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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2014 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,
v.

Case No. 14 CR 3537 BAS

I N D I C T M E N T

Title 18, U.S.C., Sec. 1962(d) -
Conspiracy to Conduct Enterprise
Affairs Through A Pattern of
Racketeering Activity; Title 18,
U.S.C., Sec. 1963 - Criminal
Forfeiture

- JAMES TERELLE KING (1),
aka "Tkeezin", aka "TK", aka
"John'te Avery King-Chambers",
aka "Terelle King", aka
"Terelle Keezin",
- MICHAEL DEAN RICHARDSON (2),
aka "Geezo", aka "Mike Geezo",
aka "Mike Gee-ofied", aka
"M-Geezo", aka "Europeangeez",
aka "GeezLewinsky",
- ANDREW DAMON RICHARDSON (3),
aka "A-Knox", aka "A-Knox
Twotimes", aka "Black Jesus",
- BRIAN KEITH SCOTT (4),
aka "Prince Bam", aka "Additup
Harris", aka "T-Bam",
- ALONDRE SHAMIL DICKERSON (5),
aka "Krazy Ass KP", aka "KP2",
aka "Lil' KP",
- ANTHONY ROBERT DENNISON (6),
aka "AD", aka "Badact",
aka "Badact Business",
- KEYON RENTA GILL (7),
aka "Bambino Onlikeshit",
aka "Boostodamax", aka "Bino",

1 DONAVYN KEITH DOVE (8),
2 aka "Barzo", aka "Barrzo
3 Doitrite Dove", aka "Teddy
4 Macmcrec",
5 RYAN MCINTOCH IZUMI (9),
6 aka "Mack G", aka "Ryan Chan",
7 WILLIAM HENRY MITCHELL (10),
8 aka "Baddass Blingemm", aka
9 "Bills Thebaddass Blangemmm"
10 JORDAN RENEE MITCHELL (11),
11 aka "Jayblangenn Mitchell",
12 DAVID MICHAEL STOKES (12),
13 aka "Daddy Stokes",
14 aka "Daddizm",
15 CHRISTIAN DARWIN WILCOX (13),
16 aka "Cash Chris", aka "Chris
17 Cash", aka "Craymac",
18 aka "Cray",
19 MARQUIS DOMINIQUE DAVIS (14),
20 aka "Bang Oneohone", aka "Tiny
21 Bang", aka "TB", aka "T-Bang",
22 CORTES TIZZARO PRATER (15),
23 aka "Ceejay", aka "Ceejay
24 Staxx",
25 EMMANUEL GUMATAOTAO FAROL (16),
26 aka "June Farol", aka "Tha
27 Kidd", aka "Additup June",
28 aka "Tycoon June",
DONALD MICKEY STOKES (17),
aka "KT Brackito",
WILEY JUNIUS GREENO (18),
aka "Wiley Additup Greeno",
aka "Additupuno",
DEIJA RENEE LAMB (19),
aka "Dosha Marley",
JOSEPH BENJAMIN TAYLOR (20),
aka "JT", aka "King Taylor",
aka "Additup Deuce Taylor", aka
"Additup Tha Boss", aka
"Additup Guy",
FRANK GIBSON III (21),
aka "Frankie Cee",
CHRISTAL MARIE TORRES (22),
aka "Christal Cash",

Defendants.

The grand jury charges:

1 Count 1

2 THE ENTERPRISE

3 1. At various times material to this Indictment:

4 a. Defendants JAMES TERELLE KING, aka "Tkeezin", aka "TK",
5 aka "John'te Avery King-Chambers", aka "Terelle King", aka "Terelle
6 Keezin"; MICHAEL DEAN RICHARDSON, aka "Geezo", aka "Mike Geezo", aka
7 "Mike Gee-ofied", aka "M-Geezo", aka "Europeangeez", aka
8 "GeezLewinsky"; ANDREW DAMON RICHARDSON, aka "A-Knox", aka "A-Knox
9 Twotimes", aka "Black Jesus"; BRIAN KEITH SCOTT, aka "Prince Bam", aka
10 "Additup Harris", aka "T-Bam"; ALONDRE SHAMIL DICKERSON, aka "Krazy
11 Ass KP", aka "KP2", aka "Lil' KP"; ANTHONY ROBERT DENNISON, aka "AD",
12 aka "Badact", aka "Badact Business"; KEYON RENTA GILL, aka "Bambino
13 Onlikeshit", aka "Boostodamax", aka "Bino"; DONAVYN KEITH DOVE, aka
14 "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy Macmcrec"; RYAN
15 MCINTOCH IZUMI, aka "Mack G", aka "Ryan Chan"; WILLIAM HENRY MITCHELL,
16 aka "Baddass Blingemm", aka "Bills Thebaddass Blangemmm"; JORDAN RENEE
17 MITCHELL, aka "Jayblangenn Mitchell"; DAVID MICHAEL STOKES, aka "Daddy
18 Stokes", aka "Daddizm"; CHRISTIAN DARWIN WILCOX, aka "Cash Chris", aka
19 "Chris Cash", aka "Craymac", aka "Cray"; MARQUIS DOMINIQUE DAVIS, aka
20 "Bang Oneohone", aka "Tiny Bang", aka "TB", aka "T-Bang"; CORTES
21 TIZZARO PRATER, aka "Ceejay", aka "Ceejay Staxx"; EMMANUEL GUMATAOTAO
22 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup June", aka
23 "Tycoon June"; DONALD MICKEY STOKES, aka "KT Brackito"; WILEY JUNIUS
24 GREENO, aka "Wiley Additup Greeno", aka "Additupuno"; DEIJA RENEE
25 LAMB, aka "Dosha Marley"; JOSEPH BENJAMIN TAYLOR, aka "JT", aka "King
26 Taylor", aka "Additup Deuce Taylor", aka "Additup Tha Boss", aka
27 "Additup Guy"; FRANK GIBSON III, aka "Frankie Cee"; and CHRISTAL MARIE
28 TORRES, aka "Christal Cash" (collectively "Defendants"), and others

1 known and unknown to the grand jury, were members and associates of an
2 organization known as the "Tycoons."

3 b. The Tycoons organization was engaged in a variety of
4 illegal activities, including but not limited to the prostitution of
5 minor and adult females, attempted murder, criminal threats of murder,
6 robbery, and narcotics trafficking. At all relevant times, the
7 Tycoons operated in the Southern District of California and elsewhere.
8 The organization and the individuals who associate with it for
9 criminal purposes constituted an "enterprise," as defined by Title 18,
10 United States Code, Section 1961(4) (hereinafter the "Enterprise"),
11 that is, a group of individuals associated in fact. The Enterprise
12 constituted an ongoing organization whose members functioned as a
13 continuing unit for the common purpose of achieving the objectives of
14 the Enterprise. The Enterprise was engaged in, and its activities
15 affected, interstate and foreign commerce.

16 THE PURPOSE OF THE ENTERPRISE

17 2. The purposes of the Enterprise included, but are not limited
18 to, the following:

19 a. Enriching the members and associates of the Enterprise
20 through, among other things, recruiting and maintaining juvenile and
21 adult females to work as prostitutes; the illegal distribution of
22 narcotics; committing robberies; and conducting other profit-driven
23 illegal activities in San Diego County and elsewhere;

24 b. Maintaining control over illegal activities occurring
25 in Tycoons' "territory" within San Diego County, California, including
26 keeping the public-at-large in fear of the Enterprise, and in fear of
27 its members and associates through threats of violence and violence;
28

1 c. Preserving, protecting and expanding the power of the
2 Enterprise through the use of intimidation, violence, threats of
3 violence, assaults, and other violent crimes as well through rap music
4 and social media.

5 BACKGROUND ON THE TYCOONS AND THE ROLE OF THE DEFENDANTS WITHIN
6 THE ENTERPRISE

7 3. The Tycoons is primarily comprised of African American gang
8 members from cliques or subgroups distinct to the Enterprise:
9 Tycoons/Additup, Play Girl Fantasy (PGF) and Break Yo Bitch (BYB).

10 a. Tycoons/Additup: First documented in 2008 in Lemon
11 Grove, a suburb of San Diego, Tycoons' members and associates
12 typically operate at the Lemon Grove Trolley Station in Lemon Grove.
13 Members range in age from late teens to mid-twenties.

14 b. Play Girl Fantasy: First documented in Spring Valley,
15 a suburb of San Diego, in 2004, members and associates operate at La
16 Presa (Spring Valley) and Grand Avenue. Members range in age from
17 early twenties to mid-thirties.

18 c. Break Yo Bitch (BYB): First documented in 2012 in
19 Lemon Grove, a suburb of San Diego, these members and associates are
20 typically under the age of 18 and operate in Lemon Grove at the Lemon
21 Grove Trolley Station in the same area as Tycoons/Additup.

22 4. Some members of the Enterprise are also documented gang
23 members of several criminal street gangs within San Diego County.
24 These gangs include West Coast Crips, Eastside Skyline Piru (ESP),
25 O'Farrell Park Banksters, Lincoln Park, Emerald Hills, Neighborhood
26 Crips, and Cutthroats. While several of these gangs are rivals that
27 regularly engage in violence with each other, Enterprise members from
28 otherwise rival gangs assemble together to promote Tycoons' activity

1 in East San Diego County, and specifically collaborate on profitable
2 illegal activities. Members of the Tycoons come together for one
3 common goal, which is to make money through criminal acts and to raise
4 their status within the Enterprise.

5 5. The Tycoons do not follow a strict hierarchy where one
6 member reports to another or is directed by another member. In all,
7 the Tycoons sees itself as a "family" where all members work together
8 committing various criminal acts to make money and further support the
9 Enterprise, which is sometimes referred to as "Tycoonin" or "Adding It
10 Up." Members of the Tycoons confer with each other on how best to
11 conduct their criminal activities and assist each other with their
12 criminal activity.

13 6. Tycoons activities began being documented by law enforcement
14 as early as 2008 when law enforcement noticed a cohesive group of
15 males committing burglaries, robberies, and assaults in the cities of
16 Lemon Grove and Spring Valley. It is believed that Tycoons was formed
17 in 2008, with approximately four members. At the time, the actions of
18 most Tycoons were directed by James Terelle King, Michael Dean
19 Richardson, Andrew Damon Richardson, and an unindicted coconspirator.

20 7. The Tycoons claim certain areas in the cities of Lemon Grove
21 and Spring Valley. The boundaries in the City of Lemon Grove include
22 Interstate 94 to the North, Palm Avenue to the South, Sweetwater Road
23 to the East and Massachusetts Avenue to the West. The Boundaries in
24 the City of Spring Valley include Eucalyptus Street to the North, San
25 Carlos Street to the South, Whitestone to the East and Sweetwater Road
26 to the West. The Tycoons claims the lemon statue located near the
27 Trolley Station, located at the intersection of Broadway and Lemon
28 Grove Avenue as a symbol of their gang territory. The Tycoons

1 primarily congregate at the breezeway outside of the El Pollo Grill
2 located at 7836 Broadway, and outside of the Starbucks located at 7801
3 Broadway, in the City of Lemon Grove. Members and associates are also
4 known to congregate at Kunkle Park, also known as "Purple Park" or
5 "Tycoon Park" located at 8105 Lemon Grove Way, Lemon Grove.

6 8. Members of the Tycoons use tattoos to identify themselves as
7 members of the Enterprise. These symbols include "Tycoons" or the
8 letter "T" for Tycoons, "Additup" or the letter "A" for "Additup,"
9 "PGF" for "Playgirl Fantasy" and "BYB" for "Break Yo Bitch." Members
10 of the Tycoons also identify themselves by displaying hand signs
11 representing their membership. Some of these hand signs include
12 displaying a "T," "A," or "P." Tycoon members generally wear purple
13 which is the combination of red and blue for "Bloods" and "Crips"
14 given that many members are members or associates from various "Blood"
15 or "Crip" criminal street gangs.

16 9. Many members of the Tycoons claim to be "rappers" and
17 produce rap music and rap videos. This music raises the Enterprise's
18 status making it a symbol of success and power within the community,
19 thus assisting in recruitment of other members of the Enterprise and
20 victims of prostitution. Members of the Tycoons have created various
21 rap groups and support each other in the promotion of their music.
22 The lyrics of the Enterprise's music primarily focus on pimping
23 activity and narcotics related activity in San Diego County and across
24 the country. The lyrics also frequently contain mentions of the gang
25 lifestyle and their respective gang sets.

26 10. Tycoons has no set procedure to join the Enterprise. Some
27 members have joined due to their family connection or geographical
28 location. Some members have been "jumped in" which requires a new

1 member to be physically beaten by senior, established members of the
2 group and demonstrate resilience during the beating. Other members
3 have been able to join due to their contribution to the Enterprise,
4 such as selling drugs, obtaining guns, selling and receiving stolen
5 property, or "putting in work," which includes other illegal
6 activities.

7 11. The Tycoons puts much of its profit-driven Enterprise focus
8 on prostituting adult and juvenile females throughout San Diego County
9 and the United States:

10 a. Members and associates of the Enterprise acted as
11 "pimps" (a person who befriends, recruits, trains and/or panders a
12 person for prostitution) and "bottoms" (a pimp's most trusted/senior
13 prostitute) to promote and manage prostitution activities in San Diego
14 County, California, and elsewhere. Other coconspirators facilitated
15 the Enterprise's prostitution activities, assisting Enterprise members
16 and associates in "pimping out" the adult and juvenile prostitutes.
17 Gang-controlled prostitution spawned a "pimping" subculture, known as
18 "The Game," with its own set of rules.

19 b. The Tycoons Enterprise adheres to the rules of "The
20 Game," which a pimp would teach to any female he was about to "turn
21 out" or begin prostituting. Prostitutes were expected to maintain
22 absolute loyalty to their pimp, and in fact are often considered the
23 property of the pimp. Prostitutes were not permitted to speak with or
24 even look at other pimps, and may be traded or sold among the pimps.
25 Other pimps were permitted to encourage a prostitute to work for him,
26 and she was allowed to select, or "choose up," to a new pimp, though
27 generally she must pay a "choose up fee" to her new pimp for the
28 privilege. The new pimp then informed the old pimp that the

1 prostitute had decided to leave. Long-term prostitutes frequently
2 obtained tattoos, or other branding, featuring the gang moniker of
3 their pimps. The rules of "The Game" also included instructions
4 related to interactions with other prostitutes ("wifey" or "wifey-
5 in-law"), and interactions with prostitution clients ("johns" or
6 "tricks").

