

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

v.

Case:2:15-cr-20574
Judge: Hood, Denise Page
MJ: Stafford, Elizabeth A.
Filed: 09-16-2015 At 03:10 PM
INDI SEALED MATTER (NA)

D-1 COREY DEANDRE MAPP,
a.k.a. CEO Corey,
a.k.a. Lil Corey,

Violations:

D-2 ALEXANDER TEONTAE JOHNSON,
a.k.a. CEO Gwopp,

18 U.S.C. §§ 1962(d), 1963;

18 U.S.C. § 1959;

18 U.S.C. § 924(c);

D-3 LEO JAMES JOHNSON,
a.k.a. Bam,

18 U.S.C. § 922;

18 U.S.C. § 2

D-4 JOSEPH HEZEKIAH FORD,
a.k.a. Co-CEO Joesky,

D-5 TRAVONTAE JAVON JOSEPH,
a.k.a. CEO Trick,

D-6 JAMELL LOVAL SMITH,
a.k.a. CEO Mel,

D-7 MARIO PERKINS,
a.k.a. Rio,

D-8 AKEEM ARTEAZE WALKER,
a.k.a. Keem,

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Racketeering Conspiracy

18 U.S.C. 1962(d)

D-1 COREY DEANDRE MAPP
D-2 ALEXANDER TEONTAE JOHNSON
D-3 LEO JAMES JOHNSON
D-4 JOSEPH HEZEKIAH FORD
D-5 TRAVONTAE JAVON JOSEPH
D-6 JAMELL LOVAL SMITH
D-7 MARIO PERKINS
D-8 AKEEM ARTEAZE WALKER

The Enterprise

At all times relevant to this Indictment:

1. "Band Crew," also known as "22 Band Crew" and "BC," was a street gang whose base of operation was primarily in northwest Detroit, Eastern District of Michigan, specifically the area in and around Seven Mile Road, with Southfield Freeway to the west, West McNichols Road to the south, Eight Mile Road to the north, and Greenfield Road to the east. Band Crew members claimed this area as their territory. Band Crew members wrote gang-related graffiti on buildings in their territory, including markings such as "#22 BandCrew," "BAND CREW," "22

BAND CREW,” “YNCMH,” and “PBF.”

2. Band Crew was an association of existing smaller gangs that principally included members of Constantly Making Hundreds (CMH, formerly Cash Money Hoes), Young N Crispy (YNC), Pushit (or Pusha) Boy Family (PBF), and Family Over Everything Love is Forever (FOE Life). As an association of smaller gangs, Band Crew did not have a formal hierarchical structure apart from having leaders of each subgroup who were known as “CEOs” and “Co-CEOs.” Band Crew members and associates also continued to identify themselves as members of these smaller gangs, including CMH, YNC, PBF, and FOE Life.

3. Band Crew members signified their affiliation with the gang through the use of tattoos, clothing, hand signs, statements made on social media, statements made to unaffiliated individuals, statements made to law enforcement, and photographing themselves with other Band Crew members and associates.

4. Band Crew members and associates used social networking websites such as Facebook, Instagram, Twitter, Keek, and YouTube to post photographs, videos, and statements that identified and highlighted the existence of the gang, a member’s affiliation with the gang, and gang-related accomplishments.

5. Band Crew members and associates also communicated via cellular telephones and other mobile devices, using these instruments to plan their criminal

activities, update each other about gang activity, boast about the gang, promote the gang, and disrespect rival gangs.

6. Band Crew often clashed with other gangs including, but not limited to: Related Through Money (RTM), Too Much Cash Never End (TMCNE), All Star Ball Hard (ASBH), True Savage Niggas (TSN), and The Take Over (TTO). Band Crew members and associates worked together against rival gangs to defend their territory, to promote and maintain the status and reputation of Band Crew, and to retaliate with acts and threats of violence for perceived wrongs.

7. Band Crew, including its leadership, membership, and associates, constituted an enterprise, as defined in Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, the activities of which affected interstate and foreign 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.

