.
83. On or about December 11, 2017, **KEVIN SCOTT SOSEBEE** a/k/a "**Sosa**," was holding methamphetamine for **Hailey Danielle Sizemore**.
84. On or about December 13, 2017, GFG **Hailey Danielle Sizemore**, along with **CHRISTOPHER STEVEN JONES**, a/k/a "**Red**," offered to sell 10 oz. of methamphetamine for \$5,000.00; **Samantha Miller** agreed that her house was to be the location of the methamphetamine deal.
85. On or about December 13, 2017, while **KEVIN SCOTT SOSEBEE**, a/k/a "**Sosa**," was hiding from police, **Hailey Danielle Sizemore** procured a hotel room for him.
86. On or about December 15, 2017, when police searched for **KEVIN SCOTT SOSEBEE**, a/k/a "**Sosa**," they found him with **Hailey Danielle Sizemore**.
87. On or about December 18, 2017, **Christopher Lasher**, a/k/a "**Retta**," while in prison, offered to sell methamphetamine

to TW after he heard about the failed deal on December 13, 2017, described above.

88. On or about December 19, 2017, **Christopher Lasher, a/k/a "Retta,"** while in prison, set up a meeting between TW and **Kayli Brewer** for the purpose of TW buying methamphetamine; **Kayli Brewer** and TW spoke on the phone to arrange the drug deal.
89. On or about December 19, 2017, TW and **Kayli Brewer** drove to the home of **Brittany Nicole Jones**, and TW bought ½ lb. of methamphetamine from **Brittney Nicole Jones** for \$4,000, as directed by **Christopher Lasher, a/k/a "Retta,"** and **Kayli Brewer**.
90. On or about December 18, 2017, **TOBY JAMES OGLETREE**, while in prison declared war on the Aryan Brotherhood gang, in retaliation for the murder of a GFG member in prison.
91. On or about December 29, 2017, **Kelly Ray Shiflett** possessed a firearm after having been convicted of a felony offense
92. On or about January 7, 2018, **Marc Avon Lefevre a/k/a "Ghost,"** from prison, called TW to discuss upcoming methamphetamine deals he was planning and discussed buying a gun.

offense; he also had methamphetamine and an illegal sawed-off shotgun.

95. On or about February 5, 2017, **DAVID GENE POWELL**, a/k/a "**Davo**," and other GFG on members, including **TOBY OGLETREE** and **Samantha Miller**, agreed to assault and/or to "cut the patch off" of a GFG member for violations of GFG rules.

### **Notice of Enhanced Sentencing**

1. The following defendants joined and remained in the RICO conspiracy knowing and agreeing that members of the enterprise would commit acts involving murder, in violation of Official Code of Georgia Section 16-5-1, that is, unlawfully and with malice aforethought, either express or implied, causes the death of another human being:

- **JEFFREY ALAN BOURASSA**, a/k/a "**JB**," "**Babyface**" and "**Kid**,"
- **DAVID GENE POWELL**, a/k/a "**Davo**," and
- **RICHARD BRIAN SOSEBEE**, a/k/a "**Dirty**."

2. The following defendants joined and remained in the RICO conspiracy knowing and agreeing that members of the enterprise would commit in acts involving illegal narcotics distribution, in violation of Title 21, United States Code, Sections 841(a)(1), and (b)(1)(A)(viii) and 846,

- **JEFFREY ALAN BOURASSA**, a/k/a "**JB**," "**Babyface**" and "**Kid**," at least 500 grams of methamphetamine;



2. The following defendants joined and remained in the RICO conspiracy knowing and agreeing that members of the enterprise would commit in acts involving illegal narcotics distribution, in violation of Title 21, United States Code, Sections 841(a)(1), and (b)(1)(A)(viii) and 846,

- JEFFREY ALAN BOURASSA, a/k/a "JB," "Babyface" and "Kid," at least 500 grams of methamphetamine;
- DAVID GENE POWELL, a/k/a "Davo," at least 500 grams of methamphetamine,

