

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:14-CR-72-1 (1)
NO. 5:14-CR-72-2 (1)
NO. 5:14-CR-72-3 (1)
NO. 5:14-CR-72-4 (1)
NO. 5:14-CR-72-5 (1)
NO. 5:14-CR-72-6 (1)
NO. 5:14-CR-72-7 (1)
NO. 5:14-CR-72-8 (1)
NO. 5:14-CR-72-9 (1)

FILED IN OPEN COURT
ON 4.22.2014 *llc*
Julie A. Richards, Clerk
US District Court
Eastern District of NC

UNITED STATES OF AMERICA)

v.)

I N D I C T M E N T

KELVIN MELTON)

a/k/a Dizzy, Old Man,)

QUANTAVIOUS THOMPSON)

a/k/a Quan, Kirkwood Quan,)

JAKYM CAMEL TIBBS)

a/k/a Jok,)

a/k/a Jak,)

TIANNA DANEY MAYNARD)

a/k/a Tianna Danet Maynard,)

a/k/a Tianna Danet Solomon,)

a/k/a Tianna Brooks,)

a/k/a Axt Up,)

a/k/a Act Up,)

JENNA MARTIN)

a/k/a Jenna Paulin Martin,)

CLIFTON JAMES ROBERTS)

a/k/a Yeelo,)

a/k/a CJ,)

a/k/a Yee,)

a/k/a Don Yee,)

a/k/a ~~Don~~ ^{KING} yee,)

a/k/a Elo, *[Signature]*)

PATRICIA ANN KRAMER)
a/k/a Trish,)
a/k/a Trisha,)
JEVANTE PRICE)
a/k/a JeVante Travell Price,)
a/k/a Flame,)
MICHAEL MARTRELL GOODEN)
a/k/a Hot,)
a/k/a Michael Montreal Gooden,)
a/k/a Michael Martree Gooden,)

The Grand Jury charges that:

INTRODUCTION

I. North Carolina Criminal Conviction of Defendant KELVIN MELTON, a/k/a Dizzy, a/k/a Old Man.

1. On April 30, 2012, Defendant KELVIN MELTON, a/k/a Dizzy, a/k/a Old Man (hereinafter "MELTON"), was indicted by the State for Assault with a Deadly Weapon with Intent to Kill Inflicting Serious Injury and Conspiracy relating to the same. The charge related to the September 13, 2011, shooting of a man by a person associated with MELTON.

2. On May 1, 2012, MELTON was indicted by the State for being a Violent Habitual Felon.

3. A Wake County Assistant District Attorney (hereinafter "ADA") served as the State prosecutor and trial attorney on both Indictments. MELTON was represented by a court-appointed attorney (hereinafter "Defense Counsel").

4. On October 12, 2012, a Wake County jury convicted MELTON of Assault with a Deadly Weapon with Intent to Kill Inflicting Serious Injury. At the close of the trial evidence, the Conspiracy charge was dismissed by the Court. Because MELTON had also been charged as a Violent Habitual Felon under North Carolina law, he was sentenced to life in prison without the possibility of parole.

5. On or about October 17, 2012, MELTON began serving his life sentence at Polk Correctional Institution, a North Carolina correctional facility located, in Butner, North Carolina, within the Eastern District of North Carolina. From on or about October 17, 2012, through all times material to this Indictment, MELTON was incarcerated at Polk Correctional Institution.

II. March 2014 Plot to Kidnap a Person with Ties to the Defense Attorney.

6. On a date unknown, but not later than March 2014, MELTON obtained a cellular telephone that he used to communicate with persons located outside of Polk Correctional Institution. Using the cellular telephone, MELTON contacted Defendants TIANNA MAYNARD, a/k/a Tianna Danet Maynard, a/k/a Tianna Danet Solomon, a/k/a Tianna Brooks, a/k/a Axt Up, a/k/a Act Up (hereinafter "MAYNARD"), and PATRICIA ANN KRAMER, a/k/a Trish, a/k/a Trisha (hereinafter "KRAMER"), and orchestrated a plot to kidnap a

person with ties to the Defense Counsel (hereinafter "March 2014 Plot").

