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### MEMORANDUM

TO: JODY PICKENS  
FROM: BRADLEY CHAMPINE  
RE: GANG PROSECUTOR CONTINUATION 2021  
DATE: 2/2/2021

#### Overview:

The purpose of this memo is to provide you with a quick overview of three topics:

- (1) the **gang prosecutor position's total stats** to date (which encompass 2014 thru 2020),
- (2) the **gang prosecutor case highlights**, and
- (3) grant historical **budgetary information**.

This memo was written internally for the purpose of preparing a future proposal to preserve this position in our office. I have divided the memo in to three sections, as outlined above. Attached to the memo are all the documents I relied on in writing the memo.

The documents supplied to me by Lt. Jones were voluminous (as anything this long-running and involving this much paperwork would be) so I wanted to present the relevant information in a way that you don't have to waste your time pouring over documents to find what you need.

We think the information in this memo will establish the importance and necessity of the gang prosecutor position in the 26<sup>th</sup> District, both now and in the future.

**Part One | Case Stats:**

The original GRIT grant appears to have begun sometime back in 2013, but statistical reports for the gang prosecutor begin July of 2014<sup>1</sup>. The format for reporting stats was alluded to in the continuation proposal,<sup>2</sup> and has changed slightly over the years, becoming more precise and uniform in its reporting metrics. However, the proposal, along with available quarterly reports<sup>3</sup> from 2014-2016 did indicate the stats over that period, including numbers of new prosecutions and convictions.<sup>4</sup>

| 2014   | Quarter 1 | Quarter 2 | Quarter 3 | Quarter 4 | Total |
|--|-----------|-----------|-----------|-----------|-------|
| “Number of prosecutions and their dispositions”  | N/A       | N/A       | 56        | 59        | 115   |
| Convictions  | N/A       | N/A       | 10        | 7         | 17    |
| “Number of ‘crooks with guns’ enhanced prosecutions” <sup>5</sup>  | N/A       | N/A       | N/A       | 6         | 6     |
| “Number of cases enhanced by their ‘gang nexus’”   | N/A       | N/A       | N/A       | 2         | 2     |
| “Number of supervised conditional release and probation violations on cases / individuals with a gang nexus” | N/A       | N/A       | 11        | 10        | 21    |

| 2015   | Quarter 1 | Quarter 2 | Quarter 3 | Quarter 4 | Total |
|--|-----------|-----------|-----------|-----------|-------|
| “Number of prosecutions and their dispositions”  | 68        | 72        | 32        | 27        | 199   |
| Convictions  | 11        | 29        | 19        | 24        | 83    |
| “Number of ‘crooks with guns’ enhanced prosecutions”   | 9         | 9         | 3         | 1         | 22    |
| “Number of cases enhanced by their ‘gang nexus’” <sup>6</sup>  | 12        | 13        | 5         | 13        | 43    |
| “Number of supervised conditional release and probation violations on cases / individuals with a gang nexus” | 15        | 4         | 8         | 8         | 35    |

<sup>1</sup> It looks like initially the grant did not cover a prosecutor and was used mostly for training and equipment.

<sup>2</sup> See Attachment 1: **GRIT CONTINUATION PROPOSAL**.

<sup>3</sup> See Attachment 2: **GRIT Prosecutor Reports**

<sup>4</sup> The proposal and early reports did not always clearly distinguish between new prosecutions and convictions.

<sup>5</sup> Until January of 2018, the quarterly reports used inconsistent metrics for measuring prosecution of Crooks with Guns cases. Some reports listed convictions only, or a number with no explanation, or even separate numbers for new prosecutions, pending prosecutions, indictments and convictions. For 2014-2017, the numbers listed in this row reflect the total number reported in the quarterly report. After that they represent new prosecutions.

<sup>6</sup> Note that the first few years of stats from the gang prosecutor came before Tennessee’s original gang enhancement statute was struck down as unconstitutional in 2016. It then became much more difficult to prosecute someone under the statute. 2016 was the last set of quarterly reports to specify gang enhancement cases.

| <b>2016</b>  | Quarter 1 | Quarter 2 | Quarter 3 | Quarter 4 | Total |
|--|-----------|-----------|-----------|-----------|-------|
| “Number of prosecutions and their dispositions”  | 26        | 26        | 24        | 30        | 106   |
| Convictions  | 15        | 27        | 24        | 15        | 81    |
| “Number of ‘crooks with guns’ enhanced prosecutions”   | 2         | 2         | 3         | 3         | 10    |
| “Number of cases enhanced by their ‘gang nexus’”   | 1         | N/A       | 0         | 6         | 7     |
| “Number of supervised conditional release and probation violations on cases / individuals with a gang nexus” | 7         | 7         | 4         | 6         | 24    |

This represents all the data I was able to find on 2014 – 2016 gang prosecutor stats.<sup>7</sup> The total number of prosecutions recorded over this span was approximately **420**, or an average of **14** per month (using the months where data was provided). The total number of recorded convictions was **181**, or an average of **6.033** per month.