8. At all times relevant to this Indictment, the defendants, COREY DEANDRE MAPP, a.k.a. CEO Corey, a.k.a. Lil Corey, ALEXANDER TEONTAE JOHNSON, a.k.a. CEO Gwopp, LEO JAMES JOHNSON, a.k.a. Bam, JOSEPH HEZEKIAH FORD, a.k.a. Co-CEO Joesky, TRAVONTAE JAVON JOSEPH, a.k.a. CEO Trick, JAMELL LOVAL SMITH, a.k.a. CEO Mel, MARIO PERKINS, a.k.a. Rio, AKEEM ARTEAZE WALKER, a.k.a. Keem, and

others known and unknown to the Grand Jury, were members and associates of Band Crew, a criminal organization.

Purposes of the Enterprise

9. The purposes of the Band Crew enterprise included the following:
 - a. Enriching the members and associates of the enterprise through criminal activity;
 - b. Preserving, expanding, and protecting the power, territory, reputation, and profits of the enterprise through the use and threatened use of intimidation, violence, assaults, robberies, thefts, and attempted murder;
 - c. Promoting and enhancing the enterprise and the activities of its members and associates;
 - d. Sharing and disseminating information about the enterprise's plans and activities;
 - e. Obtaining, possessing, sharing, and using firearms to further the enterprise's purposes;
 - f. Keeping victims, potential witnesses, and community members in fear of the enterprise and its members and associates through intimidation, threats of violence, and acts of violence;
 - g. Confronting and retaliating against rival gangs through the use

of intimidation, threats of violence, and acts of violence;

h. Providing assistance to members and associates who committed crimes with and on behalf of the enterprise in order to hinder, obstruct, and prevent the identification, apprehension, and successful prosecution of the offenders.

Manner and Means of the Enterprise

10. Among the manner and means by which Band Crew members and associates agreed to conduct and participate in the conduct of the affairs of the enterprise were the following:

a. Members and associates of the enterprise committed, or agreed that enterprise members and associates would commit, criminal acts, including robbery, assaults, acts or threats involving murder, and dealing and distributing marijuana, the commission of which were related to the enterprise;

b. Members and associates of the enterprise wore clothing signifying their affiliation with Band Crew, exhibited Band Crew and affiliated gang tattoos, and displayed hand signs, all to demonstrate the existence of the enterprise, to exhibit one's membership in the enterprise, and to enhance the prestige, reputation, and position of the enterprise;

c. Members and associates of the enterprise provided financial

assistance to other incarcerated members and associates of the enterprise;

d. Members and associates of the enterprise routinely armed themselves with firearms to commit crimes, to protect their territory, to project a violent attitude toward rival gang members, and to retaliate against rival gangs who have conflicts with Band Crew members and associates;

e. Members and associates of the enterprise shared firearms and other items to be used for gang-related crimes;

f. Members and associates of the enterprise provided transportation for each other during the commission of gang-related crimes;

g. Members and associates of the enterprise used intimidation, threats of violence, and violence against known and suspected members of rival gangs;

h. Members and associates of the enterprise promoted a climate of fear through intimidation, threats of violence, and violence to enhance the enterprise's prestige, reputation, and position in the community;

i. Members and associates of the enterprise used cellular telephones, mobile devices, and computers to communicate about enterprise activities and to keep members and associates informed about ongoing enterprise activities;

j. Members and associates of the enterprise used internet-based

social networking sites to communicate with each other and to promote the enterprise's criminal activities;

k. Members and associates of the enterprise were expected to retaliate with threats of violence and violence when members and associates of the enterprise were disrespected, threatened, intimidated, or assaulted;

l. Members and associates of the enterprise intimidated witnesses and victims to deter them from providing information to law enforcement and to enforce a "no snitching" code;

m. Members and associates of the enterprise used intimidation, threats of violence, and violence against members of the general public to enhance the enterprise's prestige, reputation, and position in the community.

