

**IN THE CRIMINAL COURT OF HAMILTON COUNTY, TENNESSEE
ELEVENTHTH JUDICIAL DISTRICT IN CHATTANOOGA
DIVISION I**

**STATE OF TENNESSEE, ex rel,
NEAL PINKSTON
DISTRICT ATTORNEY GENERAL**

vs.

NO: _____

**Set for Hearing:
October 3, 2016 at 1:30 pm
Criminal Court Division I**

**GANGSTER DISCIPLES,
And
GRAPE STREET CRIPS**

**VERIFIED PETITION FOR ABATEMENT OF A NUISANCE AND REQUEST
FOR INJUNCTIVE RELIEF**

COMES NOW the State of Tennessee ex. rel. Neal Pinkston, District Attorney General for the Eleventh Judicial District of Tennessee at Chattanooga, and file this Verified petition for Abatement of a Nuisance and Request for Injunctive Relief, and for their cause of action state:

I. OVERVIEW

1. The Gangster Disciples are a street gang with a presence in eight different areas of Chattanooga have the largest number of gang members in Hamilton County As a violent street gang, the Gangster Disciples is comprised of members with ties to the East Lake area of Chattanooga, with the area more particularly described in Section IX of this Petition.

2. The Grape Street Crips are an emerging gang in Chattanooga with a presence

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2. The Grape Street Crips are an emerging gang in Chattanooga with a presence in the East Lake area of Chattanooga. The gang has between 15-20 members and the original Grape Street Crips began in the Watts section of Los Angeles, California.
3. In the areas described in Section IX of this Petition as the "Safety Zones," The Gangster Disciples and the Grape Street Crips regularly sell illegal drugs in plain view on public streets and engage in other crimes to the detriment of the neighborhoods. The crimes committed by members of each gang include various drug offenses, robberies, attempted homicides, homicides, aggravated assaults and domestic violence.
4. Despite the concerted efforts of law enforcement, the illegal activities of The Gangster Disciples and the Grape Street Crips continue unabated.
5. The level of unlawful activity and lack of respect for the law by The Gangster Disciples and The Grape Street Crips keeps other residents in the Safety Zones from the free exercise of their rights as property owners, tenants, and citizens; and keeps the owners of East Lake Courts and surrounding areas, including businesses, from engaging in their lawful business to the fullest extent possible.
6. This Petition seeks to declare the Gangster Disciples and the Grape Street Crips a public nuisance and to abate such nuisance by enjoining the Gangster Disciples and the Grape Street Crips from participating in activities in the Safety Zones, all as set forth herein.

II. JURISDICTION AND VENUE

7. Jurisdiction to declare a criminal gang a public nuisance is proper in this

Court pursuant to Tenn. Code Ann. § 29-3-102.

8. Venue is proper in the Court because the nuisance activity from which the Petitioner seeks relief occurs in Hamilton County. *State ex. rel. v. Scott*, 176 Tenn. 145 S.W.2d 765 (1940).

III. PARTIES

9. The Petitioners in this matter are the People of the State of Tennessee, acting by and through Neal Pinkston, the District Attorney General for the Eleventh Judicial District.

10. The Respondents in this matter are the Gangster Disciples and the Grape Street Crips. They are criminal gangs with a physical presence in the City of Chattanooga. These criminal gangs are subject to suit in the State of Tennessee. The individual members of these gangs either live in or frequent particular areas described in Section IX of this Petition as the Safety Zones.

IV. SERVICE

11. Despite being a criminal enterprise without a lawful purpose, the Gangster Disciples and the Grape Street Crips are similarly situated to an unincorporated association conducting business primarily in the State of Tennessee.

12. Criminal gangs are legal bodies capable of being served in a manner consistent with an unincorporated association. *People ex. rel. Totten v. Colonia Chiques*, 156 Cal. App. 4th 31, 38 (2007).

13. Service is also proper by delivering a copy of the summons and of the complaint, this Petition, to a partner or managing agent of the partnership or to an officer or managing agent of the association, or to an agent authorized by

appointment or by law to receive service on behalf of the partnership or association. See Tenn. R. Civ. Pro. 4.04.

