

APPENDIX D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

NO. 15-20652

v.

HON. GEORGE CARAM STEEH

D-1	BILLY ARNOLD, a/k/a "B-Man," "Berenzo," "Killa"	18 U.S.C. § 1962(d); 18 U.S.C. § 1959(a)(1); 18 U.S.C. § 1959(a)(3);
D-2	STEVEN ARTHUR JR., a/k/a "Steve-O"	18 U.S.C. § 1959(a)(5); 18 U.S.C. § 924(c);
D-3	EUGENE FISHER, a/k/a "Fist"	18 U.S.C. § 922(g)(1); 18 U.S.C. § 2
D-4	COREY BAILEY, a/k/a "Sonny," "Cocaine Sonny"	
D-5	QUINCY GRAHAM, a/k/a "Dub," "Q"	
D-6	ROBERT BROWN II a/k/a "R.O."	
D-7	JEROME GOOCH a/k/a "Rome," "Dada"	
D-8	MICHAEL ROGERS a/k/a "Smoke," "Ace"	
D-9	DERRICK KENNEDY a/k/a "Dip"	
D-10	DEVON PATTERSON a/k/a "Duck," "Sosa"	
D-11	CHRISTOPHER OWENS a/k/a "Baby O," "Cee"	
D-12	JEFFERY ADAMS a/k/a "Brick," "Product"	
D-13	ARLANDIS SHY II a/k/a "Grymee," "VIL"	
D-14	ANTHONY LOVEJOY a/k/a "PT"	

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FILED

U.S. DIST. COURT CLERK
EAST. DIST. MICHIGAN
DETROIT

D-15 DIONDRE FITZPATRICK

a/k/a "D-Nice"

D-16 JAMES ROBINSON

a/k/a "Wick"

D-17 DONELL HENDRIX

a/k/a "Jig"

D-18 MATLEAH SCOTT

a/k/a "Thang M"

D-19 KEITHON PORTER

a/k/a "KP"

D-20 JEFFAUN ADAMS

a/k/a "J-Rock"

D-21 MARTEZ HICKS

a/k/a "Rayful"

/

SIXTH SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

18 U.S.C. 1962(d) – *RICO Conspiracy*

D-1 BILLY ARNOLD

D-2 STEVEN ARTHUR JR.

D-3 EUGENE FISHER

D-4 COREY BAILEY

D-5 QUINCY GRAHAM

D-6 ROBERT BROWN

D-7 JEROME GOOCH

D-8 MICHAEL ROGERS

D-9 DERRICK KENNEDY

D-10 DEVON PATTERSON

D-11 CHRISTOPHER OWENS

D-12 JEFFERY ADAMS

D-13 ARLANDIS SHY II

D-14 ANTHONY LOVEJOY

D-15 DIONDRE FITZPATRICK

D-16 JAMES ROBINSON
D-17 DONELL HENDRIX
D-19 KEITHON PORTER
D-20 JEFFAUN ADAMS
D-21 MARTEZ HICKS

The Enterprise

1. The Seven Mile Bloods, commonly referred to as, and hereinafter referred to as, "SMB" is a street gang that operates primarily on the east side of Detroit, Eastern District of Michigan, specifically the area in and around Gratiot Avenue to the west, Kelly Road to the east, Eight Mile to the north, and Seven Mile to the south. SMB members have claimed this area as their territory and refer to it as the "Red Zone." The main streets in the area that the SMB conduct many of their illegal narcotics trafficking are Lappin, Coram, Novara, Liberal, Manning, and Tacoma. This particular area of Detroit's zip code in 48205, which SMB members change into "4-8-2-0-Die" in many of their rap lyrics.