In 2017 the renewed grant continued providing specific data in quarterly reports.<sup>8</sup> These reports begin with January of 2017 and continue to the present with more consistent metrics.

| <b>2017</b>                                | Quarter 1 | Quarter 2 | Quarter 3 | Quarter 4 | Total |
|--|-----------|-----------|-----------|-----------|-------|
| New Prosecutions                           | 26        | 23        | 43        | 20        | 112   |
| Convictions                                | 16        | 20        | 37        | 13        | 86    |
| Dismissals                                 | 2         | 2         | 2         | 1         | 7     |
| New Crooks w/Guns Enhancement Cases        | 6         | 8         | 1         | N/A       | 15    |
| Supervised Release / Probation Revocations | 5         | 3         | 6         | 4         | 18    |

| <b>2018</b>                                | Quarter 1 | Quarter 2 | Quarter 3 | Quarter 4 | Total |
|--|-----------|-----------|-----------|-----------|-------|
| New Prosecutions                           | 58        | 59        | 59        | 55        | 172   |
| Convictions                                | 24        | 31        | 42        | 33        | 130   |
| Dismissals                                 | 2         | 2         | 3         | 8         | 15    |
| New Crooks w/Guns Enhancement Cases        | 15        | 10        | 4         | 13        | 42    |
| Supervised Release / Probation Revocations | 4         | 4         | 8         | 7         | 23    |

| <b>2019</b>                                | Quarter 1 | Quarter 2 | Quarter 3 | Quarter 4 | Total |
|--|-----------|-----------|-----------|-----------|-------|
| New Prosecutions                           | 61        | 48        | 55        | 33        | 197   |
| Convictions                                | 50        | 31        | 53        | 27        | 161   |
| Dismissals                                 | 4         | 3         | 6         | 1         | 14    |
| New Crooks w/Guns Enhancement Cases        | 6         | 5         | 10        | 7         | 28    |
| Supervised Release / Probation Revocations | 7         | 8         | 5         | 10        | 30    |

<sup>7</sup> See Attachment 4: **Misc. Reporting Notes**. A yearly report was prepared for 2014-2015. This was mostly a progress report but did touch on the efficacy of the gang prosecutor.

<sup>8</sup> See Attachment 3: **GRIT Highlight Reports**.

| <b>2020</b>                                | Quarter 1 | Quarter 2 | Quarter 3 | Quarter 4 | Total |
|--|-----------|-----------|-----------|-----------|-------|
| New Prosecutions <sup>9</sup>              | 50        | 26        | 20        | 27        | 123   |
| Convictions                                | 35        | 13        | 21        | 23        | 92    |
| Dismissals                                 | 1         | 1         | 3         | 2         | 7     |
| New Crooks w/Guns Enhancement Cases        | 11        | 4         | 6         | 10        | 31    |
| Supervised Release / Probation Revocations | 4         | 3         | 1         | 3         | 11    |

Over the course of 2017 – 2020 where method of stat reporting became more uniform, the gang prosecutor commenced approximately **604** new prosecutions, or **12.583** per month.<sup>10</sup> Over that time span **469** convictions were recorded, or **9.770** per month. In total where stats are available from the second quarter of 2014 – end of 2020 the gang prosecutor accounted for **1,024** prosecutions (**13.128** average per month) and **650** (**8.333** average per month) convictions.

**ADDENDUM (UPDATED 6/17/2021)**

| <b>2021</b>                                | Quarter 1 | Quarter 2 <sup>11</sup> | Quarter 3 | Quarter 4 | Total |
|--|-----------|-------------------------|-----------|-----------|-------|
| New Prosecutions                           | 20        | 7                       | N/A       | N/A       | 27    |
| Convictions                                | 18        | 21                      | N/A       | N/A       | 39    |
| Dismissals                                 | 2         | 3                       | N/A       | N/A       | 5     |
| New Crooks w/Guns Enhancement Cases        | 11        | 0                       | N/A       | N/A       | 11    |
| Supervised Release / Probation Revocations | 1         | 1                       | N/A       | N/A       | 2     |

This Addendum brings total prosecutions up to 1,061 and convictions up to 689 over the lifetime of the grant where stats are available.