14. In the present case, the Tennessee Secretary of State does not have an authorized representative listed for the Gangster Disciples or the Grape Street Crips nor any other aliases as pleaded in this Petition.

15. This Petition and Summons will be served upon at least one of the partners and/or managing agents of the Gangster Disciples and the Grape Street Crips.

16. Service will also be accomplished by posting notice at two locations in each of the Safety Zones which are frequented by these criminal gangs.

V. OVERVIEW OF THE USE OF GANG INJUNCTIONS

17. Combating urban street gangs with nuisance abatement lawsuits originated in Los Angeles, California with *People v. Playboy Gangster Crips*, No. WEC 118860 (Cal. Super. Ct. Los Angeles County Dec. 11, 1987).

18. Over the past twenty-five years, the practice has become a common tool for law enforcement in several states across the United States to include Minnesota, Illinois, Florida, Utah, North Carolina, Texas and Tennessee.

19. The most prevalent use of gang injunctions remains in California, a state that is severely afflicted by gang activity. California courts have upheld the use of gang injunctions. *People ex rel. Gallo vs. Acuna*, 14 Cal.4th 1090 (Cal. 1997).

20. Gang injunctions have been utilized in Tennessee in the cities of Nashville and Memphis. While municipalities must seek the injunctions, the Tennessee General Assembly has enacted statutory definitions of “public nuisance” specifically related to gang activity. This statutory authority for a nuisance

allows the Court to abate the nuisance without requiring the State to prove deleterious effect on the community as required by a common law nuisance.

21. These new statutes are a signal that states are beginning to embrace this type of public remedy. A criminal court in Davidson County, Tennessee issued Tennessee's first gang injunction in March 2013. Courts in Shelby County, Tennessee have issued injunctions against the Riverside Rolling 90's in September 2013, Dixie Homes Murda Gang/47 Neighborhood Crips in October 2014, and the FAM Mob Gang in December 2014.

VI. TENNESSEE LAW ON GANG INJUNCTIONS

A. Criminal Gangs are a Statutory Nuisance

22. In 2009, the Tennessee General Assembly amended the nuisance statute to include criminal gangs.

23. The statute creates a per se nuisance subject to a permanent injunction for a "*criminal gang*" that regularly "*engages in gang related conduct.*"

Tenn. Code Ann. § 29-3-101 (a)(2)(B) (emphasis added).

24. A *criminal gang* is defined as a group with three or more members who has:

As one (1) of its activities the commission of criminal acts; and

Two (2) or more members who, individually and collectively, engaged or have engaged in a *pattern of gang activity*;

Tenn. Code Ann. § 40-35-121 (2013) (emphasis added).

25. A pattern of *criminal gang activity* is

(A) "Pattern of criminal gang activity" means prior convictions for the commission or attempted commission of, facilitation of, solicitation of, or conspiracy to commit:

- (i) Two (2) or more criminal gang offenses that are classified as felonies; or
 - (ii) Three (3) or more criminal gang offenses that are classified as misdemeanors; or
 - (iii) One (1) or more criminal gang offenses that are classified as felonies and two (2) or more criminal gang offenses that are classified as misdemeanors; and
 - (iv) The criminal gang offenses are committed on separate occasions; and
 - (v) The criminal gang offenses are committed within a five-year period;
- Tenn. Code Ann. § 40-35-121 (2013).

26. The statute defines a *criminal gang offense* as:

(3) "Criminal gang offense" means:

(A) A criminal offense committed prior to July 1, 2013 that:

(i) During the perpetration of which the defendant knowingly causes, or threatens to cause, death or bodily injury to another person or persons and specifically includes rape of a child, aggravated rape and rape; or

(ii) Results, or was intended to result, in the defendant's receiving income, benefit, property, money or anything of value from the commission of any aggravated burglary, or from the illegal sale, delivery, or manufacture of a controlled substance, controlled substance analogue, or firearm; or

(B) The commission or attempted commission, facilitation of, solicitation of, or conspiracy to commit any of the following offenses on or after July 1, 2013:

(i) First degree murder, as defined in § 39-13-202;

(ii) Second degree murder, as defined in § 39-13-210;

(iii) Voluntary manslaughter, as defined in § 39-13-211;

(iv) Assault, as defined in § 39-13-101;

