

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

v.

D-1 JVON CLEMENTS,
a.k.a. "Toon,"

D-2 WINSTON HILL,
a.k.a. "Shady Blue,"

D-3 DAWON TAYLOR,
a.k.a. "J9,"

D-4 RON BENSON, JR.,
a.k.a. "Duke,"

D-5 DEVANTE CROCKETT,
a.k.a. "TBK,"

D-6 DESHAUN TISDALE,
a.k.a. "Havoc,"

D-7 DAVON MOULTRIE,
a.k.a. "Blue,"

D-8 DEONDRE CASEY,
a.k.a. "Trouble,"

D-9 ANDRE TINSLEY,
a.k.a. "Danger,"

D-10 DANGELO DAVIS,
a.k.a. "Black,"

Case:2:17-cr-20640

Judge: Murphy, Stephen J.

MJ: Whalen, R. Steven

Filed: 09-27-2017 At 03:40 PM

INDI USA V SEALED MATTER (DA)

OFFENSES:

RICO Conspiracy; 18 U.S.C. §
1962(d);

Possession of a Firearm in
Furtherance of a Drug
Trafficking Crime; 18 U.S.C.
§ 924(c);

Felon-in-Possession of
Ammunition; 18 U.S.C. §
922(g)(1)

Possession with Intent to
Distribute; 21 U.S.C. § 841(a)

Conspiracy to Distribute; 21
U.S.C. § 846

RICO Forfeiture; 18 U.S.C.
§1963

D-11 RECHARL BOYNTON,
a.k.a. "Bear,"

D-12 ANTHONY MARSHALL,
a.k.a. "Hitman,"

D-13 NATHANIEL BROWN,
a.k.a. "Nino,"

D-14 DARRYL GRIZZARD,
a.k.a. "Deezy,"

Defendants.

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Racketeering Conspiracy
18 U.S.C. 1962(d)

The Enterprise

At all times relevant to this Indictment:

1. The Playboy Gangster Crips, also known as "PBGC," "Thirty-Third Gangstas," or "Trey Trey Gangstas," [hereinafter "Playboy Gangster Crips"] is a national street gang founded in Los Angeles, California, with smaller "sets" in cities throughout the United States, including Detroit, Michigan. The base of

operation for the Detroit set of the Playboy Gangster Crips is in northwest Detroit; specifically, the Playboy Gangster Crips claim the area of Seven Mile Road between Lahser and Evergreen as their territory. Playboy Gangster Crips members “tag” their “turf” by writing or spray painting gang-related graffiti on buildings and walls.

2. The Playboy Gangster Crips operate under the leadership of an “Original Gangster,” or “OG.” Under the Original Gangster, there are four additional ranks – Original Baby Gangster (OBG), Young Baby Gangster (YBG), Baby Gangster (BG), and Tiny Gangster (TG). A number of factors determine a member’s rank including, the amount of time an individual has been in the gang and the amount of “work,” or criminal activity a person commits on behalf of the gang.

3. The Playboy Gangster Crips hold regular meetings to coordinate their efforts, and to discuss gang business. During these meetings, members discuss gang rivalries, criminal activity, and collect dues money from members. The enterprise makes its money primarily through the sale and distribution of controlled substances, including cocaine, heroin, marijuana, and various prescription pills, the illegal sale of firearms, and the commission of robberies and carjackings. Playboy Gangster Crips sell these controlled substances at the Sunoco gas station on the corner of 7 Mile and Braile and certain vacant houses in this area, also known as “trap houses,” including 19801 Trinity and 19740 Trinity, Detroit, Michigan.

Enterprise members also utilize various social networking internet sites, including Facebook, to sell and distribute controlled substances and firearms. The money goes to the OG who has the discretion to spend the collected money how he chooses. At times, the OG uses the pot money to purchase additional drugs, firearms, or put the money on the “books” of incarcerated members.

4. Playboy Gangster Crips indicate their affiliation with the gang by displaying hand gestures (gang signs), obtaining tattoos, and wearing navy blue bandannas, or “flags.” Members also proclaim their affiliation with the Playboy Gangster Crips, and highlight the existence of the gang and gang-related “accomplishments,” by posting photographs, videos, and messages on various social networking internet sites, including Facebook. Playboy Gangster Crips have their own language that members use to communicate with each other. For example, members replace the letter “K” with a “C” because the letter “C” is associated with the Crips. Members also refrain from using the letter “B” because it is associated with the rival Bloods gang.

