

DISSECTING A GANG CASE

Systematic approach to defending a gang charge



TERMINAL PERFORMANCE OBJECTIVE

To provide the student with an understanding of Organized Criminal Street Gangs and Terrorism Act and how to systematically approach a gang charge defense

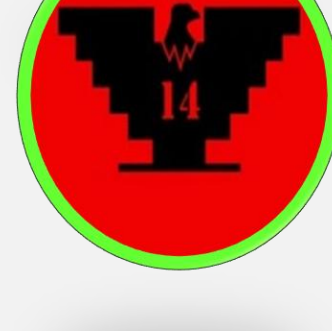


ENABLING OBJECTIVES

- **Identify Legal Standards:** Understand RICO (Racketeer Influenced and Corrupt Organizations) Acts and state gang-terrorism predicate statutes to challenge prosecution strategies. (**CHARGE**)
- **Evaluate Evidence:** Assess proper techniques for reviewing social media, phone data and evidence used in gang investigations. (**GANG**)
- **Challenge Validations:** Identify criteria in member/associate validations with Rule of 6, lack of corroboration, or bias in how law enforcement validates gang members. (**MEMBER**)
- **Examine Documentation:** Analyze gang affidavits and warrants to ensure they are legally sound. (**NEXUS**)
- **Discuss Case Studies & Strategy:** Review cases to identify weaknesses in gang expert testimony and classification.

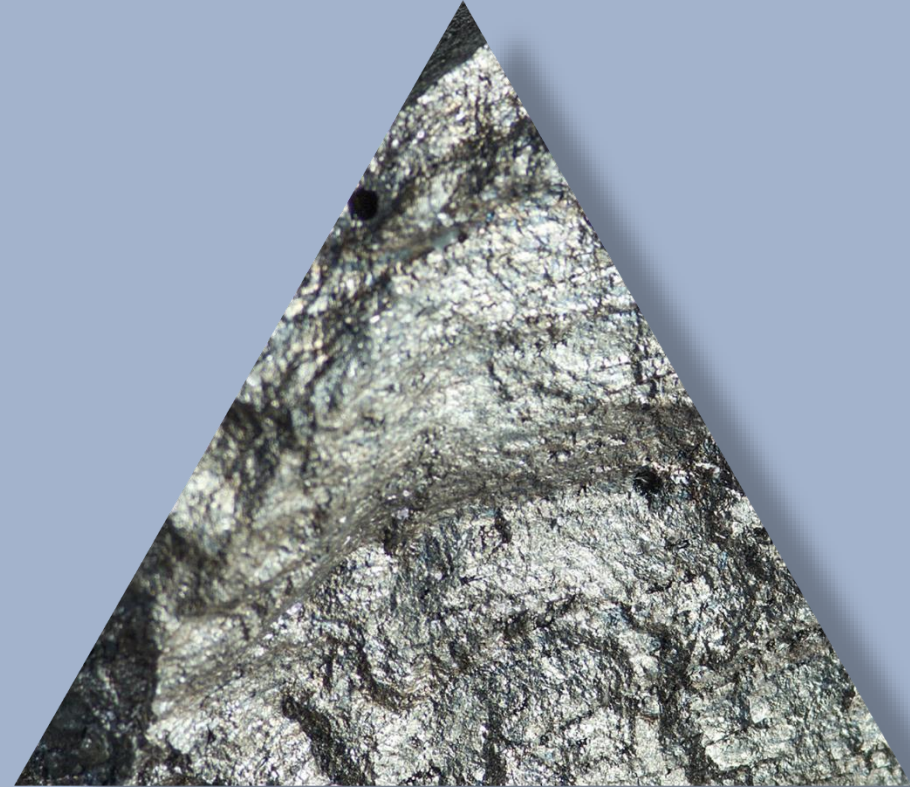
GANG

B I N G O



01

THE IRON TRIANGLE



THE IRON TRIANGLE



01

Existence of a
Criminal Street
Gang

02

Offender is a Gang
Member or Associate

03

Criminal Gang
Activity predicate
charge

04

Nexus proven between
the person, the gang and
the crime



DEFENDANT

EVALUATE EVIDENCE – THE GANG





O.C.G.A. 16-15-3

- Any organization, association, or group of 3 or more members associated in fact, formally or informally, which engages in criminal street gang activity.
- The existence of such organization may be established by evidence of a common name or common identifying signs, symbols, tattoos, graffiti, or attire.

GANG DISSECTION

O.C.G.A. 16-15-3



“The existence of such organization, association, or group of individuals associated in fact may be established by evidence of a **common name** or common identifying signs, symbols, tattoos, graffiti, or attire or other distinguishing characteristics, including, but not limited to, common activities, customs, or behaviors.”

Bloods
Crips

Gangster Disciples
Goodfellas



O.C.G.A. 16-15-3

“The existence of such organization, association, or group of individuals associated in fact may be established by evidence of a common name or common identifying signs, symbols, tattoos, graffiti, or attire or other distinguishing characteristics, including, but not limited to, common activities, customs, or behaviors.”



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GANG DISSECTION



O.C.G.A. 16-15-3



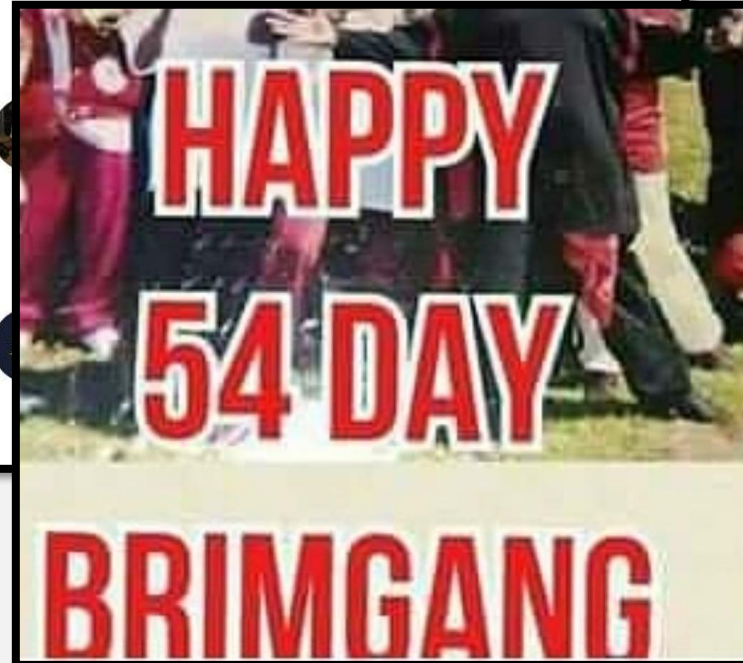
“The existence of such organization, association, or group of individuals associated in fact may be established by evidence of a common name or common identifying signs, symbols, tattoos, graffiti, or attire or other distinguishing characteristics, including, but not limited to, common activities, customs, or behaviors.”



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2blu_r20llxn H20dDay 2021 Ga 2x10



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officialtoastb Whk59p

99w Reply



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34w Reply



81 likes

MAY 4, 2019



Add a comment...



GANG DISSECTION

O.C.G.A. 16-15-3



“The existence of such organization, association, or group of individuals associated in fact may be established by evidence of a common name or common identifying signs, symbols, tattoos, graffiti, or attire or other distinguishing characteristics, including, but not limited to, common activities, customs, or behaviors.”



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more
whet
enga

Girl Scouts Heart of Central California,
a California nonprofit public benefit corporation

AMENDED AND RESTATED BYLAWS

Adopted February 2, 2019



Sacramento Regional Program Center

6601 Elvas Avenue
Sacramento, CA 95819
916.452.9181 800.922.4475

Modesto Regional Program Center
3330 Oakdale Rd., Modesto CA 95355
209.545.3620 800.834.9899

Stockton Regional Office
1212 W. Robinhood Drive, Ste 4F,
Stockton, CA 95210
209.473.5914

GANG DISSECTION

GEORGIA STATUTE (16-15-3) (1) “Criminal street gang”



Being part of a gang is not illegal in Georgia, however, individuals that participate in criminal activity on behalf of a gang is unlawful and can lead to criminal charges. To be charged with a gang crime, Law Enforcement must first establish probable cause for a predicate charge, a criminal act committed by the suspect. Actions like recruiting, committing violent acts, or leading gang operations/activities are prohibited.