(v) Aggravated assault, as defined in § 39-13-102;

(vi) Kidnapping, as defined in § 39-13-303;

(vii) Aggravated kidnapping, as defined in § 39-13-304;

- (viii) Especially aggravated kidnapping, as defined in § 39-13-305;
- (ix) Robbery, as defined in § 39-13-401;
- (x) Aggravated robbery, as defined in § 39-13-402;
- (xi) Especially aggravated robbery, as defined in § 39-13-403;
- (xii) Carjacking, as defined in § 39-13-404;
- (xiii) Rape, as defined in § 39-13-503;
- (xiv) Aggravated rape, as defined in § 39-13-502;
- (xv) Rape of a child, as defined in § 39-13-522;
- (xvi) Aggravated burglary, as defined in § 39-14-403;
- (xvii) Especially aggravated burglary, as defined in § 39-14-404;
- (xviii) Aggravated criminal trespass, as defined in § 39-14-406;
- (xix) Coercion of witness, as defined in § 39-16-507;
- (xx) Retaliation for past action, as defined in § 39-16-510;
- (xxi) Riot, as defined in § 39-17-302;
- (xxii) Aggravated riot, as defined in § 39-17-303;
- (xxiii) Inciting to riot, as defined in § 39-17-304;
- (xxiv) The illegal sale, delivery or manufacture of a controlled substance or controlled substance analogue, as defined in §§ 39-17-417 and 39-17-454;
- (xxv) Possession of a controlled substance or controlled substance analogue with intent to sell, deliver, or manufacture, as defined in § 39-17-417(a)(4) and § 39-17-454;
- (xxvi) Unlawful carrying or possession of a weapon, as defined in § 39-17-1307;
- (xxvii) Trafficking for commercial sex acts, as defined in § 39-13-309;

Tenn. Code Ann. § 40-35-121 (2013).

27. The statute defines *gang related* conduct as:

(i) Intimidating, harassing, threatening, stalking, provoking or assaulting any person;

(ii) Possessing weapons prohibited under §§ 39-17-1302 and 39-17-1307, knowingly remaining in the presence of anyone who is in possession of such weapons, or knowingly remaining in the presence of such weapons;

(iii) Unlawfully damaging, defacing or marking any public or private property of another or possessing tools for the purpose of unlawfully damaging, defacing or marking any public or private property of another;

(iv) Selling, possessing, manufacturing or using any controlled substance, drug paraphernalia, as defined in § 39-17-402, or controlled substance analogue, as defined in § 39-17-454, knowingly remaining in the presence of anyone selling, possessing, manufacturing or using any controlled substance, controlled substance analogue or drug paraphernalia, knowingly remaining in the presence of any controlled substance, controlled substance analogue or drug paraphernalia, driving under the influence of any controlled substance or controlled substance analogue in violation of § 55-10-401, or being under the influence of any controlled substance or controlled substance analogue in public in violation of § 39-17-310;

(v) Using, consuming, possessing or purchasing alcoholic beverages unlawfully, including, but not limited to, public intoxication in violation of § 39-17-310 or driving under the influence of alcohol in violation of § 55-10-401;

(vi) Criminal trespassing in violation of § 39-14-405;

(vii) Taking any action to recruit gang members or making any threats or promises to shoot, stab, strike, hit, assault, injure, disturb the peace or destroy the personal property of anyone as an incentive to join a gang;

(viii) Taking any action to stop a gang member from leaving a gang or making any threats or promises to shoot, stab, strike, hit, assault, injure, disturb the peace or destroy the personal property of anyone as an incentive not to leave a gang;

(ix) Engaging in a criminal gang offense as defined by § 40-35-121(a);

(x) Disorderly conduct in violation of § 39-17-305; or

(xi) Contributing to or encouraging the delinquency or unruly behavior of a minor in violation of § 37-1-156;

Tenn. Code Ann. § 29-3-101 (2013).