From a sheer numbers perspective these stats are important because gang prosecutor cases are handled vertically, are more likely to go to trial, often involve difficult fact patterns (uncooperative or unreliable witnesses) and uphill burdens of proof (especially on crooks with guns cases dealing in narcotics or the new gang enhancement requirements).

At present, the gang prosecutor maintains a current workload of over **80 active cases**. **12** of those cases are pending Murder or Attempted Murder cases, with several others being violent crimes such as Aggravated Robbery, and many cases involve felony weapon or drug charges. All of these would have to be reassigned to other already burdened prosecutors if the gang prosecutor position were eliminated.

<sup>9</sup> New prosecutions and convictions, especially, went down in 2020 due to the COVID-19 pandemic and inability of the gang prosecutor to conduct jury trials for most of the year. From the numbers, you can see there was a *pronounced* increase, year-to-year from 2017 through 2019 of new cases prosecuted by the gang prosecutor.

<sup>10</sup> From partway through 2017 to the present, the gang prosecutor has also maintained an Excel spreadsheet recording all prosecutions and outcomes individually. I would print it and attach it to this memo, but printing it out in any kind of readable format is not really doable.

<sup>11</sup> Quarter 2 has not ended at the time of this Addendum.

## Part Two | Highlight Overview:<sup>12</sup>

In September of 2015, the gang prosecutor (in cooperation with Jackson Police Department and Jackson Metro Narcotics Unit) used the gang enhancement statute to leverage several significant plea agreements, as well as trying two cases using the enhancement. The Madison County gang prosecutor was the *first* in Tennessee to utilize the statute at trial. A member of the Black P Stone Nation street gang was tried and convicted for First Degree Murder, then convicted during the bifurcated trial of criminal gang offenses. Later that same month the gang prosecutor tried, and convicted, a member of the Gangster Disciples for felony drug and criminal gang offenses.

In October – December of 2015, the gang prosecutor continued using the old enhancement statute to great effect, securing a 22-year sentence on a convicted felon and known Vice Lord who illegally possessed a firearm. In March of 2016, the gang prosecutor used the statute again to enhance a known Gangster Disciple's sentence from 6-10 years to 12-20 for another weapon case.

Unfortunately, in April of 2016 the Tennessee Court of Appeals struck down the gang enhancement statute as unconstitutional. We were seeing a deterrent effect from the statute and had about 20 known gang members under indictment at the time the statute was struck down. Overnight two cases set for trial had to be cancelled and the entire strategy of gang prosecution had to be redrawn.

By summer of 2016, the gang prosecutor switched from primarily using the gang enhancement statute as an offensive strategy to focusing time and resources on identifying known gang members and targeting them for zealous prosecution under state or federal law. With the gang statute gone, the gang prosecutor relied on knowledge of gang members, associates, rivalries and activities to work together with local police in identifying – and going after – the people responsible for violence in the 26<sup>th</sup> district. In May, 8 Gangster Disciples in Jackson TN, along with 40 across the nation, were indicted in federal court. Local police as well as the gang prosecutor participated in the preparation for this endeavor; the gang prosecutor had previously filed charges against 7 of the defendants in state court. The state prosecutions contributed to the federal investigation and indictment, a practice that would continue as the gang prosecutor began meeting regularly with the US attorney's office to coordinate and share information as well as collaborate on charging decisions so that both offices could seek the highest penalties for identified members of violent gangs.

Also during this period the gang prosecutor tried – and convicted – Corbyn Davis (Vice Lord) for First Degree Murder. Though the enhancement statute was gone, the gang prosecutor could still seek harsh penalties for crimes involving violence and the use of firearms. The victim in that case was a documented Gangster Disciple; dealing with victims who themselves had gang ties would become an important part of effective gang prosecution that other prosecutors who do not specialize in gang-related time do not have as much time to dedicate learning.

During third quarter of 2016 the gang prosecutor convicted Autonius Merriweather in a 2013 cold-case homicide. Merriweather was a documented Crip involved in several shootings with Vice Lords in the Jackson area through 2013. The gang prosecutor was able to file charges against Merriweather

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<sup>12</sup> The following highlights are gathered from Attachments 2 and 3. Where I could locate them quickly, I also printed off the judgments for the mentioned cases. See Attachment 5: **Case Judgments**.

because the firearm he had been using in gang shootings was forensically matched to the murder from 2013. JPD developments like the NIBN program and later, the shotspotter alert system, would become important tools for gang-related cases.

