

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

v.

Case:2:15-cr-20472
Judge: Edmunds, Nancy G.
MJ: Majzoub, Mona K.
Filed: 07-29-2015 At 04:32 PM
INDI USA V. SEALED MATTER (DA)

- D-1 ANTONIO CLARK,
a/k/a "Cheeto," 18 U.S.C. § 1959(a)(5);
- D-2 ARAMIS WILSON,
a/k/a "Ace" 18 U.S.C. § 1959(a)(3);
- D-3 TYRONE PRICE,
a/k/a "Price," 18 U.S.C. § 924(c);
- D-4 JONATHAN KINCHEN,
a/k/a "Deago," 18 U.S.C. § 922(g);
- D-5 KOJUAN LEE,
a/k/a "Juan," 18 U.S.C. § 2
- D-6 KIRSHEAN NELSON,
- D-7 DION ROBINSON,
a/k/a "Doggy,"

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. §§ 1959(a)(5) – *Attempted Murder in Aid of Racketeering*

- D-1 ANTONIO CLARK
- D-2 ARAMIS WILSON

The Enterprise

1. The Almighty Vice Lord Nation, commonly referred to as the "Vice Lords" (hereinafter referred to as the "Vice Lords"), is a national gang founded in Chicago, Illinois. There are various "sets," "decks," or

"branches" within the Vice Lords, which are expected to assist one another, collaborate with one another on criminal activities, and answer to the gang's leaders in Chicago, Illinois, and Detroit, Michigan. Some of these sets are the Insane Vice Lords, Imperial Insane Vice Lords, Traveling Vice Lords, Conservative Vice Lords, the Mafia Insane Vice Lords, and the Insane Goon Gang.

2. The Vice Lords have a hierarchical chain of command. There are "kings" and "princes" that rule the Vice Lords. In particular locations, "universal elites" run the particular sets within an area or city. These universal elites are ranked as five-star (highest), three-star, and one-star. There are "enforcers" who enact the orders of the universal elite by directing "lieutenants" to maintain discipline within a particular branch by administering beatings or fines. Other Vice Lord members are known as "soldiers" or "foot soldiers." Vice Lords must follow the orders of their leaders. These orders from Vice Lord leaders include, but are not limited to, retaliation against rival gangs, orders to assault other gang members, armed robberies, and other crimes and acts of violence.

3. The Vice Lords utilize a variety of unifying marks, manners, and identifiers, including "gang signs," clothing, and tattoos that are specific to the organization. A common symbol is the five-pointed star which

represents the fact that the Vice Lords belong to the "People Nation," an alliance of various street gangs including the Bloods, the Latin Kings, and the Latin Counts. This alliance is in direct conflict with the "Folk Nation," an alliance of various street gangs including the Gangster Disciples and the Crips. Many of the Vice Lords symbols, clothing, and sayings attempt to differentiate themselves from or disrespect their rivals. Other common Vice Lords symbols include a top hat and cane, the "Playboy" bunny, and the numbers "22 12," which represent the 22nd and 12th letters of the alphabet, VL. The Vice Lords colors are predominately black and gold, although red is also incorporated to show their participation in the People Nation.

4. Individuals enter the Vice Lords by either being "blessed in," that is by reciting an oath or prayer and being approved of by a high-ranking member, or by being "beat in," that is by being "circled up" by five other Vice Lords members who then physically assault the new member for five minutes. This is commonly referred to by the Vice Lords as a "55."

5. The organization utilizes defined membership criteria and rules. These rules are commonly referred to by Vice Lords as "literature." Members must know their literature which includes the principles and commandments of the Vice Lords. Vice Lords also have rules requiring

attendance at meetings, the payment of dues, and assisting fellow members in crimes and acts of violence, if so ordered. The organization imposes punishment upon members, generally referred to as "violations," including beatings, for violations of these rules.