B. Criminal Gangs can also constitute a common law public nuisance

28. A criminal gang may constitute a nuisance subject to abatement under traditional common law nuisance jurisprudence.
29. Under traditional common law, a nuisance is “anything which annoys or disturbs the free use of one’s property, or which renders its ordinary use or physical occupation uncomfortable.” *Caldwell v. Knox Concrete Products, Inc.*, 54 Tenn. App. 393, 402 (Ct. App. 1964).
30. The Restatement of Torts defines a public nuisance as “an unreasonable interference with a right common to the general public.” Restatement (Second) of Torts § 821B (1979).
31. When determining whether an unreasonable interference with a public right exists, courts should consider:
- (a) Whether the conduct involves a significant interference with the public health, the public safety, the public peace, the public comfort or the public convenience, or
 - (b) whether the conduct is proscribed by a statute, ordinance or administrative regulation, or
 - (c) whether the conduct is of a continuing nature or has produced a permanent or long-lasting effect, and, as the actor knows or has reason to know, has a significant effect upon the public right.
- Restatement (Second) of Torts § 821B (1979).
32. A criminal gang, such as the Gangster Disciples, engages in activities that significantly interfere with the public rights of those who live and do business in their territory. In the present case, these criminal gangs maintain a presence in

the Safety Zones with open displays of narcotics dealing, intimidation, and other activity prohibited by statute.

VII. GANGSTER DISCIPLES

33. The Gangster Disciples are a violent, drug dealing, organized street gang which has taken over the Safety Zones for the purpose of committing criminal acts. This section will outline how the Gangster Disciples are a criminal gang that has engaged in and continues to perpetuate criminal activity in the Safety Zones.

34. Petitioners re-allege and incorporate herein each of the preceding paragraphs as if stated verbatim.

35. As of July 2016, the Gangster Disciples have over 30 members who, individually and collectively, engage in *criminal gang activity* in the Safety Zones.

36. The Gangster Disciples are rather organized, have extensive rules, regulations, weekly meetings and payment of dues. Members operate under structured chain of command to include positions known as 1st Coordinator, Secretary, Chief of Security and Chief Enforcer.

37. Detailed information about Gangster Disciples leaders and their criminal gang activity follows:

- a. Monte Lamar Brewer Jr
2104 Foust Street
Chattanooga Tennessee 37407

He has convictions for seven cases of criminal trespassing and simple

possession of marijuana out of Hamilton County General Sessions Court and convictions for robbery, theft and reckless endangerment out of Hamilton County Criminal Court.

He has pending charges of driving on revoked, possession of drugs and possession of a firearm with intent to go armed.

Brewer is a validated Gangster Disciple. He has self-admitted to his gang involvement, wears gang colors, flashes gang signs and is known to have contact with other gang members and also pose for gang related photos.

- b. Lee Antonio Clements
1908 Foust Street
Chattanooga, TN

He has convictions for possession of controlled substance, possession of drug Paraphernalia, and driving without a license out of Hamilton County General Sessions Court and convictions for possession of a firearm and simple possession of marihuana out of Hamilton County Criminal Court.

He is a validated Gangster Disciple. He has self-admitted to his gang involvement, and is known to have contact with other known gang members and was validated as a gang member by an outside law enforcement agency.

- c. Keenan Ivory Cooley
1904 E. 25th St. Place
Chattanooga, TN

He has multiple convictions for criminal trespassing out of Hamilton County General Sessions Court as well as evading arrest and possession of controlled substance. In addition, Cooley has been convicted of aggravated assault, reckless aggravated assault and possession of a firearm with prior felony conviction out of Hamilton County Criminal Court.

He is a validated Gangster Disciple. He has self-admitted belonging to the Gangster disciples. He has gang tattoos and often uses gang symbols and colors, and has participated in photographs with other confirmed gang members.

- d. Nitorius Montel Cooley
2257 E. 25th Street
Chattanooga TN

His criminal history includes a conviction for criminal trespassing and pending charges of drugs, possession of controlled substance and resisting arrest.

He is a validated Gangster Disciple. Cooley is known to have a gang tattoo "Wacky Mac," and uses gang symbols and clothing, and has contact with known gang members as he was present when his brother Keenan Cooley was arrested for outstanding warrants.

- e. Ronnie Dyrail Dobbins, Jr
1408 Carousel Road
Chattanooga, TN

He has convictions for assault, domestic assault, failure to appear, possession of a firearm, escape, criminal trespassing, aggravated criminal trespassing, and public intoxication out of Hamilton County General Sessions Court. He has new pending charges include trespassing, possession of controlled substance and possession of a firearm. Several of his arrests have occurred within the proposed safety zone.