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

**COUNT TWO**

*(Conspiracy to Traffic a Controlled Substance)*  
*(21 U.S.C. § 846)*

1. Beginning on or about March 22, 2002 and continuing until in or around the date of this indictment, in the Northern District of Georgia and elsewhere, the defendants, DAVID GENE POWELL, a/k/a "Davo," JEFFREY ALAN BOURASSA, a/k/a "JB," "Babyface" and "Kid," CHERI LEA RAU, JOSEPH M. PROPPS, a/k/a "JP," MARC AVON LEFEVRE, JR, a/k/a "Ghost," CHRISTOPHER LASHER, a/k/a/ "Retta," GENEVIEVE WAITS, TOBY JAMES OGLETREE, CHRISTOPHER STEVEN JONES, a/k/a "Red," SAMANTHA MILLER, HAILEY DANIELLE SIZEMORE, KAYLI BREWER, and BRITTANY NICOLE JONES, did knowingly and willfully, combine, conspire, confederate, agree, and have a tacit understanding with one another to violate Title 21, United

States Code, Section 841(a)(1), that is, to knowingly and intentionally distribute and possess with the intent to distribute a controlled substance, said conspiracy involving:

- a. at least 500 grams of a substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii), as to defendants **DAVID GENE POWELL, a/k/a "Davo," JEFFREY ALAN BOURASSA, a/k/a "JB," JOSEPH M. PROPPS, a/k/a "JP," MARC AVON LEFEVRE, JR, a/k/a "Ghost," CHRISTOPHER LASHER, a/k/a "Retta," GENEVIEVE WAITS, TOBY JAMES OGLETREE, SAMANTHA MILLER, KAYLI BREWER, HAILEY DANIELLE SIZEMORE, BRITTNEY JONES and CHRISTOPHER STEVEN JONES, a/k/a "Red;"**
- b. a substance containing a detectable amount of cocaine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) as to defendants **JEFFREY ALAN BOURASSA, a/k/a "JB," "Babyface," and "Kid," and GENEVIEVE WAITS;** and
- c. a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, all in violation of Title

21, United States Code, Sections 841(a)(l) and (b)(1)(B), as to defendants **JEFFREY ALAN BOURASSA, a/k/a "JB," "Babyface," and "Kid,"** **CHERI LEA RAU, GENEVIEVE WAITS,** and **SAMANTHA MILLER;**

- d. a substance containing Alprazolam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(E) as to defendants **JEFFREY LAN BOURASSA, a/k/a "JB," "Babyface," and "Kid,"** and **CHERI LEA RAU;**

All in violation of Title 21, United States Code, Section 846.

**COUNT THREE**

*(Carjacking)*  
(18 U.S.C. § 2119)

On or about July 5, 2016, in the Northern District of Georgia, the defendant, **VICTOR MANUEL DEJESUS, a/k/a "VG Vic,"** with the intent to cause death and serious bodily harm, did take a motor vehicle that had been transported, shipped and received in interstate commerce, that is, a 2001 Mercury Marquis, from the person and presence of KG, by force, violence and intimidation, in violation of Title 18, United States Code, Section 2119.

**COUNT FOUR**

*(Attempted Murder)*  
(18 U.S.C. § 1959(a)(5))

1. At all times relevant to this Indictment, the GFG, as more fully described in Paragraphs 1-8 of Count One 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), namely the GFG, that is, a group of individuals associated in fact, which was engaged in and the activities of which, affected interstate and foreign commerce. The GFG constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. 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, murder, including attempted murder, and conspiracy to murder, in violation of Georgia law, O.C.G.A. § 16-5-1, 16-4-1 & 16-4-6 (attempt), and 16-4-8 (conspiracy); Robbery, in violation of Georgia law, O.C.G.A. § 16-8-40; 16-4-1; 16-4-8; and 16-5-44.1; Kidnapping, in violation of Georgia law, O.C.G.A. § 16-5-40; Multiple offenses involving: Distribution of controlled substances, including multiple grams of methamphetamine, cocaine, illegal prescription pills and marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 846; Multiple acts indictable under: Title 18, United States Code, Sections 1512 and 1513, relating to tampering with a witness; Title 18, United States Code, Sections 1956 and 1957, relating to money laundering; Title 18, United States Code, Section 1343 relating to wire fraud.