6. Vice Lords are prohibited from speaking to outsiders about the Vice Lords or from cooperating with law enforcement authorities. Engaging in such activity would result in a violation, meaning physical injury or death. Attempts to leave or withdraw from the Vice Lords oftentimes results in a "beat out," a physical beating by multiple Vice Lords members, or a "green light," an order to kill. The incident on May 7, 2015, as further described in Counts One – Eight, resulted from V.T. and S.T.'s attempts to leave the Traveling Vice Lord set.

7. The Vice Lords share close relationships with the Phantom Outlaw Motorcycle Club (hereinafter referred to as the "Phantoms"), including sharing common leaders in the Eastern District of Michigan. Multiple Vice Lords members are also Phantoms members. Among other things, Vice Lords and Phantoms share common identification marks on their clothing and other paraphernalia. At least one shared leader between the Vice Lords and Phantoms called upon and utilized the services of the Vice Lords to further the goals of the Phantoms and achieve its purposes,

including by using the Vice Lords to enforce discipline within the Phantoms, to search for rivals of the Phantoms, and to carry out acts of violence on the Phantoms' behalf. The same shared leader between the two organizations used the Phantoms to advance the interests of the Vice Lords, and vice versa, including the use of one organization to attack the rival of another. Also, the same shared leader between the two organizations held Vice Lord meetings and conducted Vice Lord business at the Phantoms' clubhouse in Detroit, Michigan. Members of the Phantoms attended Vice Lord meetings, and vice versa.

8. Although falling under the Almighty Vice Lord Nation, disputes and rivalries do arise between some of the respective branches, including recruitment of members between branches.

9. At various times relevant to this Indictment, ANTONIO CLARK, ARAMIS WILSON, TYRONE PRICE, JONATHAN KINCEN, KOJUAN LEE, KIRSHEAN NELSON, DION ROBINSON, and others, were members and associates of the Vice Lords, a criminal organization whose members and associates engaged in acts of violence, including conspiracy to commit murder and attempted murder, robbery, narcotics trafficking, and witness intimidation, and which operated principally in Detroit, Michigan.

10. The Vice Lords, including its leadership, membership, and associates, constituted an enterprise, as defined by 18 U.S.C. § 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

11. The purposes of the enterprise included the following:
- a. Maximizing profits for enterprise leaders and members from a variety of illegal activity;
 - b. Preserving and protecting the power, territory, and profits of the enterprise through the use of intimidation and violence, including assaults and threats of violence;
 - c. Promoting and enhancing the enterprise and its members' and associates' activities;
 - d. Keeping victims in fear of the enterprise and in fear of its members and associates through threats of violence and violence.

12. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:

a. Members of the enterprise and their associates committed, conspired, attempted and threatened to commit acts of violence including acts involving murder, robbery, and assaults with dangerous weapons, to protect and expand the enterprise's criminal operations.

b. Members of the enterprise and their associates promoted a climate of fear through violence and threats of violence.

c. Members of the enterprise and their associates used and threatened to use physical violence against various individuals.

d. Members of the enterprise and their associates distributed controlled substances.

e. Members of the enterprise and their associates committed armed robberies.

13. The Vice Lords enterprise, through its members and associates, engaged in racketeering activity as defined by Sections 1959(b)(1) and 1961(1) of Title 18, United States Code, namely acts involving murder and robbery in violation of Michigan State Law, acts involving dealing in controlled substances indictable under 21 U.S.C. §§

841 and 846, and acts indictable under 18 U.S.C. § 1512 (witness intimidation).

14. On or about May 7, 2015, in the Eastern District of Michigan, Southern Division, ANTONIO CLARK and ARAMIS WILSON, did, for the purpose of maintaining and increasing position in the Vice Lords, an enterprise engaged in racketeering activity, knowingly and unlawfully attempt to murder V.T.; in violation of Michigan Compiled Laws, Sections 750.316(1) and 750.92.