7. Using the cellular telephone, MELTON instructed MAYNARD and KRAMER to assemble a team to travel from the Atlanta, Georgia, area, to Louisiana, in order to carry out the kidnaping plot. The kidnaping team included Defendants JEVANTE PRICE, a/k/a JeVante Travell Price, a/k/a Flame (hereinafter "PRICE"), and MICHAEL MARTRELL GOODEN, a/k/a Michael Montreal Gooden, a/k/a Michael Martree Gooden, a/k/a Hot (hereinafter "GOODEN"). MELTON agreed to arrange for each member of the kidnaping team to receive approximately \$10,000 in exchange for their participation in the kidnaping plot. MELTON also agreed that KRAMER would receive an extra \$1,000 to cover expenses of the trip.

8. Pursuant to MELTON's instruction, KRAMER used the internet to locate the address of the intended victim. KRAMER, using her own funds to front the expenses of the March 2014 Plot, rented a car and paid for the members of the kidnaping team to stay at a hotel in Louisiana. Participants in the March 2014 Plot carried a firearm and a stun gun for use in abducting the victim.

9. Despite traveling from Georgia to Louisiana and taking various other steps to carry out the kidnaping plot, the participants aborted the plot prior to completing the abduction.

III. April 2014 Plot to Kidnap the ADA's
Father.

10. In or about late March to early April 2014, MELTON, using a cellular telephone communication emanating from Polk Correctional Institution, instructed MAYNARD and KRAMER to assemble a team to travel to North Carolina and kidnap the ADA (hereinafter "April 2014 Plot"). Pursuant to MELTON's instruction, MAYNARD used the internet to research what she thought was the address of the ADA. Unbeknownst to MAYNARD, she had actually found the address of the ADA's father in Wake Forest, North Carolina.

11. On Thursday April 3, 2014, KRAMER and MAYNARD went to Low Rent Rental Car Co. in Mableton, Georgia, where KRAMER rented a silver 2008 Nissan Versa car for use in carrying out the April 2014 Plot. KRAMER listed MAYNARD as an eligible driver of the rental car.

12. During the early morning hours of Saturday, April 5, 2014, Defendant JENNA MARTIN, a/k/a Jenna Paulin Martin (hereinafter "MARTIN") was picked up by MAYNARD in order to travel to North Carolina to commit the abduction. MARTIN was promised the sum of \$6,000 in exchange for her participation in the April 2014 Plot. At the time that MAYNARD picked up MARTIN, Defendants QUANTAVIOUS THOMPSON, a/k/a Quan, a/k/a Kirkwood Quan

(hereinafter "THOMPSON"), and JAKYM CAMEL TIBBS, a/k/a Jok, a/k/a Jak (hereinafter "TIBBS") were already in the car.

13. During the trip from Georgia to North Carolina, MELTON communicated with the kidnaping team on a number of occasions. At one point, MELTON called and instructed the kidnaping team to wear khakis and collared shirts during the abduction. The kidnaping team then stopped at Walmart and purchased some clothing for use in the abduction. At another point, MELTON asked to be put on speaker phone and instructed the kidnaping team as to the role of each member during the kidnaping. In Lexington, South Carolina, en route to North Carolina, the kidnaping team stopped for gas and also purchased some food at a McDonald's restaurant.

14. As the kidnaping team began to get close to Wake Forest, North Carolina, they stopped at a rest stop and changed clothes. Upon arriving at the home of the ADA's father, MAYNARD drove into the driveway and remained with the car. MARTIN, with a clipboard in hand, walked to the front door of the house and knocked at the door. THOMPSON, who held a handgun, and TIBBS, who held a stun gun, stood just behind MARTIN, so as to be concealed from the direct view of the occupant of the house. When the ADA's father opened his front door a crack, THOMPSON and TIBBS forced their way into the house and abducted him. During the course of the abduction, TIBBS used the stun gun on

the ADA's father several times and THOMPSON pistol whipped the ADA's father. After he was subdued, the ADA's father's hands were zip-tied and he was forced into the backseat of the Nissan Versa.

15. Once in the Nissan Versa, the ADA's father was forced to remain lying on the backseat floorboard and a blanket was put over his body. During the entire trip back to Georgia, THOMPSON and TIBBS remained in the backseat with their feet on the victim's body. During the trip, THOMPSON and TIBBS also restrained the victim with handcuffs, pistol whipped him, and used the stun gun on him dozens of times.