**GEORGIA**
CORPORATIONS DIVISION

GEORGIA SECRETARY OF STATE
BRAD RAFFENSPERGER

[HOME](#)

BUSINESS SEARCH

BUSINESS INFORMATION

Business Name: **FRATERNAL ORDER OF ATLANTA OUTLAWS NON-PROFIT CORPORATION**

Control Number: **0322770**

Business Type: **Domestic Nonprofit Corporation**

Business Status: **Active/Compliance**

Business Purpose: **NONE**

Principal Office Address: **4050 CAMPBELLTON RD SW, ATLANTA, GA, 30331, USA**

Date of Formation / Registration Date: **4/16/2003**

State of Formation: **Georgia**

Last Annual Registration Year: **2026**

REGISTERED AGENT INFORMATION

Registered Agent Name: **B Johnson**

Physical Address: **4050 Campbellton Road SW, Atlanta, GA, 30331, USA**

County: **Fulton**

OFFICER INFORMATION

Name	Title	Business Address
Brad Johnson	Secretary	4050 Campbellton Road SW, Atlanta, GA, 30331, USA
Jessie Brizendine	CFO	4050 Campbellton Road SW, Atlanta, GA, 30331, USA
Larry McDaniel	CEO	4050 Campbellton Road SW, Atlanta, GA, 30331, USA

[Back](#) [Filing History](#) [Name History](#) [Return to Business Search](#)





GEORGIA STATUTE (16-15-3) (1) “Criminal street gang”



with the offense of: **VIOLATION OF STREET GANG TERRORISM AND PREVENTION ACT,**
O.C.G.A. 16-15-4(a),

for that the said accused in Bryan County and the State of Georgia, **between the 24th day of August, 2021, and the 15th day of June, 2022,** being associated with Outcast, a criminal street

lawfully participate in criminal street gang activity through the commission of at least one

enumerated in paragraph 1 of OCGA 16-15-3, Conspiracy to Commit Aggravated Assault

7 of this Indictment being contrary to the laws of said State, the good order, peace



1
2
3
4
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6

II. FACTUAL BACKGROUND

A. The Hells Angels Motorcycle Club and Hells Angels Sonoma County

The following is a summary of the evidence as it stood at the end of the Government’s case-in-chief:

The Hells Angels Motorcycle Club (“Hells Angels”) Government refers to as an Outlaw Motorcycle Gang (“OMG”). See T Hells operate

Within the Hells Angels umbrella, Hells Angels operate Hells Angels charters in the United States. Id. at 3864. Each charter acts semi-autonomously, but all charters are still required to adhere to Hells Angels’ world rules govern how an individual can become a member of a charter. Id. at 3859–60. Individuals begin as “hang-arounds” and are then over a twelve-month period before they can become “full-patch” members.

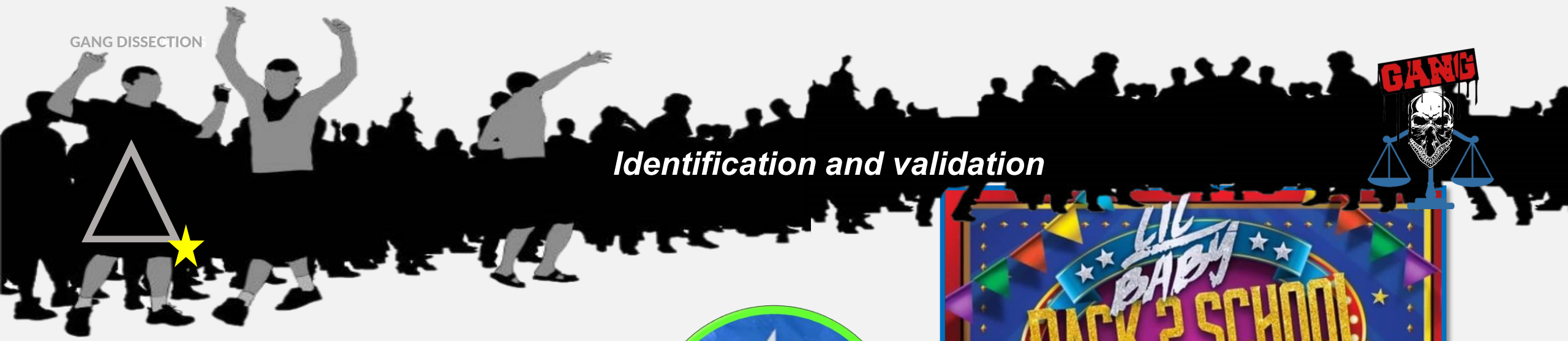


strict
of Ca

14

Id. at 3859, 3927–33. The term “full-patch” refers to the three-piece patch on members’ vests, or

GANG DISSECTION



Identification and validation



FOX5

Live

News

Weather

Good Day

Sports

stemmed from escalating gang tensions following a 2024 music video involving rapper Lil Baby, though he was not directly injured in the shooting.

ATLANTA - A gang-related dispute between two criminal organizations culminated in a fatal shooting on July 2, 2024, leaving two young teenagers dead and a third wounded outside an apartment complex in southwest Atlanta, police say. The attack was part of an escalating feud between the "Four Pockets Full" (4PF) gang and the "Only My Family" (OMF) gang.



Challenge locations / Incident Reports



114

Count of Victims

Crime Against Property

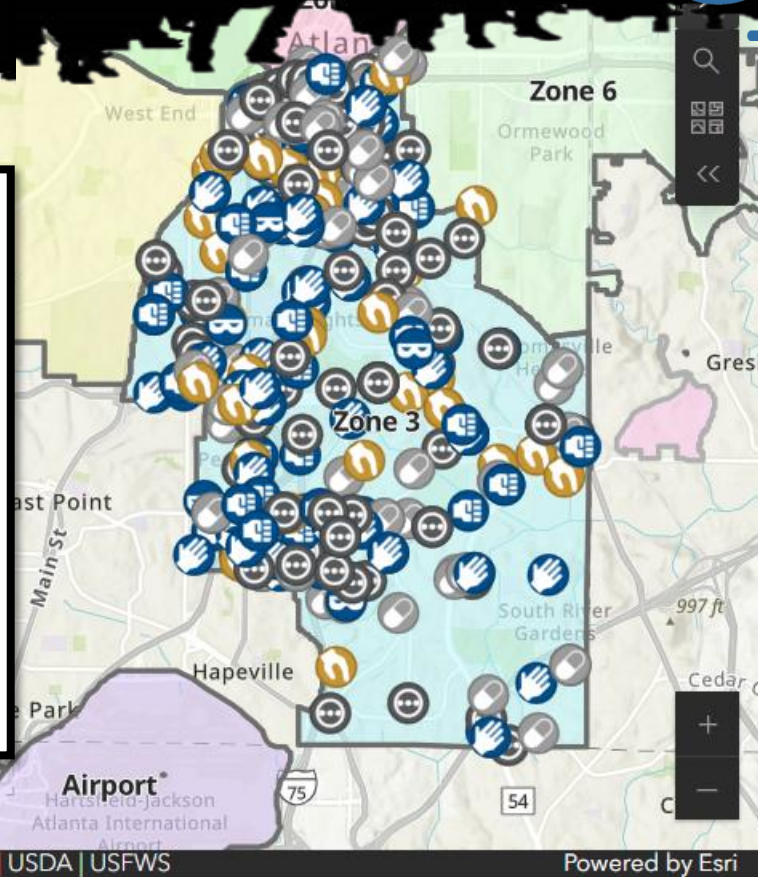
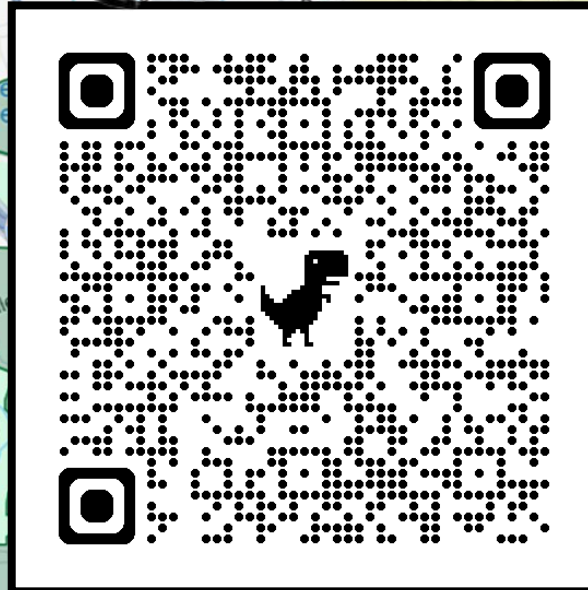
52

Count of Incidents

Crime Against Society

188

Count of Incidents



Date	NIBRS_Offense	StreetAddress
	Simple Assault	1906 BROWNS MILL RD SE
	All Other Offenses	464 WINDSOR ST SW
	Aggravated Assault	700 WINDSOR ST SW

20



Gang Data Documentation

1. Gang Details
2. Ranks
3. History
4. Association & Rivals
5. Criminal Activities
6. Locations
7. Graffiti & Tagging
8. Group Photos
9. Subsets

PAGE 6



COLLEGE PARK POLICE DEPARTMENT



...suggested that they were actually the same group.