5. The Playboy Gangster Crips have an ongoing rivalry with the Rollin 60s Neighborhood Crips, Band Crew, Vice Lords, and Bloods. Playboy Gangster Crips are encouraged by their leader to exact violence against rival gang members.

6. The Playboy Gangster Crips are involved in numerous crimes including, but not limited to murder, assaults, robberies, carjackings, and the

unlawful possession and trafficking of firearms and narcotics. The Playboy Gangster Crips use violence as a means of retribution for acts done by rival gang members, to intimidate witnesses, and a way for individual gang members to maintain or advance their position within the gang. Members who disobey orders or rules or who are deemed to have acted contrary to the best interest of the gang are punished. The punishment, referred to as a “violation,” consists of a beating and possible removal of the member from the gang.

The Enterprise

7. At all times relevant to this Indictment, in the Eastern District of Michigan, and elsewhere, the Playboy Gangster Crips, including its leadership, members, and associates constituted an enterprise, as defined by Title 18, United States Code, Section 1961(4), 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. At various times relevant to this Indictment, JVON CLEMENTS, WINSTON HILL, DAWON TAYLOR, RON BENSON JR., DEVANTE CROCKETT, DESHAUN TISDALE, DAVON MOULTRIE, DEONDRE CASEY, RECHARL BOYNTON, ANDRE TINSLEY, DANGELO DAVIS, ANTHONY MARSHALL, NATHANIEL BROWN, DARRYL GRIZZARD, and others, known

and unknown to the Grand Jury, were members and associates of the Playboy Gangster Crips.

Purposes of the Enterprise

8. The purposes of the Playboy Gangster Crips enterprise include 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 and violence, including assaults and threats of violence;

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, particularly through use of social networking internet sites;

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 violence;

g. Confronting and retaliating against rival gangs through the use of intimidation, threats of violence, and violence; and

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

9. The manner and means used by the enterprise to further the goals of the enterprise and achieve its purposes, included but was not limited to the following:

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

b. Members and associates of the enterprise wore blue clothing and bandannas signifying their affiliation with the Playboy Gangster Crips, exhibited Playboy Gangster Crips tattoos, and displayed gang-related hand signs, all to demonstrate the existence of one's membership in the enterprise, and to enhance the prestige, reputation, and position of the enterprise;

c. Members and associates secured accomplices in criminal endeavors from a particular pool of individuals, that is, fellow members and associates of the Playboy Gangster Crips;

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 Playboy Gangster Crips 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 and computers to communicate about enterprise activities and to

keep members informed about ongoing enterprise activities;

j. Members and associates of the enterprise used social networking internet sites to communicate with each other, to promote the enterprise's criminal activities, and facilitate the illegal sale of controlled substances and firearms; and

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.

The Racketeering Conspiracy

10. Beginning on a date unknown to the Grand Jury, but starting no later than 2010, and continuing to the date of this Indictment, in the Eastern District of Michigan, and elsewhere, the defendants,

JVON CLEMENTS
WINSTON HILL
DAWON TAYLOR
RON BENSON JR.
DEVANTE CROCKETT
DESHAUN TISDALE
DAVON MOULTRIE
DEONDRE CASEY
ANDRE TINSLEY
DANGELO DAVIS
RECHARL BOYNTON
ANTHONY MARSHALL
NATHANIEL BROWN
DARRYL GRIZZARD

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

with the Playboy Gangster Crips, which enterprise is described more fully in Paragraphs 1 through 9 above, which was engaged in, and the activities of which affected interstate and foreign commerce, did knowingly, willfully, and unlawfully combine, conspire, confederate, and agree with one another to violate Title 18, United States Code, Section 1962(c), that is, the defendants agreed to conduct and participate, directly and indirectly, in the conduct of said enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), consisting of multiple:

a. Threats and acts involving murder, in violation of Michigan Compiled Laws, Sections 750.316(1), 750.83, 750.157a(a), and 767.39;

b. Acts involving robbery, in violation of Michigan Compiled Laws, Sections 750.529, 750.529a, 750.530, 750.88, 750.89, 750.157a(a), and 767.39; and

c. Offenses involving conspiracy to distribute and the distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