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

COUNT TWO

18 U.S.C. §§ 1959(a)(3); 2 – *Assault with a Dangerous Weapon in Aid of Racketeering*

- D-1 ANTONIO CLARK
- D-2 ARAMIS WILSON
- D-3 TYRONE PRICE
- D-4 JONATHAN KINCHEN
- D-5 KOJUAN LEE
- D-6 KIRSHEAN NELSON
- D-7 DION ROBINSON

1. Paragraphs One – Thirteen of Count One are re-alleged herein as if fully incorporated in this Count.

2. On or about May 7, 2015, in the Eastern District of Michigan, Southern Division, ANTONIO CLARK, ARAMIS WILSON, TYRONE PRICE, JONATHAN KINCHEN, KOJUAN LEE, KIRSHEAN NELSON,

DION ROBINSON, and others, known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did, for the purpose of maintaining and increasing position in the Vice Lords, an enterprise engaged in racketeering activity, knowingly and unlawfully assault V.T. with a dangerous weapon; in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

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

COUNT THREE

18 U.S.C. §§ 1959(a)(5) – *Attempted Murder in Aid of Racketeering*

D-1 ANTONIO CLARK
D-2 ARAMIS WILSON

1. Paragraphs One – Thirteen of Count One are re-alleged herein as if fully incorporated in this Count.

2. On or about May 7, 2015, in the Eastern District of Michigan, Southern Division, ANTONIO CLARK and ARAMIS WILSON, did, for the purpose of maintaining and increasing position in the Vice Lords, an enterprise engaged in racketeering activity, knowingly and unlawfully attempt to murder T.T.-1; in violation of Michigan Compiled Laws, Sections 750.316(1) and 750.92.

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

COUNT FOUR

18 U.S.C. §§ 1959(a)(3); 2 – *Assault with a Dangerous Weapon in Aid of Racketeering*

D-1 ANTONIO CLARK
D-2 ARAMIS WILSON
D-3 TYRONE PRICE
D-4 JONATHAN KINCHEM
D-5 KOJUAN LEE
D-6 KIRSHEAN NELSON
D-7 DION ROBINSON

1. Paragraphs One – Thirteen of Count One are re-alleged herein as if fully incorporated in this Count.

2. On or about May 7, 2015, in the Eastern District of Michigan, Southern Division, ANTONIO CLARK, ARAMIS WILSON, TYRONE PRICE, JONATHAN KINCHEM, KOJUAN LEE, KIRSHEAN NELSON, DION ROBINSON, and others, known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did, for the purpose of maintaining and increasing position in the Vice Lords, an enterprise engaged in racketeering activity, knowingly and unlawfully assault T.T.-1 with a dangerous weapon; in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

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

COUNT FIVE

18 U.S.C. §§ 1959(a)(3); 2 – *Assault with a Dangerous Weapon in Aid of Racketeering*

D-1 ANTONIO CLARK
D-2 ARAMIS WILSON
D-3 TYRONE PRICE
D-4 JONATHAN KINCHEN
D-5 KOJUAN LEE
D-6 KIRSHEAN NELSON
D-7 DION ROBINSON

1. Paragraphs One – Thirteen of Count One are re-alleged herein as if fully incorporated in this Count.

2. On or about May 7, 2015, in the Eastern District of Michigan, Southern Division, ANTONIO CLARK, ARAMIS WILSON, TYRONE PRICE, JONATHAN KINCHEN, KOJUAN LEE, KIRSHEAN NELSON, DION ROBINSON, and others, known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did, for the purpose of maintaining and increasing position in the Vice Lords, an enterprise engaged in racketeering activity, knowingly and unlawfully assault S.T. with a dangerous weapon; in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

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

COUNT SIX

18 U.S.C. §§ 1959(a)(3); 2 – *Assault with a Dangerous Weapon in Aid of Racketeering*

D-1 ANTONIO CLARK
D-2 ARAMIS WILSON
D-3 TYRONE PRICE
D-4 JONATHAN KINCHEM
D-5 KOJUAN LEE
D-6 KIRSHEAN NELSON
D-7 DION ROBINSON