Within the prison system, the Goodfellas have had clashes with other large gangs in an effort to control the jails. In 2013, the Goodfellas had their greatest conflict with the Bloods, which resulted in several murders within Georgie prisons. However, their conflict wasn't only with the Bloods - the Goodfellas generated conflict with several other groups in an effort to claim territory within various facilities.

For the most part, rivalries have been contained to inside the prison system. Members of the Goodfellas have had issues with other gangs on the street, but these appear to be individual issues rather than gang-wide rivalries.

Criminal Activities

Armed Robbery, burglary, Entering Auto, Larceny

Identifiers

Tattoos - "GF" / "2Luv" or "2Love" / "10" - meaning 10 letters of GoodFellas

Clothing - Omerta Entertainment / PFK - Play For Keeps /

Purple - hearts / flags / emojis



10letters



10 letters tattoo and meaning - "GoodFellaz"

10 letters



"10" and hearts near eye

GF



GF in five-pointed star

1725 JACKET GANG
GANG PROFILE
 1725 Jacket Gang

Gang Data Documentation



Identifiers

1725 Jacket Gang have a distinct set of identifiers which are typical for a criminal street gang, including colors, tattoos, clothing, "tagging" and hand signs. On social media members incorporate the 1725 or JG for Jacket Gang in their profiles. Members also adopted different meanings for 1725. For example, one member would say 17 shots 25 to life or broke at 17 rich at 25 and ill take 17 shots and give them 25. Members typically display the color of red to show their affiliation with 93 BBA. Members

The Billy Bad Ass Bloods (BBA), or Nine Trey Bloods (9Trey), have a distinct set of identifiers such as colors, tattoos, clothing, graffiti and hand signs, which are typical of a criminal street gang.

The Billy Bad Ass Bloods is another name for the Blood set, 9 Trey, of the United Blood Nation (UBN) and members identify themselves with the color red. Members typically display their color by "flagging", or wearing a red bandana on their person. The bandana, or "flag", is carried in different fashions but always on the right side of the body. Members usually hang the red bandana from their rear right pants pocket, but will also tie the bandana around their right wrist or neck, or even tie it to their belt loops in lieu of a belt.

Subsets of 9 Trey Bloods/Billy Bad Ass (Strongwhip, Firaq and Wavy Lines) sometimes have an additional color identifier-for example, Smash Krew(SK) also uses the color orange. Members of the Smash Krew will wear orange bandanas and spray paint their graffiti in orange writing. Members of Billy Bad Ass Bloods/Smash Krew also make t-shirts and sweatshirts with the gang's name in large letters on the front and/or back.

Members also get tattoos of the gang's name. Tattoos come in different forms but some commonly seen ones are the "K" on the right side of the body, the name "Billy" on the right side of the body and/or stomach, and a "93" or "9" and "B" on the body and/or face. Red 5 pointed stars and the name "Flame Gang" have also been seen along with the letters "MOB" on the right side of the body.

Members of the gang have stated that in order to become a part of the gang you must fight 5 members for 31 seconds. The gang uses hand signs also to identify their set. One of the common hand signs used by all Bloods is the full extension of the thumb, index and pinky finger while the ring and middle fingers are balled in a fist.

Another hand sign that is common with the gang is the lowercase "b". Members will curl their thumb and index finger together forming a circle and leave the rest of their fingers out and pointed upward, forming a "9" and a "3". Both of these signs are typically done using their right hand. In their graffiti, social media monikers and text messaging, the gang also commonly omits the letter of the alphabet "c", to show their disdain for their rival the Crips, replacing it with an "x" or a "b".



COLLEGE PARK POLICE DEPARTMENT MEMBER ROSTER

Master Disciples



Jerrald Cook
Suspected Member
Black/Male
5'10"/135



Deandre Franklin
(Dre, Dreyy)
720
Suspected Member
Black/Male
5'08"/130



Terrance Crimes
Suspected Member
Black/Male
5'08"/130



Isaiah Johnson
Confirmed Member
Black/Male



Joshua Darius Knox
Confirmed Member
Black/Male
5'07"/192



Justus Nation
Confirmed Member
Black/Male
6'01"/140



O'Ron Lowe
Associate
Black/Male
4'11"/98



Edwin Mack
Confirmed Member
Black/Male



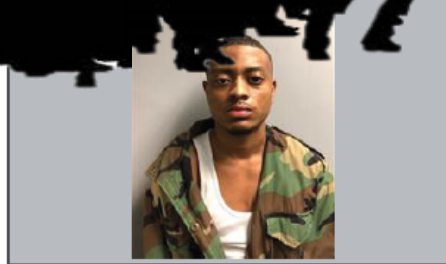
Trayon Anton Moore
(Tray)
Black/Male
Suspected Member
Black/Male
5'11"/195



Gang Data Documentation



POLICE DEPARTMENT GANG MEMBER PROFILE



Sex: Male
Race: Black
Height: 6'01"
Weight: 162
Eye Color: Brown
Facial Hair: None
Hair Color: Black
Hair Length: Short
Hair Style: Low Cut
Classification: Adult
Deceased: No

Primary Affiliation

Gang: Goodfellas
Subset: Purp Gang - Play for Keeps
Affiliation: Suspected Member
Rank:

First Contact:
Member Since:

Identification

Social Security Number:
FBI Identification:
Drivers License Number:
SO Number:

Criminal History

Convicted Gang Member: No
Convicted Felon: No
Incarcerated:

Education

School: Westlake High School
Grade: 12th

Addresses

Home

Phone Numbers

Aliases





Gang Data Documentation

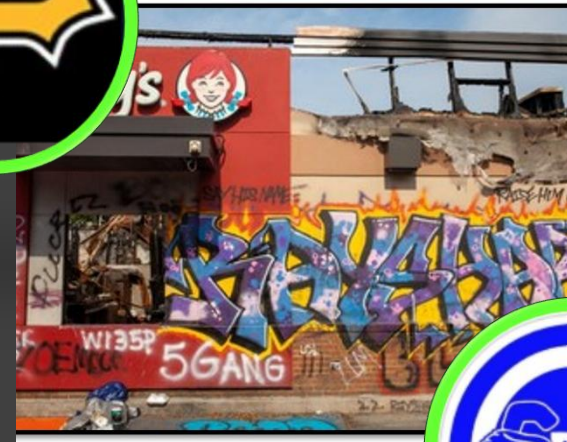
28 Code of Federal Regulations (CFR) Part 23

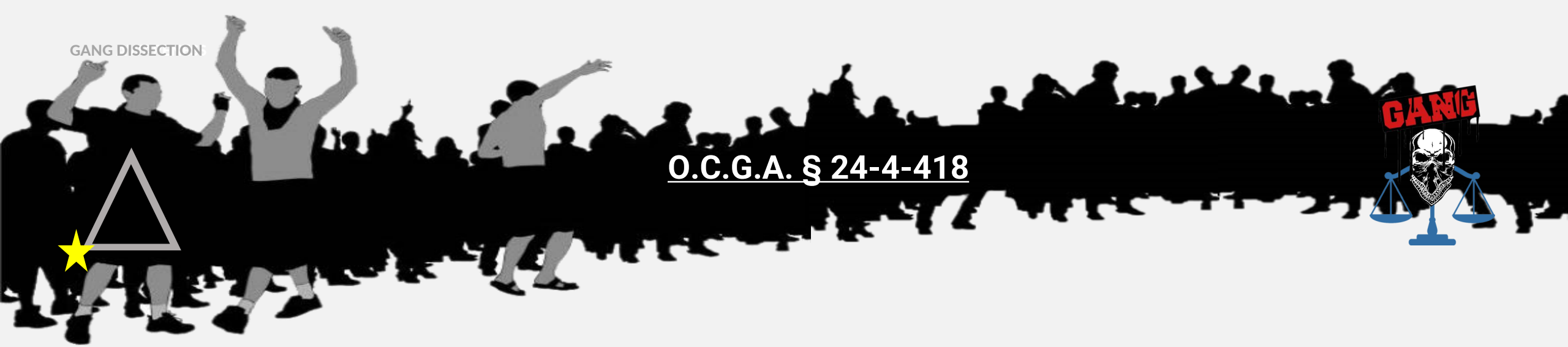
This is a guideline for Law Enforcement Agencies and is used to balance the need to collect and share information while keeping the individual's privacy rights protected.