The Racketeering Conspiracy

11. Beginning on a date unknown to the Grand Jury, but starting no later than November 2011, and continuing to the date of this Indictment, in the Eastern District of Michigan, and elsewhere, the defendants,

COREY DEANDRE MAPP,
ALEXANDER TEONTAE JOHNSON,
LEO JAMES JOHNSON,
JOSEPH HEZEKIAH FORD,
TRAVONTAE JAVON JOSEPH,
JAMELL LOVAL SMITH,
MARIO PERKINS,
AKEEM ARTEAZE WALKER,

along with others known and unknown to the Grand Jury, being persons

employed by and associated with Band Crew, which enterprise is described more fully herein, which was engaged in, and the activities of which affected interstate and foreign commerce, knowingly, willfully, and unlawfully combined, conspired, confederated, and agreed with one another to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the enterprise's affairs through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which consisted of:

a. Multiple threats and acts involving:

1. Murder, in violation of Michigan Compiled Laws, Sections 750.316, 750.317, 750.157a, 750.92, and 767.39;
2. Robbery, in violation of Michigan Compiled Laws, Sections 750.529, 750.530, 750.88, 750.89, 750.157a, 750.92, and 767.39;

b. Multiple acts indictable under the following provisions of federal law:

1. 18 U.S.C. § 1951 (Interference with Commerce by Threats or Violence); and

c. Multiple acts involving the following provisions of federal narcotics law:

1. 21 U.S.C. §§ 841(a) (Distribute or Possess with Intent to Distribute a Controlled Substance) and 846 (Conspiracy to Distribute a Controlled Substance).

12. It was further part of the conspiracy that each defendant, and others known and unknown to the Grand Jury, agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the enterprise's affairs.

Overt Acts

13. In furtherance of the conspiracy, and to achieve the object and purposes of the conspiracy, the defendants, and others known and unknown to the Grand Jury, committed and caused to be committed various overt acts, including, but not limited to, the following:

a. In or around late November 2011, members and associates of CMH and YNC, among others, attended a meeting at the Burger King located at Seven Mile Road and Greenfield Road, Detroit, Michigan, and formed the larger Band Crew enterprise in order to enhance their ability to make money and to augment their ability to provide protection from rival gangs.

b. On or about November 9, 2011, Band Crew Member A, along with other members and associates, went to the British Petroleum (BP) Gas Station, located at 16000 West Seven Mile Road, Detroit, Michigan, and

stole items from the gas station and damaged property belonging to the gas station clerk.

c. On or about December 16, 2011, Juvenile Band Crew Member 4 and Band Crew Member A, along with other members and associates, went to the BP Gas Station, located at 16000 West Seven Mile Road, Detroit, Michigan, and robbed the attendant working at the time. Approximately two days later, on December 18, Band Crew members threatened the attendant with further violence.

d. On or about February 6, 2012, COREY DEANDRE MAPP and Juvenile Band Crew Member 5 were at the Mobile Gas Station, located at 16901 West Seven Mile Road, Detroit, Michigan, while possessing marijuana with the intent to distribute it.

e. On or about March 15, 2012, Band Crew Member A, while on the premises of the BP Gas Station, located at 16000 West Seven Mile Road, Detroit, Michigan, brandished a firearm and held the attendant at gunpoint while other Band Crew members stole items from the gas station. After the Band Crew members stole items, Band Crew Member A discharged his firearm in the air while leaving the gas station and crossing the street.

f. On or about April 4, 2012, COREY DEANDRE MAPP,

Juvenile Band Crew Member 7, Juvenile Band Crew Member 3, Juvenile Band Crew Member 6, and other members of the Band Crew, committed a home invasion at 18900 St. Mary's Street, Detroit, Michigan, possessing a firearm and ammunition.

g. Approximately two weeks after the April 4, 2012, event, COREY DEANDRE MAPP, while in a vehicle with other Band Crew members within a few blocks of that residence, confronted and threatened with a firearm a witness of the above-referenced event.

h. On or about July 30, 2012, Band Crew Member C possessed marijuana with the intent to distribute near the Marathon Gas Station, located at 16901 West Seven Mile Road, Detroit, Michigan.