7 c. A prostitute was expected to provide her pimp with the
8 money earned through her prostitution activities. In exchange, the
9 prostitute received protection, clothing, housing, cars, and food from
10 her pimp. Prostitutes who attempted to carry out their business
11 without a pimp, known as "renegading," or prostitutes who were
12 suspected of cooperating with law enforcement investigations may be
13 subject to punishment by the Enterprise and were labeled as "snitches"
14 by the Enterprise. This labeling was to encourage physical punishment
15 to these females. Enterprise members jointly enforced the rules of
16 "The Game" on prostitutes who were ignoring the rules, or "out-of-
17 pocket." This would typically be done through violence or threats of
18 violence. Pimps known for controlling their prostitutes through force
19 were considered "gorilla pimps," while those who convinced their
20 prostitutes to abide by the rules without violence are "finesse
21 pimps." "Finesse Pimps" usually use fraud, coercion, and emotional
22 manipulation to get their prostitutes to follow their rules.

23 d. Enterprise members and associates cooperated to promote
24 the prostitution activities of the Enterprise, primarily in and around
25 low-cost motels in Lemon Grove, Spring Valley, National City, Chula
26 Vista, and Mission Valley, California.

27 e. Members frequently pooled resources to further the
28 prostitution activities of the Enterprise by, for instance, sharing

1 vehicles used to transport prostitutes, computers used to post
2 advertisements, and motel rooms in which the "dates" occur.
3 Enterprise members also worked together to monitor law enforcement and
4 monitor other pimps' girls. Enterprise members and associates
5 traveled together to prostitute females in other states.

6 f. Enterprise members and associates also worked together
7 to recruit new prostitutes. Recruitment efforts generally focused on
8 vulnerable females, particularly those from a broken home or runaways.
9 Both pimps and their "bottoms" recruited new prostitutes from local
10 middle and high schools. To "turn out" or initiate a new prostitute,
11 pimps and bottoms utilized various methods to manipulate the woman,
12 including false promises of a luxurious lifestyle, intimidation, and
13 actual or threatened violence. Pimps regularly furnished drugs and
14 alcohol to lower the recruited prostitute's inhibitions and increase
15 her productivity.

16 12. At various times material to this Indictment, the defendants
17 had the following roles in the Enterprise.

18 a. Tycoons Enterprise Members: Defendants JAMES TERELLE
19 KING, aka "Tkeezin", aka "TK", aka "John'te Avery King-Chambers", aka
20 "Terelle King", aka "Terelle Keezin"; MICHAEL DEAN RICHARDSON, aka
21 "Geezo", aka "Mike Geezo", aka "Mike Gee-ofied", aka "M-Geezo", aka
22 "Europeangeez", aka "GeezLewinsky"; ANDREW DAMON RICHARDSON, aka "A-
23 Knox", aka "A-Knoxx Twotimes", aka "Black Jesus"; BRIAN KEITH SCOTT,
24 aka "Prince Bam", aka "Additup Harris", aka "T-Bam"; ALONDRE SHAMIL
25 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP"; ANTHONY
26 ROBERT DENNISON, aka "AD", aka "Badact", aka "Badact Business"; KEYON
27 RENTA GILL, aka "Bambino Onlikeshit", aka "Boostodamax", aka "Bino";
28 DONAVYN KEITH DOVE, aka "Barzo", aka "Barrzo Doitrite Dove", aka

1 "Teddy Macmcrecree"; RYAN MCINTOCH IZUMI, aka "Mack G", aka "Ryan Chan";
2 WILLIAM HENRY MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
3 Blangemmm"; JORDAN RENEE MITCHELL, aka "Jayblangenn Mitchell"; DAVID
4 MICHAEL STOKES, aka "Daddy Stokes", aka "Daddizm"; CHRISTIAN DARWIN
5 WILCOX, aka "Cash Chris", aka "Chris Cash", aka "Craymac", aka "Cray";
6 MARQUIS DOMINIQUE DAVIS, aka "Bang Oneohone", aka "Tiny Bang", aka
7 "TB", aka "T-Bang"; CORTES TIZZARO PRATER, aka "Ceejay", aka "Ceejay
8 Staxx"; EMMANUEL GUMATAOTAO FAROL, aka "June Farol", aka "Tha Kidd",
9 aka "Additup June", aka "Tycoon June"; DONALD MICKEY STOKES, aka "KT
10 Brackito"; WILEY JUNIUS GREENO, aka "Wiley Additup Greeno", aka
11 "Additupuno"; DEIJA RENEE LAMB, aka "Dosha Marley"; JOSEPH BENJAMIN
12 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce Taylor", aka
13 "Additup Tha Boss", aka "Additup Guy"; and FRANK GIBSON III, aka
14 "Frankie Cee" were members of Tycoons Enterprise. Each Tycoon member
15 may be a "Big Homie" or "Lil' Homie" within the Enterprise. Members
16 were expected to "hustle" on behalf of the Enterprise, with their
17 efforts focused upon a variety of profit-making illegal activity,
18 including drug trafficking, robberies, extortion and, in recent years,
19 the prostitution of juvenile and adult females. To protect and expand
20 these illegal ventures, members defend Enterprise territory against
21 competing gangs, cooperate to detect and avoid law enforcement, and
22 intimidate members of the community.

23 b. Tycoons Enterprise Associate: Defendant CHRISTAL MARIE
24 TORRES, aka "Christal Cash" is an associate of the Tycoons Enterprise.
25 She is a "bottom" or "bottom bitch" for pimp members of the Enterprise
26 who assists the pimp members in recruiting and training other females
27 to work as prostitutes, and provide logistical support like computers,
28

1 online accounts and pre-paid credit cards for the new prostitutes and
2 other pimps.

3 THE MEANS AND METHODS OF THE ENTERPRISE

4 13. Defendants and their coconspirators and associates used the
5 following methods and means, among others, to conduct and participate
6 in the conduct of the affairs of the Enterprise:

7 a. Defendants used the Enterprise to promote and expand
8 their prostitution of juvenile and adult females. Tycoons Enterprise
9 members used their status and reputation as gang members to further
10 the Enterprise's illegal prostitution activities.

11 b. Members and associates of the Enterprise, acting as
12 pimps, bottoms, and other coconspirators, solicited, enticed, coerced
13 and persuaded adult and juvenile females from various locations where
14 minors congregate, to work for them as prostitutes. Members of the
15 Enterprise also conducted online recruitment through social networking
16 websites like Instagram, Facebook, and Twitter, as well as through
17 other previously recruited prostitutes.

18 c. Members of the enterprise, acting as pimps and bottoms,
19 instructed prostitutes on the "rules of the game," which are rules
20 that prostitutes are expected to obey without question.

21 d. Members of the Enterprise, acting as pimps, controlled
22 their females, and punished them if they broke the rules set by the
23 pimp. Punishment included physical beatings, verbal lashings and
24 other humiliating acts towards the prostitute.

25 e. Members of the Enterprise, acting as pimps, sold, or
26 traded prostitutes to other pimps, and females working as prostitutes
27 were forced to work for the receiving pimp.

1 f. Members of the Enterprise, acting as pimps, transported
2 female prostitutes to various locations in San Diego County and
3 elsewhere in the United States, including known areas of prostitution
4 (called "tracks" or "blades"), private residences, hotels and motels
5 that would facilitate such activity and places and events with large
6 customer base such as professional sporting events.

7 g. Members of the Enterprise, acting as pimps, transported
8 their female prostitutes across state lines, to states including, but
9 not limited to Texas, Arizona, Kansas, Michigan and Nevada.

10 h. Members of the Enterprise, acting as pimps, bottoms and
11 coconspirators, provided logistical support for each other, including
12 but not limited to renting motel rooms for one another, transporting
13 prostitutes for each other, sharing computers, data, mobile internet
14 connections, online accounts (like Backpage.com) and prepaid credit
15 cards to post prostitution ads.

16 i. Members of the Enterprise also shared prostitution
17 intelligence such as what areas to work and what websites will
18 generate the most business.

19 j. Members of the Enterprise, acting as pimps, directed
20 adult and juvenile prostitutes working for them to rent hotel and
21 motel rooms to use as temporary residences for the pimps and
22 prostitutes as well as to commit acts of prostitution.

23 k. Members of the Enterprise, acting as pimps, provided
24 to, and directed others to provide for, their prostitutes specific
25 items to further their prostitution activity, including cellular
26 telephones, laptop computers, wireless internet connections, prepaid
27 credit cards and condoms.

28

1 "GeezLewinsky"; ANDREW DAMON RICHARDSON, aka "A-Knox", aka "A-Knox
2 Twotimes", aka "Black Jesus"; BRIAN KEITH SCOTT, aka "Prince Bam", aka
3 "Additup Harris", aka "T-Bam"; ALONDRE SHAMIL DICKERSON, aka "Krazy
4 Ass KP", aka "KP2", aka "Lil' KP"; ANTHONY ROBERT DENNISON, aka "AD",
5 aka "Badact", aka "Badact Business"; KEYON RENTA GILL, aka "Bambino
6 Onlikeshit", aka "Boostodamax", aka "Bino"; DONAVYN KEITH DOVE, aka
7 "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy Macmcrec"; RYAN
8 MCINTOCH IZUMI, aka "Mack G", aka "Ryan Chan"; WILLIAM HENRY MITCHELL,
9 aka "Baddass Blingemm", aka "Bills Thebaddass Blangemmm"; JORDAN RENEE
10 MITCHELL, aka "Jayblangenn Mitchell"; DAVID MICHAEL STOKES, aka "Daddy
11 Stokes", aka "Daddizm"; CHRISTIAN DARWIN WILCOX, aka "Cash Chris", aka
12 "Chris Cash", aka "Craymac", aka "Cray"; MARQUIS DOMINIQUE DAVIS, aka
13 "Bang Oneohone", aka "Tiny Bang", aka "TB", aka "T-Bang"; CORTES
14 TIZZARO PRATER, aka "Ceejay", aka "Ceejay Staxx"; EMMANUEL GUMATAOTAO
15 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup June", aka
16 "Tycoon June"; DONALD MICKEY STOKES, aka "KT Brackito"; WILEY JUNIUS
17 GREENO, aka "Wiley Additup Greeno", aka "Additupuno"; DEIJA RENEE
18 LAMB, aka "Dosha Marley"; JOSEPH BENJAMIN TAYLOR, aka "JT", aka "King
19 Taylor", aka "Additup Deuce Taylor", aka "Additup Tha Boss", aka
20 "Additup Guy"; FRANK GIBSON III, aka "Frankie Cee"; and CHRISTAL MARIE
21 TORRES, aka "Christal Cash" and others known and unknown to the grand
22 jury, being persons employed by and associated with the Enterprise (as
23 defined above), which Tycoons Enterprise was engaged in, and the
24 activities of which affected, interstate and foreign commerce, did
25 knowingly and intentionally conspire with each other, and with other
26 persons, to violate Title 18, United States Code, Section 1962(c),
27 that is, to conduct and participate, directly and indirectly, in the
28 conduct of the Enterprise's affairs through a pattern of racketeering

1 activity involving multiple acts chargeable under the following
2 provisions of State law and punishable by imprisonment for more than
3 one year:

4 a. Acts and threats involving murder in violation of
5 California Penal Code, Sections 182, 187, 422 and 664;

6 b. Acts involving robbery in violation of California Penal
7 Code, Sections 182, 211, 212.5, 664;

8 c. Acts involving drug trafficking in violation of
9 California Health and Safety Code, Sections 11351.5, 11352, 11359,
10 11360, 11378, 11379;

11 and multiple acts indictable under the following provisions of federal
12 law:

13 d. Title 18, United States Code, Section 1591 (sex
14 trafficking of children or by force, fraud, and
15 coercion);

16 e. Title 18, United States Code, Section 1952 (interstate
17 and foreign travel or transportation in aid of
18 racketeering);

19 f. Title 18, United States Code, Section 1956 (money
20 laundering);

21 g. Title 18, United States Code, 2421 (Mann Act)

22 h. Title 18, United States Code, Section 2423
23 (transportation of minors);

24 and multiple acts involving distribution of narcotics in violation of:

25 i. Title 21, United States Code, Sections 841(a)(1) and
26 846 (Possession of controlled substance for
27 distribution and distribution of controlled
28 substances).

1 15. It was a further part of the conspiracy that each defendant
2 agreed that a conspirator would commit at least two acts of
3 racketeering activity in the conduct of the affairs of the Enterprise.

4 OVERT ACTS

5 16. In furtherance of the conspiracy and to accomplish the
6 objects of the conspiracy, the defendants and their co-conspirators
7 committed the following overt acts, among others, in San Diego County,
8 within the Southern District of California, and elsewhere, unless
9 otherwise specified, on or about the dates set forth below:

10 (1) On or about April 2, 2008, defendant ANDREW DAMON
11 RICHARDSON, aka "A-Knox", aka "A-Knox Twotimes", aka
12 "Black Jesus", did attempt to rob R.J.A. by force or fear
13 at Orange Avenue and Acacia Avenue in La Mesa, California.

14 (2) On or about September 1, 2008, defendant JAMES TERELLE
15 KING, aka "Tkeezin", aka "TK", aka "John'te Avery King-
16 Chambers", aka "Terelle King", aka "Terelle Keezin", and
17 two unindicted coconspirators assisted in the prostitution
18 of minor female #1 (MF#1) (age 14) and MF#2 (age 15).

19 (3) On or about March 3, 2009, defendant ANDREW DAMON
20 RICHARDSON, aka "A-Knox", aka "A-Knox Twotimes", aka
21 "Black Jesus", took a ring from R.J.A. by force or fear in
22 La Mesa, California.