- Data CANNOT be retained longer than 5 years unless the investigation involving that gang and the individual continue.
- At the end of the retention period, the information needs to be purged and removed from the system IF no activity is documented on the individual or the gang.

03|

CHALLENGE VALIDATIONS – THE PERSON





O.C.G.A. § 24-4-418

...governs the admissibility of evidence regarding criminal street gang activity in criminal proceedings. It allows evidence of a defendant's commission of gang activity to be admitted if it is relevant to the case, provided the prosecution discloses such evidence at least 10 days before trial.

Key details regarding O.C.G.A. § 24-4-418 include:

- **Disclosure Requirements:** The prosecution must disclose evidence to be offered under this rule to the defense at least 10 days before the trial.
- **Exceptions to Notice:** A judge may shorten, lengthen, or excuse the 10-day notice requirement for good cause shown.
- **Purpose:** This rule ensures relevant evidence of gang-related crimes can be considered
- **Admissibility:** In trials where the accused is charged with gang activity under Code Section 16-15-4, evidence of their involvement in criminal gang activity is admissible.

**State v McKinney, 11/29/22; “in conjunction with one another that a nexus between the prior act and an intent to further gang activity must be established for the evidence to be admissible”*



Fulton County Superior Court
 FILED
 Date: 12/15/22 3:00 PM
 Cathleen R. Johnson, Clerk

O.C.G.A. § 24-4-418

DEFENDANT'S MOTION TO ADOPT CO-DEFENDANT'S MOTION TO DECLARE GEORGIA GANG STATUTE AND CORRESPONDING EVIDENCE RULE 418 UNCONSTITUTIONAL

COMES NOW the Defendant, by and through his undersigned counsel and, files this his
 Motion to Adopt Co-Defendant's Motion: Defendant would like to join and adopt the following
 motion:

Co-Defendant's Motion to Declare Georgia Gang Statute and Corresponding Evidence
 Rule 418 Unconstitutional filed by Anastasios Manettas for Mr. Miles Farley on or about
 November 29, 2022.

RESPECTFULLY SUBMITTED on this 1st of December, 2022.

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/s/ E. Jay Abt
 E. Jay Abt, Esq.
 GA Bar No. 001466
 jay@abtlaw.com

THE ABT LAW FIRM, LLC
 2295 Parklake Drive, Suite 525
 Atlanta, GA 30345
 Phone: 678.644.9757
 Fax: 800.256.7054



Fulton County Superior Court
 FILEDNY
 12 5:59 PM
 Cathleen R. Johnson, Clerk



STATE OF GEORGIA

JEFFERY WILLIAMS
 Defendant

CASE NO.: 22SC183572

NOTICE OF STATE'S INTENT TO INTRODUCE EVIDENCE PURSUANT TO O.C.G.A. § 24-4-418 AND O.C.G.A. § 16-15-9

The State of Georgia, by and through the undersigned District Attorney FANI T. WILLIS,
 hereby provides notice of the State's intention to present evidence of other acts pursuant to
 O.C.G.A. §§ 24-4-418 and 16-15-9.

The above-named defendant is charged with violating the Georgia Gang Act under
 O.C.G.A. § 16-15-4. Therefore, other acts evidence is admissible pursuant to the above code
 sections.

Rule 418

First, O.C.G.A. § 24-4-418 ("Rule 418") allows for the admission of any of a defendant's
 other acts of criminal gang activity when that defendant is charged under the Georgia Gang Act.

This Rule 418(a) provides:

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In a criminal proceeding in which the accused is accused of conducting or
 participating in criminal gang activity in violation of Code Section 16-15-4,
 evidence of the accused's commission of criminal gang activity, as such term
 is defined in Code Section 16-15-3, shall be admissible and may be considered
 for its bearing on any matter to which it is relevant.¹



- **Reliable Informant** identified by reliable source/informant who has previously provided accurate information which is supported by validated documentations by Law Enforcement
- **Unreliable Informant and Independently verified** : identified by unreliable source/informant that is independently verified by Law Enforcement
- **Evidence:** Social media/Electronic Media/Technology obtained through technology, including but not limited to the internet and social media
- **Self-Admission:** Subject admits to Law Enforcement his/her association with CSG and it is properly documented
- **Arrested:** Subject arrested for criminal street gang charges, identified by OCGA 16-15-4
- **Associate:** Subject documented as an associate with CSG members/associates at multiple locations, and numerous times and supported by evidence



Rule of 6



SHAKIRA [REDACTED] a/k/a/ "ACE", black female, date of birth (DOB) August [REDACTED], home address [REDACTED] Atlanta, GA 30314, telephone number: 470-629-6293, a member of the BOUNTY HUNTER BLOODS criminal street gang, arrested at 9157 Tenth Avenue, Atlanta, Georgia.

[REDACTED] was interviewed, in the presence of Detective [REDACTED], using a Clayton County Police Department State Sent of Miranda Rights form. [REDACTED] advised that she understood her Miranda Rights by giving expressed verbal acknowledgment and by placing her initials next to each of the five Miranda Rights. [REDACTED] then voluntarily waived her right to legal representative during the custodial interview and signed the Statement of Miranda Rights form. The custodial interview of [REDACTED] was recorded using an audio recording device to wit; the audio file is attached to this document.

Below is an interview summary; it is not intended to be a verbatim account and does not memorialize all statements made during the interview. Communications by the parties were electronically recorded. The recording captures the actual words spoke.

[REDACTED] was arrested and charged with an Armed Robbery. [REDACTED] did not plan nor orchestrate the Armed Robbery, it was the plan of someone else. [REDACTED] has a nick name "ACE", which she obtained prior to her joining the BOUNTY HUNTER BLOODS criminal street gang. [REDACTED] stated that "DMV" stands for "D.C., MARYLAND, AND VIRGINIA" is a "line" of the BOUNTY HUNTER BLOODS criminal street gang.

[REDACTED] stated that she and "KD", identified as [REDACTED], both hold the same rank of "TYG", Tiny Young Gangster, within the BOUNTY HUNTER BLOODS criminal street gang. [REDACTED] knows that one of the "OG's", Original Gangster, has the street name of "NITRO" within the criminal street gang. [REDACTED] knows that "NITRO" is an "OG" and is in his mid-30's because she had met him before and had heard of him from other criminal street gang members. [REDACTED] stated that one of the "OYG's", Original Young Gangster, is "PIPEUP", identified as [REDACTED].

[REDACTED] had become a member of "DMV" line of the BOUNTY HUNTER BLOODS criminal street gang in July 2019. OLIVER moved to an apartment complex located at 7250 Campbellton Road SW in Atlanta Georgia also in July 2019. [REDACTED] was at her girlfriend's house located on Walden Boulevard in South Fulton Georgia when she stated talking to "PIPEUP" on Instagram. [REDACTED] stated that "PIPEUP" had sent her a "DM", Direct Message, on Instagram. [REDACTED] then had a FaceTime conversation with "PIPEUP" and discussed "rolling" over to the DMV line of the BOUNTY HUNTER BLOODS criminal street gang.



Rule of 6



- **Unreliable Informant and Independently verified :**
identified by unreliable source/informant that is
independently verified by Law Enforcement

Good Afternoon Sgt. [REDACTED]

As per our conversation earlier on this date, I have the following information regarding the gang status of the
aforementioned subject, [REDACTED], DOB: 06/10/1991 FBI # [REDACTED] State ID. # 010245030 SS. # 111 00
1 [REDACTED]

This subject has (1) arrest in the New York area for Criminal Possession of a weapon 3rd dated 5/20/2003.

In 2004 while in custody at our jail facility, this subject did state in fact that he was a member of the Bloods(GKB) gang.
"Gangsta Killer Bloods".

We do not have any other criminal history other than the aforementioned information provided regarding this subject.
The last contact with this subject was in 2004.

I hope this information is of some help with your investigation.