12. It was part of the conspiracy that defendants, JVON CLEMENTS, WINSTON HILL, DAWON TAYLOR, RON BENSON JR., DEVANTE CROCKETT, DESHAUN TISDALE, DAVON MOULTRIE, DEONDRE CASEY, ANDRE TINSLEY, DANGELO DAVIS, RECHARL BOYNTON, ANTHONY

MARSHALL, NATHANIEL BROWN, and DARRYL GRIZZARD, and others, known and unknown to the Grand Jury, agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

Overt Acts

In furtherance of the conspiracy, and to affect the object and purposes thereof, 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:

(1) On or about March 31, 2010, DAWON TAYLOR advertised an AK-47 for sale on Facebook for \$200;

(2) On or about October 26, 2011, ANDRE TINSLEY stated on Facebook that he had a .380 caliber handgun for sale for \$275 and then stated, “I bkang my set TTG P.B.G.C^ 33rd if yall didn’t kno im DVNG3R Coripppp;”

(3) On or about December 2, 2011, RON BENSON and ANDRE TINSLEY shouted “33rd” and shot victim R.B. with a .380 caliber handgun in front of the Apollo Market located at 20250 West Seven Mile, Detroit, Michigan;

(4) On or about January 21, 2012, an individual asked RON BENSON on Facebook to “get put on 33rd” (meaning, to join the PBGC), and RON BENSON responded to “Tawk to my bro ttg toon;”

(5) On or about January 29, 2012, DEVANTE CROCKETT and ANDRE TINSLEY robbed victim J.Y. at gunpoint and then shot him in the back;

(6) On or about February 26, 2012, JVON CLEMENTS and DEVANTE CROCKETT possessed a stolen 2009 Chevrolet Impala that had been carjacked the day before from victim L.S. at gunpoint;

(7) On or about May 12, 2012, RON BENSON, DEVANTE CROCKETT, and DAWON TAYLOR carjacked victim B.H. at gunpoint and stole a 2008 Chrysler Aspen;

(8) On or about May 12, 2012, RON BENSON, DEVANTE CROCKETT, and DAWON TAYLOR robbed victims L.W. and R.S. at gunpoint;

(9) On or about May 12, 2012, RON BENSON, DEVANTE CROCKETT, and DAWON TAYLOR carjacked victim L.W. at gunpoint and stole a 2010 Ford Fusion;

(10) On or about May 24, 2012, DAVON MOULTRIE stated on Facebook that he was “Playboy gangsta crip” / “PbGC” and then confirmed that this meant “33^ttg;”

(11) On or about July 29, 2012, JVON CLEMENTS stated “We hittin liccs . . . TTG the mob, we shoot, steal, and rob” on Facebook;

(12) On or about January 31, 2013, police arrested JVON CLEMENTS with marijuana packaged for sale;

(13) On or about March 29, 2013, DEONDRE CASEY and DESHAUN TISDALE broke into a house on Golfview Drive in Southfield and stole jewelry;

(14) On or about June 13, 2013, DEVANTE CROCKETT and ANDRE TINSLEY broke into a house on St Francis Avenue in Farmington Hills and stole a X-Box game system, a laptop computer, and jewelry;

(15) On or about August 3, 2013, RECHARL BOYNTON advertised marijuana for sale on Facebook;

(16) On or about November 15, 2013, DEVANTE CROCKETT broke into a house on Sussex in Detroit and stole a television, a laptop computer, and jewelry;

(17) On or about March 23, 2014, DESHAUN TISDALE stated on Facebook that he was “WestCide Playbkxy GankGsta Crop;”

(18) On or about September 2, 2014, ANTHONY MARSHALL robbed T.W. at gunpoint;

(19) On or about October 24, 2014, police arrested JVON CLEMENTS with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(20) On or about November 1, 2014, JVON CLEMENTS advertised marijuana for sale on Facebook for \$45 for an eighth of an ounce;

(21) On or about December 23, 2014, DESHAUN TISDALE instructed a fellow Playboy Gangster Crip to assault a member of the rival Rollin 60 Crips gang held in the same prison facility;

(22) On or about December 25, 2014, DESHAUN TISDALE ordered a fellow Playboy Gangster Crip to give ANTHONY MARSHALL a 60-second "violation" because MARSHALL denied that he was a gang member in the county jail;

(23) On or about January 30, 2015, DEVANTE CROCKETT and DAWON TAYLOR told a PBGC member in a recorded call that they were at the Sunoco gas station on Seven Mile making money and proceeded to make multiple drug sales in the background;