In fourth quarter of 2016 the gang prosecutor tried and convicted a documented Vice Lord who was on parole for violent offenses. He was charged with Aggravated Assault, possessing a firearm after being a convicted felon, and felony drug charges. The case started because the defendant displayed a weapon to members of the Jackson Police Department Gang Unit – a unit the gang prosecutor worked very closely with gathering information. Though it did not rise to the level required by the new gang enhancement statute, evidence of the defendant's motive was admissible at trial because he mistook the gang unit for a rival gang in displaying his weapon.

In the spring of 2017 the gang prosecutor successfully tried and convicted Roddalous Bond (AKA "Hot Rod") for conspiracy to Commit First Degree Murder in a plot to kill two state witnesses from a double homicide. Along with fellow gang member Johnny Wade, Bond was caught through evidence including jail calls and cell tower records – which would become common types of evidence used in future trials by the gang prosecutor.

During the fall of 2017, the gang prosecutor would go on to try and convict Trimon Pruitt (AKA "T-Petty") of the Second Degree Murder of Tony Willoughby. All of the co-conspirators and even the victim were members of the Vice Lord street gang. In a fact pattern that would become increasingly common among Jackson area Vice Lords, Willoughby was killed during a power struggle between competing fellow gang members. Also during this time, Kendrick Johnson (a violent Gangster Disciple) was convicted across 8 separate cases for multiple felony and misdemeanor offenses despite (increasingly common) noncooperation from the victim.

Winter of 2017 saw several important convictions – Brandon Cole-Pugh (a Gangster Disciple and career offender) for felony theft which would run consecutive to another sentence Cole-Pugh was serving (that the gang prosecutor had also secured). Dennis Jones and Untario Kidd were also convicted in October of that year, with Kidd being sentenced to 14 years as a Multiple Offender for Aggravated Assault. December of 2017 marked the end of Aaron Chaplin's service as the gang prosecutor for Madison County.

When I took over this position from General Chaplin in December of 2017, I had never tried a case in front of a jury before. Aaron did several things to help me get started, though. Most importantly, he established a rapport and culture of trust between the gang prosecutor position and Jackson Police Department. He was well-respected and it was understood that if the gang prosecutor took a case, the case would be handled properly and that the defendant would be dealt with seriously. This expectation motivated officers and investigators to provide information on cases about defendants and to assist the gang prosecutor in securing things like jail calls, uncooperative witnesses, and other things necessary to win these tough cases.

In spring of 2018, we started to see a trend of the Gangster Disciples decreasing in influence and violence in Jackson – a result of the massive cooperative undertaking between state and federal government during 2016. We switched focus to the remaining large gangs in Jackson – The Vice Lords (specifically Ghost Mob) and the Crips (with several notable sets including the Hoovers, 111's, rolling

40's and others), as well as a smaller hybrid gang that had cropped up called "Squad." Tevin Cole and Bryndarious Futrell, both Squad members, were convicted during this time for Aggravated Burglary and sentenced to 6 years consecutive to other federal and city cases. Braxton Watkins, who would die later in a gang shootout, was also implicated with Futrell and Cole. Greg Bond, one of the most active members, had his release revoked and he was sent back to TDOC.

Moving to summer of 2018, the gang prosecutor along with another prosecutor in this office tried and convicted Montreal Robinson of Felony Murder in a week-long jury trial. Robinson owed money to Greg Bond as well as another highly active gang member, Julian Wilson (aka "JUKE"), and along with a co-defendant, Corinthian Person, who testified against him at trial, took Lewis Jones out to a field and murdered him for a sports car, which he drove to another state to sell. The investigation was led by the TBI and evidence included out-of-state surveillance video from gas stations where Robinson was spotted driving the car after the murder as well as TBI tire track and shoeprint molds used to identify the vehicles and shoes from the field where the murder took place.

Also during summer of 2018, Marcus Sturghill III (AKA "FOO") was tried and convicted in the first of 9+ pending indictments on two counts of Aggravated Robbery. Marcus and his brother, Marlando (AKA "EL VANDEZ") were both tied to the Squad gang and involved in several armed robberies. Daniel Perkins, a known Crip, was convicted of felony drug and weapon offenses and sentenced to 11 years consecutive to another sentence he received earlier that year.