23 (4) On or about March 24, 2009, defendant ANTHONY ROBERT
24 DENNISON, aka "AD", aka "Badact", aka "Badact Business",
25 and five other unindicted coconspirators robbed by force
26 and fear B.A. of his wallet and jewelry at Central Avenue
27 and Corona Street in Lemon Grove, California.

28

1 (5) On or about April 6, 2009, defendants MICHAEL DEAN
2 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
3 ofied", aka "M-Geezo", aka "Europeangeez", aka
4 "GeezLewinsky", EMMANUEL GUMATAOTAO FAROL, aka "June
5 Farol", aka "Tha Kidd", aka "Additup June", aka "Tycoon
6 June", DONAVYN KEITH DOVE, aka "Barzo", aka "Barrzo
7 Doitrite Dove", aka "Teddy Macmcrecree", JOSEPH BENJAMIN
8 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
9 Taylor", aka "Additup Tha Boss", aka "Additup Guy", and
10 several unindicted coconspirators were together at Belmont
11 Park located at 3190 Mission Blvd, in San Diego,
12 California.

13 (6) On or about July 12, 2009, defendant MICHAEL DEAN
14 RICHARDSON aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
15 ofied", aka "M-Geezo", aka "Europeangeez", aka
16 "GeezLewinsky", took by force and fear an Ipod from two
17 juvenile males at 8141 La Mesa Blvd, in La Mesa,
18 California.

19 (7) On or about December 11, 2009, defendants MICHAEL DEAN
20 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
21 ofied", aka "M-Geezo", aka "Europeangeez", aka
22 "GeezLewinsky", and ANDREW DAMON RICHARDSON, aka "A-Knox",
23 aka "A-Knoxx Twotimes", aka "Black Jesus", and an
24 unindicted coconspirator were contacted together by
25 El Cajon Police Department in El Cajon, California while
26 in possession of a stolen vehicle.

27 (8) On or about March 20, 2010, defendant JOSEPH BENJAMIN
28 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce

1 Taylor", aka "Additup Tha Boss", aka "Additup Guy", posted
2 to his Facebook profile a photograph with defendants
3 CORTES TIZZARO PRATER, aka "Ceejay", aka "Ceejay Staxx",
4 and two unindicted coconspirators displaying the "Tycoon"
5 gang hand sign which is depicted by the letter "T".

6 (9) On or about June 12, 2010, defendant WILLIAM HENRY
7 MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
8 Blangemmm", took by force or fear gold necklace from the
9 neck of C.T. while parked at Horse Shoe Liquor, Grand
10 Avenue in Spring Valley, California.

11 (10) On or about July 28, 2010, defendant CORTES TIZZARO
12 PRATER, aka "Ceejay", aka "Ceejay Staxx", uploaded a video
13 on YouTube titled "ADDITUP Freestyle BadAct Glow TA" where
14 defendant ANTHONY ROBERT DENNISON, aka "AD", aka "Badact",
15 aka "Badact Business", freestyle raps "Add It Up, Add It
16 Up...I'm from the P...Tycoon are my Goons" and displays the
17 "Tycoon" hand sign.

18 (11) On or about August 26, 2010, defendant MICHAEL DEAN
19 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
20 ofied", aka "M-Geezo", aka "Europeangeez", aka
21 "GeezLewinsky", ANDREW DAMON RICHARDSON, aka "A-Knox", aka
22 "A-Knox Twotimes", aka "Black Jesus", and two unindicted
23 coconspirators were together near 482 Hilltop Drive, Chula
24 Vista, California.

25 (12) On or about November 18, 2010, defendant RYAN MCINTOCH
26 IZUMI, aka "Mack G", aka "Ryan Chan", and an unindicted
27 coconspirator burglarized the residence of J.J.C., on
28 Woodland Drive in La Mesa, California.

1 (13) On or about January 26, 2011, defendant FRANK GIBSON III,
2 aka "Frankie Cee", and other unindicted coconspirators
3 were associating with each other in front of Kunkel Park
4 aka "Purple Park"/"Tycoon Park" in Lemon Grove,
5 California.

6 (14) On or about February 13, 2011, defendant DONAVYN KEITH
7 DOVE, aka "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy
8 Macmcrecree", posted a photograph to his Facebook profile
9 wearing a baseball cap with the "Tycoon" gang symbol.

10 (15) On or about February 28, 2011, defendant FRANK GIBSON III,
11 aka "Frankie Cee", posted to his Facebook profile a
12 conversation with "ByResha Williams" wherein Gibson writes
13 "My sad mamas Nahh bt im frmm Tycoon PgF nd Neighborhood
14 bt if yuu damuin it skyLKine its cOolkin I fucc wit east
15 niggas noo other bkKood sets...Bt any way wee nt gnna goo
16 too far into this banginn shxt imm really tryna get too
17 noo yuu".

18 (16) On or about March 21, 2011, defendants JAMES TERELLE KING,
19 aka "Tkeezin", aka "TK", aka "John'te Avery King-
20 Chambers", aka "Terelle King", aka "Terelle Keezin",
21 CHRISTIAN DARWIN WILCOX, aka "Cash Chris", aka "Chris
22 Cash", aka "Craymac", aka "Cray", ALONDRE SHAMIL
23 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
24 CORTES TIZZARO PRATER, aka "Ceejay", aka "Ceejay Staxx";
25 DONAVYN KEITH DOVE, aka "Barzo", aka "Barrzo Doitrite
26 Dove", aka "Teddy Macmcrecree", JOSEPH BENJAMIN TAYLOR, aka
27 "JT", aka "King Taylor", aka "Additup Deuce Taylor", aka
28 "Additup Tha Boss", aka "Additup Guy", FRANK GIBSON III,

1 aka "Frankie Cee", and other unindicted coconspirators
2 appeared in a YouTube rap video titled, "Tkeezin-Roll it
3 Up" that features rapping about pimping including "how she
4 treat you like a trick, then see me and give me money."

5 (17) On or about March 30, 2011, defendant FRANK GIBSON III,
6 aka "Frankie Cee", posted to his Facebook profile a
7 conversation with "Ayana Harris" discussing gang sets and
8 functions where Gibson asks Harris "...howd yuu noo I was
9 frm TyCoon" "cohs u got the TY infront of ur name & I noe
10 ppl from tycoons", Harris states "were ur from? & shit
11 might hit this function in the valley" Gibson writes back,
12 "Tycoon PGF NHC."

13 (18) On or about April 5, 2011, defendant CORTES TIZZARO
14 PRATER, aka "Ceejay", aka "Ceejay Staxx", posted a link to
15 a freestyle rap video on his Facebook profile, titled
16 "CeeJayStaxx\$ High Freestyle" where Prater performs a
17 freestyle rap and refers to himself as "Add It Up Staxx."

18 (19) On or about April 17, 2011, defendant JOSEPH BENJAMIN
19 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
20 Taylor", aka "Additup Tha Boss", aka "Additup Guy", posted
21 to his Facebook profile a photograph with codefendants
22 ANDREW DAMON RICHARDSON, aka "A-Knox", aka "A-Knoxx
23 Twotimes", aka "Black Jesus", BRIAN KEITH SCOTT, aka
24 "Prince Bam", aka "Additup Harris", aka "T-Bam", EMMANUEL
25 GUMATAOTAO FAROL, aka "June Farol", aka "Tha Kidd", aka
26 "Additup June", aka "Tycoon June", ALONDRE SHAMIL
27 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
28 and an unidentified black male displaying the "Tycoon" and

1 "Add it Up" gang hand signs which are depicted with the
2 letters "T" and "A" respectively.

3 (20) On or about April 20, 2011, defendant WILLIAM HENRY
4 MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
5 Blangemmm", did possess controlled substances in a
6 distributable amount in Spring Valley, California.

7 (21) On or about April 27, 2011, defendant JAMES TERELLE KING,
8 aka "Tkeezin", aka "TK", aka "John'te Avery King-
9 Chambers", aka "Terelle King", aka "Terelle Keezin",
10 posted to his Facebook profile a photograph titled, "Add
11 It Up for Keezin. Its Grindtime" which depicted a nude
12 white female that had several baseball hats on her back
13 that read "ADDITUP" and "KEEZIN."

14 (22) On or about May 29, 2011, defendant BRIAN KEITH SCOTT, aka
15 "Prince Bam", aka "Additup Harris", aka "T-Bam", posted a
16 photograph on his Facebook profile with codefendants JAMES
17 TERELLE KING, aka "Tkeezin", aka "TK", aka "John'te Avery
18 King-Chambers", aka "Terelle King", aka "Terelle Keezin",
19 MICHAEL DEAN RICHARDSON, aka "Geezo", aka "Mike Geezo",
20 aka "Mike Gee-ofied", aka "M-Geezo", aka "Europeangeez",
21 aka "GeezLewinsky", ANDREW DAMON RICHARDSON, aka "A-Knox",
22 aka "A-Knoxx Twotimes", aka "Black Jesus", DONAVYN KEITH
23 DOVE, aka "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy
24 Macmcrecree", and another unindicted coconspirator displaying
25 the "Add it Up" hand sign.

26 (23) On or about July 21, 2011, defendants JOSEPH BENJAMIN
27 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
28 Taylor", aka "Additup Tha Boss", aka "Additup Guy", and

1 DONAVYN KEITH DOVE, aka "Barzo", aka "Barrzo Doitrite
2 Dove", aka "Teddy Macmcrecree", had a Facebook conversation
3 with each other where each are discussing drug trafficking
4 and prostitution.

5 (24) On or about July 29, 2011, defendant MICHAEL DEAN
6 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
7 ofied", aka "M-Geezo", aka "Europeangeez", aka
8 "GeezLewinsky", posted to his Facebook profile a
9 photograph with an unindicted coconspirator titled, "The A
10 don't stand for ATL" where the unindicted conspirator is
11 displaying the "Tycoon" gang hand sign which is depicted
12 with a "T" and Richardson is displaying the "Add it Up"
13 gang hand sign with the letter "A."

14 (25) On or about August 8, 2011, defendant ANDREW DAMON
15 RICHARDSON, aka "A-Knox", "A-Knox Twotimes", "Black
16 Jesus", posted to his Facebook profile a photograph with
17 codefendants JAMES TERELLE KING, aka "Tkeezin", aka "TK",
18 aka "John'te Avery King-Chambers", aka "Terelle King", aka
19 "Terelle Keezin", DONAVYN KEITH DOVE, aka "Barzo", aka
20 "Barrzo Doitrite Dove", aka "Teddy Macmcrecree", and MICHAEL
21 DEAN RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike
22 Gee-ofied", aka "M-Geezo", aka "Europeangeez", aka
23 "GeezLewinsky" displaying the "Tycoon" gang hand sign
24 which is displayed as a "T."

25 (26) On or about September 3, 2011, defendant ANDREW DAMON
26 RICHARDSON, aka "A-Knox", "A-Knox Twotimes", "Black
27 Jesus", posted to his Facebook profile a photograph of
28

1 himself displaying the "Tycoon" gang hand sign which is
2 displayed as a "T."

3 (27) On or September 15, 2011, a YouTube rap video was posted
4 by TripleMDesignz, titled "Tkeezin and Young Gee - Only In
5 San Diego (Daygo)" wherein defendants JAMES TERELLE KING,
6 aka "Tkeezin", aka "TK", aka "John'te Avery King-
7 Chambers", aka "Terelle King", aka "Terelle Keezin", BRIAN
8 KEITH SCOTT, aka "Prince Bam", aka "Additup Harris", aka
9 "T-Bam", CORTES TIZZARO PRATER, aka "Ceejay", aka "Ceejay
10 Staxx"; CHRISTIAN DARWIN WILCOX, aka "Cash Chris", aka
11 "Chris Cash", aka "Craymac", aka "Cray", ANDREW DAMON
12 RICHARDSON, aka "A-Knox", aka "A-Knox Twotimes", aka
13 "Black Jesus", MICHAEL DEAN RICHARDSON, aka "Geezo", aka
14 "Mike Geezo", aka "Mike Gee-ofied", aka "M-Geezo", aka
15 "Europeangeez", aka "GeezLewinsky", ALONDRE SHAMIL
16 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
17 ANTHONY ROBERT DENNISON, aka "AD", aka "Badact", aka
18 "Badact Business", FRANK GIBSON III, aka "Frankie Cee",
19 DONAVYN KEITH DOVE, aka "Barzo", aka "Barrzo Doitrite
20 Dove", aka "Teddy Macmcrecree", and unindicted coconspirators
21 are seen rapping "We handle business make a livin, gansta
22 pimping, thug intentions and get the money out these
23 bitches."

24 (28) On or about October 22, 2011, defendant ANTHONY ROBERT
25 DENNISON, aka "AD", aka "Badact", aka "Badact Business",
26 posted to his Facebook profile a status update which read,
27 "BACKPAGE,CITYVIBE BICH LETS POST INCALL OUTCALL BITCH
28 LETS POST."

1 (29) On or about October 31, 2011, defendant EMMANUEL
2 GUMATAOTAO FAROL, aka "June Farol", aka "Tha Kidd", aka
3 "Additup June", aka "Tycoon June", and unindicted
4 conspirator did threaten to assault P.L.B. with a knife in
5 La Mesa, California.

6 (30) On or about November 16, 2011, defendants WILEY JUNIUS
7 GREENO, aka "Wiley Additup Greeno", aka "Additupuno", and
8 JORDAN RENEE MITCHELL, aka "Jayblangenn Mitchell", did
9 knowingly possess marijuana with intent to distribute in
10 Valencia, California.

11 (31) On or about November 19, 2011, defendant MICHAEL DEAN
12 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
13 ofied", aka "M-Geezo", aka "Europeangeez", aka
14 "GeezLewinsky", posted to his Facebook profile status
15 update stating, "Proud of my niggas
16 working/trappn/slanglin/school etc. Additup just aint
17 Hoe'n/pimpin. It clearly means get tf off you ass n get yo
18 money.#Additup."