3. On or about July 5, 2016, in the Northern District of Georgia, the defendants, **VICTOR MANUEL DEJESUS, a/k/a "VG Vic,"** aided and abetted by **CHRISTOPHER MARLOW, a/k/a "Loko,"** did attempt to murder Deputy Sheriff KB, by knowingly and unlawfully shooting at Deputy Sheriff KB with a

firearm, in violation of the Official Code of Georgia Annotated, § 16-5-1 and § 16-4-6, for the purpose of maintaining and increasing position within the Gangsters, an enterprise engaged in racketeering activity.

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

**COUNT FIVE**

*(Use of Firearm During Crime of Violence)*  
U.S.C. § 924(c))

On or about July 5, 2016, in the Northern District of Georgia, the defendant, **VICTOR MANUEL DEJESUS, a/k/a ""VG Vic,"** and **CHRISTOPHER MARLOW, a/k/a "Loko,"** aided and abetted by each another, did use and carry a firearm during and in relation to a crime of violence, that is the shooting and attempted murder charged in Count Four of the Indictment, and during and in relation to the commission of the offense, did discharge the firearm, in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) and Section 2.

**COUNT SIX**

*(Attempted Murder)*  
(18 U.S.C. § 1959(a)(5))

1. Paragraphs 1 and 2 of Count Four of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. On or about October 29, 2016, in the Northern District of Georgia, the defendant, **RICHARD BRIAN SOSEBEE, a/k/a "Dirty,"** did knowingly and unlawfully attempt to murder MC, by shooting victim MC in the face, in

violation of the Official Code of Georgia Annotated, § 16-5-1 and 16-4-6, for the purpose of maintaining and increasing position in the Ghost Face Gangsters, an enterprise engaged in racketeering activity, all in violation of Title 18, United States Code, Section 1959(a)(5).

**COUNT SEVEN**

*(Felon in possession of firearm)*  
*(18 U.S.C. § 922(g))*

On or about October 29, 2016, in the Northern District of Georgia, the defendant, **RICHARD BRIAN SOSEBEE, a/k/a "Dirty,"** after having been convicted of at least one of the following felony offenses: Felon in Possession of a Firearm, in the Superior Court of Hall County, Georgia, on or about October 18, 2011; and Violation of the Georgia Controlled Substances Act, in the Superior Court of Cobb County, Georgia, on or about December 19, 2001, did possess a firearm, that is, a Rohm .22 magnum, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT EIGHT**

*(Use of Firearm During Crime of Violence)*  
*(18 U.S.C. § 924(c))*

On or about October 29, 2016, in the Northern District of Georgia, the defendant, **RICHARD BRIAN SOSEBEE, a/k/a "Dirty,"** did use and carry a firearm during and in relation to a crime of violence, that is the attempted murder charge in Count Six above, and during and in relation to the



commission of the offense, did discharge the firearm, in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

**COUNT NINE**  
*(Kidnapping)*  
*(18 U.S.C. § 1959(a)(1))*

1. Paragraphs 1 and 2 of Count Four in this indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. In or about December of 2016, in the Northern District of Georgia, the defendants, **CHRISTOPHER JARMAN DAVIS, JONATHAN STUBBS, JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** aided and abetted by one another and others unknown to the Grand Jury, did knowingly and unlawfully kidnap victim JBB, in violation of the Official Code of Georgia Annotated §16-5-40, for the purpose of maintaining and increasing position in the Ghost Face Gangsters, an enterprise engaged in racketeering activity,

All in violation of Title 18, United States Code, Section 1959(a)(1) and Section 2.