(24) On or about February 11, 2015, police seized marijuana packaged for sale and a handgun from a house in which DARRYL GRIZZARD was located;

(25) On or about February 19, 2015, DESHAUN TISDALE told a fellow Playboy Gangster Crip in a recorded call that TISDALE and DEVANTE CROCKETT maintain shifts at the gas station to sell drugs;

(26) On or about March 17, 2015, DAWON TAYLOR and

DESHAUN TISDALE discussed the sale of drugs at the Sunoco gas station on Seven Mile with a PBGC member in a recorded call;

(27) On or about March 28, 2015, police arrested NATHANIEL BROWN with marijuana packaged for a sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(28) On or about April 1, 2015, police arrested DESHAUN TISDALE with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(29) On or about April 20, 2015, police arrested DESHAUN TISDALE with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(30) On or about April 23, 2015, DAWON TAYLOR told a PBGC member in a recorded call that he was at JVON CLEMENTS's house trying to sell marijuana;

(31) On or about May 20, 2015, police arrested DARRYL GRIZZARD with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(32) On or about May 27, 2015, police arrested DAWON TAYLOR with marijuana packaged for sale, larger bags of marijuana, and two digital scales;

(33) On or about May 28, 2015, police arrested DEONDRE CASEY with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(34) On or about June 1, 2015, police arrested DAVON MOULTRIE with marijuana packaged for sale;

(35) On or about June 21, 2015, DANGELO DAVIS and DAWON TAYLOR stole a 2004 Pontiac Grand Prix from V.A. in the parking lot of the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(36) On or about July 7, 2015, police arrested DAVON MOULTRIE with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(37) On or about July 10, 2015, police arrested JVON CLEMENTS with marijuana packaged for sale, a digital scale, and a sawed-off shotgun;

(38) On or about July 14, 2015, police arrested DAWON TAYLOR with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(39) On or about August 13, 2015, DEVANTE CROCKETT advertised on Facebook "Green barz on deck 3 a pill;"

(40) On or about September 5, 2015, police arrested DESHAUN

TISDALE with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(41) On or about September 6, 2015, JVON CLEMENTS negotiated the purchase of a .38 caliber handgun from NATHANIEL BROWN for \$125 or marijuana;

(42) On or about September 11, 2015, police arrested JVON CLEMENTS with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(43) On or about October 10, 2015, police arrested DAWON TAYLOR with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(44) On or about October 11, 2015, police arrested DEONDRE CASEY with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(45) On or about October 24, 2015, police arrested NATHANIEL BROWN with marijuana packaged for sale;

(46) On or about November 25, 2015, DESHAUN TISDALE advertised the sale of an assault rifle on Facebook for \$300 but warned that he had “put a body on dis btc doe;”

(47) On or about December 1, 2015, police arrested DARRYL

GRIZZARD with marijuana packaged for sale;

(48) On or about January 27, 2016, police arrested DEONDRE CASEY with marijuana packaged for sale at the Sunoco gas station at the intersection of 7 Mile and Braile, Detroit, Michigan;

(49) On or about March 19, 2016, DESHAUN TISDALE and another Playboy Gangster Crip member robbed A.E. and T.M. at gunpoint and took a 2003 Honda Pilot from them;

(50) On or about March 30, 2016, ANTHONY MARSHALL robbed H.J. at gunpoint of his wallet, money, and jewelry;

(51) On or about April 29, 2016, DEONDRE CASEY and DANGELO DAVIS were together outside of 19801 Trinity Street, Detroit, Michigan;

(52) On or about May 4, 2016, police arrested RON BENSON with marijuana packaged for sale;

(53) On or about May 10, 2016, ANTHONY MARSHALL discussed the sale of “norcs” and “zans” on Facebook;

(54) On or about May 11, 2016, DESHAUN TISDALE and WINSTON HILL discussed committing a drive-by shooting in retaliation for the robbery of DAVON MOULTRIE;

(55) On or about May 24, 2016, ANTHONY MARSHALL

discussed the sale of “perkasetns narcos and zanis” on Facebook with 90 pills of each;

(56) On or about July 29, 2016, NATHANIEL BROWN stated that he had “crud” (marijuana) for sale on Facebook with “5\$ bags. 20\$ 1.7s. 35\$ 8thys.”;