Respectfully,

[REDACTED]
Criminal Intelligence Section
Suffolk County Police Department
30 Yaphank Avenue
Yaphank, New York 11980



Office: [REDACTED]
FAX: [REDACTED]
Email: [REDACTED]



GANG DISSECTION



Rule of 6

- **Evidence:** Social media/Electronic Media/Technology/Tattoos/Cellphone data obtained through technology, including but not limited to the internet and social media



Galaxy Z Fold4



- **Self-Admission:** Subject admits to Law Enforcement his/her association with CSG and it is properly documented

DANIELS also admitted to being a member of the Goodfellaz PurpGang Playforkeeps gang and stated that he has been a member since he was in 9th grade, approximately 4-5yrs ago. DANIELS admitted that previously he was a member of the Rollin 60's Crips but rolled over to Goodfellaz because the Crips "weren't making any money".



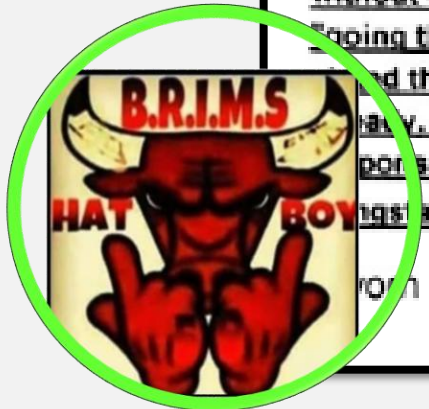


Rule of 6

- **Arrested:** Subject arrested for criminal street gang charges, identified by OCGA 16-15-4

Personally came [REDACTED], who on oath says that to the best of his/her knowledge and belief [REDACTED] (hereinafter called the accused) between 10/27/2017 at 07:00 PM and 10/27/2017 at 10:00 PM, at 3300 College St, College Park in FULTON county aforesaid, did commit the offense of Unlawful For Person Employed By/Associated With Criminal Street Gang To Conduct/Participate In Crimin - Felony, 16-15-4(a) in that said accused unlawfully was employed or associated with a criminal street gang Brim Bloods to conduct or participate in criminal gang activity by illegally entering and taking items from multiple vehicles without the consent of the owners. Accused stated that he is an active member of the Brim Bloods gang and that he joined two (2) years ago by "going thru the flame for 54" a term meaning that he was jumped into the gang by multiple Brim Bloods gang members for 54 seconds. The Accused and that he attends meetings held by the gang and does not have to pay dues because the members "get money" through their illegal activities every day. The Accused identified several individuals as members of his specific Brim Bloods set and identified his Big Homie, the individual that is responsible for subsets of each gang. The Accused admitted to holding rank within the Brim Bloods gang of TYG, which stands for Top Young gang, said and this deponent makes this affidavit that a warrant may issue for his/her arrest.

from to and subscribed before me,





Rule of 6



- **Associate:** Subject documented as an associate with CSG members/associates at multiple locations, and numerous times and supported by evidence



Consent Agenda Item

Proof of Membership / Association



- Corey L. Bell and PHIT Leaders Day (Councilmember Leland)
- Kym Feltus and Stro
- Eugene "Big U" Henl
- Larry Hoover Day (C
- Edwin "Eddie" James
- Pastor Kenneth T. Jo
- Sergio Giavanni "Gur
- Minority Business Op
- Dr. Rashad Richey D
- Wilma L. Scott Mem
- Norma B. Mitchell D
- Gilyard, khalid and R
- Courtney "Bear" Sills
- Khandi Williams and
- World Senior Citizens

CITY OF SOUTH FULTON, GEORGIA
VIRTUAL - REGULAR COUNCIL MEETING
Tuesday, September 28, 2021, 4:00 PM

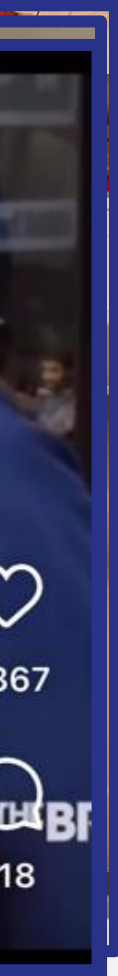
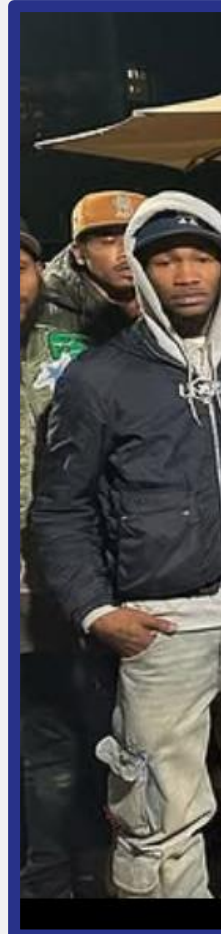


The Honorable William "Bill" Edwards, Mayor
The Honorable Catherine F. Rowell, District 1 Councilmember
The Honorable Carmalitha Gumbs, District 2 Councilmember
The Honorable Helen Z. Willis, District 3 Councilmember
The Honorable Naeema Gilyard, District 4 Councilmember
The Honorable Corey A. Reeves, District 5 Councilmember
The Honorable khalid kamau, District 6 Councilmember
The Honorable Mark Baker, District 7 Councilmember

REGULAR COUNCIL MEETING AGENDA

GANG DISSECTION

Proof of Membership / Association



GANG DISSECTION

Proof of Gang Membership/Evidence



Proof of Gang Membership/Evidence



mr_920_d.o.a · following

mr_920_d.o.a #WHK27Px2

nidiusvlfytk Wh27p

mpr_tito 🇸🇰 🇵🇸 🇹🇼 LINE 920 and 820 SHIT
WH27PX2

🔥 SXUTH Tha Fuxk Up

👍 Like

➦ Share

👍❤️ 9

👤 Flip Rxllin Wh359

Like · 1y

👤 BandKamp Justo MoB. Shit

Like · 1y

👤 Flip Rxllin Null Diss ApeShit B B NHB20
Justin GoGetta

Like · 1y

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Gang membership may be proven through a variety of methods and experts must take a multitude of factors in account to determine whether an individual is involved in a gang.

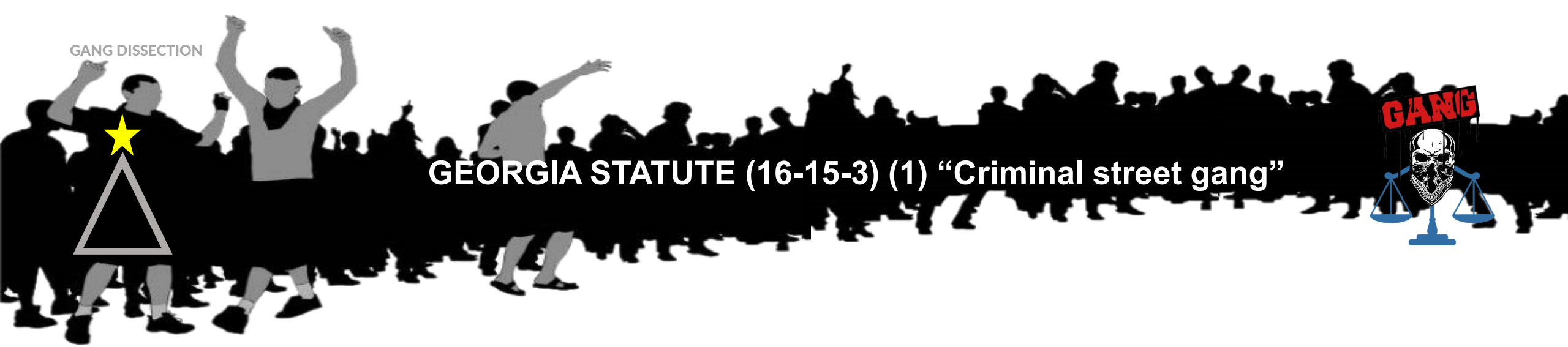
These include a **clustering** of the following:

- Tattoos bearing similarities to known gang motifs,
- Possessed gang paraphernalia,
- Admitted gang membership,
- Observed wearing attire/colors associated with street gangs,
- Publicly displayed signs, symbols and using language associated with a gang,
- Posted social media posts discussing or indicating gang membership,
- Seen in photos throwing documented and established “gang signs.”