He is a validated Gangster disciple and admitted joining the gang at the age of 15. Dobbins also has a gang tattoo and wears gang clothing.

- f. Jeramie Lamont Hawthorne
3003 E. 34th Street
Chattanooga, Tennessee

He has Hamilton County General Sessions convictions for possession of a controlled substance, evading arrest, theft, domestic assault, vandalism and possession of crack cocaine. Hawthorne has Hamilton County Criminal Court convictions for false reports, criminal trespassing, driving on revoked, possession of cocaine and contraband in a penal institution. He also has cases pending the Hamilton County Grand Jury.

Hawthorne is a validated Gangster Disciple. He has openly admitted to being a Gangster Disciple and has tattoos of "GD Nation" and "4" about his body. He has had his photo taken with other confirmed gang members and his brother Jerrico Hawthorne is a Gangster Disciple currently serving a life sentence in TDOC for first degree murder.

- g. Jonathan Lebron Horton
931 East Avenue
Chattanooga, Tennessee

His criminal history includes convictions for possession of controlled substance and a pending charge of possession of drug paraphernalia.

Horton is a confirmed Gangster Disciple and has been arrested with fellow Gangster Disciple Lee Clements. Horton admits he is a Gangster Disciple, wears gang clothing, and is often in the physical presence of and in photos with confirmed gang members.

- h. Horatio Houston Jr
4203 10th Avenue
Chattanooga, Tennessee

His criminal history includes Hamilton County General Sessions Court convictions for assaults and he has pending cases in Hamilton Court Criminal Court to include aggravated burglary, theft, possession of marijuana, carrying a dangerous weapon and tampering with evidence.

Houston is a self-admitted and validated Gangster Disciple. He proudly wears gang clothing and flashes "GD" gang signs throughout Chattanooga.

- i. Jacorey Darnell Owens
3616 Glendon Drive
Chattanooga, Tennessee

His criminal history includes four convictions for possession of controlled substances and four convictions for possession of firearm with intent to go armed out of Hamilton County General Sessions Court and has a pending drug case in Sessions Court. Owens also has a pending indictment in Hamilton County Criminal Court for attempted first degree murder, employment of a firearm during commission of a dangerous felony and one for reckless endangerment.

He has admitted he is a Gangster Disciple on numerous occasions and has gang tattoos. He is known to commit crimes in the proposed safety zone and has even been arrested with fellow Gangster Disciple Thaddeus Pollard.

- k. Thaddeus Pollard Jr
1803 E. 27th Street

Chattanooga, Tennessee

His criminal history includes Hamilton County General Sessions Court convictions for Resisting Arrest, Driving on Revoked, Resisting Arrest, Simple Possession of Marijuana, Criminal Trespassing, Criminal Trespassing, Unlawful Carrying of a Weapon, Theft of Property, Failure to Appear, Criminal Trespassing, Driving on Revoked, Public Intoxication and Criminal Trespassing. He also has been convicted in Hamilton County Criminal Court for two counts of driving on a revoked license.

Pollard has self admitted to belonging to the Gangster Disciples. He is consistently observed with other Gangster Disciples including when he was present at a homicide scene and the police told all parties to not seek retribution for the homicide. Also present when fellow Gangster Disciple Jacorey Owens was arrested.

- l. Demetrius Delaney Buchanan
3301 Pinewood Avenue, Apt 26
Chattanooga, Tennessee

His criminal history includes Hamilton County General Sessions Court convictions for Driving on Revoked, Resisting Arrest, Possession of a Controlled Substance, Failure to Appear and Hamilton County Criminal Court convictions for Possession of Cocaine, Simple Possession of Marihuana, Resisting Arrest, and Possession of Marihuana for Resale.

Buchanan is a self-admitted Gangster Disciple since age 14 and has gang tattoos. In addition, Mr. Buchanan name was identified in correspondence as a member of the Gangster Disciple roster.