In third quarter of 2018, James Anthony McCurry (AKA "ANT BANKS"), a career violent criminal and gang member, went to trial on the first of numerous pending indictments for Aggravated Kidnapping. He was convicted and sentenced to 21 years (later he would plead on his remaining cases to an additional, consecutive sentence). Jared Ellison also went to trial during this time and was convicted of being a felon in possession of a firearm, for which he was sentenced to TDOC for four years. Michael Thomas (AKA "White Mike," a 107 Hoover Crip) was convicted on the crooks with guns statute and sentenced to five years in prison. Dionne Horton (AKA "Drako") was convicted on multiple heroin cases and sentenced to 12 years. And Zion Ross along with James Hudson, both young violent Crips, were convicted of Voluntary Manslaughter, with Ross also being convicted of Reckless Homicide in a separate killing.

Winter of 2018 saw several more trials and convictions for violent gang members. The gang prosecutor took Markist Kantrell Cole to trial and convicted him of Attempted Second Degree Murder and the crooks with guns enhancement. Cole was a Vice Lord and was sentenced to 16 years for walking into a convenience store in a high crime area and shooting the clerk for refusing to sell him cigarettes (he didn't have identification so the clerk wouldn't give him the cigarettes). 107 Hoover Crip Michael Wayne Robinson also went to trial on multiple counts of Aggravated Assault for shooting up a house on Dupree Street, another especially high crime area in Jackson. All of the witnesses to the shooting were uncooperative and had to be forced to testify. Robinson tried his best to intimidate them – even at trial – and had to be warned by the judge to stop. Ultimately he was convicted and sentenced to 18 years in TDOC. Vice Lord Marcus Burgess was also convicted of being a violent felon in possession of a firearm and sentenced to 12 years in TDOC – and that sentence ran consecutive to a violation of probation he was serving stemming from a Gang Unit arrest earlier in 2018.

In spring of 2019, Vice Lords Clinton Berry and Demarcus Hardin were both sent to TDOC – Berry on drugs and the crooks with guns enhancement and Hardin for the shooting of Antrez Atkins. They received sentences of 11 and 10 years. Also that spring, Marcus Sturghill’s brother, Marlando, as well as fellow Squad member Xavier Martin were convicted at trial, also for Aggravated Robbery. That case involved painstaking investigation by JPD Investigator Darrell Listenbee because the defendants wore masks during the robbery. We had to trace their distinctive car across town using JPD pole cameras and gas station footage to an earlier stop where Marlando got out not wearing a mask. That together with cell tower evidence helped secure a conviction. At sentencing, the gang prosecutor worked together with Michael Byrd of the Gang Unit, who was qualified as an expert on the Squad gang to identify both co-defendants as members.

In Summer of 2019 Jamarian Jordan (Vice Lord) was tried, convicted, and sentenced to 10 years for Aggravated Robbery, another sentence which would run consecutive to a felony he was already in prison for. Investigator Ron Pugh and (now retired) Sgt. Mike Thomas were able to get a confession from Jordan which was crucial to the case. Marcus Graves, a 107 Hoover Crip, also went trial and was convicted for possession of a firearm by a felon and sentenced to 10 years in prison. That conviction was thanks to the efforts of the Gang Unit investigators Ashley Robertson and Michael Byrd, who were able to obtain a written statement from Graves regarding the gun and who were able to track down Destinee Cole, his girlfriend at the time and a key (uncooperative) witness for the state. Tavaris Coicou, a Blood, was also convicted for weapons and drug offenses thanks to the Gang Unit during this time. He was set for trial but pled the morning of thanks to jail calls the Gang Unit was able to find. In another Gang Unit case led by Investigator Robertson, Aaron Barnett, a violent and dangerous Gangster Disciple, was convicted for weapons offenses and sentenced to 12 years thanks to Robertson using social media to catch Barnett bragging about and brandishing illegal weapons on Facebook.