19 (32) On or about November 21, 2011, defendant WILEY JUNIUS
20 GREENO, aka "Wiley Additup Greeno", aka "Additupuno",
21 posted to his Facebook profile a photograph of Greeno and
22 codefendants MICHAEL DEAN RICHARDSON, aka "Geezo", aka
23 "Mike Geezo", aka "Mike Gee-ofied", aka "M-Geezo", aka
24 "Europeangeez", aka "GeezLewinsky", CORTES TIZZARO PRATER,
25 aka "Ceejay", aka "Ceejay Staxx", and other unindicted
26 coconspirators displaying the "Tycoon" gang hand sign
27 depicted with the letter "T" and the "PGF" gang hand sign
28 depicted with a Play Boy bunny.

1 (33) On or about November 23, 2011, defendant MICHAEL DEAN
2 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
3 ofied", aka "M-Geezo", aka "Europeangeez", aka
4 "GeezLewinsky", posted to his Facebook profile a
5 photograph titled, "#addTHATshitUPbitch" and the name
6 "Kiesha" spelled out in \$20 dollar bills.

7 (34) On or about December 19, 2011, defendant JOSEPH BENJAMIN
8 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
9 Taylor", aka "Additup Tha Boss", aka "Additup Guy", posted
10 to his Facebook profile a photograph with codefendants
11 ALONDRE DICKERSON, aka "Krazy Azz KP", aka "KP2", aka
12 "Lil' KP", and ANTHONY ROBERT DENNISON, aka "AD", aka
13 "Badact", aka "Badact Business", and other unknown black
14 males where Dennison is holding up two hands simulating
15 holding a long gun at the camera.

16 (35) On or about December 19, 2011, defendant JOSEPH BENJAMIN
17 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
18 Taylor", aka "Additup Tha Boss", aka "Additup Guy", posted
19 to his Facebook profile a photograph with codefendants
20 ALONDRE SHAMIL DICKERSON, aka "Krazy Ass KP", aka "KP2",
21 aka "Lil' KP" and ANTHONY ROBERT DENNISON, aka "AD", aka
22 "Badact", aka "Badact Business", and other unknown black
23 males displaying the "Tycoon", "Add it Up" and "PGF" gang
24 hand signs.

25 (36) On or about December 29, 2011, defendant ANDREW DAMON
26 RICHARDSON, aka "A-Knox", aka "A-Knox Twotimes", aka
27 "Black Jesus", posted to his Facebook profile a photograph
28 of a red hoodie decorated with "PGF" on the right sleeve,

1 "Tycoon" on the left sleeve, "Black Jesus" on the hood,
2 "Aknnox" and "Add it Up" on the chest.

3 (37) On or about January 1, 2012, defendant WILLIAM HENRY
4 MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
5 Blangemmm", posted a photograph on his Facebook profile
6 wearing a sweat shirt with the wording "SO PGF" and
7 displaying the "PGF" gang hand sign.

8 (38) On or about January 2, 2012, defendant WILLIAM HENRY
9 MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
10 Blangemmm", posted a photograph on his Facebook profile
11 with codefendant JAMES TERELLE KING, aka "Tkeezin", aka
12 "TK", aka "John'te Avery King-Chambers", aka "Terelle
13 King", aka "Terelle Keezin", and displaying the "Add-it-
14 Up" gang hand sign which appears as the letter "A."

15 (39) On or about January 3, 2012, defendant FRANK GIBSON III,
16 aka "Frankie Cee", posted to his Facebook profile a status
17 update titled, "2K12 wit money in my voice mail. Got
18 bxtchs tht Succ dicc n do triccs and love to sell. Ya
19 heard #AddiTUkp Ty Million."

20 (40) On or about January 7, 2012, defendant DONAVYN KEITH DOVE,
21 aka "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy
22 Macmcrecree", posted to his Facebook profile a conversation
23 with a person who goes by "Lovley Irene" where they
24 discuss "Lovley Irene" working as a prostitute for Dove,
25 what she will pay him and what he expects from her.

26 (41) On or about January 19, 2012, defendant JAMES TERELLE
27 KING, aka "Tkeezin", aka "TK", aka "John'te Avery King-
28 Chambers", aka "Terelle King", aka "Terelle Keezin",

1 posted a photograph on his Facebook profile a photograph
2 with defendants MICHAEL DEAN RICHARDSON, aka "Geezo", aka
3 "Mike Geezo", aka "Mike Gee-ofied", aka "M-Geezo", aka
4 "Europeangeez", aka "GeezLewinsky", CHRISTIAN DARWIN
5 WILCOX, aka "Cash Chris", aka "Chris Cash", aka "Craymac",
6 aka "Cray", and other unindicted coconspirators displaying
7 the "Add-it-Up" gang hand sign which appears as the letter
8 "A."

9 (42) On or about January 20, 2012, defendant WILEY JUNIUS
10 GREENO, aka "Wiley Additup Greeno", aka "Additupuno",
11 posted to his Facebook profile a conversation with
12 "Additallup For'fifty", an unindicted coconspirator, "Aye
13 bro yuk no wut additup is" "Naw my white bitch made that
14 my name it sum new shit tho I been down since 09" "its sum
15 shit me nd my broz started lik sum get money type shit
16 mob" "yea datt so u ty" "indeed ty pgf."

17 (43) On or about February 14, 2012, defendant JAMES TERELLE
18 KING, aka "Tkeezin", aka "TK", aka "John'te Avery King-
19 Chambers", aka "Terelle King", aka "Terelle Keezin",
20 posted to his Facebook profile a photograph of him filming
21 a rap music video where codefendants MICHAEL DEAN
22 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
23 ofied", aka "M-Geezo", aka "Europeangeez", aka
24 "GeezLewinsky", WILLIAM HENRY MITCHELL, aka "Baddass
25 Blingemm", aka "Bills Thebaddass Blangemmm", ANDREW DAMON
26 RICHARDSON, aka "A-Knox", aka "A-Knox Twotimes", aka
27 "Black Jesus", and three other unindicted Tycoon
28 associates are depicted.

- 1 (44) On or about February 27, 2012, defendant JORDAN RENEE
2 MITCHELL, aka "Jayblangenn Mitchell", posted to his
3 Facebook profile a photograph with an unindicted
4 coconspirator displaying the "PGF" gang hand sign.
- 5 (45) On or about March 2, 2012, defendant JORDAN RENEE
6 MITCHELL, aka "Jayblangenn Mitchell", posted to his
7 Facebook profile a photograph taken on January 23, 2012,
8 of himself and codefendant and brother WILLIAM HENRY
9 MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
10 Blangemmm", displaying the "Tycoon/Add it Up" gang hand
11 shake.
- 12 (46) On or about March 16, 2012, defendant JORDAN RENEE
13 MITCHELL, aka "Jayblangenn Mitchell", posted to his
14 Facebook profile a photograph of him in San Diego County
15 jail where he is displaying the "PGF" gang hand sign.
- 16 (47) In or about April 2012, defendant JAMES TERELLE KING, aka
17 "Tkeezin", aka "TK", aka "John'te Avery King-Chambers",
18 aka "Terelle King", aka "Terelle Keezin", paid \$15,000
19 towards the purchase of vehicle registered in his
20 brother's name in San Diego, California.
- 21 (48) On or about April 12, 2012, defendant ALONDRE SHAMIL
22 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
23 did shoot a gun at R.H. in Spring Valley, California.
- 24 (49) On or about April 15, 2012, defendant JAMES TERELLE KING,
25 aka "Tkeezin", aka "TK", aka "John'te Avery King-
26 Chambers", aka "Terelle King", aka "Terelle Keezin",
27 posted to his Facebook profile a conversation with
28

1 unindicted female coconspirator and talking about having
2 prostituted her out.

3 (50) On or about April 30, 2012, defendant ALONDRE SHAMIL
4 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
5 posted to his Facebook profile a photograph titled,
6 "Tycoon is NOT A CLICC. It's the biggest MONEY GANG since
7 SindO MOB. #100."

8 (51) On or about May 4, 2012, defendant DONAVYN KEITH DOVE, aka
9 "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy Macmcrec",
10 posted a photograph to his Facebook profile with
11 codefendants BRIAN KEITH SCOTT, aka "Prince Bam", aka
12 "Additup Harris", aka "T-Bam", CORTES TIZZARO PRATER, aka
13 "Ceejay", aka "Ceejay Staxx"; CHRISTIAN DARWIN WILCOX,
14 aka "Cash Chris", aka "Chris Cash", aka "Craymac", aka
15 "Cray", and another unindicted coconspirator where the
16 coconspirator is wearing a shirt with "Add-It-Up."

17 (52) On or about May 9, 2012, when codefendant JORDAN RENEE
18 MITCHELL, aka "Jayblangenn Mitchell", slapped his
19 girlfriend two times, dragged her out of their house by
20 her hair, defendant WILLIAM HENRY MITCHELL, aka "Baddass
21 Blingemm", aka "Bills Thebaddass Blangemmm", threatened to
22 burn down the mother's home when she tried to intervene.

23 (53) On or about June 1, 2012, defendant JAMES TERELLE KING,
24 aka "Tkeezin", aka "TK", aka "John'te Avery King-
25 Chambers", aka "Terelle King", aka "Terelle Keezin",
26 posted to his Facebook profile a photograph with
27 codefendants MICHAEL DEAN RICHARDSON, aka "Geezo", aka
28 "Mike Geezo", aka "Mike Gee-ofied", aka "M-Geezo", aka

1 "Europeangeez", aka "GeezLewinsky", and CHRISTIAN DARWIN
2 WILCOX, aka "Cash Chris", aka "Chris Cash", aka "Craymac",
3 aka "Cray", displaying the "Tycoon" gang hand sign which
4 is the letter "T."

5 (54) On or about June 6, 2012, defendant WILLIAM HENRY
6 MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
7 Blangemmm", posted to his Facebook profile "Shrooms,
8 drooo, thizzles, duff. Hml or inbox."

9 (55) On or about July 1, 2012, defendant KEYON RENTA GILL, aka
10 "Bambino Onlikeshit", aka "Boostodamax", aka "Bino",
11 posted to his Facebook profile a photograph of him holding
12 over \$1,000 with caption "THIS IS WHAT I KIMS HOME TO
13 PIMP...CHUUCH!!! AND ITS STILL MO TO GET...SAY DAT SHYT
14 CHUUCH..." "ITS LIKE A RACH SUMN AFTER I GAVE WIFEY SIX
15 SUMN..."

16 (56) On or about July 5, 2012, defendant EMMANUEL GUMATAOTAO
17 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup
18 June", aka "Tycoon June", posted to his Facebook profile a
19 photograph titled "Tycoon Gang" of himself with a young
20 female where Farol is displaying the "Tycoon" gang hand
21 sign which is depicted with the letter "T".

22 (57) On or about July 18, 2012, defendant FRANK GIBSON III, aka
23 "Frankie Cee", posted to his Facebook profile a photograph
24 titled, "Ty/pgf Fam" and on the photograph are the words
25 "Ty/Pgf Additup" and "100 fam" in the photograph are
26 codefendants BRIAN KEITH SCOTT, aka "Prince Bam", aka
27 "Additup Harris", aka "T-Bam", and DONAVYN KEITH DOVE, aka
28 "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy Macmcrec",

1 with unknown black male displaying the "PGF" gang hand
2 sign.

3 (58) On or about July 25, 2012, defendant MARQUIS DOMINIQUE
4 DAVIS, aka "Bang Oneohone", aka "Tiny Bang", aka "TB", aka
5 "T-Bang", grabbed the chin of H.V. and pushed her head
6 back during an argument.

7 (59) On or about August 7, 2012, defendant JOSEPH BENJAMIN
8 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
9 Taylor", aka "Additup Tha Boss", aka "Additup Guy", posted
10 to his Facebook profile a photograph with codefendants
11 DONAVYN KEITH DOVE, aka "Barzo", aka "Barrzo Doitrite
12 Dove", aka "Teddy Macmcrecree", ANTHONY ROBERT DENNISON, aka
13 "AD", aka "Badact", aka "Badact Business", EMMANUEL
14 GUMATAOTAO FAROL, aka "June Farol", aka "Tha Kidd", aka
15 "Additup June", aka "Tycoon June", BRIAN KEITH SCOTT, aka
16 "Prince Bam", aka "Additup Harris", aka "T-Bam", and
17 JORDAN RENEE MITCHELL, aka "Jayblangenn Mitchell"
18 displaying the "Add it Up" and "PGF" gang hand signs.

19 (60) On or about August 14, 2012, defendant EMMANUEL GUMATAOTAO
20 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup
21 June", aka "Tycoon June", was pimping out an adult female
22 (AF#1) in San Diego, California.

23 (61) On or about August 15, 2012, defendant DONAVYN KEITH DOVE,
24 aka "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy
25 Macmcrecree", posted to his Facebook profile a conversation
26 with codefendant JAMES TERELLE KING, aka "Tkeezin", aka
27 "TK", aka "John'te Avery King-Chambers", aka "Terelle
28 King", aka "Terelle Keezin", wherein King advises Dove

1 that he needed to look in other states for girls to work
2 for him as prostitutes and King agreed to find Dove a girl
3 to work for him.

4 (62) On or about August 17, 2012, defendant ANTHONY ROBERT
5 DENNISON, aka "AD", aka "Badact", aka "Badact Business",
6 posted to his Facebook profile a group message to
7 approximately 28 suspected Tycoon members and associates
8 from codefendant MICHAEL DEAN RICHARDSON, aka "Geezo", aka
9 "Mike Geezo", aka "Mike Gee-ofied", aka "M-Geezo", aka
10 "Europeangeez", aka "GeezLewinsky" titled, "Y'all niggas
11 are all stooped af get tf off fb wit this shit lay low &
12 stack doe up. Be prepared Ty's" reference to Tycoon
13 members and associates posting too much on Facebook about
14 illegal Tycoon business, such as narcotic sales, pimping
15 and pandering.

16 (63) On or about August 18, 2012, defendant ALONDRE SHAMIL
17 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
18 posted to his Facebook profile a conversation with "Anna
19 Minter" where he asks Minter "Who you been work for? I
20 been seeing yo posts on baccpage you tryna go get it
21 still" Minter responds "aww..i dnt wrk fer Uh Nigga im on
22 my lonely.." and Dickerson responds "Oh I heard it but ima
23 let yu trap" Minter responds "yup, but dmn tycoon been
24 getting into it w the Lincoln niggas."