2. The SMB consists of the SMB, older individuals involved in the gang, and Hobsquad, a distinct set affiliated with the SMB. Initially, the Hobsquad was known as SMB Juniors and consisted of younger, school-aged minors from this neighborhood. The SMB Juniors changed their name to Hobsquad in honor of SMB member, Ihab Maslamani, who was convicted of the homicide of Matthew Landry in 2010.

the United States, that is, attempted murder and assault with a dangerous weapon in aid of racketeering, as alleged in Counts Thirteen and Fourteen, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SIXTEEN

18 U.S.C. §§ 1959(a)(1); 2 – *Murder in Aid of Racketeering*

D-1 BILLY ARNOLD
D-13 ARLANDIS SHY
D-18 MATLEAH SCOTT
D-19 KEITHON PORTER

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

2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, ARLANDIS SHY, KEITHON PORTER, and MATLEAH SCOTT, aided and abetted by each other, did, for the purpose of maintaining and increasing position in the SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully murder D.R.-1; in violation of Michigan Compiled Laws, Sections 750.316(1) and 767.39.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT SEVENTEEN

18 U.S.C. §§ 924(c); 924(j); 2 – *Use of Firearm in Furtherance of a Crime of Violence Causing Death*

D-1 BILLY ARNOLD
D-13 ARLANDIS SHY
D-18 MATLEAH SCOTT
D-19 KEITHON PORTER

1. Paragraphs One – Two of Count Two are re-alleged herein as if fully incorporated in this Count.
2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, ARLANDIS SHY, KEITHON PORTER, and MATLEAH SCOTT, aided and abetted by each other, did knowingly, intentionally, and unlawfully carry and use a firearm, and caused the death of a person, to wit: the murder of D.R.-1, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, murder in aid of racketeering; in violation of Title 18, United States Code, Sections 924(c); 924(j); and 2.

COUNT EIGHTEEN

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

D-1 BILLY ARNOLD
D-13 ARLANDIS SHY
D-18 MATLEAH SCOTT
D-19 KEITHON PORTER

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

2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, ARLANDIS SHY, KEITHON PORTER, and MATLEAH SCOTT, aided and abetted by each other, did, for the purpose of maintaining and increasing position in the SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully attempt to murder M.W.; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

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

2.

COUNT NINETEEN

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

D-1 BILLY ARNOLD
D-13 ARLANDIS SHY
D-18 MATLEAH SCOTT
D-19 KEITHON PORTER

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

2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, ARLANDIS SHY, KEITHON PORTER, and MATLEAH SCOTT, aided and abetted by each other, did, for the

purpose of maintaining and increasing position in the SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully attempt to murder D.R.-2; in violation of Michigan Compiled Laws, Sections 750.83 and 750.39.

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

2.

COUNT TWENTY

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

D-1 BILLY ARNOLD
D-13 ARLANDIS SHY
D-18 MATLEAH SCOTT
D-19 KEITHON PORTER

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

2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, ARLANDIS SHY, KEITON PORTHER, and MATLEAH SCOTT, aided and abetted by each other, did, for the purpose of maintaining and increasing position in the SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully attempt to murder J.R.; in violation of Michigan Compiled Laws, Sections 750.83 and 767.39.

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

2.

COUNT TWENTY-ONE

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

D-1 BILLY ARNOLD
D-13 ARLANDIS SHY
D-18 MATLEAH SCOTT
D-19 KEITHON PORTER

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

2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, ARLANDIS SHY, KEITHON PORTER, and MATLEAH SCOTT, aided and abetted by each other, did, for the purpose of maintaining and increasing position in the SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully assault M.W. with a dangerous weapon; in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

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

COUNT TWENTY-TWO

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

D-1 BILLY ARNOLD
D-13 ARLANDIS SHY
D-18 MATLEAH SCOTT

D-19 KEITHON PORTER

1. Paragraphs One – Two of Count Two are re-alleged herein as if fully incorporated in this Count.
2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, ARLANDIS SHY, KEITHON PORTER, and MATLEAH SCOTT, aided and abetted by each other, did, for the purpose of maintaining and increasing position in the SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully assault D.R.-2 with a dangerous weapon; in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

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

2.

COUNT TWENTY-THREE

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

D-1 BILLY ARNOLD
D-13 ARLANDIS SHY
D-18 MATLEAH SCOTT
D-19 KEITHON PORTER

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

2. On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, ARLANDIS SHY, KEITHON PORTER, and MATLEAH SCOTT, aided and abetted by each other, did, for the purpose of maintaining and increasing position in the SMB, an enterprise engaged in racketeering activity, knowingly and unlawfully assault J.R. with a dangerous weapon; in violation of Michigan Compiled Laws, Sections 750.82 and 767.39.