i. In or around September and October 2012, COREY DEANDRE MAPP, Band Crew Member A, and other Band Crew members, assaulted M.P. at the BP Gas Station, 16000 West Seven Mile Road, Detroit, Michigan.

j. On or about October 23, 2012, Juvenile Band Crew Member 4 possessed with the intent to distribute marijuana near the Marathon Gas Station, located at 16901 West Seven Mile Road, Detroit, Michigan.

k. On or about November 17, 2012, COREY DEANDRE MAPP and Juvenile Band Crew Member 2, after confronting Y.B. and inquiring

about Y.B.'s gang affiliation, shot Y.B. in the chest.

l. On or about December 31, 2012, Juvenile Band Crew Member 5, COREY DEANDRE MAPP, Juvenile Band Crew Member 6, and other members of the Band Crew, on two occasions at the Mobile Gas Station, located at 15444 West Seven Mile Road, Detroit, Michigan, while exclaiming their affiliation with Band Crew, stole goods from the gas station. During this time, Band Crew members discharged a firearm outside the gas station.

m. On or about January 17, 2013, Band Crew Member B, who was wearing a belt with Band Crew and other affiliated gang markings and while accompanied by Juvenile Band Crew Member 2, possessed with intent to distribute marijuana near the Burger King, located at 15500 West Seven Mile Road, Detroit, Michigan.

n. On or about February 16, 2013, Juvenile Band Crew Member 6 and Juvenile Band Crew Member 7 robbed C.M. in the vicinity of St. Mary's Street, Cambridge Avenue, and Seven Mile Road, Detroit, Michigan.

o. On or about March 9, 2013, Juvenile Band Crew Member 6, and other members of Band Crew, after proclaiming gang membership with Band Crew, robbed A.C. at gun point of his personal property while A.C.

was near West McNichols Road and Greenfield Road, Detroit, Michigan.

p. On or about March 10, 2013, T.T. was robbed at the corner of West McNichols Road and Rutherford Street by a group of individuals asserting their Band Crew affiliation or wearing clothes bearing Band Crew markings.

q. On or about May 8, 2013, COREY DEANDRE MAPP and Juvenile Band Crew Member 5 forcibly took the personal property of J.L. while J.L. was in her vehicle at the Mobile Gas Station, located at 15444 West Seven Mile Road, Detroit, Michigan.

r. On or about May 23, 2013, Juvenile Band Crew Member 5 robbed D.P.G. and J.L. of their personal property while each walked home from school in the area of Annchester Road and Pembroke Avenue, Detroit, Michigan.

s. On or about May 28, 2013, Juvenile Band Crew Member 3 and COREY DEANDRE MAPP were together at the Marathon Gas Station, located at 16901 West Seven Mile Road, Detroit, Michigan, when Juvenile Band Crew Member 3 robbed L.N. of personal property.

t. On or about June 7, 2013, Juvenile Band Crew Member 7 possessed a firearm and ammunition while at a residence located at 18461 St. Mary's Street, Detroit, Michigan.

u. On or about June 11, 2013, ALEXANDER TEONTAE JOHNSON, while wearing clothing bearing Band Crew markings, sold marijuana to an unidentified individual at Burger King, located at 15500 West Seven Mile Road, Detroit, Michigan.

v. On or about October 29, 2013, Juvenile Band Crew Member 6 stated to Band Crew Member C that Juvenile Band Crew Member 6 fought two rival gang members at a correctional facility.

w. On or about March 26, 2014, in the area of Lindsay Street and Pembroke Avenue, Detroit, Michigan, Juvenile Band Crew Member 8, COREY DEANDRE MAPP, JOSEPH HEZEKIAH FORD, and FOE Life Member A were in a vehicle from which Juvenile Band Crew Member 8 disposed of a handgun and multiple rounds of ammunition.

x. On or about May 4, 2014, JOSEPH HEZEKIAH FORD robbed A.A. of personal property.