25 (64) On or about August 22, 2012, defendant JAMES TERELLE KING,
26 aka "Tkeezin", aka "TK", aka "John'te Avery King-
27 Chambers", aka "Terelle King", aka "Terelle Keezin",
28 posted a YouTube video titled, "Tkeezin - You Ain't Doing

1 Enough (Official Video)" where codefendants RYAN MCINTOCH
2 IZUMI, aka "Mack G", aka "Ryan Chan", MICHAEL DEAN
3 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
4 ofied", aka "M-Geezo", aka "Europeangeez", aka
5 "GeezLewinsky", BRIAN KEITH SCOTT, aka "Prince Bam", aka
6 "Additup Harris", aka "T-Bam", CORTES TIZZARO PRATER, aka
7 "Ceejay", aka "Ceejay Staxx", ANDREW DAMON RICHARDSON, aka
8 "A-Knox", aka "A-Knox Twotimes", aka "Black Jesus",
9 ALONDRE SHAMIL DICKERSON, aka "Krazy Ass KP", aka "KP2",
10 aka "Lil' KP", and JOSEPH BENJAMIN TAYLOR, aka "JT", aka
11 "King Taylor", aka "Additup Deuce Taylor", aka "Additup
12 Tha Boss", aka "Additup Guy", with unindicted
13 coconspirators appear, and King raps "you are not doing
14 enough in the game...all nigga pimpin...I know why you are
15 hating...we're pimpin and we're shooting stuff."

16 (65) On or about September 5, 2012, defendant ALONDRE SHAMIL
17 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
18 posted a photograph on his Facebook profile his hand over
19 a stack of \$100 bills stating, "My early Morning #AddITUP'
20 Session, lmao."

21 (66) On or about September 11, 2012, defendant JAMES TERELLE
22 KING, aka "Tkeezin", aka "TK", aka "John'te Avery King-
23 Chambers", aka "Terelle King", aka "Terelle Keezin",
24 transported AF#2 from San Diego, California to Tempe,
25 Arizona for the purpose of her to engage in prostitution.

26 (67) On or about September 28, 2012, defendant DEIJA RENEE
27 LAMB, aka "Dosha Marley", posted a photograph to her
28 Facebook profile of herself with a caption stating, "Add

1 it up for the ty's #bueno" and her displaying the "Add it
2 Up" gang hand sign.

3 (68) On or about October 23, 2012, defendant BRIAN KEITH SCOTT,
4 aka "Prince Bam", aka "Additup Harris", aka "T-Bam",
5 filmed a video posted on YOUTUBE showing two female
6 juveniles fighting in the breezeway off of the 7900 Block
7 of Broadway, Lemon Grove, California, where he displayed
8 the "Tycoon" gang hand sign.

9 (69) On or about October 25, 2012, defendants BRIAN KEITH
10 SCOTT, aka "Prince Bam", aka "Additup Harris", aka "T-
11 Bam", FRANK GIBSON III, aka "Frankie Cee", CORTES TIZZARO
12 PRATER, aka "Ceejay", aka "Ceejay Staxx", and other
13 unindicted coconspirators were together at 7800 Broadway,
14 located in Lemon Grove, California.

15 (70) On or about October 26, 2012, defendant FRANK GIBSON III,
16 aka "Frankie Cee", posted to his Facebook profile a
17 photograph of himself titled, "Early Tmorning wit it
18 ROLLiN lhunnits" and him displaying the "Tycoon" gang hand
19 sign and the "PGF" gang hand sign depicted with the letter
20 "T" and the Play Boy Bunny respectively.

21 (71) In or about November 2012, defendant MICHAEL DEAN
22 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
23 ofied", aka "M-Geezo", aka "Europeangeez", aka
24 "GeezLewinsky", did offer, provide, harbor, maintain and
25 obtain MF#3 for purposes of prostitution in Chula Vista,
26 California.

27 (72) On or about November 12, 2012, defendant ANTHONY ROBERT
28 DENNISON, aka "AD", aka "Badact", aka "Badact Business",

1 posted to his Facebook profile a photograph with him and
2 codefendant EMMANUEL GUMATAOTAO FAROL, aka "June Farol",
3 aka "Tha Kidd", aka "Additup June", aka "Tycoon June", and
4 titled, "Welcome hom lil bro we gone keep itlhun an pimp
5 her away" with Dennison displaying the "PGF" gang hand
6 sign and Farol displaying the "Tycoon" gang hand sign.

7 (73) On or about November 26, 2012, defendant ALONDRE SHAMIL
8 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
9 posted a photograph to his Facebook profile to recipient
10 "Chamsta Get Her Doe" of a female with money in her bra
11 captioned, "Bad bitches pay da KP niggah quit playn and
12 upgrade yo self."

13 (74) On or about December 8, 2012, defendant EMMANUEL
14 GUMATAOTAO FAROL, aka "June Farol", aka "Tha Kidd", aka
15 "Additup June", aka "Tycoon June", posted a photograph on
16 his Facebook profile with six black males including
17 ANTHONY ROBERT DENNISON, aka "AD", aka "Badact", aka
18 "Badact Business", who is displaying the "Eastside Piru"
19 gang hand sign which is depicted with the letter "E".

20 (75) On or about December 10, 2012, defendant EMMANUEL
21 GUMATAOTAO FAROL, aka "June Farol", aka "Tha Kidd", aka
22 "Additup June", aka "Tycoon June", posted a photograph on
23 his Facebook profile with codefendant ALONDRE SHAMIL
24 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
25 with caption stating, "Additup kids w' KrazyAssKP" and
26 DICKERSON displaying the "Add it Up" gang sign.

27 (76) On or about January 3, 2013, defendant MARQUIS DOMINIQUE
28 DAVIS, aka "Bang Oneohone", aka "Tiny Bang", aka "TB", aka

1 "T-Bang", was in a vehicle with three females, two of whom
2 were under the age of 18, with luggage in the trunk
3 containing lingerie and clothing.

4 (77) On or about January 4, 2013, defendant CHRISTAL MARIE
5 TORRES, aka "Christal Cash", posted to her Facebook
6 profile a photograph of herself holding a large amount of
7 cash with a comment "The fee for a real p huh".

8 (78) On or about January 5, 2013, defendant CHRISTAL MARIE
9 TORRES, aka "Christal Cash", posted to her Facebook
10 profile a comment "Simple As This; I Think We Both Know, I
11 Got It Out for you Now.. I Aint No Captiain Save A P, But
12 When Its My Nigga That You Fckn With Pretty Much Askin To
13 Get Yo Ass Beat.. Your Way YOUNGER Than Me But It WONT
14 Stop Me Goin Up Across Yo Head! &Catchin That! You Owe My
15 Niigga Doe For The Time Spent w/Him..You Know The Saying
16 "Time Is \$\$" &CLEARLY Thats What You Owe.. You Either hand
17 It Over,Or Ill Just Take It! Either Or Im Gettin Whats
18 OURS! Now That We On The Same Page! You Know what You Got
19 To Do -CASH".

20 (79) On or about January 6, 2013, defendant CHRISTAL MARIE
21 TORRES, aka "Christal Cash", did knowingly recruit, obtain
22 maintain and provide MF#4 for purposes of prostitution in
23 Vista, California.

24 (80) On or about January 6, 2013, defendant DONAVYN KEITH DOVE,
25 aka "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy
26 Macmcrecree", posted to his Facebook profile and photograph
27 with codefendant CORTES TIZZARO PRATER, aka "Ceejay", aka
28 "Ceejay Staxx", and an unindicted coconspirator where the

1 coconspirator is wearing a shirt that says "Add it Up" and
2 displaying the "PGF" gang hand sign.

3 (81) On or about January 7, 2013, defendant CHRISTAL MARIE
4 TORRES, aka "Christal Cash", did transport MF#4 from Los
5 Angeles, California to Las Vegas, Nevada for purposes of
6 prostitution.

7 (82) On or about January 13, 2013, defendant ALONDRE SHAMIL
8 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
9 posted to his Facebook profile a conversation with "Dee
10 Cee" where "Dee Cee" asks Dickerson "Was cracin bro yu got
11 a credit card to post on baccpage kee" "Im tryna post
12 these 2 bitches." and Dickerson responds "Damn go to
13 7elevn with 21\$ vanilla one Visa Card."

14 (83) On or about January 16, 2013, defendant EMMANUEL
15 GUMATAOTAO FAROL, aka "June Farol", aka "Tha Kidd", aka
16 "Additup June", aka "Tycoon June", posted a photograph to
17 his Facebook profile of \$260 dollars and seven packages of
18 marijuana.

19 (84) On or about February 1, 2013, defendant WILLIAM HENRY
20 MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
21 Blangemmm", posted to his Facebook profile a conversation
22 with "Cash Crystal" wherein Mitchell attempted to recruit
23 the female to work as a prostitute for him because he is a
24 "Tycoon".

25 (85) On or about February 18, 2013, defendant CHRISTAL MARIE
26 TORRES, aka "Christal Cash", posted to her Facebook
27 profile a conversation with a person named "Life'of
28 The'mizzie" where Torres states that she made money by

1 "sell[ing] pussy to meds" "from oxys to the bade meds like
2 crystal lol."

3 (86) On or about February 19, 2013, defendant CORTES TIZZARO
4 PRATER, aka "Ceejay", aka "Ceejay Staxx", posted a link to
5 a freestyle rap video on his Facebook profile titled,
6 "CeeJay Staxx anf Frank gasin" of him and codefendant
7 FRANK GIBSON III, aka "Frankie Cee", where they are both
8 displaying "Tycoon" gang hand signs as well as shout outs,
9 "Tycoon, Add It Up."

10 (87) On or about February 20, 2013, defendant WILEY JUNIUS
11 GREENO, aka "Wiley Additup Greeno", aka "Additupuno", and
12 other unindicted coconspirators were together at a
13 residence that exploded due to a THC marijuana extraction
14 at Spring Valley, California.

15 (88) On or about February 22, 2013, defendant CHRISTAL MARIE
16 TORRES, aka "Christal Cash", worked as a prostitute after
17 posting on Backpage.com in Chula Vista, California.

18 (89) On or about February 23, 2013, defendants MICHAEL DEAN
19 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
20 ofied", aka "M-Geezo", aka "Europeangeez", aka
21 "GeezLewinsky", ANDREW DAMON RICHARDSON, aka "A-Knox", aka
22 "A-Knox Twotimes", aka "Black Jesus", DONALD MICKEY
23 STOKES, aka "KT Brackito", BRIAN KEITH SCOTT, aka "Prince
24 Bam", aka "Additup Harris", aka "T-Bam", RYAN MCINTOCH
25 IZUMI, aka "Mack G", aka "Ryan Chan", CORTES TIZZARO
26 PRATER, aka "Ceejay", aka "Ceejay Staxx", CHRISTIAN DARWIN
27 WILCOX, aka "Cash Chris", aka "Chris Cash", aka "Craymac",
28 aka "Cray", and another unindicted coconspirator appeared

1 in a YOUTUBE rap video titled, "Mike Geez oft Cray Max x
2 Goblin X Dre Trip - Mike Tyson (Official Video) rapping
3 about how their "game carries a punch like Mike Tyson".

4 (90) On or about February 27, 2013, defendant BRIAN KEITH
5 SCOTT, aka "Prince Bam", aka "Additup Harris", aka "T-
6 Bam", posted a photo of a backpage.com ad on his Facebook
7 profile and defendant JAMES TERELLE KING, aka "Tkeezin",
8 aka "TK", aka "John'te Avery King-Chambers", aka "Terelle
9 King", aka "Terelle Keezin", commented, "yur dohdiehd cuhz
10 dis why da feds be asking bout certain niggas cuz da
11 homies who aint pimpin do dis shit ty, dis not tycoonin,
12 let go getters get dey money, not promot bp p."

13 (91) On or about February 28, 2013, defendants MICHAEL DEAN
14 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
15 ofied", aka "M-Geezo", aka "Europeangeez", aka
16 "GeezLewinsky", DAVID MICHAEL STOKES, aka "Daddy Stokes",
17 aka "Daddizm", CORTES TIZZARO PRATER, aka "Ceejay", aka
18 "Ceejay Staxx", ANDREW DAMON RICHARDSON, aka "A-Knox", aka
19 "A-Knox Twotimes", aka "Black Jesus", JORDAN RENEE
20 MITCHELL, aka "Jayblangenn Mitchell", and several
21 unindicted coconspirators were together at Kunkel Park
22 located in Lemon Grove, California.

23 (92) On or about March 9, 2013, defendant JORDAN RENEE
24 MITCHELL, aka "Jayblangenn Mitchell", posted to his
25 Facebook profile a photograph of him holding a stack of
26 \$100 dollar bills while displaying the "PGF" gang hand
27 sign in a BMW with a key chain "Auto Sellers Inc", and
28

1 "Kendal Hutto" asked Mitchell, "Didn't you just have a
2 range?" Mitchell responded, "Yea..Had to get BMW tho."

3 (93) On or about March 10, 2013, defendant EMMANUEL GUMATAOTAO
4 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup
5 June", aka "Tycoon June", posted to his Facebook profile
6 status "I got the loud going hit me if you need data im
7 delivering too" user "Antbankz Has Haangiees" responds
8 "Loud dnt got seeds and stems P lol" and Farol responds
9 "You ain't even seen my weed don't play like data p you
10 fckn upp."

11 (94) On or about March 18, 2013, defendant KEYON RENTA GILL,
12 aka "Bambino Onlikeshit", aka "Boostodamax", posted to
13 his Facebook profile a conversation with "Cam Be Boomin"
14 who stated he got one of his prostitutes pregnant and he
15 needed her beat up to ensure she lost the baby and Gill
16 stated he would help.

17 (95) On or about March 18, 2013, defendant KEYON RENTA GILL,
18 aka "Bambino Onlikeshit", aka "Boostodamax", aka "Bino",
19 posted to his Facebook profile a conversation with "Kaylin
20 Danielle Lovinhim" wherein Gill is attempting to recruit
21 her to come to San Diego and work as his prostitute.