02

IDENTIFY LEGAL STANDARD – THE CHARGE





GEORGIA STATUTE (16-15-3) (1) “Criminal street gang”

- Crimes against person; *violence, fraud, rape, sexual battery, aggravated sodomy*
- Crimes involving narcotics; *possession, trafficking, intent to distribute*
- Crimes involving weapons; *possession, use of during commission of crime*
- Crimes involving property damage; *tagging, graffiti,*
- Crimes committed regarding confinement; *contraband, riot, escape*

violence, possession of a weapon, or use of a weapon, whether designated as a felony or not, and regardless of the maximum sentence that could be imposed or actually was imposed

PREDICATE CHARGE



GEORGIA STATUTE (16-15-3) (1) “Criminal street gang”



Fulton County Superior Court
FILEDAP
Date: 7/25/2022 12:01 PM
Cathelene Robinson, Clerk

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

HUSTON, ET AL. vs. STATE OF GEORGIA

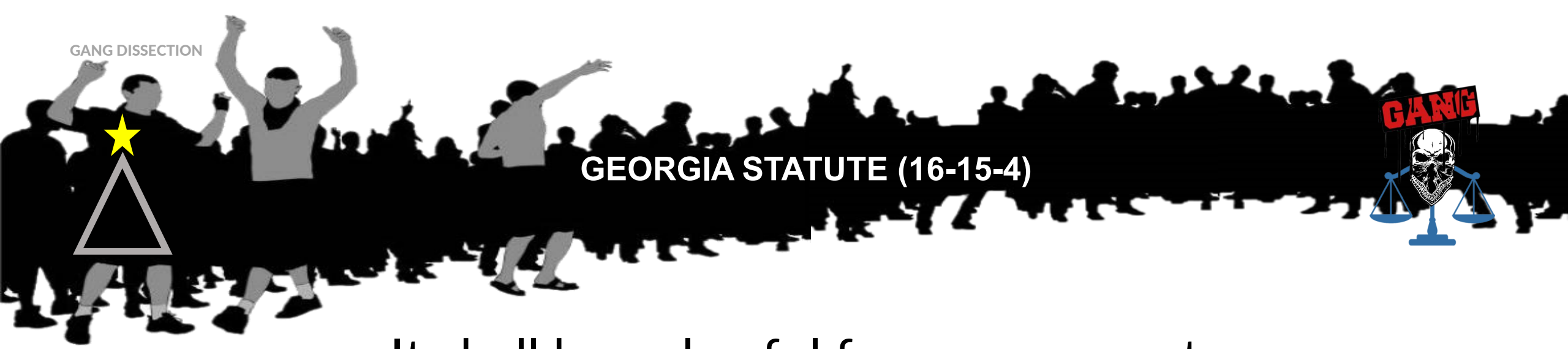
Dante WILLIAMS

NOTICE AND MEMORANDUM OF LAW IN SUPPORT OF STATE’S INTENT TO ADMIT GANG-RELATED EVIDENCE AT TRIAL

COMES NOW the State of Georgia, by and through the undersigned Assistant District Attorney and files this, *NOTICE AND MEMORANDUM OF LAW IN SUPPORT OF ADMISSION OF GANG-RELATED EVIDENCE AT TRIAL*, and respectfully states as follows:

Introduction

The Defendant(s) in the above case have been charged, *inter alia*, with violation(s) of O.C.G.A. § 16-15-1, *et seq.*, The Georgia Street Gang Terrorism and Prevention Act (“Gang Act”). The State anticipates that the Defense may object to the introduction of criminal street gang-related evidence at the trial of this case. Accordingly, the State hereby notices the Court to allow this admission of gang-related evidence at the trial of this case and provides the following legal authority in support thereof.

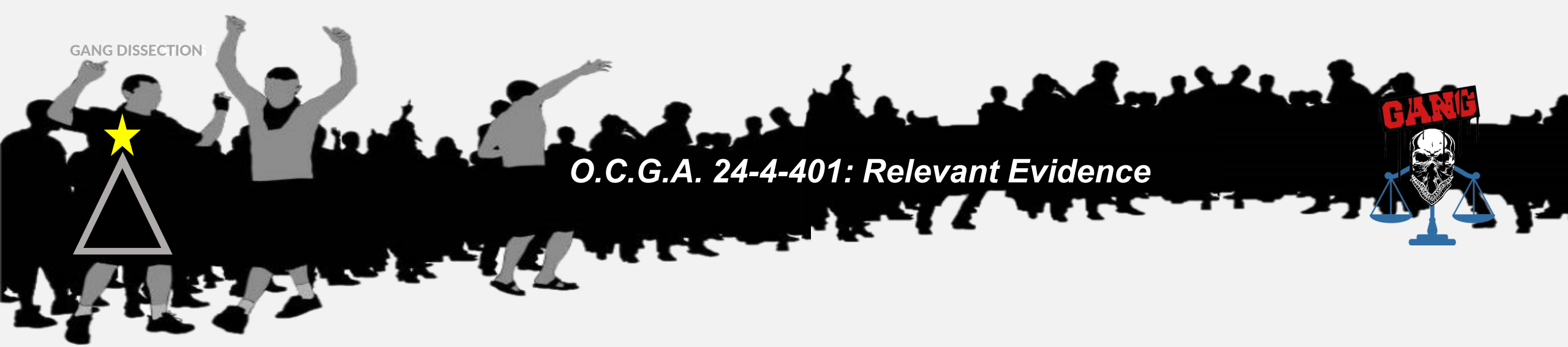


GEORGIA STATUTE (16-15-4)

It shall be unlawful for any person to;

- (a) Participate:
- (b) Earn/Increase status:
- (c) Acquire stolen property/proceeds:
- (d) Leader/Organizer role:
- (e) Recruit:
- f) Threaten intent for leaving:
- g) Threaten to punish for leaving:
- h) Threaten for refusing for joining:
- i) Threaten for providing statements/testimony
- j) Threaten for communication w/ Police





...defines "relevant evidence" as any evidence having a tendency to make the existence of any fact of consequence to the determination of the action more or less probable than it would be without the evidence. This rule is used to determine if evidence is admissible.

Key Aspects of GA Rule 401 (Relevant Evidence)

- **Definition:** Evidence must have any tendency to make a consequential fact more or less probable.
- **Purpose:** It sets the threshold for whether evidence can be admitted in a Georgia court.
- **Relation to other rules:** If evidence is not relevant under Rule 401, it is generally not admissible under Rule 402.
- **Context:** It is part of the Georgia Code Title 24, Chapter 4, which deals with Evidence and the relevancy of evidence.

**State v Sims, 10/15/25; "decision whether evidence is relevant turns not on "fairness" but rather on whether it has "any tendency to make a fact of consequence more or less probable than it would be without the evidence."*



KEY & PEELE

O.C.G.A. 24-4-401: Relevant Evidence



- ★ Wat GKB stand 4? Gangsta Killa Bloods
- ★ these other set call GKB got Crips and G's in it it stand 4? Gangsta killing Bloods
- ★ If a crab ask you wat's crackin say my Bullet in yo crab shell or upskull
- ★ Crab means? Crips respect all Bloods. Crip stand 4? Crips rest in piss.
- ★ wat side do we bang to? the right
- ★ why do we bang to the right? Becau he shot his self & threw the left side of his head the blood leak down the right
- ★ O.G Tye was a crab but he wanted to be Blood so he went to O.G RaRa and said he wanted to become a Blood so O.G RaRa



Rollins 20s OPPS is Rollin 30s & Crips, Sur 13 & ms-13
 We have the largest BLOOD Territory in LA & Cali
 25th, 27th, 29th, & Avenue is our territory.
 Rollin 20s NHB (Neighborhood Blood) started out
 as being the outlaws & Avenues later changed
 their name in 1972. Our name has nothing
 to do with Rollin Crip gangs.