**COUNT TEN**  
*(Maiming)*  
*(18 U.S.C. § 1959(a)(2))*

1. Paragraphs 1 and 2 of Count Four of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. In or about December 2016, in the Northern District of Georgia, the defendants, **CHRISTOPHER JARMAN DAVIS, JONATHAN STUBBS, and JEFFREY ALAN BOURASSA, a/k/a "JB," a/k/a "Babyface" a/k/a "Kid,"** aided

and abetted by one another and others unknown to the Grand Jury, did knowingly and unlawfully assault and maim JBB with a knife, by cutting into his skin to remove a tattoo, in violation of the Official Code of Georgia Annotated § 16-5-24, for the purpose of maintaining and increasing position in the Ghost Face Gangsters, an enterprise engaged in racketeering activity,

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

**COUNT ELEVEN**

*(Kidnapping)*  
(18 U.S.C. § 1959(a)(1))

1. Paragraphs 1 and 2 of Count Four of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. On or about December 2, 2016, in the Northern District of Georgia, the defendant, **CODY RYAN TODD** and **DAVID GENE POWELL**, a/k/a "Davo," aided and abetted by each other and others known and unknown to the Grand Jury, did knowingly and unlawfully kidnap CKB, in violation of the Official Code of Georgia Annotated, § 16-5-40, for the purpose of maintaining and increasing position in the Ghost Face Gangsters, an enterprise engaged in racketeering activity,

All in violation of Title 18, United States Code, Section 1959(a)(1) and Section 2.

**COUNT TWELVE**

*(Assault with Serious Bodily Injury)*  
(18 U.S.C. § 1959(a)(3))

1. Paragraphs 1 and 2 of Count Four of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. On or about December 2, 2016, in the Northern District of Georgia, the defendant, **CODY RYAN TODD and DAVID GENE POWELL, a/k/a "Davo,"** aided and abetted by each other and others known and unknown to the Grand Jury, did knowingly and unlawfully assault CKB, resulting in serious bodily injury to CKB, in violation of the Official Code of Georgia, § 16-5-21, for the purpose of maintaining and increasing position in the Ghost Face Gangsters, an enterprise engaged in racketeering activity.

All in violation of Title 18, United States Code, Section 1959(a)(3) and Section 2.

**COUNT THIRTEEN**  
*(Attempted Murder)*  
*(18 U.S.C. § 1959(a)(5))*

1. Paragraphs 1 and 2 of Count Four of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

2. On or about March 8, 2017, in the Northern District of Georgia, the defendant, **WILLIAM J. GOODMAN, a/k/a "JBeenlivin'good," and "JGood,"** aided and abetted by others known and unknown to the Grand Jury, with the use of a dangerous weapon, did knowingly and unlawfully attempt to murder TG, by stabbing TG with a knife, in violation of the Official Code of Georgia Annotated, § 16-5-1 and 16-4-6, for the purpose of maintaining and increasing position in the Ghost Face Gangsters, an enterprise engaged in racketeering activity.

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



**COUNT FOURTEEN**

*(Attempted murder)*  
*(18 U.S.C. § 1959(a)(5))*

1. Paragraphs 1 and 2 of Count Four of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.
  2. On or about December 12, 2017, in the Northern District of Georgia, the defendant, **KEVIN SCOTT SOSEBEE, a/k/a "Sosa,"** did knowingly and unlawfully attempt to murder MHK, a Cobb County Police Officer, by shooting at him with a firearm in violation of the Official Code of Georgia Annotated, § 16-5-1 and § 16-4-6, for the purpose of maintaining and increasing position in the Ghost Face Gangsters, an enterprise engaged in racketeering activity.
- All in violation of Title 18, United States Code, Section 1959(a)(5).

**COUNT FIFTEEN**

*(Use of Firearm During Crime of Violence)*  
*(18 U.S.C. § 924(c))*

On or about December 12, 2017, in the Northern District of Georgia, the defendant, **KEVIN SCOTT SOSEBEE, a/k/a "Sosa,"** did use and carry a firearm during and in relation to a crime of violence, that is the attempted murder charge in Count Fourteen of the Indictment, and during and in relation to the commission of the offense, did discharge the firearm, in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii).