(57) On or about October 3, 2016, ANTHONY MARSHALL and DESHAUN TISDALE discussed the purchase of “straps (guns) from “gunman” for \$400 or 2 for \$700 on Facebook and potentially combining their money to buy the two guns;

(58) On or about October 12, 2016, police arrested JVON CLEMENTS with marijuana packaged for sale after observing a suspected hand-to-hand transaction;

(59) On or about November 22, 2016, RECHARL BOYNTON stated that he had “cookie on the floor” (marijuana for sale) for “250oz 130hf 35eth 20 1.7;”

(60) On or about January 6, 2017, police arrested DANGELO DAVIS during a burglary of a house on Ward Street in Detroit;

(61) On or about January 31, 2017, DESHAUN TISDALE and DANGELO DAVIS attempted to shoot E.H. during a burglary on Stout Street in Detroit;

(62) On or about February 12, 2017, DEONDRE CASEY, DAWON TAYLOR, and DEVANTE CROCKETT got into an altercation with victim T.A. and others at a Tim Horton for being “fake crips” and then shot T.A. as he walked home;

(63) On or about February 22, 2017, and February 25, 2017, WINSTON HILL advertised “green bars” (alprazolam) and “cookie” (marijuana) for sale on Facebook;

(64) On or about February 24, 2017, federal agents seized marijuana packaged for sale and a digital scale from NATHANIEL BROWN and DARRYL GRIZZARD;

(65) On or about February 27, 2017, WINSTON HILL sold alprazolam 2-mg pills and marijuana to an undercover agent;

(66) On or about March 2, 2017, WINSTON HILL sold marijuana to an undercover agent and also offered to sell Adderall and Norco prescription pills;

(67) On or about March 17, 2017, DAWON TAYLOR robbed victims D.T. and S.S. at gunpoint at a Red Roof Inn in Madison Heights;

(68) On or about March 21, 2017, federal agents seized marijuana and a digital scale from DEVANTE CROCKETT, DESHAUN TISDALE and another PBGC member;

(69) On or about March 21, 2017, federal agents seized marijuana and alprazolam pills from the residence of NATHANIEL BROWN;

(70) On or about August 11, 2017, agents recovered two bags of marijuana packaged for sale from DESHAUN TISDALE;

(71) On or about August 30, 2017, RECHARL BOYNTON sold marijuana;

(72) On or about September 1, 2017, RECHARL BOYNTON sold marijuana.

Notice of Acts with Enhanced Sentencing

(1) On or about December 2, 2011, in the Eastern District of Michigan, enterprise members RON BENSON and ANDRE TINSLEY, aided and abetted by each other and others known and unknown to the grand jury, did commit an act involving murder, that is, assault R.B. with the intent to commit murder, in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

(2) On or about January 29, 2012, in the Eastern District of Michigan, enterprise members DEVANTE CROCKETT, ~~DAWON TATE~~^{aw/sc} and ANDRE TINSLEY, aided and abetted by each other and others known and unknown to the grand jury, did commit an act involving murder, that is, assault J.Y. with the intent to commit murder, in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

(3) On or about January 29, 2012, in the Eastern District of Michigan, enterprise members DEVANTE CROCKETT and ANDRE TINSLEY, aided and abetted by each other and others known and unknown to the grand jury, engaged in conduct as proscribed in Michigan Compiled Law Section 750.529, that is, in the course of committing a larceny of any money or property that may be the subject of larceny from the person of J.Y. did, in the course of engaging in that conduct possessed a dangerous weapon, or an article used or fashioned in a manner to lead any person present to reasonably believe the article was a dangerous weapon, or represented orally or otherwise that he was in possession of a dangerous weapon, all in violation of Michigan Compiled Laws, Sections 750.529, 750.530, and 767.39, and engaged in conduct as proscribed in Michigan Compiled Law Section 750.89, that is, being armed with a dangerous weapon, or any article used or fashioned in a manner to lead a person so assaulted reasonably to believe it to be a dangerous weapon, did assault J.Y. with intent to rob and steal, all in violation of Michigan Compiled Laws, Sections 750.89 and 767.39.

(4) On or about May 12, 2012, in the Eastern District of Michigan, enterprise members RON BENSON, DEVANTE CROCKETT, and DAWON TAYLOR, aided and abetted by each other and others known and unknown to the grand jury, did in the course of committing a larceny of a motor vehicle use force or violence or the threat of force or violence, or who put in fear B.H., who was in lawful possession

of the motor vehicle, in violation of Michigan Compiled Laws, Sections 750.529a and 767.39.