y. On July 20, 2014, COREY DEANDRE MAPP, LEO JAMES JOHNSON, and TRAVONTAE JAVON JOSEPH possessed a firearm at the Citgo Gas Station, located at 17800 West Seven Mile Road, Detroit, Michigan.

z. On July 20, 2014, while at the Citgo Gas Station, COREY DEANDRE MAPP engaged in a shootout with individuals unknown to the

Grand Jury.

aa. On or about August 7, 2014, COREY DEANDRE MAPP was in possession of a handgun, ammunition, and a high-capacity magazine.

bb. Between on or about August 13 and August 16, 2014, LEO JAMES JOHNSON and TRAVONTAE JAVON JOSEPH possessed a stolen firearm.

cc. On or about August 16, 2014, LEO JAMES JOHNSON and TRAVONTAE JAVON JOSEPH attempted to rob and fired shots at C.E.H.

dd. On or about November 11, 2014, TRAVONTAE JAVON JOSEPH stated that he observed LEO JAMES JOHNSON assault an individual for disrespecting associates.

ee. On or about January 28, 2015, COREY DEANDRE MAPP, AKEEM ARTEAZE WALKER, and Juvenile Band Crew Member 7 assaulted, robbed, and fired shots at an unknown person with a handgun at the Citgo Gas Station, located at 17800 West Seven Mile Road, Detroit, Michigan.

ff. On or about February 28, 2015, TRAVONTAE JAVON JOSEPH instructed AKEEM ARTEAZE WALKER to sell marijuana, rather than committing robbery, to make money and to keep a low profile.

gg. On or about March 5, 2015, ALEXANDER TEONTAE

JOHNSON possessed a handgun and ammunition while in a vehicle registered and driven by Band Crew Member 4.

hh. On or about March 9, 2015, Band Crew Member C possessed a handgun and clothing affiliated with Band Crew and CMH.

ii. On or about March 25, 2015, Band Crew Member C stated, while talking with LEO JAMES JOHNSON, that he chased individuals who made a disrespectful song about a deceased leader of Band Crew.

jj. On or about July 4, 2015, MARIO PERKINS told JAMELL LOVAL SMITH that he (PERKINS) sold marijuana from a residence located on West Seven Mile Road and Evergreen Road, Detroit, Michigan.

kk. On or about July 5, 2015, TRAVONTAE JAVON JOSEPH stated that he refused to join another gang and that he confirmed his leadership role in Band Crew.

ll. On or about July 16, 2015, MARIO PERKINS and another individual were involved in a retaliatory shooting at 19797 Ferguson Street, Detroit, Michigan.

mm. On or about July 16, 2015, MARIO PERKINS and another individual possessed a handgun.

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

COUNT TWO

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

D-1 COREY DEANDRE MAPP
D-3 LEO JAMES JOHNSON
D-5 TRAVONTAE JAVON JOSEPH

1. At all times relevant to this Indictment, there existed an enterprise, the “Band Crew” enterprise, as more fully described in Paragraphs One through Ten of Count One of this Indictment, which are realleged and incorporated by reference as though set forth fully herein. Band Crew, including the leadership, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign 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.

2. At all times relevant to this Indictment, the above-described enterprise, Band Crew, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely,

a. Multiple threats and acts involving:

(1) Murder, in violation of Michigan Compiled Laws,

Sections 750.316(1), 750.317, 750.157a(a), 750.92, and 767.39;

(2) Robbery, in violation of Michigan Compiled Laws, Sections 750.529, 750.530, 750.88, 750.157a(a), 750.92, and 767.39;

b. Multiple acts indictable under the following provisions of federal law:

(1) 18 U.S.C. § 1951 (Interference with Commerce by Threats or Violence); and

c. Multiple acts involving the following provisions of federal narcotics law:

(1) 21 U.S.C. §§ 841(a) (Distribute or Possess with Intent to Distribute a Controlled Substance) and 846 (Conspiracy to Distribute a Controlled Substance).