Fall of 2019 saw several more convictions for violent gang offenders. Timothy Thornton and Timothy Long both pled and agreed to testify against Erskine Curry (a Vice Lord) on a series of Aggravated Robberies. Curry had a pattern of recruiting young easily influenced men to help him commit numerous robberies and would later be forced to plead guilty himself thanks to their cooperation. Madaryl Hampton, documented Gangster Disciple, also went to trial on felony weapon and drug charges during this time. He was convicted and at sentencing was noted to have numerous prior felony convictions as well as over 40 misdemeanor convictions. He received a total 21 year sentence to serve in TDOC for being caught with a firearm in the Parkway East apartments, another high crime area in Jackson. Cortavius Warren (AKA “Capo Gold” and self-admitted Vice Lord) was forced to plead guilty in a string of robberies where he targeted illegal Mexican immigrants because they could not speak English and were afraid to speak with police. He received a total sentence of 14 years (a sentence outside his normal range) thanks to a brilliant confession obtained by Investigator Robert Groves with JPD Major Crimes. And Memphis Blood Deterrio Harrison also went to trial on – and was convicted for – Aggravated Robbery. Harrison followed a woman out of a convenience store near the Lincoln Court apartments (one of the highest gang, drug and crime areas in Jackson) and pointed a gun at her, telling her he would kill her four year old son right in front of her if she didn’t hand over her money (the child was present and scared for he and his mother’s life).

To end 2019, we were able to secure a plea against Shuntoris “Finesse” Cole. Cole was either a Vice Lord or Gangster Disciple. He killed Tevin Murrell, a fellow gang member, who was a cooperating



informant with the TBI at the time he was killed. Through gathering intelligence with the Gang Unit, it appeared Murrell was killed after it was discovered he was a “snitch.” The case was closely tied to the notorious killing of TBI Special Agent De’Greaun Frazier. Cole was ultimately convicted based on a dying declaration of his victim which was caught on body camera by patrol officers and Sergeant Nick Donald of the JPD Major Crimes unit.

Also near year’s end, Michael Robinson was again convicted – this time for Retaliation against Investigator Robertson of the Gang Unit. We nearly tried the newly re-passed gang enhancement statute in this case because Robinson, who believed Robertson was involved in his conviction from earlier in 2018, threatened to kill Robertson and his whole family after raping his wife, telling him he could bet on the Crips following through with his threat. Robinson received another TDOC sentence consecutive to the one he was already serving thanks to his threats. Marcus Strughill was convicted again during this quarter, this time for Aggravated Burglary. He pled blind the morning of trial and received 4.5 years consecutive to the sentence he was already serving. In a Gang Unit case led by Investigators Savage, Robertson, Newbill, Byrd and Schrotberger, Eric Love was convicted for weapons and drugs found during a search warrant execution. He was sentenced under the crooks with guns enhancement and received 12 years to serve after failing to appear for trial. Lastly, Gregory Goff, an extremely violent and dangerous Gangster Disciple was tried and convicted for Especially Aggravated Robbery in a case where he hit a homeless man in the back of a head with a hatchet over five dollars and a bus pass. Investigator Williams with JPD Major Crimes led the investigation and Goff was ultimately sentenced to 35 years to serve at 100%.

Spring of 2020 would be the last time we could reliably try cases for the foreseeable future, and we were productive with the time. Marshawn Burrus, a career criminal and gang member, pled guilty to weapons and drug charges with the crooks with guns enhancement and received 20 years to serve in TDOC. The judge ordered the sentence consecutive to a 15 year one he received in federal court. Hoover Crip Braxton Taylor was tried and convicted by the gang prosecutor for Second Degree Murder and received 25 years. He was on probation for Aggravated Burglary when he followed a man into an alleyway and shot him multiple times in the back. Captain Shepherd happened to be in the area and had the presence of mind to ask the victim who shot him before he died – the dying declaration was crucial at trial. Jaquarius Carpenter (AKA “China Man”) was tried and convicted in a search warrant case led by Investigator Ifantis of the Metro Narcotics Unit (Now MCSO). Carpenter was a career drug dealer who used poor drug addicts to help distance himself from his drug operations. But the gang prosecutor established Ifantis as an expert witness in narcotics trafficking (a practice the gang prosecutor established over the past few years, ultimately identifying most of the various members of the metro narcotics unit as expert witnesses at one time or another during trial) and Carpenter was ultimately sentenced to 18 years to serve in TDOC. At the time he committed these offenses, Carpenter was on parole for selling cocaine.