1. Paragraphs One – Thirteen of Count One are re-alleged herein as if fully incorporated in this Count.

2. On or about May 7, 2015, in the Eastern District of Michigan, Southern Division, ANTONIO CLARK, ARAMIS WILSON, TYRONE PRICE, JONATHAN KINCHEM, KOJUAN LEE, KIRSHEAN NELSON, DION ROBINSON, and others, known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did, for the purpose of maintaining and increasing position in the Vice Lords, an enterprise engaged in racketeering activity, knowingly and unlawfully assault T.T.-2 with a dangerous weapon; in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

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

COUNT SEVEN

18 U.S.C. §§ 924(c); 2 – *Use and Carry of a Firearm During, and in Relation to, a Crime of Violence*

D-1 ANTONIO CLARK
D-2 ARAMIS WILSON

On or about May 7, 2015, in the Eastern District of Michigan, Southern Division, and elsewhere, ANTONIO CLARK and ARAMIS WILSON, did aid and abet each other in knowingly, intentionally, and unlawfully using and carrying a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted murder in aid of racketeering, as alleged in Counts One and Three, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT EIGHT

18 U.S.C. §§ 924(c); 2 – *Use and Carry of a Firearm During, and in Relation to, a Crime of Violence*

D-1 ANTONIO CLARK
D-2 ARAMIS WILSON
D-3 TYRONE PRICE
D-4 JONATHAN KINCHEN
D-5 KOJUAN LEE
D-6 KIRSHEAN NELSON
D-7 DION ROBINSON

On or about May 7, 2015, in the Eastern District of Michigan, Southern Division, and elsewhere, ANTONIO CLARK, ARAMIS WILSON, TYRONE PRICE, JONATHAN KINCHEN, KOJUAN LEE, KIRSHEAN NELSON, DION ROBINSON, and others, known and unknown to the Grand Jury, did aid and abet each other in knowingly, intentionally, and unlawfully using and carrying a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, assault with a dangerous weapon in aid of racketeering, as alleged in Count Two and Counts Four - Six, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT NINE

18 U.S.C. § 922(g)(1) – *Felon in Possession of a Firearm*

D-1 ANTONIO CLARK
D-2 ARAMIS WILSON

On or about May 7, 2015, in the Eastern District of Michigan, Southern Division, defendant ANTONIO CLARK and ARAMIS WILSON, after having previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year (felony offense), did knowingly and unlawfully possess a firearm, said firearm having previously traveled in

interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

THIS IS A TRUE BILL

Dated: July 29, 2015

/s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

BARBARA L. McQUADE
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/s/ Joseph Wheatley
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U.S. Department of Justice

United States District Court
Eastern District of Michigan

Criminal Case Cc

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately.

Reassignment/Recusal Information This matter was opened in the USAO prior to August 15, 2008 []

Companion Case Information	Companion Case Number: 13-cr-20764
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned: Borman
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: <u>CG</u>

Case Title: USA v. Antonio Clark, et al.

County where offense occurred : Wayne County and Elsewhere

Check One: Felony Misdemeanor Petty

- Indictment/___ Information --- no prior complaint.
- Indictment/___ Information --- based upon prior complaint [Case number: _____]
- Indictment/___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- Original case was terminated; no additional charges or defendants.
- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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See Attachment

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

July 29, 2015
Date



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Attorney Bar #: P69515

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

NO.

v.

HON.

D-1	ANTONIO CLARK, a/k/a "Cheeto,"	18 U.S.C. § 1959(a)(5); 18 U.S.C. § 1959(a)(3);
D-2	ARAMIS WILSON, a/k/a "Ace"	18 U.S.C. § 924(c); 18 U.S.C. § 922(g);
D-3	TYRONE PRICE, a/k/a "Price,"	18 U.S.C. § 2
D-4	JONATHAN KINCHEN, a/k/a "Deago,"	
D-5	KOJUAN LEE, a/k/a "Juan,"	
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