**COUNT SIXTEEN**

*(Felon in possession of a firearm)*  
*(18 U.S.C. § 922(g))*

On or about, December 29, 2017, in the Northern District of Georgia, the defendant, **KELLY RAY SHIFLETT**, after having been convicted of at least one of the following felony offenses in the Superior Court of Cobb County, Georgia: Violation of the Georgia Controlled Substances Act, on or about September 21, 2016, and Possession of a Controlled Substance on or about November 15, 2016, did possess a firearm, that is a .40 caliber Glock pistol, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT SEVENTEEN**

*(Felon in possession of a firearm)*  
*(18.S.C. § 922(g))*

On or about July 8, 2017, in the Northern District of Georgia, the defendant, **RANDALL ARTHUR LEE CHUMLEY**, after having been convicted of at least one of the following felony offenses in the Superior Court of Pickens County, Georgia: Burglary and Possession of Methamphetamine on or about November 16, 2016, and Riot in a Penal Institute, on or about November 16, 2016, did possess a firearm, that is a .25 Caliber Titan pistol, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT EIGHTEEN**

*(Felon in possession of a firearm)*  
*(18 U.S.C. § 922(g))*

On or about January 12, 2018, in the Northern District of Georgia, the defendant, **RANDALL ARTHUR LEE CHUMLEY**, after having been convicted of at least one of the following felony offenses in the Superior Court of Pickens County, Georgia: Burglary and Possession of Methamphetamine on or about November 16, 2016, and Riot in a Penal Institute, on or about November 16, 2016, did possess a firearm, that is a shotgun, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT NINETEEN**

*(Possession of Methamphetamine with intent to distribute)*  
*(21 U.S.C. § 841)*

On or about January 12, 2018, in the Northern District of Georgia, the defendant, **RANDALL ARTHUR LEE CHUMLEY**, did knowingly and intentionally possess with the intent to distribute a controlled substance, a substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, pursuant to Title 21, United States Code, Sections 841(a)(1) and 841(1)(B)(viii).

**COUNT TWENTY**

*(Use of Firearm During Drug Trafficking Crime)*  
*(18 U.S.C. § 924(c))*

On or about January 12, 2018, in the Northern District of Georgia, the defendant, **RANDALL ARTHUR LEE CHUMLEY** did possess a firearm in furtherance of a drug trafficking crime, that is the possession with the intent to



distribute methamphetamine in Count Nineteen of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT TWENTY-ONE**

*(Possession of an NFA weapon)  
(26 U.S.C. § 5861 and 5871)*

On or about January 12, 2017, in the Northern District of Georgia, the defendant, **RANDALL ARTHUR LEE CHUMLEY**, did possess a firearm made in violation of the National Firearms Act (NFA), and not registered to him as required by the NFA, that is a shotgun with a barrel less than 18 inches in length, in violation of Title 26, United States Code, Sections 5861, 5845(a) and 5871.

**FORFEITURE PROVISION**

Upon conviction of the offense alleged in COUNT ONE of this Indictment, the Defendants, **JEFFREY ALAN BOURASSA, a/k/a "J.B.", "Babyface," and "Kid," DAVID GENE POWELL, a/k/a "Davo," CHERI LEA RAU, TOBY JAMES OGLETREE, VICTOR MANUEL DEJESUS, a/k/a "VG Vic", RICHARD BRIAN SOSEBEE, a/k/a "Dirty," JONATHAN STUBBS, CODY RYAN TODD, and KEVIN SCOTT SOSEBEE, a/k/a "Sosa,"** shall forfeit to the United States pursuant to Title 18, United States Code, Section 1963:

- a. All interests acquired and maintained in violation of Title 18, Section 1962;
- b. All interests in, security of, claims against, or property or contractual rights of any kind affording a source of influence over, any enterprise which a Defendant established, operated, controlled,

conducted, or participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and

- c. All property constituting, or derived from, proceeds obtained, directly and indirectly, from racketeering activity or unlawful debt collection in violation of Section 1962.