- m. Gregory Lamar Gillespie
2101 Vance Avenue
Chattanooga, Tennessee

Gillespie has convictions for Evading Arrest, Failure to Appear, Assault, Disorderly Conduct out of Hamilton County General Sessions Court and has a conviction for carrying a weapon on school property out of Hamilton County Criminal Court. He has pending cases in state court of two counts possession of controlled substance, possession of a firearm, aggravated assault, evading arrest, and failure to appear. In addition, he has a hold by federal authorities.

Gillespie is a self-admitted Gangster Disciples and has a tattoo "HPG" which is for Highland Park Gangster a set of the Gangster disciples. He is frequently seen wearing gang clothing and flashing gang signs like pitch forks and 7-4 which are common for Gangster Disciples.

- n. Dedrick Lamont Lindsey Jr
3401 Campbell Street
Apt 405
Chattanooga, Tennessee

Lindsey's criminal history includes a Hamilton County General Sessions Court conviction for Carrying Weapons on School Property and a Hamilton County Criminal Court conviction for aggravated assault.

On numerous occasions, Lindsey has admitted to being a Gangster Disciple and validated as such. He has been frequently seen with other validated Gangster Disciples.

- o. Thaddius Gerrard Montgomery
2401 Ocoee Street
Chattanooga, Tennessee

Montgomery's criminal history includes Hamilton County General Sessions Court convictions for criminal impersonation, possession of controlled Substance, drinking under age, driving on a suspended license, criminal trespass, aggravated criminal trespass, criminal trespass, and failure to appear. He has been convicted of two counts of Aggravated Burglary in Hamilton County Criminal Court. He has pending charges of possession of a controlled substance and possession of drug paraphernalia.

Montgomery is a self-admitted and validated Gangster Disciple. He has gang tattoos and is frequently seen in clothing displaying his gang colors.

- p. Sean Corn Rhodes
2116 E. 12th Street
Chattanooga, Tennessee

His criminal history includes driving without a license, domestic assault, driving without a license, aggravated criminal trespass, vandalism, unlawful possession of a weapon, criminal trespassing, driving without a license, domestic assault and criminal trespass out of Hamilton County General Sessions Court and pending cases of aggravated assault. Rhodes has Hamilton County Criminal Court convictions for driving on a revoked license

and aggravated domestic assault of which he has a pending probation violation.

Rhodes is a proud member of the Gangster Disciples and has been validated. He bears Gangster Disciples tattoos and has been seen throwing gang signs and making threats via social media.

- q. Alston Toran, III
1806 S. Greenwood Avenue
Chattanooga, Tennessee

Toran has been convicted in Hamilton County General Sessions Court of possession of marijuana, possession of controlled substance, driving without a license, failure to appear, evading arrest and another possession of a controlled substance.

Toran is a validated self-admitted Gangster Disciple. He has been named in gang correspondence as a gang member, and also has participated in photos with gang members, and has known contact with validated gang members.

- r. Orlando Watkins
2210 Bennett Avenue
Chattanooga, Tennessee

Watkins has been a frequent visitor to all Hamilton County criminal courts and stands with convictions for driving on a suspended license, disorderly conduct, possession of marijuana, criminal trespassing, failure to appear, possession of marijuana, attempted criminal simulation, criminal trespassing, and criminal trespassing. He has been convicted in Criminal Court for attempted possession of cocaine for resale and simple possession of marijuana, Watkins has outstanding warrants for aggravated assault, evading arrest, possession of cocaine, attempted first degree murder, aggravated assault, employing a firearm during commission of dangerous felony and reckless endangerment. He has additional outstanding warrants for possession of marijuana and felonious possession of MDMA.

Watkins is a validated Gangster Disciple and has stated he will be a GD until he dies. He has various gang tattoos and has been seen in photos throwing up gang signs.

- s. Norman Eugene Williams, Jr.
4415 Drummond Drive
Chattanooga, Tennessee

His significant criminal history includes convictions out of Hamilton County

General Sessions Court for possession of marijuana, criminal trespassing and failure to appear. He has multiple pending criminal trespass cases. He has Criminal Court convictions for robbery, aggravated burglary, theft, burglary, theft, and aggravated criminal trespass.

He is a validated Gangster Disciple and has admitted to the same. He bears Gangster Disciple tattoos and has been seen with other validated gang members.