GANG DISSECTION



O.C.G.A. 24-4-401: Relevant Evidence

Should include:

- Names of person(s) in photo
- Day/time/location picture taken
- Name of Officer taking photo



IMG_2673 from 2609 Charlestown.JPG



IMG_2673 from 2609 Charlestown

May 14 2018

11 10 AM

Add a description

Size Info

640 x 480 155.8 KB 72 dpi 24 bit

Device Info

iPhone 6 4.15 mm f/2.2 1/125 sec EXP 0 No flash, auto

ASOD\Gang Unit\Gangs\Crips\Rollin
IMG_2673 from 2609 Charlestown.JPG

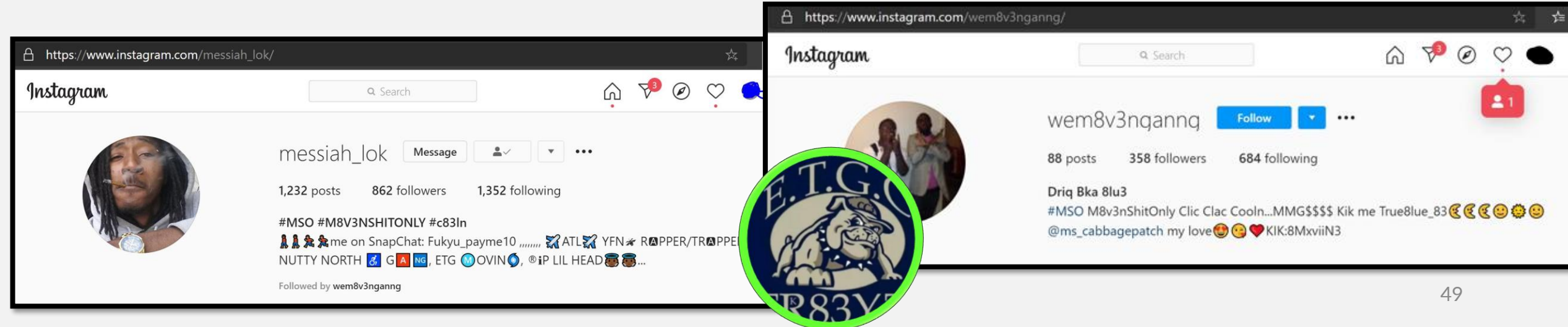


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- The Agency has a social media policy for undercover use for investigations
- The social media page used by Law Enforcement complies with their Agency policies
- All views and recordings are properly documented to reflect day/time/location/summary of image
- Review for any direct communications between Law Enforcement and client via social media page





Georgia Rule of Evidence 402 (O.C.G.A. § 24-4-404) dictates that a person's character, or a trait of a character, shall not be admissible for the purpose of proving action in conformity therewith on a particular occasion, except for;

(b) Evidence of other crimes, wrongs, or acts shall not be admissible to prove the character of a person in order to show action in conformity therewith. It may, however, be admissible for other purposes, including, but not limited to, proof of motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident.

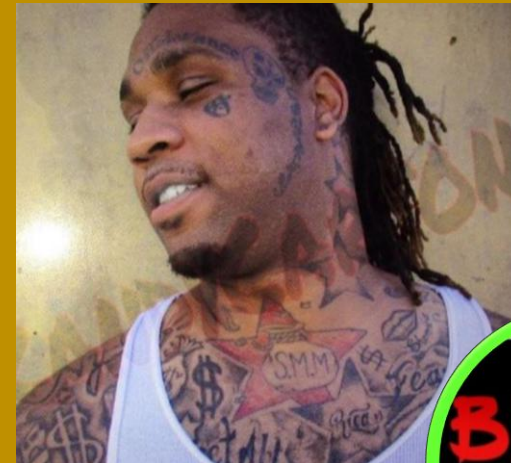
****Worthen v State, 08/19/2019; "to be admissible as proof of motive, however, the other acts evidence must be logically relevant to the crimes charged and necessary to prove something other than the defendant's."***



Any organization, association, or group of ? or more members associated formally or informally which engages in criminal street gang activity.

- A. 5
- B. 3
- C. 8
- D. 2

REVIEW DOCUMENTATION – THE NEXUS





NEXUS

VS

GANG RELATED:

1. The suspect is identified as a Gang Member/Associate
2. The motive has been identified and confirmed as involving gang members **BUT** the crime was committed for personal reasons **NOT** meant to bolster the gang or the member.

GANG MOTIVATED:

1. The suspect is identified as a Gang Member/Associate
2. The motive has been identified and confirmed as involving gang members **AND** the crime was committed for reasons meant to bolster the gang or the member.



Randolph v State, 334 Ga. App. 475, 780 S.E.2d 19 (2015)

The State must prove to secure an adjudication under the Georgia gang statute is that the predicate act must further the interests of the gang. The State “must prove something more than the mere commission of a crime by gang members; instead, the State had to prove the existence of a nexus between the crime and an intent to further street gang activity.” *In the Interest of W.B.*, 342 Ga.App. 277, 801 S.E.2d 595 (2017).

- “benefit gang itself through monetary profit, enhanced reputation, or other means.”



Randolph v State, 334 Ga. App. 475, 780 S.E.2d 19 (2015)

Cases wherein Georgia appellate courts have found a nexus include cases where:

- Evidence showed that the crime was committed in retaliation for an insult against the gang or its members. *In the Interest of W.B.*, 342 Ga. App. 277, 801 S.E.2d 595 (2017).
- Evidence showed that the victim in a battery case waved a bandana with a rival team's colors and started talking about the rival gang just before the battery occurred. *Anthony v. State*, 303 Ga. 399, 811 S.E.2d 399 (2018).
- Evidence showed that the defendant planned a robbery to take over the victim's drug territory and to train or promote gang members. *Nolley v. State*, 335 Ga. App. 539, 782 S.E.2d 446 (2016).
- Evidence showed that the juvenile engaged in a fight with a member of a rival gang because he knew that fighting would “get his rank back up” in the gang. *In re X.W.*, 301 Ga. App. 625, 688 S.E.2d 646 (2009).

Nexus Evidence



WILLIAMS stated that he always had a mind for business which suited him well selling narcotics out of #8J, showing his innovation of having a dry erase board illustrating the several types of narcotics available at any given day along with prices for each weight/amount. When asked where he got this idea, WILLIAMS stated that he saw it being done in the West and wanted to bring that idea to Georgia. WILLIAMS stated that he started selling narcotics at a small rate but grew his business to what it currently is. WILLIAMS was asked about the graffiti that was observed inside of #8J, to which he said started with him having an artist come in and decorate Ed, Edd and Eddy on the wall because those were some of his favorite characters growing up. When asked about the other pictures/drawings illustrated on the walls, WILLIAMS stated that others had an influence on those, specifically the "2200/2727" to which he admitted he was never around those locations but allowed it to be placed on display inside his residence. The question of the Trailblazers basketball logo was then asked how that fit in, to which WILLIAMS stated its connection to the SexMoneyMurder Bloods because of the "blazing" term. This matches one of the monikers identified with SexMoneyMurder (SMM) Bloods of Blazing Billys Only, or BBO. When asked if he was a gang member, WILLIAMS denied but stated that he "is an associate and affiliate" of the gang and that he was originally approached by ASAP, also known as Aaron Nesbitt, to join the gang years ago. WILLIAMS stated that there's an affiliation because he's around the gang members all the time.

When asked if he's ever used any SMM gang handsigns or identified himself as a SMM member, WILLIAMS stated that he's used the handsigns repeatedly before and has taken pictures using it. When asked if he's ever attended any SMM meetings, WILLIAMS answered "yes" and further stated that during those meetings his input and advise would be asked for, and listened to by members present. Questions were then asked about how his apartment and the sales of narcotics were supported and assisted by the SMM gang, to which WILLIAMS answered that the gang does provide security and protection for his narcotics distribution inside of #8J at 3100 Godby Rd and individuals easily and immediately recognize the "2200", "2727" and Trailblazers logos as all being connected to the SexMoneyMurder Bloods gang. The weapons



Nexus Evidence



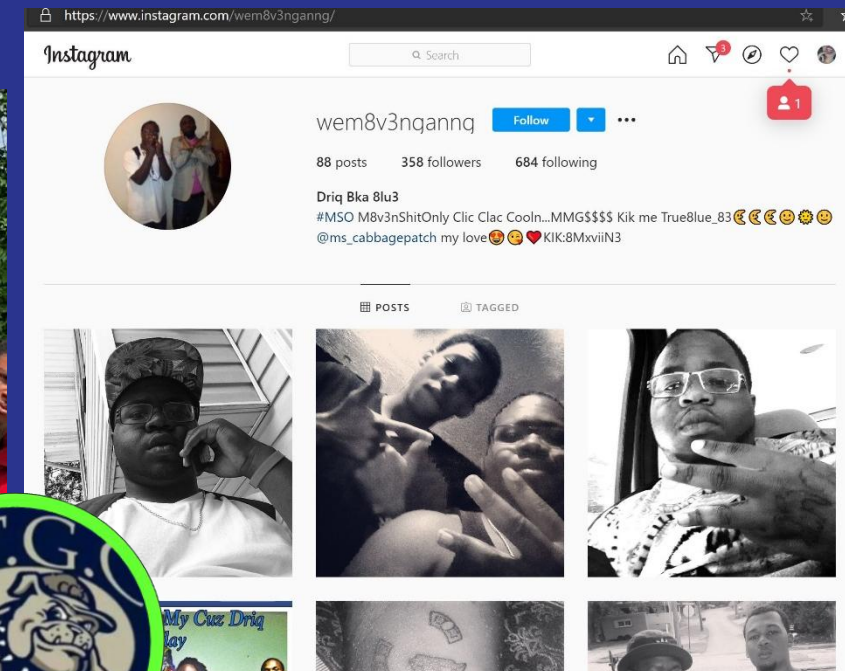
3 Q And did you have that information prior to
 4 interviewing the defendant?
 5 A We did.
 6 Q Did you have information prior to interviewing the defendant?
 7 A We did.
 8 Q And did that make reference to meetings in that group
 9 chat?
 10 They did.
 11 Did they mention of the Rollin 20's in that group
 12 They did.
 13 Did they mention about doing fades in that group
 14 They did.
 15 Did you have conducting multiple interviews with
 16 prior to interviewing him?
 17 We did.