16. MELTON arranged for the victim to be held in an apartment in Forest Cove Apartment Complex (also called Four Seasons) in Atlanta, Georgia. MELTON agreed to pay \$100 per day for the use of the apartment. The ADA's father was delivered to the apartment during the early evening hours on Saturday, April 5, 2014, and kept there against his will until he was freed by authorities just prior to midnight on April 9, 2014.

17. MELTON called MARTIN and dictated a text message to be sent to the victim's spouse. On Monday, April 7, 2014, at approximately 1:51 a.m., a series of text messages were sent to the victim's spouse. The text messages disclosed that the ADA's father had been kidnapped and then added, among other things:

- a. That the ADA's father was in the trunk

of a car on the way to California.

- b. If law enforcement was contacted, "we will send him back to you in 6 boxes and every chance we get we will take someone in you family to italy and torture them and kill them, we will do a drive by and gun down anybody in you family and we will throw grenades in you window."
- c. Various demands benefiting MELTON must be satisfied or harm would result to the ADA's father and others.
- d. That they had been to the residences of other members of the families of the ADA and Defense Attorney and that others would be harmed if cooperation was not forthcoming.

18. During the period from April 7, 2014, through the evening of April 9, 2014, MARTIN, MAYNARD, THOMPSON, and TIBBS stood watch over the hostage, who was taped to a chair inside a closet. PRICE and GOODEN also agreed to stand watch on the hostage. MELTON also sent instruction to Defendant CLIFTON JAMES ROBERTS, a/k/a Yeelo, a/k/a CJ, a/k/a Yee, a/k/a Don Yee, a/k/a Elo (hereinafter "ROBERTS"), about assisting in the killing and disposing of the hostage if MELTON's demands were not met or if the kidnaping team lost contact with MELTON for three consecutive days.

19. Pursuant to MELTON's instruction, on Wednesday, April 9, 2014, at approximately 12:19 a.m., another text message was sent to the victim's wife. The text message included a

photograph of the victim, taken by MAYNARD, in which he was tied up to a chair and seated in a closet. In a text message that accompanied the photograph, the sender made other demands and stated, among other things, as follows: "Tomorrow we call you again and if you can not tell me where my things are at tomorrow i will start torchering [ADA's father]"

20. By the evening of Wednesday, April 9, 2014, authorities had determined that MELTON was orchestrating the kidnaping from inside Polk Correctional Institution using a cellular telephone. Authorities were also watching two houses in Austell, Georgia, about 21 miles from the apartment in which the hostage was ultimately rescued, in which members of the conspiracy were staying.

21. On Wednesday, April 9, 2014, at approximately 8:00 p.m., a SMS/text message was sent to MELTON stating as follows: "We got car, spot, and shovel." At approximately 8:06 p.m. on April 9, 2014, a call was placed from MELTON's cellular telephone to MAYNARD, THOMPSON, and TIBBS. During the call, MELTON directed that the hostage be murdered, and provided specific instructions regarding the manner in which the hostage was to be killed, the body was to be buried, and the crime was to be covered up.

22. Authorities were able to locate the apartment where the hostage was being held and to extract the hostage from the

apartment just before midnight on Wednesday, April 9, 2014. In the early morning hours of Thursday, April 10, 2014, MAYNARD, ROBERTS, and MARTIN were apprehended in a blue Chevy Tahoe while transporting two shovels, a pick, and a firearm owned by ROBERTS.

23. The allegations set forth in the foregoing Introduction are hereby incorporated by reference into each count of this Indictment and realleged therein.

COUNT ONE

[Conspiracy to Commit Violations of the Kidnaping Statute;
18 U.S.C. § 1201(c)]

Beginning in or about February of 2014, and continuing to on or about April 10, 2014, in the Eastern District of North Carolina, and elsewhere, MELTON, THOMPSON, TIBBS, MAYNARD, MARTIN, ROBERTS, KRAMER, PRICE, and GOODEN, Defendants herein, did knowingly combine, conspire, confederate, and agree to commit offenses in violation Title 18, United States Code, Section 1201, that is:

- a. From in or about February 2014, to on or about March 11, 2014, to unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom, reward, and otherwise, any person, and to willfully transport such person in interstate commerce and use any means, facility, and instrumentality of interstate commerce in committing and furtherance of the commission of the offense, to wit, motor vehicles, public roads, and cellular telephones, in violation of Title 18, United States Code, Section 1201(a).

b. From on or about April 3, 2014, and continuing to on or about April 10, 2014, to unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom, reward, and otherwise, any person, and to willfully transport such person in interstate commerce and use any means, facility, and instrumentality of interstate commerce in committing and in furtherance of the commission of the offense, to wit, motor vehicles, public roads, and cellular telephones, in violation of Title 18, United States Code, Sections 1201(a).