Finally, and most notably in early 2020, the State finally tested its first use of the new Gang Enhancement Statute, again being the first district to wield the statute at trial. In January of 2019, the leader of the Ghost Mob Vice Lords, Ronald Terry (AKA “Big Pokey”) was shot and killed in Memphis. Just as in the Pruitt case from 2017, the vacuum of power created a quick succession of violence. Darren Harris, a Vice Lord, was approached by two other Vice Lords: Jacobe Snipes and Jamaine Tipler. He was told “If you’re not Ghost, you gotta get it” – a threat related to how Harris, a high ranking member of Ghost Mob, had been recently associating with the Traveling Vice Lords (a different set). Tipler and Snipes followed Harris around the city, and Snipes went with Harris to his apartment where he shot

Harris in the back of the head. Snipes was indicted for Attempted First Degree Murder and under the crooks with guns and gang enhancement statutes. In a bifurcated trial, he was convicted of all counts. The Gang and Major Crimes units were crucial in connecting the gang evidence and getting Harris' cooperation at trial. Tipler, the new leader of the Ghost Mob, lacked sufficient evidence for indictment. He was a suspect in several other similar shootings where young men like Snipes had been ordered to kill other gang members.

After these trials, early 2020 saw the beginning of a steep drop-off in productivity – not because crime was down, but because COVID-19 caused the closure of the courts. Rakeem Coleman was convicted for Retaliation for Past Action in another case where the Vice Lord threatened to kill a police officer. Ghost Mob Vice Lord Gerald Crossley was indicted in February for First Degree Murder in another Ghost Mob shooting we believe was ordered directly by Jamaine Tipler, but that case cannot be tried until at least April of 2021 at this point. Fortunately, the gang prosecutor was able to get Crossley held until trial. Crossley had received a bond of only 200,000 dollars despite being charged with First Degree Murder, and the Gang Unit supplied the gang prosecutor with information that Jamaine Tipler was planning to bail Crossley out of jail. The gang prosecutor pioneered this district's first use of the Source Hearing statute and was able to block Tipler from bailing Crossley out of jail. Tipler had paid for two different attorneys to represent Jacobe Snipes at trial.

Summer of 2020 Kevin White and Cedarius Cole were both convicted for being felons in possession of a firearm and sentenced to lengthy prison stays in TDOC. And during a pause from the court closures, we were able to try and convicted Crip member Quincy Lamont Collins for Attempted First Degree Murder and with the crooks with guns enhancement. Collins walked into his ex-girlfriend's bedroom and shot her twice at point blank range, one of which hit her in the face and destroyed her jaw. Thanks to incredible persistence by Sergeant Donald of the Major Crimes Unit, Collins ultimately gave in and gave a crucial confession for the shooting. He was sentenced to 31 years to serve in TDOC, most of which would be at 85-100%. We were also able to try and convict Corey Allen Harris (Vice Lord) near the end of the summer for Attempted Second Degree Murder with the crooks with guns enhancement for the shooting of a fellow Vice Lord. He was later sentenced to 18 years to serve in TDOC. Reginald Williamson and Montez Butler (AKA "JUICE") were both convicted on weapons and drug related offenses and sentenced to TDOC for lengthy stays during this time.

Also in the summer of 2020, Jamaine Tipler was finally locked up in yet another Ghost Mob shooting on Martin Street. Tipler, along with two other young members of Ghost Mob, shot up a vehicle occupied by Evita Sanders and Joe Bates. Neither witness would cooperate, and the investigation, led by Lt. Chestnut of the Jackson Police Department Major Crimes Unit, would be an uphill battle. But Tipler and his co-defendants were tracked from where they ditched the SUV they used in the shooting to where they would ultimately be captured through the use of JPD's canine unit, led by Ron Dewald and K-9 "Echo." Tipler paid for three expensive attorneys to represent him and his co-defendants during the preliminary hearing, and we also believe paid a Memphis attorney to file a motion on Evita Sanders' behalf, seeking to quash a warrant for her failure to appear under subpoena – all in an effort to get the case dismissed at the lower level. But after a three-hour preliminary hearing, the case was bound up to the Grand Jury and all co-defendants, including Tipler, would remain in custody.

The last case we were able to try in 2020 was Keyshawn Fouse (AKA "Shoota"). Fouse went to Lane College campus and led Mario Wilson out to an alleyway where he tried to execute him. He shot Wilson twice in the chest over a robbery he accused Wilson of being part to, then as Wilson laid out on the ground put the barrel to his head. Wilson lived only because the gun jammed, and Fouse wound up being convicted through jail call and cell phone evidence secured by JPD Major Crimes Sergeant Adam Pinion where he was caught bragging about shooting the victim and giving instructions to friends on where to hide the gun he used. He was ultimately sentenced to 26 years in TDOC.

