

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

NO. 15-20652

v.

HON. GEORGE CARAM STEEH

D-1 BILLY ARNOLD,
a/k/a "B-Man," "Berinzo,"
"Killa"

18 U.S.C. § 1959(a)(5);
18 U.S.C. § 1959(a)(3);
18 U.S.C. § 924(c);

D-2 STEVEN ARTHUR JR.,
a/k/a "Steve-O"

18 U.S.C. § 922(g)(1);
18 U.S.C. § 2

D-3 EUGENE FISHER,
a/k/a "Fist"

_____ /

SUPERSEDING INDICTMENT

FILED
JAN 13 2016
CLERK'S OFFICE
DETROIT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. §§ 1959(a)(5); 2 – *Attempted Murder in Aid of Racketeering*

D-1 BILLY ARNOLD

The Enterprise

1. The Seven Mile Bloods, commonly referred to as, and hereinafter referred to as "SMB," is a street gang that operates primarily on the east side of Detroit, Eastern District of Michigan, specifically the area in and around Gratiot Avenue to the west, Kelly Road to the east, Eight Mile to the north, and Seven Mile of the south. SMB members have claimed this area as their territory and refer to it as the "Red Zone." The main

streets in the area that the SMB conduct many of their illegal narcotics trafficking are Lappin, Coram, Novara, Liberal, Manning, and Tacoma. This particular area of Detroit's zip code in 48205, which SMB members change into "4-8-2-0-Die" in many of their rap lyrics.

2. The SMB consists of the SMB, older individuals involved in the gang, and Hobsquad, a distinct set affiliated with the SMB. Initially, the Hobsquad was known as SMB Juniors and consisted of younger, school-aged minors from this neighborhood. The SMB Juniors changed their name to Hobsquad in honor of one of their members, Ihab Maslamani, who was convicted of homicide.

3. SMB and Hobsquad members 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, a hand sign with all five fingers, or a crown with five points which represents the fact that the SMB belong to the "People Nation," an alliance of various street gangs including the Bloods, Vice Lords, Latin Kings, and 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. The SMB also identify themselves with the number "55" and sometimes refer to themselves as "55 Crew" or "55

Grinch.” SMB members will also identify themselves with the number “762” which stands for the numbers on a keypad that a person would push to type out SMB. Members will often tattoo themselves with these gang symbols. Many of the SMB symbols, clothing, and sayings attempt to differentiate themselves from or disrespect their rivals. The SMB colors are predominately red which the gang members signify by wearing red clothing, hats, and bandanas.

4. SMB members regularly use social networking websites such as Facebook, Instagram, Twitter, and YouTube, to post photographs, videos, and statements that identify and highlight their affiliation with the enterprise, as well as their gang-related accomplishments, thereby glorifying and perpetuating SMB. SMB is also heavily involved in the rap music scene. SMB members regularly post videos of their raps and discuss their gang affiliation and accomplishments via rap. SMB has a close relationship with “Hard Work Entertainment.”

5. The enterprise makes its money predominately through the sale and distribution of controlled substances, including cocaine, heroin, and various prescription pills. SMB members sell these controlled substances within the “Red Zone,” outside of vacant houses known as “trap houses.” Within the time frame of the charged enterprise, higher-ranking SMB

members would often sell on the same block of Manning Street sharing workers and firearms to distribute and protect their narcotics. SMB members also travel to West Virginia, Ohio, Kentucky, and other states to sell controlled substances.

6. The SMB is currently in an active gang war with an alliance of other gangs operating on Detroit's east side including, but not limited to: Hustle Boys, East Warren, Six Mile Chedda Ave., Gutta Boys, Maxout 220, BossHogs, and Hustle Hard. Since July 2014, these rivals are violently attacking one another and have posted respective "hit lists" on social media. The incident on May 1, 2015, as further described in this Count and Counts Two and Three, is one incident in this gang war.

7. At various times relevant to this Indictment, BILLY ARNOLD and others, known and unknown to the grand jury, were members and associates of the SMB enterprise, a criminal organization, which includes both SMB and Hobsquad, whose members and associates engaged in acts of violence, including murder, and attempts and conspiracy to commit the same, robbery, narcotics trafficking, and witness intimidation, and which operated principally in Detroit, Michigan and Charleston, West Virginia.

8. The SMB enterprise, 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

9. The purposes of the enterprise included the following:
 - a. Maximizing profits for enterprise 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.

10. 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.

11. The SMB 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).

12. On or about May 1, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, 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 SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully attempt to murder R.C.; 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) and 2.

COUNT TWO

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

D-1 BILLY ARNOLD

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

2. On or about May 1, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD 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 SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully assault R.C. 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. §§ 924(c); 2 – *Use and Carry of a Firearm During, and in Relation to, a Crime of Violence*

D-1 BILLY ARNOLD

On or about May 1, 2015, in the Eastern District of Michigan, Southern Division, and elsewhere, BILLY ARNOLD 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, attempted murder and assault with a dangerous weapon in aid of racketeering, as alleged in Counts One and Two, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT FOUR

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

D-1 BILLY ARNOLD
D-2 STEVE ARTHUR JR.
D-3 EUGENE FISHER

On or about September 26, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, STEVE ARTHUR JR., and EUGENE

FISHER, 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: to wit, a Bushmaster .223 caliber rifle, Model M15-E2S, serial number BFI468505, said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS

Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby provides notice to the defendant(s) of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set forth in this Indictment.

THIS IS A TRUE BILL

Dated: January 13, 2016

/s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

BARBARA L. McQUADE
UNITED STATES ATTORNEY

/s/ Christopher Graveline
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/s/ James M. Trusty
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U.S. Department of Justice

/s/ Rajesh Prasad
RAJESH PRASAD
Assistant U.S. Attorney

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number 15-20652
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

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

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

Case Title: USA v. Billy Arnold, et al.

County where offense occurred : Wayne County and Elsewhere

FILE
JAN 13 2016
CLERK'S OFFICE
DETROIT

Check One: **Felony** **Misdemeanor**

- 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: 15-cr-20652 Judge: George Caram Steeh

- 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>
D-3 Eugene Fisher	18 U.S.C. §922(g)(1);	

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

January 13, 2016
Date

/s/ Christopher Graveline
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 Assistant United States Attorney
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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. 04/13