22 (96) On or about March 24, 2013, defendant DAVID MICHAEL
23 STOKES, aka "Daddy Stokes", aka "Daddizm", posted to his
24 Facebook profile a photograph with defendant MICHAEL DEAN
25 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
26 ofied", aka "M-Geezo", aka "Europeangeez", aka
27 "GeezLewinsky", titled, "Out here wit it mobbing threw r
28 ckity keppin it lit" wherein Richardson is displaying the

1 "Add it Up" gang hand sign depicted with the letter "A"
2 and wearing an Alabama University red baseball cap with
3 the letter "A".

4 (97) On or about March 26-29, 2013, defendants KEYON RENTA
5 GILL, aka "Bambino Onlikeshit", aka "Boostodamax", aka
6 "Bino" and CORTES TIZZARO PRATER, aka "Ceejay", aka
7 "Ceejay Staxx", recruited, harbored, obtained, provided
8 and maintained a MF#5 for purpose of prostitution in Lemon
9 Grove, California.

10 (98) On or about March 28, 2013, defendant EMMANUEL GUMATAOTAO
11 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup
12 June", aka "Tycoon June", posted to his Facebook profile
13 status "Play the bitCh don't le the bitCh play you" and
14 "When the trap ain't looking too good im throwing on data
15 ski mask."

16 (99) On or about March 30, 2013, defendant BRIAN KEITH SCOTT,
17 aka "Prince Bam", aka "Additup Harris", aka "T-Bam",
18 posted to his Facebook profile a photograph with
19 codefendants CHRISTIAN DARWIN WILCOX, aka "Cash Chris",
20 aka "Chris Cash", aka "Craymac", aka "Cray", DONAVYN KEITH
21 DOVE, aka "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy
22 Macmcrecree", JAMES TERELLE KING, aka "Tkeezin", aka "TK",
23 aka "John'te Avery King-Chambers", aka "Terelle King", aka
24 "Terelle Keezin", and other unindicted coconspirators
25 displaying the "Tycoon" gang hand sign which is displayed
26 at the letter "T".

27 (100) On or about April 6, 2013, defendant CHRISTIAN DARWIN
28 WILCOX, aka "Cash Chris", aka "Chris Cash", aka "Craymac",

1 aka "Cray", posted to his Facebook profile a photograph
2 with codefendant JAMES TERELLE KING, aka "Tkeezin", aka
3 "TK", aka "John'te Avery King-Chambers", aka "Terelle
4 King", aka "Terelle Keezin", with the post, "Cree Since
5 3."

6 (101) On or about April 6, 2013, defendant EMMANUEL GUMATAOTAO
7 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup
8 June", aka "Tycoon June", posted a photograph of marijuana
9 buds to his Facebook profile with a caption stating, "King
10 O.G. some boom stink 15\$ uhh gee and 40\$ for the 8th."

11 (102) On or about April 6, 2013, defendant CHRISTIAN DARWIN
12 WILCOX, aka "Cash Chris", aka "Chris Cash", aka "Craymac",
13 aka "Cray", posted to his Facebook profile a photograph
14 with codefendant MARQUIS DOMINIQUE DAVIS, aka "Bang
15 Oneohone", aka "Tiny Bang", aka "TB", aka "T-Bang", with
16 his new album cover that reads "DOHDIEHD MUSIC PRESENTS"
17 with their photos of their gang monikers "Craymac" and
18 "Tinybang."

19 (103) On or about April 13, 2013, defendant JAMES TERELLE KING,
20 aka "Tkeezin", aka "TK", aka "John'te Avery King-
21 Chambers", aka "Terelle King", aka "Terelle Keezin",
22 posted to his Facebook profile a photograph with
23 defendants CHRISTIAN DARWIN WILCOX, aka "Cash Chris", aka
24 "Chris Cash", aka "Craymac", aka "Cray", and unindicted
25 coconspirators and where WILCOX is displaying the West
26 Coast Crip gang sign and King is displaying the "Tycoon"
27 ("T") gang sign.
28

1 (104) On or about April 16, 2013, defendant KEYON RENTA GILL,
2 aka "Bambino Onlikeshit", aka "Boostodamax", aka "Bino",
3 posted to his Facebook profile a conversation with
4 codefendant RYAN MCINTOCH IZUMI, aka "Mack G", aka "Ryan
5 Chan", wherein Gill stated that he had "Hit" or robbed a
6 liquor store the night before for "a couple of bands",
7 discussed Izumi giving Gill money that he has left in a
8 hotel room and discussed getting drugs from Mexico.

9 (105) On or about April 23, 2013, defendant ANTHONY ROBERT
10 DENNISON, aka "AD", aka "Badact", aka "Badact Business",
11 posted to his Facebook profile a conversation with "Anna
12 Minter" attempting to recruit her for prostitution by
13 writing "Sw e gone get to tha trapin fast ma? Yea".

14 (106) On or about April 24, 2013, defendant BRIAN KEITH SCOTT,
15 aka "Prince Bam", aka "Additup Harris", aka "T-Bam",
16 posted to his Facebook profile a photograph with
17 codefendants RYAN MCINTOCH IZUMI, aka "Mack G", aka "Ryan
18 Chan", KEYON RENTA GILL, aka "Bambino Onlikeshit", aka
19 "Boostodamax", aka "Bino", and other unindicted
20 coconspirators displaying the "Add it Up" gang hand sign
21 displayed with the letter "A".

22 (107) On or about April 24, 2013, defendant KEYON RENTA GILL,
23 aka "Bambino Onlikeshit", aka "Boostodamax", aka "Bino",
24 posted a video to YouTube titled, "Bino...put the bitch to
25 work" that also features codefendants BRIAN KEITH SCOTT,
26 aka "Prince Bam", aka "Additup Harris", aka "T-Bam",
27 JOSEPH BENJAMIN TAYLOR, aka "JT", aka "King Taylor", aka
28 "Additup Deuce Taylor", aka "Additup Tha Boss", aka

1 "Additup Guy", CORTES TIZZARO PRATER, aka "Ceejay", aka
2 "Ceejay Staxx", and an unindicted coconspirator wherein
3 they rap about money, pimping, rolling "blunts" and
4 keeping his "hoes running, its always money over
5 bitches...".

6 (108) On or about May 12, 2013, defendant BRIAN KEITH SCOTT, aka
7 "Prince Bam", aka "Additup Harris", aka "T-Bam", posted to
8 his Facebook profile a photograph with codefendants WILEY
9 JUNIUS GREENO, aka "Wiley Additup Greeno", aka
10 "Additupuno", ANTHONY ROBERT DENNISON, aka "AD", aka
11 "Badact", aka "Badact Business", and WILLIAM HENRY
12 MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
13 Blangemmm", displaying the "Tycoon" and "Add it Up" gang
14 hand signs that are depicted with the letter "T" and the
15 letter "A" respectively.

16 (109) On or about May 12, 2013, defendant WILLIAM HENRY
17 MITCHELL, aka "Jayblangenn Mitchell", attacked AF#2
18 multiple times in the head and face where AF#2 sustained a
19 fractured jaw while she was working as a prostitute for
20 him.

21 (110) On or about May 14, 2013, defendant DEIJA RENEE LAMB, aka
22 "Dosha Marley", posted a photograph on her Facebook
23 profile of a Starbucks coffee cup with words "BYB" and
24 caption stating, "Even starbucks knows wat that BYB life
25 is like #DaGrove."

26 (111) On or about and between June 4, 2013 - July 27, 2013,
27 defendant DAVID MICHAEL STOKES, aka "Daddy Stokes", aka
28 "Daddizm", did use a cell phone to promote, manage and

1 carry on prostitution activity with AF#3 in Chula Vista,
2 California and elsewhere.

3 (112) On or about June 6, 2013, defendant ALONDRE SHAMIL
4 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
5 posted a photograph to his Facebook profile depicting
6 approximately \$2,000 with a comment stating, "#Eazy2k &
7 sum change. The day aint even over yet #More2Come".

8 (113) On or about June 6, 2013, defendant CORTES TIZZARO PRATER,
9 aka "Ceejay", aka "Ceejay Staxx", posted to his Facebook
10 profile a conversation with "Ange Kamil Chavez" trying to
11 recruit her to work as a prostitute for him.

12 (114) On or about June 17, 2013, defendant MICHAEL DEAN
13 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
14 ofied", aka "M-Geezo", aka "Europeangeez", aka
15 "GeezLewinsky", posted a photograph to his Facebook
16 profile titled, "late ass upload Friday Nite up wit my
17 boss niggas" of himself and codefendants RYAN MCINTOCH
18 IZUMI, aka "Mack G", aka "Ryan Chan", DAVID MICHAEL
19 STOKES, aka "Daddy Stokes", aka "Daddizm" and MARQUIS
20 DOMINIQUE DAVIS, aka "Bang Oneohone", aka "Tiny Bang", aka
21 "TB", aka "T-Bang", where Richardson is displaying the
22 "Add-It-Up" gang hand sign.

23 (115) On or about June 17, 2013, defendant DAVID MICHAEL STOKES,
24 aka "Daddy Stokes", aka "Daddizm", posted to his Facebook
25 profile a photograph with codefendant MICHAEL DEAN
26 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
27 ofied", aka "M-Geezo", aka "Europeangeez", aka

1 "GeezLewinsky", titled, "SHOUTOUT to my Real nigga sincke
2 day 1 #PimpieNigga\$#REALDAY1NIGGAS".

3 (116) On or about June 23, 2013, defendant FRANK GIBSON III, aka
4 "Frankie Cee", sold marijuana to a cooperating witness in
5 Lemon Grove, California.

6 (117) On or about June 23, 2013, defendant DAVID MICHAEL STOKES,
7 aka "Daddy Stokes", aka "Daddizm", did use a cell phone to
8 promote, manage and carry on prostitution activity with
9 AF#4 in Chula Vista, California and elsewhere.

10 (118) On or about July 1, 2013, defendant MARQUIS DOMINIQUE
11 DAVIS, aka "Bang Oneohone", aka "Tiny Bang", aka "TB", aka
12 "T-Bang", uploaded to YouTube video titled, "All I Want -
13 Mike Geezo, Tiny Bank, Mack G," where Davis raps about
14 pimping with codefendants MICHAEL DEAN RICHARDSON, aka
15 "Geezo", aka "Mike Geezo", aka "Mike Gee-ofied", aka "M-
16 Geezo", aka "Europeangeez", aka "GeezLewinsky", RYAN
17 MCINTOCH IZUMI, aka "Mack G", aka "Ryan Chan", and DAVID
18 MICHAEL STOKES, aka "Daddy Stokes", aka "Daddizm".

19 (119) On or about July 5, 2013, defendant BRIAN KEITH SCOTT, aka
20 "Prince Bam", aka "Additup Harris", aka "T-Bam", posted to
21 his Facebook profile report a photograph with codefendants
22 JORDAN RENEE MITCHELL, aka "Jayblangenn Mitchell",
23 CHRISTIAN DARWIN WILCOX, aka "Cash Chris", aka "Chris
24 Cash", aka "Craymac", aka "Cray", DONAVYN KEITH DOVE, aka
25 "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy Macmcre",
26 WILLIAM HENRY MITCHELL, aka "Baddass Blingemm", aka "Bills
27 Thebaddass Blangemmm", and JOSEPH BENJAMIN TAYLOR, aka
28 "JT", aka "King Taylor", aka "Additup Deuce Taylor", aka

1 "Additup Tha Boss", aka "Additup Guy", and unindicted
2 coconspirators displaying the "Tycoon", "Add it Up", and
3 "PGF" gang hand signs.

4 (120) On or about July 18, 2013, defendants WILEY JUNIUS GREENO,
5 aka "Wiley Additup Greeno", aka "Additupuno", and JORDAN
6 RENEE MITCHELL, aka "Jayblangenn Mitchell", and unindicted
7 coconspirators were together at 760 Grand Avenue, Spring
8 Valley, California.

9 (121) On or about July 19, 2013, defendant MARQUIS DOMINIQUE
10 DAVIS, aka "Bang Oneohone", aka "Tiny Bang", aka "TB", aka
11 "T-Bang", did provide and offer MF#6 for purposes of
12 prostitution in San Diego County.

13 (122) On or about July 19, 2013, defendant WILEY JUNIUS GREENO,
14 aka "Wiley Additup Greeno", aka "Additupuno", did possess
15 a controlled substance while at codefendant ANTHONY ROBERT
16 DENNISON's, aka "AD", aka "Badact", aka "Badact Business",
17 residence in El Cajon, California.

18 (123) On or about August 4, 2013, defendant CORTES TIZZARO
19 PRATER, aka "Ceejay", aka "Ceejay Staxx", posted to his
20 Facebook profile a comment that stated "New White Bitch Bu
21 I Got 8 Broads They All Apying Fees & Imma Break em All."

22 (124) On or about August 7, 2013, defendant FRANK GIBSON III,
23 aka "Frankie Cee", and an unindicted coconspirator sold
24 \$40 worth of marijuana and \$50 worth of pills to a
25 cooperating witness in Lemon Grove, California.

26 (125) On or about August 8, 2013, defendant CORTES TIZZARO
27 PRATER, aka "Ceejay", aka "Ceejay Staxx", posted to his
28

1 Facebook profile a conversation with "Cassandra Rose"
2 saying that she can trust his "pimping."

3 (126) On or about August 20, 2013, defendant EMMANUEL GUMATAOTAO
4 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup
5 June", aka "Tycoon June", stated during an interview that
6 his Tycoon tattoo was "about the money making business"
7 and when asked what kind of business, "the illegal kin
8 ...Pimping, like what I am charged for."

9 (127) On or about August 30, 2013, defendant CHRISTAL MARIE
10 TORRES, aka "Christal Cash", posted to her Facebook
11 profile a conversation with "Antoinette Nicole Robinson"
12 were Robinson asks Torres "how do you be getting doe!" and
13 Torres replies "sale drugs and I hoe".