(5) On or about May 12, 2012, in the Eastern District of Michigan, enterprise members RON BENSON, DEVANTE CROCKETT, and DAWON TAYLOR, aided and abetted by each other and others known and unknown to the grand jury, engaged in conduct as proscribed in Michigan Compiled Law Section 750.529, that is, in the course of committing a larceny of any money or property that may be the subject of larceny from the persons of L.W. and R.S. did, in the course of engaging in that conduct possessed a dangerous weapon, or an article used or fashioned in a manner to lead any person present to reasonably believe the article was a dangerous weapon, or represented orally or otherwise that he or she was in possession of a dangerous weapon, all in violation of Michigan Compiled Laws, Sections 750.529, 750.530, and 767.39, and engaged in conduct as proscribed in Michigan Compiled Law Section 750.89, that is, being armed with a dangerous weapon, or any article used or fashioned in a manner to lead a person so assaulted reasonably to believe it to be a dangerous weapon, did assault L.W. and R.S. with intent to rob and steal, all in violation of Michigan Compiled Laws, Sections 750.89 and 767.39.

(6) On or about May 12, 2012, in the Eastern District of Michigan, enterprise members RON BENSON, DEVANTE CROCKETT, and DAWON TAYLOR, aided and abetted by each other and others known and unknown to the grand jury,

did in the course of committing a larceny of a motor vehicle use force or violence or the threat of force or violence, or who put in fear L.W., who was in lawful possession of the motor vehicle, in violation of Michigan Compiled Laws, Sections 750.529a and 767.39.

(7) On or about September 2, 2014, in the Eastern District of Michigan, enterprise member ANTHONY MARSHALL, engaged in conduct as proscribed in Michigan Compiled Law Section 750.529, that is, in the course of committing a larceny of any money or property that may be the subject of larceny from the person of T.W. did, in the course of engaging in that conduct possessed a dangerous weapon, or an article used or fashioned in a manner to lead any person present to reasonably believe the article was a dangerous weapon, or represented orally or otherwise that he was in possession of a dangerous weapon, all in violation of Michigan Compiled Laws, Sections 750.529 and 750.530 and engaged in conduct as proscribed in Michigan Compiled Law Section 750.89, that is, being armed with a dangerous weapon, or any article used or fashioned in a manner to lead a person so assaulted reasonably to believe it to be a dangerous weapon, did assault T.W. with intent to rob and steal, all in violation of Michigan Compiled Laws, Section 750.89.

(8) On or about March 19, 2016, in the Eastern District of Michigan, enterprise member DESHAUN TISDALE, aided and abetted by others known and unknown to the grand jury, engaged in conduct as proscribed in Michigan Compiled

Law Section 750.529, that is, in the course of committing a larceny of any money or property that may be the subject of larceny from the persons of A.E. and T.M. did, in the course of engaging in that conduct possessed a dangerous weapon, or an article used or fashioned in a manner to lead any person present to reasonably believe the article was a dangerous weapon, or represented orally or otherwise that he or she was in possession of a dangerous weapon, all in violation of Michigan Compiled Laws, Sections 750.529, 750.530, and 767.39, and engaged in conduct as proscribed in Michigan Compiled Law Section 750.89, that is, being armed with a dangerous weapon, or any article used or fashioned in a manner to lead a person so assaulted reasonably to believe it to be a dangerous weapon, did assault A.E. and T.M. with intent to rob and steal, all in violation of Michigan Compiled Laws, Sections 750.89 and 767.39.

(9) On or about March 19, 2016, in the Eastern District of Michigan, enterprise member DESHAUN TISDALE, aided and abetted by others known and unknown to the grand jury, aided and abetted by each other and others known and unknown to the grand jury, did in the course of committing a larceny of a motor vehicle use force or violence or the threat of force or violence, or who put in fear A.E. and T.M., who was in lawful possession of the motor vehicle, in violation of Michigan Compiled Laws, Sections 750.529a and 767.39.