3. On or about July 20, 2014, in the Eastern District of Michigan, for the purpose of maintaining and increasing position in Band Crew, an enterprise engaged in racketeering activity, COREY DEANDRE MAPP, LEO JAMES JOHNSON, and TRAVONTAE JAVON JOSEPH, aided and abetted by each other, did unlawfully and knowingly assault persons unknown to the Grand Jury with a dangerous weapon, that is, a black semi-automatic pistol with extended magazine, 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

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

D-1 COREY DEANDRE MAPP
D-3 LEO JAMES JOHNSON
D-5 TRAVONTAE JAVON JOSEPH

On or about July 20, 2014, in the Eastern District of Michigan,
COREY DEANDRE MAPP, LEO JAMES JOHNSON, and TRAVONTAE
JAVON JOSEPH, aided and abetted by each other, did knowingly use and carry a
firearm, that is, a handgun, during, and in relation to, a crime of violence, that is,
Assault with a Dangerous Weapon in Aid of Racketeering, as alleged in Count
Two of this Indictment, said firearm was brandished and discharged, all in
violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT FOUR

Possession of a Stolen Firearm
18 U.S.C. § 922(j)

D-3 LEO JAMES JOHNSON
D-5 TRAVONTAE JAVON JOSEPH

Between on or about August 13 and August 16, 2014, in the Eastern
District of Michigan, LEO JAMES JOHNSON and TRAVONTAE JAVON
JOSEPH, knowingly and unlawfully possessed a firearm, that is, a Berretta 9mm
Nano handgun, serial number NU065261, which had been shipped and transported

in interstate commerce, knowing and having reasonable cause to believe the firearm was stolen, in violation of Title 18, United States Code, Section 922(j).

COUNT FIVE

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

D-1 COREY DEANDRE MAPP
D-8 AKEEM ARTEAZE WALKER

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

2. On or about January 28, 2015, in the Eastern District of Michigan, for the purpose of maintaining and increasing position in Band Crew, an enterprise engaged in racketeering activity, COREY DEANDRE MAPP and AKEEM ARTEAZE WALKER, aided and abetted Juvenile Band Crew Member 7, in unlawfully and knowingly assaulting a person unknown to the Grand Jury with a dangerous weapon, that is, a Glock, Model 22C, 40 caliber firearm, serial number NWA959, 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

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

D-1 COREY DEANDRE MAPP
D-8 AKEEM ARTEAZE WALKER

On or about January 28, 2015, in the Eastern District of Michigan, COREY DEANDRE MAPP and AKEEM ARTEAZE WALKER, aided and abetted Juvenile Band Crew Member 7, who did knowingly use and carry a firearm, that is, a Glock, Model 22C, 40 caliber handgun, serial number NWA959, during, and in relation to, a crime of violence, that is, Assault with a Dangerous Weapon in Aid of Racketeering, as alleged in Count Five of this Indictment, said firearm was discharged, all in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SEVEN

Conspiracy to Assault with a Dangerous Weapon in Aid of Racketeering
18 U.S.C. § 1959(a)(6)

D-7 MARIO PERKINS

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

2. On or about July 16, 2015, in the Eastern District of Michigan, MARIO PERKINS and an individual known to the Grand Jury, did knowingly, intentionally, and unlawfully, and for the purpose of maintaining and increasing position in Band Crew, an enterprise engaged in racketeering activity, combine, conspire, confederate, and agree to assault a person unknown to the Grand Jury, with a dangerous weapon, that is, a Leinad 9 millimeter caliber handgun, serial

number 94-0013769, in violation of Michigan Compiled Laws, Sections 750.82 and 767.39, all in violation of Title 18, United States Code, Section 1959(a)(6).

COUNT EIGHT

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

D-7 MARIO PERKINS

On or about July 16, 2015, in the Eastern District of Michigan, MARIO PERKINS and an individual known to the Grand Jury, aided and abetted by each other, did knowingly use and carry a firearm, that is, a Leinad 9 millimeter caliber handgun, serial number 94-0013769, during, and in relation to, a crime of violence, that is, Conspiracy to Assault with a Dangerous Weapon in Aid of Racketeering, as alleged in Count Seven of this Indictment, said firearm was discharged, all in violation of Title 18, United States Code, Sections 924(c) and 2.