- t. Ommerieal Dywane Woods
1307 E. 31st Street
Chattanooga Tennessee

His criminal history includes Hamilton County General Sessions Court convictions for possession of a controlled substance, criminal trespassing, unlawful possession of a weapon, theft, possession of a controlled substance, and six other criminal trespasses. He has a pending theft charge in Hamilton County Criminal Court.

Woods has admitted his status as a Gangster Disciple and has been validated as such. He has frequently seen with fellow Gangster Disciples and displaying gang signs.

- u. Oshae Kadaris Smith
2114 E. 12th Street
Chattanooga, TN

His criminal history includes Hamilton County General Sessions Court convictions for evading arrest, criminal trespassing, underage drinking, unlawful possession of a firearm, failure to appear, carrying a dangerous weapon, reckless endangerment and evading arrest. In addition, he was convicted of aggravated assault in Hamilton County Criminal Court.

Smith is a self-admitted and validated Gangster Disciple. He has been photographed with black clothing and bandanas indicative of his allegiance to the Gangster Disciples and has been photographed with other validated gang members and also with them when some were arrested and firearms were seized. Also throws gang signs "4th" which is about 4th Avenue.

- v. Antonio Watkins
2004 Curtis Street
Chattanooga, TN

His criminal history includes Hamilton County General Sessions convictions for Possession of Controlled Substance and Possession of Burglary Tools. He

has cases of unlawful possession of a weapon and driving on a revoked license pending in General Sessions Court. Watkins has Hamilton County Criminal Court convictions for possession of marijuana for resale and unlawful possession of weapon and pending cases of cocaine for resale, possession of marijuana for resale, retaliation for past actions and possession of drug paraphernalia in Criminal Court.

VIII. GRAPE STREET CRIPS

38. The Grape Street Crips are a violent, drug dealing, organized street gang which has taken over the Safety Zones for the purpose of committing criminal acts. This section will outline how the Grape Street Crips are a criminal gang that has engaged in and continues to perpetuate criminal activity in the Safety Zones.

39. Petitioners re-allege and incorporate herein each of the preceding paragraphs as if stated verbatim.

40. As of July 2016, the Grape Street Crips have over 10 members who, individually and collectively, engage in *criminal gang activity* in the Safety Zones.

41. There is no known structure of the Grape Street Crips, but the gang consists of foot soldiers and a person as the central head of the group called the "OG" or the "Shot Caller."

42. Detailed information about Grape Street Crips leaders and their criminal gang activity is as follows:

- a. Sherman Shermaine Bowles
2251 E. 25th Street
Chattanooga, Tennessee

Bowles has an extensive criminal history in Hamilton County General Sessions and Criminal Court to include convictions for evading arrest, Possession of cocaine, criminal trespassing, evading arrest, criminal trespassing, driving under the influence, possession of marijuana, criminal impersonation, criminal trespassing, assault possession of drug paraphernalia, theft of property, possession of marijuana, possession of cocaine for resale, possession of marijuana, violation of the habitual motor vehicle offenders act, possession of cocaine for resale, violation of the habitual motor vehicle offenders act, and tampering with evidence.

He has been validated as a Grape Street Crip by the Tennessee Department Of Corrections.

b. Clifford Rasheed Hill
714 S. Seminole Drive
Chattanooga, Tennessee

Hill is a self-admitted and validated member of the Grape Street Crips. He has been known to wear purple bandanas, the color associated with the Grape Street Crips, and also has thrown gang signs. He has been photographed with fellow Grape Street Crips.

He has a prior conviction for violation of a seat belt law out of Hamilton County General Sessions Court.

c. Keyon Denzel Hinton
7809 Opal Drive
Chattanooga, Tennessee

His criminal history includes a conviction in Hamilton County General Sessions Court for unlawful carrying or possessing a weapon and convictions in Hamilton County Criminal Court for possession of a controlled substance, possession of a prohibited weapon, possession of marijuana for resale, and unlawful possession of a firearm.

Hinton is a validated Grape Street Crip, and has gang tattoos, uses gang symbols, and wears clothing specific to the Grape Street Crips. He has also been in possession of gang documents.

d. Dominique Jackson
2300 Wilson Street
Apt 7J
Chattanooga, Tennessee

Jackson's criminal history includes a Hamilton County General Sessions Court

Conviction for Possession of a Firearm with Intent to Go Armed and Hamilton County Criminal Court convictions for Attempted Aggravated Burglary, Attempted Theft over \$1000, and Resisting Arrest.