Based on your Affiant's training knowledge and experience the tattoos that were indicated by the unknown tipster are consistent with the Criminal Street Gang CRIPS. The initials "LOC" are consistent with the meaning of "love of Crips" or "love only Crips". The tattoo with the initials "NHC" is consistent with a sub set of the CRIPS known as the "Neighborhood CRIPS". NHC can be displayed in several ways, but common way is the logo of North Carolina Tar Heels. The tattoo that has a wheel chair is also common with the Neighborhood CRIPS Set called the Rolling 60's, which often times will be in the form of a handicapped symbol. The use of the wheelchair represents the crippled or "CRIP" aspect of the gang along with the wheels representing the rolling aspect of this subset Rolling 60's. The tattoo of a brick wall and tower are commonly representing that an individual has been to prison or done time within a jail system.

Based on your Affiant's training, knowledge and experience, and the sustained information into the unknown tipsters information, the statements that were made by Andre "Rolling In" and "Clatt Baby" during the robbery, his wearing of all blue clothing in the robbery, and his admission to your Affiant that he committed the armed robbery with the intentions of improving his status with his group of friends, show a connection between him and the Neighborhood CRIPS Rolling 60's. Further, it shows he committed the criminal acts to further his reputation within the criminal street gang.

Rollin
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DISCUSS CASE STUDIES AND STRATEGY



Subject Matter Expert



Officer's Expert Testimony (O.C.G.A. § 24-7-702(b)) DAUBERT

In what capacity?

How long have you been an investigator?

How long have you been in your current assignment?

Is [Unit Title] a specialized gang unit?

What are your duties as a gang Investigator?

What experience, education, training and background qualify you to perform those duties?

What does that training entail?

Can you describe your experience and contact with criminal street gangs?

Can you provide an estimate of how many gangs and gang members you have investigated or interviewed?

Is it part of your job to stay current on gang trends, including rivalries, alliances, customs, and habits?

How do you do this?

Did you ever work the streets, i.e. patrol? Did you talk to gang members in that setting?

Describe a typical casual contact you might have with a gang member.

18. Have you had contacts with that gang and its members?

19. Describe those contacts in general.

20. What is the size of this gang overall?

21. How many members are in "name of gang" in "location"?

22. Does "name of gang" have a turf or territory that it claims?

23. What are those boundaries?

24. Does "name of gang" have a colors, symbols, hand signs, graffiti or other identifiers that signify the gang?

25. Describe those.

26. What, in your expert opinion, are among the primary activities of "name of gang"? What criminal activities?

27. Who are their rivals?

28. Would you say this gang is an "organized" gang? Why/why not?

29. What about their manner of conducting this crime/these crimes is organized?

30. Is there a ranking structure?

31. Are you familiar with "suspect's name" in this case?

32. How are you familiar with "suspect's name"?

33. In your opinion, is "suspect's name" a member or associate of "name of gang"?

34. How do you know? (items found/recovered? Social media?)

35. Have you had personal contact with "suspect's name"?

36. Has "suspect's name" admitted his membership to you? To others?

37. Have you been able to verify "suspect's name" rank?

38. Does "suspect's name" have any tattoos that indicate his affiliation with?

39. Is "suspect's name" still active? How long has he been active?

40. Are there other factors that cause you to come to this conclusion?

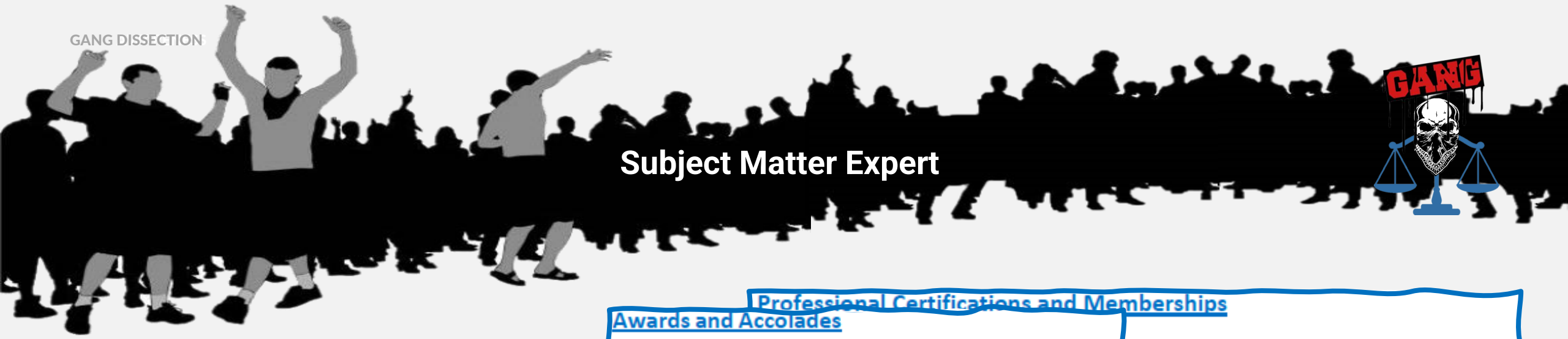
41. Are you familiar with the facts of this case?

42. How?



• **Legal Basis:** O.C.G.A. § 24-7-702 is based on Federal Rule of Evidence 702 and mirrors the Supreme Court's *Daubert* standard.

• **The "Gatekeeper" Role:** Trial judges must determine if an expert is qualified and if their methodology is scientifically valid and reliable.



Subject Matter Expert

Professional Certifications and Memberships

Awards and Accolades

Outstanding Service Award – December 2022

City of South Fulton Police Department

Proclamation – August 2019

City of South Fulton

Gang Investigator of the Year – July 2019

Georgia Gang Investigator's Association

Meritorious Award – December 2017

Cobb County Police Department

Outstanding Citizen – July 2017

State of Georgia

Investigations/ Intake and Classification
 Evidence / Intel Unit / Project Management

Team

Training

Instructed Gang Training- *GGLA Winter Conference 2020, GGLA North Metro Atlanta Gang Update 2020, GGLA DJJ Community Gang Update 2020, PAC Gang Course 2021, GGLA Summer Conference 2021, Georgia DOC STG 2021, PAC Gang Course 2022, Full Force Fulton 2022, Atlanta Police Gang Training 2022, GGLA Summer Conference 2022, Symposium for Faith Leaders 2022, GGLA Basic Gang Investigators Course 2022, Georgia State University College of Law 2022*

200+hrs Related Gang Training Courses-*Basic Gang Investigators Course, Intermediate Gang Investigators Course, Advance Gang Investigators Course, Street Gang Identification and Investigation Certified, Gangs and Organized Crime*

1,000+hrs Related Law Enforcement Courses-*GA POST Intermediate Certified Law Enforcement Officer*

Curriculum Vitae (CV):

1. Appropriate training (recent)?
2. Certifications/Memberships?
3. Testimony history?
4. Awards/Accolades?
5. Assignments?

Gang Expert Testimony

- Cherokee County State v. Corley (*Sex Money Murder*)
- Cherokee County State v. McMahan (*Peoples Nation*)
- Cherokee County State v. Jones (*Nine Trey Gangster*)
- Clayton County State v. Marion (*Nine Trey Gangster*)
- Fulton County State v. Daniels (*Harvard Park Brims*)
- Fulton County State v. Marignay (*Play For Keeps*)
- Fulton County State v. Sims (*Paper Drugs Extortion*)

PRESENTED BY:



Georgia
Public
Defender
COUNCIL

Investigator **Tealer**

Flint Judicial Circuit Public Defender's Office

(404) 730-9456

dtealer@gapublicdefender.gov