In furtherance of the conspiracy and to effect the objects of the conspiracy, the Defendants did, in the Eastern District of North Carolina and elsewhere, commit numerous overt acts, many of which are detailed in the Introduction to this Indictment.

All in violation of Title 18, United States Code, Section 1201(c).

COUNT TWO

[Attempted Kidnaping and Aiding
and Abetting the Same;
18 U.S.C. §§ 1201(d) and 2]

Beginning in or about February of 2014, and continuing to on or about March 11, 2014, in the Eastern District of North Carolina and elsewhere, MELTON, KRAMER, PRICE, and GOODEN, Defendants herein, aiding and abetting each other and others, did attempt to unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom, reward, and otherwise, any person, and to willfully transport such person in

interstate commerce, and the offenders did travel in interstate commerce and did use means, facilities, and instrumentalities of interstate commerce in committing and in furtherance of the commission of said offense, including, motor vehicles, public roads, and cellular telephones, in violation of Title 18, United States Code, Sections 1201(d) and 2.

COUNT THREE

**[Using and Carrying a Firearm During and
in Relation to Attempted Kidnaping,
and Aiding and Abetting the Same;
18 U.S.C. §§ 924(c) and 2]**

From on or about March 7, 2014, continuing to on or about March 11, 2014, MELTON, PRICE, and GOODEN, defendants herein, aiding and abetting each other and others, did knowingly use and carry a firearm during and in relation to crimes of violence for which the defendants may be prosecuted in a court of the United States, that is, conspiracy to commit kidnaping and attempted kidnaping, in the Eastern District of North Carolina and elsewhere, in violation of Title 18, United States Code, Sections 1201(c), 1201(d), and 2, as alleged in Counts One and Two of this Indictment, all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT FOUR

[Kidnaping and Aiding and Abetting the Same;
18 U.S.C. §§ 1201(a) and 2]

Beginning on or about April 3, 2014, and continuing to on or about April 10, 2014, in the Eastern District of North Carolina and elsewhere, MELTON, THOMPSON, TIBBS, MAYNARD, MARTIN, ROBERTS, PRICE, and GOODEN, defendants herein, aiding and abetting each other, did unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom, reward, and otherwise, any person, and to willfully transport such person in interstate commerce, and the offenders did travel in interstate commerce and did use means, facilities, and instrumentalities of interstate commerce in committing and in furtherance of the commission of said offense, including, motor vehicles, public roads, and cellular telephones, in violation of Title 18, United States Code, Sections 1201(a) and 2.

COUNT FIVE

[Use, Carrying, and Brandishing a Firearm During
and in Relation to, and Possessing a Firearm in
Furtherance of, a Kidnaping, and
Aiding and Abetting the Same;
18 U.S.C. §§ 924(c) and 2]

On or about April 5, 2014, in the Eastern District of North Carolina and elsewhere, MELTON, THOMPSON, TIBBS, and MAYNARD, Defendants herein, aiding and abetting each other and others,

did knowingly use and carry a firearm during and in relation to crimes of violence for which the defendants may be prosecuted in a court of the United States, that is, conspiracy to commit kidnapping and kidnaping, in the Eastern District of North Carolina and elsewhere, in violation of Title 18, United States Code, Sections 1201(c), 1201(a), and 2, as alleged in Counts One and Four of this Indictment, and did possess said firearm in furtherance of said crime of violence, and said firearm was brandished, in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(ii), and 2.

A TRUE BILL

REDACTED VERSION

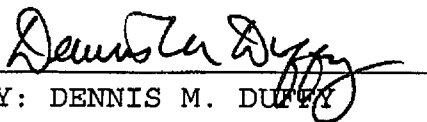
Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

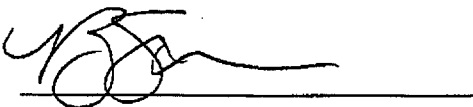
FOREPERSON

DATE

4/22/14

THOMAS G. WALKER
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Assistant United States Attorney


BY: BRIAN S. MEYERS
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