RICO FORFEITURE

1. The allegations contained in Count One of this Indictment are hereby repeated, re-alleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963, and Title 28, United States Code, Section 2461(c). Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963

in the event of any defendant's conviction under Count One of this Indictment.

2. The defendants, COREY DEANDRE MAPP, ALEXANDER TEONTAE JOHNSON, LEO JAMES JOHNSON, JOSEPH HEZEKIAH FORD, TRAVONTAE JAVON JOSEPH, JAMELL LOVAL SMITH, MARIO PERKINS, and AKEEM ARTEAZE WALKER,

a. Have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

b. Have an interest in, security of, claim against, or property or contractual right of any kind affording a source of influence, over any enterprise established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(2); and

c. Have property constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States

Code, Section 1963(a)(3).

3. If any of the property subject to forfeiture, as a result of any act or omission of any of the defendants:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be divided with difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m), to seek forfeiture of any other property of the defendant or defendants up to the value of the property subject to forfeiture.

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

FIREARMS FORFEITURE

The allegations contained in Counts One through Eight of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1). Upon conviction of any of the offenses charged in Counts One through Eight of this Indictment, the defendants, COREY DEANDRE MAPP, ALEXANDER

TEONTAE JOHNSON, LEO JAMES JOHNSON, JOSEPH HEZEKIAH FORD, TRAVONTAE JAVON JOSEPH, JAMELL LOVAL SMITH, MARIO PERKINS, and AKEEM ARTEAZE WALKER, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) any firearm or ammunition involved in said offense, including, but not limited to, the following firearms:

- a. Glock, Model 19, 9 millimeter, serial number HVF164;
- b. Glock, Model 22C, .40 caliber, serial number NWA959;
- c. Llama, Model IIIA, .380 caliber, serial number A83847;
- d. Smith & Wesson, Model SW9VE, 9 millimeter, serial number PBP2117;
- e. Harrington and Richardson, Model Topper 58, 12 gauge short-barreled shotgun, serial number AP238262;
- f. Rossi, Model M88, .380 caliber, serial number D570247;
- g. Omega, Model 100, .22 caliber, serial number 81406;
- h. Beretta, Model BU9 Nano, 9 millimeter, serial number NU065261;
- i. Colt, Model MKIV, .45 caliber, serial number SS10639E;
- j. Leinad, Model M11, 9 millimeter, serial number 94-0013769.

THIS IS A TRUE BILL.

Dated: September 16, 2015

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

BARBARA L. McQUADE
United States Attorney

s/John N. O'Brien, II
JOHN N. O'BRIEN
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211 West Fort Street, Suite 2001
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s/Christopher Graveline
CHRISTOPHER GRAVELINE
Assistant United States Attorney
Chief, Violent and Organized Crime Unit

s/James M. Trusty
JAMES M. TRUSTY
Chief, Organized Crime and Gang Section
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s/Jeremy R. Jehangiri
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Trial Attorney
Organized Crime and Gang Section
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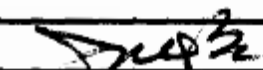
Case:2:15-cr-20574
 Judge: Hood, Denise Page
 MJ: Stafford, Elizabeth A.
 Filed: 09-16-2015 At 03:10 PM
 INDI SEALED MATTER (NA)

United States District Court
 Eastern District of Michigan

Criminal Case Co

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 LCR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: 

Case Title: USA v. Corey Mapp, et al.

County where offense occurred : Wayne

Check One: Felony Misdemeanor Petty

- Indictment/ Information --- no prior complaint.
- Indictment/ Information --- based upon prior complaint [Case number:]
- Indictment/ Information --- based upon LCR 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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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

September 16, 2015
 Date


 John N. O'Brien, II
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: 313-226-9715
 Fax: 313-226-5464
 E-Mail address: john.obrien@usdoj.gov
 Attorney Bar #: P39912

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