(10) On or about March 30, 2016, in the Eastern District of Michigan, enterprise member ANTHONY MARSHALL, engaged in conduct as proscribed in Michigan Compiled Law Section 750.529, that is, in the course of committing a larceny of any money or property that may be the subject of larceny from the person of H.J. did, in the course of engaging in that conduct possessed a dangerous weapon, or an article used or fashioned in a manner to lead any person present to reasonably believe the article was a dangerous weapon, or represented orally or otherwise that he or she was in possession of a dangerous weapon, all in violation of Michigan Compiled Laws, Sections 750.529 and 750.530 and engaged in conduct as proscribed in Michigan Compiled Law Section 750.89, that is, being armed with a dangerous weapon, or any article used or fashioned in a manner to lead a person so assaulted reasonably to believe it to be a dangerous weapon, did assault H.J. with intent to rob and steal, all in violation of Michigan Compiled Laws, Section 750.89.

(11) On or about January 31, 2017, in the Eastern District of Michigan, enterprise members DANGELO DAVIS and DESHAUN TISDALE, aided and abetted by each other and others known and unknown to the grand jury, engaged in conduct as proscribed in Michigan Compiled Law Section 750.529, that is, in the course of committing a larceny of any money or property that may be the subject of larceny from the person of E.H. did, in the course of engaging in that conduct possessed a dangerous weapon, or an article used or fashioned in a manner to lead

any person present to reasonably believe the article was a dangerous weapon, or represented orally or otherwise that he or she was in possession of a dangerous weapon, all in violation of Michigan Compiled Laws, Sections 750.529, 750.530, and 767.39, and engaged in conduct as proscribed in Michigan Compiled Law Section 750.89, that is, being armed with a dangerous weapon, or any article used or fashioned in a manner to lead a person so assaulted reasonably to believe it to be a dangerous weapon, did assault E.H. with intent to rob and steal, all in violation of Michigan Compiled Laws, Sections 750.89 and 767.39.

(12) On or about February 12, 2017, in the Eastern District of Michigan, enterprise members DEONDRE CASEY, DAWON TAYLOR, DEVANTE CROCKETT, aided and abetted by each other and others known and unknown to the grand jury, did commit an act involving murder, that is, assault of T.A. with the intent to commit murder, in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

(13) On or about March 17, 2017, in the Eastern District of Michigan, enterprise member DAWON TAYLOR, engaged in conduct as proscribed in Michigan Compiled Law Section 750.529, that is, in the course of committing a larceny of any money or property that may be the subject of larceny from the persons of D.T. and S.S. did, in the course of engaging in that conduct possessed a dangerous weapon, or an article used or fashioned in a manner to lead any person present to

reasonably believe the article was a dangerous weapon, or represented orally or otherwise that he or she was in possession of a dangerous weapon, all in violation of Michigan Compiled Laws, Sections 750.529 and 750.530 and engaged in conduct as proscribed in Michigan Compiled Law Section 750.89, that is, being armed with a dangerous weapon, or any article used or fashioned in a manner to lead a person so assaulted reasonably to believe it to be a dangerous weapon, did assault D.T. and S.S. with intent to rob and steal, all in violation of Michigan Compiled Laws, Section 750.89.

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

COUNT TWO

18 U.S.C. §924(c) – *Possession of a
Firearm in Furtherance of a Drug Trafficking Crime*

D-1 JVON CLEMENTS

On or about July 10, 2015, in the Eastern District of Michigan, the defendant, JVON CLEMENTS, did knowingly possess a firearm, to wit: a Springfield Model 67 12-gauge shotgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession of a controlled substance with intent to distribute, in violation of 21 U.S.C. § 841(a)(1).

All in violation of Title 18, United States Code, Section 924(c).

COUNT THREE

18 U.S.C. §922(g) – *Possession of
Ammunition by Previously Convicted Felon*

D-1 JVON CLEMENTS

On or about March 21, 2017, in the Eastern District of Michigan, the defendant, JVON CLEMENTS, having been convicted of a felony offense, did knowingly possess ammunition, to wit: 18 rounds of .380 caliber ammunition, which was manufactured outside the State of Michigan, thereby having previously traveled in interstate and foreign commerce to reach this jurisdiction, in violation of 18 U.S.C. § 922(g)(1).

COUNT FOUR

21 U.S.C. §841 – *Possession
with Intent to Distribute*

D-14 DARRYL GRIZZARD

On or about February 24, 2017, in the Eastern District of Michigan, the defendant, DARRYL GRIZZARD, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of marijuana, a schedule I controlled substance, in violation of 18 U.S.C. § 841(a)(1) and (b)(1)(D).