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

COUNT TWENTY-FOUR

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

D-1 BILLY ARNOLD
D-13 ARLANDIS SHY
D-18 MATLEAH SCOTT
D-19 KEITHON PORTER

On or about May 8, 2015, in the Eastern District of Michigan, Southern Division, and elsewhere, BILLY ARNOLD, ARLANDIS SHY, KEITON PORTER, and MATLEAH SCOTT, aided and abetted by each other, did knowingly, intentionally, and unlawfully carry and use a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted murder and assault with a dangerous

did knowingly, intentionally, and unlawfully carry and use a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted murder and assault with a dangerous weapon in aid of racketeering, as alleged in Counts Twenty-Eight – Thirty, and said firearm was discharged, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT THIRTY-TWO

18 U.S.C. §§ 924(c); 2 – Possession of a Firearm in Furtherance of a Crime of Violence

D-1 BILLY ARNOLD
D-2 STEVEN ARTHUR JR.
D-3 EUGENE FISHER
D-4 COREY BAILEY
D-5 QUINCY GRAHAM
D-6 ROBERT BROWN
D-7 JEROME GOOCH
D-8 MICHAEL ROGERS
D-9 DERRICK KENNEDY
D-10 DEVON PATTERSON
D-11 CHRISTOPHER OWENS
D-12 JEFFERY ADAMS
D-13 ARLANDIS SHY II
D-14 ANTHONY LOVEJOY
D-15 DIONDRE FITZPATRICK
D-16 JAMES ROBINSON
D-17 DONELL HENDRIX
D-19 KEITHON PORTER
D-20 JEFFAUN ADAMS
D-21 MARTEZ HICKS

From in or about 2003, exact date being approximate, and continuing to on or about the date of this Indictment, in the Eastern District of Michigan, Southern Division, BILLY ARNOLD, STEVEN ARTHUR JR., EUGENE FISHER, COREY BAILEY, QUINCY GRAHAM, ROBERT BROWN, JEROME GOOCH, MICHAEL ROGERS, DERRICK KENNEDY, DEVON PATTERSON, CHRISTOPHER OWENS, JEFFERY ADAMS, ARLANDIS SHY II, ANTHONY LOVEJOY, DIONDRE FITZPATRICK, JAMES ROBINSON, DONELL HENDRIX, KEITHON PORTER, JEFFAUN ADAMS, and MARTEZ HICKS did aid and abet each other and others known and unknown to the Grand Jury, and did knowingly, intentionally, and unlawfully possessed firearms in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, racketeering conspiracy as alleged in Count One; in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT THIRTY-THREE

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

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

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

resulted in the death of C.M. (18 U.S.C. § 3591(a)(2)(B));

(d) intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and C.M. died as a direct result of these acts (18 U.S.C. § 3591 (a)(2)(C));

(e) intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that the participation in the act constituted a reckless disregard for human life and C.M. died as a direct result of the act (18 U.S.C. § 3591 (a)(2)(D)); and

(f) in committing the offenses in Counts 2 and 3, intentionally killed and attempted to kill more than one person in a single criminal episode (18 U.S.C. § 3592(c)(16)).

5. As to Counts 16 and 17, the defendant ARLANDIS SHY:

(a) was 18 years of age or older at the time of the offenses alleged in Counts 16 and 17;

- (b) intentionally killed D.R.-1 (18 U.S.C. § 3591(a)(2)(A));
- (c) intentionally inflicted serious bodily injury that resulted in the death of D.R.-1 (18 U.S.C. § 3591(a)(2)(B));
- (d) intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and D.R.-1 died as a direct result of these acts (18 U.S.C. § 3591 (a)(2)(C));
- (e) intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that the participation in the act constituted a reckless disregard for human life and D.R.-1 died as a direct result of the act (18 U.S.C. § 3591 (a)(2)(D));
- (f) committed the offenses alleged in Counts 16 and 17 after substantial planning and premeditation to cause the death of a person (18 U.S.C. § 3592(c)(9));
- (g) in committing the offenses in Counts 16 and 17,