14 (128) On or about September 8, 2013, defendant CHRISTAL MARIE
15 TORRES, aka "Christal Cash", posted to her Facebook
16 profile a message "Niggas Fuck w Minors Cuz They Are Easy
17 To Knock!"

18 (129) On or about September 13, 2013, defendant MICHAEL DEAN
19 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
20 ofied", aka "M-Geezo", aka "Europeangeez", aka
21 "GeezLewinsky", posted to YouTube a video titled,
22 "GEEZO...IBC...(OFFICIAL VIDEO) and comment "San Diego artist
23 Geezo dropped his new single "I Be Coonin" RMC on
24 datpiff"" wherein codefendants DAVID MICHAEL STOKES, aka
25 "Daddy Stokes", aka "Daddizm", MARQUIS DOMINIQUE DAVIS,
26 aka "Bang Oneohone", aka "Tiny Bang", aka "TB", aka "T-
27 Bang", BRIAN KEITH SCOTT, aka "Prince Bam", aka "Additup
28 Harris", aka "T-Bam", CORTES TIZZARO PRATER, aka "Ceejay",

1 aka "Ceejay Staxx", KEYON RENTA GILL, aka "Bambino
2 Onlikeshit", aka "Boostodamax", aka "Bino", and other
3 unindicted coconspirators are featured rapping "Caus I be
4 coonin...young boss Tycoon, add it up or die soon, Geez be
5 shining like the moon, it's Europe in the Bitch, nigga,
6 nigga, watch yo bitch, free to pass to Eazy B, lost a coon
7 over a snitch...".

8 (130) On or about September 15, 2013, defendant RYAN MCINTOCH
9 IZUMI, aka "Mack G", aka "Ryan Chan", posted to his
10 Facebook profile a conversation with "Additup Ceejay",
11 codefendant CORTES TIZZARO PRATER, aka "Ceejay", aka
12 "Ceejay Staxx", wherein Izumi states, "Ayer bro I got the
13 loudest dro in daygo right now lol on my momma p ha ha
14 fuck with me I just picked up a qp".

15 (131) On or about September 16, 2013, defendant RYAN MCINTOCH
16 IZUMI, aka "Mack G", aka "Ryan Chan", posted to his
17 Facebook profile a conversation with "Shamm Cannabis
18 Greener" wherein Izumi asks "Shamm Cannabis Greener" "aye
19 bro how much u be re up'n on kuz I just got a QP of some
20 STUPID LOUD Bro better than that sour diezal I got some
21 Northern Lights And some Leo OG" "how much" "half or whole
22 thing"... "240 just for this batch though kuz I got taxed on
23 it".

24 (132) On or about and between October 2013 and January 28, 2014,
25 defendant RYAN MCINTOCH IZUMI, aka "Mack G", aka "Ryan
26 Chan", did recruit, offer, provide, obtain and maintain a
27 MF#7 for the purpose of the minor to engage in commercial
28 sex acts in San Diego County, California.

1 (133) On or about October 7-29, 2013, defendant RYAN MCINTOCH
2 IZUMI, aka "Mack G", aka "Ryan Chan", did knowingly
3 attempt to persuade, induce, entice or coerce a female via
4 Facebook whom he believed to be a 17 year old girl in
5 Lemon Grove, California.

6 (134) On or about October 9, 2013, defendant ANTHONY ROBERT
7 DENNISON, aka "AD", aka "Badact", aka "Badact Business",
8 posted to his Facebook profile a photograph of himself
9 titled, "Niggas is fony and bitches is fake...its still
10 Additup gang period point blank TY100" and Dennsion
11 displaying the "Add it Up" gang hand sign depicted with
12 the letter "A".

13 (135) On or about October 19, 2013, defendant ANTHONY ROBERT
14 DENNISON, aka "AD", aka "Badact", aka "Badact Business",
15 threatened M.Y. holding a knife to her throat and said "if
16 I can't have you, no one can" at 297 South Mollison
17 located in El Cajon, California.

18 (136) On or about October 21, 2013, defendant DONAVYN KEITH
19 DOVE, aka "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy
20 Macmcrec", posted to his Facebook profile that he had
21 Xanax, "both yellow bars and blue footballs."

22 (137) On or about October 28, 2013, defendant WILLIAM HENRY
23 MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
24 Blangemmm", posted to his Facebook profile a comment "Got
25 some blue dream online hit me. In traff for the dropp
26 offs".

27 (138) On or about November 2, 2013, defendant ANDREW DAMON
28 RICHARDSON, aka "A-Knox", aka "A-Knox Twotimes", aka

1 "Black Jesus", did possess marijuana for sale in San
2 Diego, California.

3 (139) On or about November 7, 2013, defendant KEYON RENTA GILL,
4 aka "Bambino Onlikeshit", aka "Boostodamax", aka "Bino",
5 called AF#5-6 and told them to work as prostitutes and put
6 money they earned on his jail books in San Diego,
7 California.

8 (140) On or about November 12, 2013, defendant JORDAN RENEE
9 MITCHELL, aka "Jayblangenn Mitchell", did possess
10 marijuana with the intent to distribute in Spring Valley,
11 California.

12 (141) On or about November 15, 2013, defendants WILLIAM HENRY
13 MITCHELL, aka "Baddass Blingemm", aka "Bills Thebaddass
14 Blangemmm", and DONAVYN KEITH DOVE, aka "Barzo", aka
15 "Barrzo Doitrite Dove", aka "Teddy Macmcrecree", did
16 knowingly possess controlled substances with the intent to
17 distribute at 10656 Fuerte Drive, La Mesa, California.

18 (142) On or about November 16, 2013, defendant DEIJA RENEE LAMB,
19 aka "Dosha Marley", did offer to sell marijuana to another
20 person in Spring Valley, California.

21 (143) On or about November 20, 2013, defendant DONAVYN KEITH
22 DOVE, aka "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy
23 Macmcrecree", fired a gun into an apartment located at
24 835 Grand Avenue, located in Spring Valley, California.

25 (144) On or about November 26, 2013, defendant MARQUIS DOMINIQUE
26 DAVIS, aka "Bang Oneohone", aka "Tiny Bang", aka "TB", aka
27 "T-Bang", and unindicted conspirator did take by force or
28 fear \$3,259.00 in El Cajon, California.

1 (145) On or about December 5, 2013, defendant MICHAEL DEAN
2 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
3 ofied", aka "M-Geezo", aka "Europeangeez", aka
4 "GeezLewinsky", sold \$50.00 worth of marijuana to a
5 cooperating witness in Spring Valley, California.

6 (146) On or about December 10, 2013, defendant ANTHONY ROBERT
7 DENNISON, aka "AD", aka "Badact", aka "Badact Business",
8 posted to his Facebook profile a conversation with "Lily
9 Perez" wherein "Lily Perez" asked "how much An 8th" and
10 Dennison responds "45 top shelf banana kush".

11 (147) On or about December 22, 2013, defendant MICHAEL DEAN
12 RICHARDSON, aka "Geezo", aka "Mike Geezo", aka "Mike Gee-
13 ofied", aka "M-Geezo", aka "Europeangeez", aka
14 "GeezLewinsky", posted a photograph to his Facebook
15 profile of codefendant RYAN MCINTOCH IZUMI, aka "Mack G",
16 aka "Ryan Chan", where Izumi is displaying the "Add-It-Up"
17 hand sign.

18 (148) On or about January 1, 2014, defendant DAVID MICHAEL
19 STOKES, aka "Daddy Stokes", aka "Daddizm", posted to his
20 Facebook profile a photograph with himself and codefendant
21 MICHAEL DEAN RICHARDSON, aka "Geezo", aka "Mike Geezo",
22 aka "Mike Gee-ofied", aka "M-Geezo", aka "Europeangeez",
23 aka "GeezLewinsky", and an unindicted coconspirator
24 titled, "New Year Same niggas A1 sincke day 1" wherein
25 Richardson is displaying the "Add it Up" gang hand sign
26 depicted with the letter "A".

27 (149) On or about January 14, 2014, defendant ALONDRE SHAMIL
28 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",

1 posted to his Facebook profile a conversation with "Tamari
2 Mason" where she gives Dickerson her phone number and
3 where he states "I could help ya do better" and "Lets trap
4 it out".

5 (150) On or about January 14, 2014, defendant DEIJA RENEE LAMB,
6 aka "Dosha Marley", and unindicted coconspirators took by
7 force or fear laptop, cell phone and head phones from M.M.
8 after he was punched multiple times and was kicked and
9 punched while on the ground and Lamb yelled "Blood."

10 (151) On or about January 14, 2014, defendant JOSEPH BENJAMIN
11 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
12 Taylor", aka "Additup Tha Boss", aka "Additup Guy", did
13 offer to sell marijuana via Facebook in San Diego,
14 California.

15 (152) On or about January 16, 2014, defendant ALONDRE SHAMIL
16 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
17 used a cell phone to promote, manage and carry on
18 prostitution activities involving AF#7 in Carlton Oaks
19 Country Club located in Santee, California.

20 (153) On or about January 25, 2014, defendant BRIAN KEITH SCOTT,
21 aka "Prince Bam", aka "Additup Harris", aka "T-Bam",
22 offered to sell marijuana via Facebook to an unknown
23 person in San Diego County, California.

24 (154) On or about January 26, 2014, defendant BRIAN KEITH SCOTT,
25 aka "Prince Bam", aka "Additup Harris", aka "T-Bam",
26 offered to sell marijuana via Facebook to an unknown
27 person in San Diego County, California.

28

1 (155) On or about January 30, 2014, defendants JAMES TERELLE
2 KING, aka "Tkeezin", aka "TK", aka "John'te Avery King-
3 Chambers", aka "Terelle King", aka "Terelle Keezin", and
4 BRIAN KEITH SCOTT, aka "Prince Bam", aka "Additup Harris",
5 aka "T-Bam", conspired with one another to purchase
6 marijuana for sale.

7 (156) On or about January 31, 2014, defendant ALONDRE SHAMIL
8 DICKERSON, aka "Krazy Ass KP", aka "KP2", aka "Lil' KP",
9 posted up a photograph on his Facebook profile with
10 codefendant ANTHONY ROBERT DENNISON, aka "AD", aka
11 "Badact", aka "Badact Business", with a comment stating,
12 "48hrs of Hard Work. We Down & Out Chea 24/7 @adgetrich"
13 while displaying the "Add it Up" gang hand sign.

14 (157) On or about February 8, 2014, defendant JOSEPH BENJAMIN
15 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
16 Taylor", aka "Additup Tha Boss", aka "Additup Guy", did
17 offer to sell marijuana via Facebook in San Diego,
18 California.

19 (158) On or about February 9, 2014, defendant BRIAN KEITH SCOTT
20 aka "Prince Bam", aka "Additup Harris", aka "T-Bam",
21 offered to sell marijuana via Facebook to an unknown
22 person in San Diego County, California.

23 (159) On or about February 11, 2014, defendant DONALD MICKEY
24 STOKES, aka "KT Brackito", was contacted during a traffic
25 stop in Ramona, California with AF#4 and admitted that he
26 is a member of the "Cutthroats" for the past 7 years and
27 had it tattooed on his right bicep and was also more
28

1 "Lincoln Park" than his brother, codefendant DAVID MICHAEL
2 STOKES, aka "Daddy Stokes", aka "Daddizm".

3 (160) On or about February 14, 2014, defendant JOSEPH BENJAMIN
4 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
5 Taylor", aka "Additup Tha Boss", aka "Additup Guy", did
6 offer to sell marijuana via Facebook in San Diego,
7 California.

8 (161) In or about March 2014, defendant DONALD MICKEY STOKES,
9 aka "KT Brackito", did transport AF#4 from California to
10 Las Vegas, Nevada for the purpose of prostitution.

11 (162) In and about and between March 2014 and May 12, 2014,
12 defendant JAMES TERELLE KING, aka "Tkeezin", aka "TK", aka
13 "John'te Avery King-Chambers", aka "Terelle King", aka
14 "Terelle Keezin", transported AF#2 from Kansas City,
15 Kansas to Austin, Texas for prostitution.

16 (163) On or about and between March 18-21, 2014, defendant
17 CORTES TIZZARO PRATER, aka "Ceejay", aka "Ceejay Staxx",
18 did knowingly attempt to entice, persuade and employ a
19 female whom he believed was under the age of 18 via
20 Facebook for the purpose of her to engage in prostitution.

21 (164) On or about March 29, 2014, defendant DONALD MICKEY
22 STOKES, aka "KT Brackito", posted to his Facebook profile
23 a photograph of him and codefendant JAMES TERELLE KING,
24 aka "Tkeezin", aka "TK", aka "John'te Avery King-
25 Chambers", aka "Terelle King", aka "Terelle Keezin", and
26 unidentified black male in Las Vegas, Nevada.

27 (165) In or about April 2014, defendant DONALD MICKEY STOKES,
28 aka "KT Brackito", did transport AF#4 from California to

1 Michigan with the intent for her to engage in
2 prostitution.

3 (166) On or about April 4, 2014, defendant ANDREW DAMON
4 RICHARDSON, aka "A-Knox", aka "A-Knox Twotimes", aka
5 "Black Jesus", sold marijuana to another person in
6 El Cajon, California.

7 (167) On or about April 16, 2014, defendant DEIJA RENEE LAMB,
8 aka "Dosha Marley", did sell marijuana to another person
9 in San Diego, California.

10 (168) On or about April 18, 2014, defendant DEIJA RENEE LAMB,
11 aka "Dosha Marley", did sell ecstasy to another person in
12 San Diego, California.

13 (169) On or about and between May 6-21, 2014, defendant
14 CHRISTIAN DARWIN WILCOX, aka "Cash Chris", aka "Chris
15 Cash", aka "Craymac", aka "Cray", did sell 20 pills of
16 Xanax to an undercover police officer in El Cajon,
17 California.

18 (170) On or about May 14, 2014, defendant ANTHONY ROBERT
19 DENNISON, aka "AD", aka "Badact", aka "Badact Business",
20 and one unindicted coconspirator sold methamphetamine to a
21 cooperating witness in El Cajon, California.