RICO FORFEITURE

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. Pursuant to Federal Rule of Criminal Procedure Rule 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.

As a result of committing the offense charged in Count One of this Indictment, the defendants, JVON CLEMENTS, WINSTON HILL, DAWON TAYLOR, RON BENSON JR., DEVANTE CROCKETT, DESHAUN TISDALE, DAVON MOULTRIE, DEONDRE CASEY, ANDRE TINSLEY, DANGELO DAVIS, ANTHONY MARSHALL, NATHANIEL BROWN, and DARRYL GRIZZARD:

1. 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);

2. Have an interest in, security of, claims against, and property and contractual rights which afford a source of influence over, the enterprise named and described herein which the defendants 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

3. 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).

The interest of the defendants named above subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1), (a)(2), and (a)(3), include but are not limited to a sum that represents the gross proceeds received by the defendants pursuant to their racketeering activities as charged in Count One of the Indictment during the relevant time period charged in the Indictment and all interests and proceeds traceable thereto and the following assets:

- (a) One (1) FIE, model Titan, .25 caliber pistol, serial number 107083;
- (b) Savage 12 gauge, model 67, shotgun, serial number B029097;
- (c) 1 round of Sellier & Bellot, 12 gauge ammunition;
- (d) Keltec, CNC Industries, model P11, 9mm pistol, serial number obliterated;
- (e) 7 rounds of Speer 9mm ammunition;
- (f) Smith & Wesson, model 642 Airweight, .38 caliber revolver, serial number DCX2008;

- (g) Smith & Wesson, model SD9VE, 9mm pistol, serial number FWH2068;
- (h) 2 rounds of Winchester-Western .40 caliber ammunition;
- (i) 69 rounds of Winchester-Western .40 caliber ammunition;
- (j) 28 rounds of Winchester-Western .9mm ammunition;
- (k) 40 rounds of Wolf .223 caliber ammunition;
- (l) 15 rounds of assorted 9mm ammunition;
- (m) 17 rounds of assorted 9mm ammunition;
- (n) 18 rounds of Hornady .380 caliber ammunition;
- (o) 29 rounds of assorted ammunition;
- (p) Mossberg, model 500 ASG, 12 gauge shotgun, serial number H888303;
- (q) 5 rounds of 12 gauge ammunition;
- (r) Smith & Wesson, model 36, .38 caliber revolver, serial number J53843;
- (s) 1 round of .38 caliber ammunition;
- (t) Glock GMBH, model 22, .40 caliber pistol, serial number PRC250;
- (u) 7 rounds of Smith & Wesson .40 caliber ammunition;

(v) Marlin Firearms Co, 30-30 caliber rifle, serial number
71144063;

(w) Intratec, model TECDC9, 9mm pistol, serial number 0026201;

and

(x) 12 rounds of unknown ammunition.

If any of the above-described forfeitable property, as a result of any act or omission 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 person;
- 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 subdivided without 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 said defendants up to the value of the above forfeitable property.

The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

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

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

DANIEL L. LEMISCH
Acting United States Attorney

s/ Christopher Graveline
CHRISTOPHER GRAVELINE
Chief, Violent and Organized Crime Unit

s/ Jeanine Bruson
JEANINE BRUNSON
Assistant United States Attorney

s/ Michael Heesters
MICHAEL HEESTERS
Assistant United States Attorney

s/ Shane Cralle
SHANE CRALLE
Assistant United States Attorney

Dated: September 27, 2017

United States District Court Eastern District of Michigan	Criminal Case Cov
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Case:2:17-cr-20640
 Judge: Murphy, Stephen J.
 MJ: Whalen, R. Steven
 Filed: 09-27-2017 At 03:40 PM
 INDI USA V SEALED MATTER (DA)

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

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 checked="" type="checkbox"/> No	AUSA's Initials: <i>SC</i>

Case Title: USA v. Jvon Clements, 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 LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

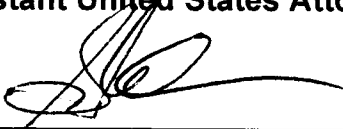
Superseding to Case No: _____ Judge: _____

- 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 27, 2017
Date



 SHANE CRALLE
 Assistant United States Attorney
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 Detroit, MI 48226-3277
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 Attorney Bar #:

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (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.