2. As a result of committing the offense alleged in Count Two of this Indictment, the Defendants **JEFFREY ALAN BOURASSA, a/k/a "JB," "Babyface," and "Kid," DAVID GENE POWELL, a/k/a "Davo," CHERI LEA RAU, GENEVIEVE WAITS, TOBY JAMES OGLETREE, CHRISTOPHER STEVEN JONES, a/k/a "Red," KAYLI BREWER, JOSEPH M. PROPPS, a/k/a "JP," MARC AVON LEFEVRE, JR., a/k/a "Ghost," CHRISTOPHER LASHER, a/k/a/ "Retta," SAMANTHA MILLER, HAILEY DANIELLE SIZEMORE, and BRITTANY NICOLE JONES,** shall forfeit to the United States pursuant to Title 21, United States Code, Section 853; Title 21, United States Code, Section 881(a); and Title 28, United States Code, Section 2461(c) any and all property constituting or derived from proceeds the said defendants obtained directly or indirectly as a result of the offenses and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of a violation alleged in therein.

3. As a result of committing the offense alleged in Count Three of this Indictment, the Defendant **VICTOR MANUEL DEJESUS, a/k/a "VG Vic,"** shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(5) and 981(a)(1)(C), all property, real and personal, which represents or is

traceable to the gross proceeds obtained, directly and indirectly, as a result of said offense, including but not limited to firearm listed below.

4. As a result of committing one or more of the offenses alleged in Counts Three, Five, Seven, Eight, Fifteen, Sixteen, Seventeen, and Eighteen of this Indictment, the Defendant **VICTOR MANUEL DEJESUS, a/k/a "VG Vic," RICHARD BRIAN SOSEBEE, a/k/a "DIRTY," KEVIN SCOTT SOSEBEE, a/k/a "Sosa," CHRISTOPHER MARLOW, a/k/a "Loko," RANDALL ARTHUR LEE CHUMLEY,** and **KELLY RAY SHIFLETT** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461 all firearms and ammunition involved in and used in the offense alleged in said Counts below including but not limited to the following:

- a. The Rohm .22 magnum firearm referenced in Count Seven, above;
- b. The .25 Caliber Titan pistol referenced in Count Seventeen, above
- c. The shotgun referenced in Count Eighteen, above; and
- d. The .40 caliber Glock pistol referenced in Count Sixteen, above.

5. Additionally, as a result of committing one or more of the offenses alleged in Counts One through Eighteen of this Indictment, the Defendants **JEFFREY ALAN BOURASSA, a/k/a "JB," "Babyface," and "Kid," DAVID GENE POWELL, a/k/a "Davo," CHERI LEA RAU, GENEVIEVE WAITS, TOBY JAMES OGLETREE, VICTOR MANUEL DEJESUS, a/k/a "VG Vic," RICHARD BRIAN SOSEBEE, a/k/a "Dirty," JONATHAN STUBBS, CHRISTOPHER JARMAN DAVIS, CHRISTOPHER STEVEN JONES, a/k/a "Red," KAYLI BREWER, WILLIAM J. GOODMAN, a/k/a "J. Been livin'**



good" and "JGood," HEATHER RODGERS, a/k/a "Lil Trouble," CODY RYAN TODD, KEVIN SCOTT SOSEBEE, a/k/a "Sosa," CHRISTOPHER MARLOW, a/k/a "Loko," JOSEPH M. PROPPS, JR., a/k/a "JP," MARC AVON LEFEVRE, a/k/a "Ghost," CHRISTOPHER LASHER, a/k/a "Retta," SAMANTHA MILLER, HAILEY DANIELLE SIZEMORE, BRITTANY NICOLE JONES, RANDALL ARTHUR LEE CHUMLEY, and KELLY RAY SHIFLETT shall forfeit to the United States pursuant to Title 18, United States Code, Section 3665 the following firearm(s) possessed by and under the immediate control of said defendants at the time of arrest;

6. Finally, if, as a result of any act or omission of a defendant, any property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

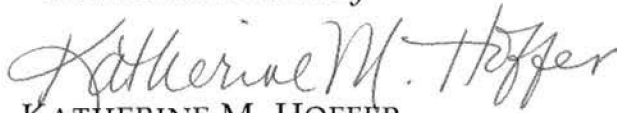
the United States intends, pursuant to Title 18, United States Code, Section[s] 982(b)(1); Title 21, United States Code, Section 853(p); and Title 28, United

States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL

BYUNG J. PAK

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