22 (171) On or about and between May 16-22, 2014, defendant MARQUIS
23 DOMINIQUE DAVIS, aka "Bang Oneohone", aka "Tiny Bang", aka
24 "TB", aka "T-Bang", did knowingly attempted to entice,
25 persuade and induce a person whom he believed to be under
26 the age of 18 via Facebook to engage in prostitution in
27 San Diego County, California.

28

1 (172) On or about May 19, 2014, defendant ANTHONY ROBERT
2 DENNISON, aka "AD", aka "Badact", aka "Badact Business",
3 sold methamphetamine to a cooperating witness in El Cajon,
4 California.

5 (173) On or about May 22, 2014, defendant ANTHONY ROBERT
6 DENNISON, aka "AD", aka "Badact", aka "Badact Business",
7 sold methamphetamine to a cooperating witness in El Cajon,
8 California.

9 (174) On or about June 10-20, 2014, defendant CHRISTIAN DARWIN
10 WILCOX, aka "Cash Chris", aka "Chris Cash", aka
11 "Craymac", aka "Cray", used a cell phone and hotel room
12 for the purpose of AF#8 to engage in prostitution in
13 San Diego County and elsewhere.

14 (175) On or about July 1, 2014, defendant JAMES TERELLE KING,
15 aka "Tkeezin", aka "TK", aka "John'te Avery King-
16 Chambers", aka "Terelle King", aka "Terelle Keezin",
17 posted to his Facebook profile page his new album, titled,
18 "Tkeezin Dirty Clean," produced by Tkeezin" and pictured
19 with King is an adult female handing Tkeezin a stack of
20 money.

21 (176) On or about July 21, 2014, defendant JOSEPH BENJAMIN
22 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
23 Taylor", aka "Additup Tha Boss", aka "Additup Guy", did
24 offer to sell ecstasy via Facebook in San Diego,
25 California.

26 (177) On or about July 28, 2014, defendant JOSEPH BENJAMIN
27 TAYLOR, aka "JT", aka "King Taylor", aka "Additup Deuce
28 Taylor", aka "Additup Tha Boss", aka "Additup Guy", did

1 offer to sell "moon rock" via cellphone and text messages
2 in San Diego, California.

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

4 FORFEITURE ALLEGATION

5 17. All of the allegations contained in Count 1 of this
6 Indictment are hereby realleged and incorporated by reference herein
7 as though fully set forth for the purpose of alleging forfeiture
8 pursuant to the provisions of Title 18, United States Code,
9 Section 1963. Pursuant to Federal Rules of Criminal Procedure,
10 Rule 32.2, notice is hereby given to the above-named defendants that
11 the United States will seek forfeiture as part of any sentence in
12 accordance with Title 18, United States Code, Section 1963, in the
13 event of any defendant's conviction under Count 1 of this Indictment.

14 a. Defendants JAMES TERELLE KING, aka "Tkeezin", aka "TK",
15 aka "John'te Avery King-Chambers", aka "Terelle King", aka "Terelle
16 Keezin"; MICHAEL DEAN RICHARDSON, aka "Geezo", aka "Mike Geezo", aka
17 "Mike Gee-ofied", aka "M-Geezo", aka "Europeangeez", aka
18 "GeezLewinsky"; ANDREW DAMON RICHARDSON, aka "A-Knox", aka "A-Knox
19 Twotimes", aka "Black Jesus"; BRIAN KEITH SCOTT, aka "Prince Bam", aka
20 "Additup Harris", aka "T-Bam"; ALONDRE SHAMIL DICKERSON, aka "Krazy
21 Ass KP", aka "KP2", aka "Lil' KP"; ANTHONY ROBERT DENNISON, aka "AD",
22 aka "Badact", aka "Badact Business"; KEYON RENTA GILL, aka "Bambino
23 Onlikeshit", aka "Boostodamax", aka "Bino"; DONAVYN KEITH DOVE, aka
24 "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy Macmcrec"; RYAN
25 MCINTOCH IZUMI, aka "Mack G", aka "Ryan Chan"; WILLIAM HENRY MITCHELL,
26 aka "Baddass Blingemm", aka "Bills Thebaddass Blangemmm"; JORDAN RENEE
27 MITCHELL, aka "Jayblangenn Mitchell"; DAVID MICHAEL STOKES, aka "Daddy
28 Stokes", aka "Daddizm"; CHRISTIAN DARWIN WILCOX, aka "Cash Chris", aka

1 "Chris Cash", aka "Craymac", aka "Cray"; MARQUIS DOMINIQUE DAVIS, aka
2 "Bang Oneohone", aka "Tiny Bang", aka "TB", aka "T-Bang"; CORTES
3 TIZZARO PRATER, aka "Ceejay", aka "Ceejay Staxx"; EMMANUEL GUMATAOTAO
4 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup June", aka
5 "Tycoon June"; DONALD MICKEY STOKES, aka "KT Brackito"; WILEY JUNIUS
6 GREENO, aka "Wiley Additup Greeno", aka "Additupuno"; DEIJA RENEE
7 LAMB, aka "Dosha Marley"; JOSEPH BENJAMIN TAYLOR, aka "JT", aka "King
8 Taylor", aka "Additup Deuce Taylor", aka "Additup Tha Boss", aka
9 "Additup Guy"; FRANK GIBSON III, aka "Frankie Cee"; and CHRISTAL MARIE
10 TORRES, aka "Christal Cash", have acquired and maintained interests in
11 violation of Title 18, United States Code, Section 1962, which
12 interests are subject to forfeiture to the United States pursuant to
13 Title 18, United States Code, Section 1963(a)(1); and

14 b. Defendants JAMES TERELLE KING, aka "Tkeezin", aka "TK",
15 aka "John'te Avery King-Chambers", aka "Terelle King", aka "Terelle
16 Keezin"; MICHAEL DEAN RICHARDSON, aka "Geezo", aka "Mike Geezo", aka
17 "Mike Gee-ofied", aka "M-Geezo", aka "Europeangeez", aka
18 "GeezLewinsky"; ANDREW DAMON RICHARDSON, aka "A-Knox", aka "A-Knox
19 Twotimes", aka "Black Jesus"; BRIAN KEITH SCOTT, aka "Prince Bam", aka
20 "Additup Harris", aka "T-Bam"; ALONDRE SHAMIL DICKERSON, aka "Krazy
21 Ass KP", aka "KP2", aka "Lil' KP"; ANTHONY ROBERT DENNISON, aka "AD",
22 aka "Badact", aka "Badact Business"; KEYON RENTA GILL, aka "Bambino
23 Onlikeshit", aka "Boostodamax", aka "Bino"; DONAVYN KEITH DOVE, aka
24 "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy Macmcrec"; RYAN
25 MCINTOCH IZUMI, aka "Mack G", aka "Ryan Chan"; WILLIAM HENRY MITCHELL,
26 aka "Baddass Blingemm", aka "Bills Thebaddass Blangemmm"; JORDAN RENEE
27 MITCHELL, aka "Jayblangenn Mitchell"; DAVID MICHAEL STOKES, aka "Daddy
28 Stokes", aka "Daddizm"; CHRISTIAN DARWIN WILCOX, aka "Cash Chris", aka

1 "Chris Cash", aka "Craymac", aka "Cray"; MARQUIS DOMINIQUE DAVIS, aka
2 "Bang Oneohone", aka "Tiny Bang", aka "TB", aka "T-Bang"; CORTES
3 TIZZARO PRATER, aka "Ceejay", aka "Ceejay Staxx"; EMMANUEL GUMATAOTAO
4 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup June", aka
5 "Tycoon June"; DONALD MICKEY STOKES, aka "KT Brackito"; WILEY JUNIUS
6 GREENO, aka "Wiley Additup Greeno", aka "Additupuno"; DEIJA RENEE
7 LAMB, aka "Dosha Marley"; JOSEPH BENJAMIN TAYLOR, aka "JT", aka "King
8 Taylor", aka "Additup Deuce Taylor", aka "Additup Tha Boss", aka
9 "Additup Guy"; FRANK GIBSON III, aka "Frankie Cee"; and CHRISTAL MARIE
10 TORRES, aka "Christal Cash", have an interest in, security of, claims
11 against, and property and contractual rights which afford a source of
12 influence over, the enterprise described herein which the defendants
13 established, operated, controlled, conducted, and participated in the
14 conduct of, in violation of Title 18, United States Code,
15 Section 1962, which interests, securities, claims, and rights are
16 subject to forfeiture to the United States pursuant to Title 18,
17 United States Code, Section 1963(a)(2); and

18 c. Defendants JAMES TERELLE KING, aka "Tkeezin", aka "TK",
19 aka "John'te Avery King-Chambers", aka "Terelle King", aka "Terelle
20 Keezin"; MICHAEL DEAN RICHARDSON, aka "Geezo", aka "Mike Geezo", aka
21 "Mike Gee-ofied", aka "M-Geezo", aka "Europeangeez", aka
22 "GeezLewinsky"; ANDREW DAMON RICHARDSON, aka "A-Knox", aka "A-Knox
23 Twotimes", aka "Black Jesus"; BRIAN KEITH SCOTT, aka "Prince Bam", aka
24 "Additup Harris", aka "T-Bam"; ALONDRE SHAMIL DICKERSON, aka "Krazy
25 Ass KP", aka "KP2", aka "Lil' KP"; ANTHONY ROBERT DENNISON, aka "AD",
26 aka "Badact", aka "Badact Business"; KEYON RENTA GILL, aka "Bambino
27 Onlikeshit", aka "Boostodamax", aka "Bino"; DONAVYN KEITH DOVE, aka
28 "Barzo", aka "Barrzo Doitrite Dove", aka "Teddy Macmcrea"; RYAN

1 MCINTOCH IZUMI, aka "Mack G", aka "Ryan Chan"; WILLIAM HENRY MITCHELL,
2 aka "Baddass Blingemm", aka "Bills Thebaddass Blangemmm"; JORDAN RENEE
3 MITCHELL, aka "Jayblangenn Mitchell"; DAVID MICHAEL STOKES, aka "Daddy
4 Stokes", aka "Daddizm"; CHRISTIAN DARWIN WILCOX, aka "Cash Chris", aka
5 "Chris Cash", aka "Craymac", aka "Cray"; MARQUIS DOMINIQUE DAVIS, aka
6 "Bang Oneohone", aka "Tiny Bang", aka "TB", aka "T-Bang"; CORTES
7 TIZZARO PRATER, aka "Ceejay", aka "Ceejay Staxx"; EMMANUEL GUMATAOTAO
8 FAROL, aka "June Farol", aka "Tha Kidd", aka "Additup June", aka
9 "Tycoon June"; DONALD MICKEY STOKES, aka "KT Brackito"; WILEY JUNIUS
10 GREENO, aka "Wiley Additup Greeno", aka "Additupuno"; DEIJA RENEE
11 LAMB, aka "Dosha Marley"; JOSEPH BENJAMIN TAYLOR, aka "JT", aka "King
12 Taylor", aka "Additup Deuce Taylor", aka "Additup Tha Boss", aka
13 "Additup Guy"; FRANK GIBSON III, aka "Frankie Cee"; and CHRISTAL MARIE
14 TORRES, aka "Christal Cash", have property constituting and derived
15 from proceeds obtained, directly and indirectly, from the racketeering
16 activity described in this Indictment, in violation of Title 18,
17 United States Code, Section 1962, which property is subject to
18 forfeiture to the United States pursuant to Title 18, United States
19 Code, Section 1963(a)(3).

20 18. The interests of the defendants subject to forfeiture to the
21 United States pursuant to Title 18, United States Code,
22 Sections 1963(a)(1), (a)(2) and (a)(3), include but are not limited to
23 any and all proceeds or property derived from proceeds traceable to
24 the racketeering activities alleged in Count 1 during the relevant
25 time period alleged in the indictment and all interests and proceeds
26 traceable thereto.

27 21. Each of the defendants is jointly and severally liable for
28 the forfeiture obligations alleged above.

1 22. If any of the above-described forfeitable property, as a
2 result of any act or omission of the defendants:

- 3 a. cannot be located upon the exercise of due diligence;
- 4 b. has been transferred or sold to, or deposited with, a
5 third person;
- 6 c. has been placed beyond the jurisdiction of the Court;
- 7 d. has been substantially diminished in value; or
- 8 e. has been commingled with other property which cannot be
9 subdivided without difficulty, it is the intent of the United States,
10 pursuant to Title 18, United States Code, Section 1963(m), to seek
11 forfeiture of any other property of said defendants up to the value of
12 the above forfeitable property.

13 All pursuant to Title 18, United States Code, Section 1963.

14 **NOTICE OF SPECIAL SENTENCING FACTORS REGARDING COUNT 1**

15 1. Sex Trafficking of Children - 18 U.S.C. § 1591

16 On or about the dates listed below, within the Southern District
17 of California, and elsewhere, defendants (see below), in and affecting
18 interstate commerce, knowingly did recruit, entice, harbor, transport,
19 provide, obtain, and maintain by any means a person (see below),
20 knowing and in reckless disregard of the fact that the minor would be
21 caused to engage in a commercial sex act, having had a reasonable
22 opportunity to observe the minor and knowing and in reckless disregard
23 of the fact that the minor had not attained the age of 18 years; in
24 violation of Title 18, United States Code, Section 1591(a) and (b).

25 //
26 //
27 //
28 //

Dates	Defendant(s)	Person
January 7, 2013	Christal Marie Torres	MF#4

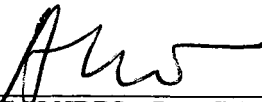
DATED: December 4, 2014.

A TRUE BILL:



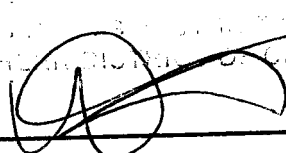
 Foreperson

LAURA E. DUFFY
 United States Attorney

By: 

 ALESSANDRA P. SERANO
 Assistant U.S. Attorney

I hereby attest and certify on 12/5/14
 That the foregoing is a true and correct
 copy of the original as it appears in my
 custody.


 _____ Deputy

SOUTHERN DISTRICT OF CALIFORNIA