#### **ADDENDUM (UPDATED 6/17/2021)**

The beginning of 2021 was plagued with further court shut-downs, but did see several important plea agreements. In the first quarter, Marcus Sturghill finally pled on his remaining indictments, extending his overall sentence to 13.5 years. Sherod Peterson, a TDOC confirmed member of the Crips, pled to crooks with gun and drug charges for a total sentence of 11 years. And A.C. Harrison, who had previously been prosecuted by the Gang Prosecutor, pled in a shooting case where he got into an argument with another gang member and began firing indiscriminately into a home, pled to an 18 year TDOC sentence.

The second quarter of 2021, winding down now at the time of writing this memorandum, marked the end of shutdowns and a return to trying cases. The Gang Prosecutor tried and convicted Tony Lamonte Johnson Jr. for a home invasion where he and other gang members broke into a pregnant woman's home and held her at gunpoint. His sentencing is pending at the time of writing. Brandon Jones was also tried and convicted on felony drug and gun charges, including possessing a firearm during the commission of a dangerous felony, while having a prior conviction for that same offense. His sentencing is also pending but he could face upwards of 35 years based on his criminal history. And Elijah Muhammed Garrison AKA "Evil Loc Who Run It," was tried and convicted in the First Degree Murder of D'Andre Holmes. Garrison shot the victim 11 times as revenge for stealing drugs. His sentencing is also pending but he faces life in prison. Garrison was a convicted felon at the time he committed the murder. And so many other cases are still pending, set for trial, or awaiting sentencing at the time of writing this memorandum.

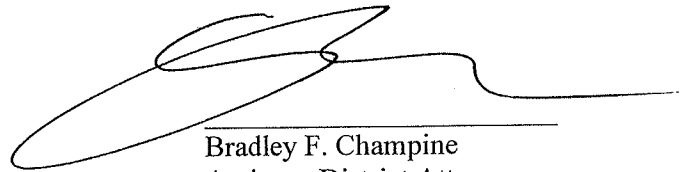
If these case highlights add anything to the statistics from Part One of this memo, it's context. The work we have been able to do in the 26<sup>th</sup> District is about more than number of prosecutions and convictions. We have been able to pioneer the use of Tennessee's Gang Enhancement Statute, not once, but twice. We have a position in the office with a unique connection and rapport with Jackson Police Department's street crimes, gang, narcotics, and violent crime units. We can assign someone to a very difficult and important kind of case load – riddled with violent, dangerous offenders and fraught with uncooperative and often criminal victims. But the results have been worth the work. While Jackson continues to suffer from the plague of gang violence, many of the convictions mentioned above could not have been achieved, nor the sentences we were able to secure obtained, without the dedicated position the GRIT grant has given us. Our District has demonstrated both a willingness to use the Gang Enhancement statute and motivation to fight the gang problem our jurisdiction has. Future funding for the gang prosecutor position would not go to waste here.

**Part Three | Budgetary Information:**

I was able to collect several documents related to the budget for the gang prosecutor position that could help in estimating what it would cost to keep the position in the future. First, I collected Fiscal Year Budget Sheets for the GRIT grant for the 2018, 2019 and 2020 fiscal years.<sup>13</sup> I also obtained copies of the 2017 Fully Executed Gang Prosecutor Contract, and the 2020 Contract Extension.<sup>14</sup> Lastly I've also included a copy of the letter our office mailed to the City of Jackson on November 2, 2020 showing where I am currently on the ADA pay scale.<sup>15</sup> If needed I can also provide a copy of my W-2 from 2020.

For the most part, the GRIT grant was structured as follows: The United States contributed about \$60,000 per year with the City of Jackson being the Grantee. The Grantee then contributed a matching amount of about \$20,000 per year towards salary and benefits for a total budget of about \$80,000 - \$90,000 for salary plus benefits. The position received city benefits, so TCRS retirement and city insurance. I don't know the current cost for city to provide those benefits or how close to or over the overall budget for years past we are once the benefits are calculated into my current pay scale step of \$67,000 annually. Suffice to say the city of Jackson has contributed a significant amount of the position's benefits and salary already.

Respectfully,



Bradley F. Champine  
Assistant District Attorney  
26<sup>th</sup> Judicial District

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<sup>13</sup> See Attachment 6: Grant Fiscal Budgets.

<sup>14</sup> See Attachment 7-8: 2017 Gang Prosecutor Contract and 2020 Contract Extension.

<sup>15</sup> See Attachment 9: Letter and Pay Scale.