Jackson is a self-admitted and validated Grape Street Crip. He admitted such after police investigated a shots fired call near a local school bus. He is known to wear Grape clothing to show his allegiance to the gang as well as frequently flashing crip signs and being photographed with other validated gang members.

e. Keyshawn Jaquan Kidd
4205 10th Avenue
Chattanooga, Tennessee

His criminal history includes a number of pending cases in both Hamilton County General Sessions Court and Hamilton County Criminal Court to include Possession of Drug Paraphernalia, Reckless Driving, Resisting Arrest, Leaving Scene of an Accident, Possession of a Handgun under the Influence, Carrying a Dangerous Weapon, Possession of Marijuana, Possession of Tramadol, and Possession of Drug Paraphernalia.

Kidd is a self-admitted and validated Grape Street Crip. He wears purple clothing common to Grape Street Crips and also various items symbolizing the Grape Street Crips. In addition, he has been photographed with other Grape Street Crips and arrested with fellow Grape Street Crips.

f. Perry Thomas
2626 6th Avenue
Chattanooga Tennessee

Thomas's criminal history includes pending cases in Hamilton County General Sessions Court for criminal trespassing, evading arrest, theft, and Vandalism. Thomas has convictions in Hamilton County Criminal Court for Possession of a firearm with intent to go armed, robbery, and assault for which he has an outstanding probationary capias on the robbery and assault convictions.

Thomas is known to be a validated member of the Grape Street Crips, wears gang clothing, flashes signs, and is known to commit crimes with other validated gang members.

g. Patrick Lamar Tory Jr
8457 Hunter Hill Court
Ooltewah Tennessee

Tory has Hamilton County General Sessions Court convictions for failure to appear, multiple criminal trespassing, disorderly conduct, resisting arrest, and firearms charges. He has two convictions for aggravated burglary in Hamilton County Criminal Court.

He has been validated as a Grape Street Crip by his own self admission and in his possession of gang clothing which were purple bandanas.

h. Guy Wilkerson
2001 S Lyerly Street
Apartment 115
Chattanooga, Tennessee

His significant criminal history includes convictions for firearms charges in General Sessions Court and Criminal Court convictions for simple possession of marijuana and robbery.

Wilkerson is another self-admitted and validated Grape Street Crip. He proudly wears gang clothing, flashes gang signs has grape tattoos and has been observed with other validated gang members.

i. Commanieakil Williams
3619 6th Avenue
Chattanooga, Tennessee

Williams' criminal history includes pending charges in the Hamilton County Grand Jury for theft, drugs, and firearms charges.

Williams is another self-admitted and validated Grape Street Crip and has been found in possession of gang clothing to include purple bandanas.

k. Marty Witt
1810 E. 12th Street
Chattanooga, Tennessee

Witt's lengthy criminal history includes Hamilton County General Sessions Court convictions for theft of property, vandalism, assault, theft, possession of drug paraphernalia, disorderly conduct, and assault. He has Criminal Court convictions for eight counts of theft of property, eight burglaries, attempted robbery and evading arrest.

Witt is another validated, self-admitted Grape Street Crips, with accompanying tattoos and was also validated by Tennessee Department of Corrections as a Grape Street Crip.

IX. SAFETY ZONE

43. The Gangster Disciples and the Grape Street Crips operate primarily in the areas described in this Petition as the Safety Zone. They reside or stay in various areas throughout the Safety Zones. The Safety Zone include:

(a) The East Lake Courts which is a public housing complex which is owned by the Chattanooga Housing Authority with its physical address as 2600 4th Avenue Chattanooga, Tennessee but that the East Lake Courts extends from the 2400 block of 4th Avenue to the 2200 block of E. 28th Street east to 2800 block of 6th Avenue north to the 2400 block of 5th Avenue;

(b) From Interstate 24 south on Hickory Street to Clio Avenue south to E. 34th Street and then from E. 34th Street to south 7th Avenue also extending on 7th Avenue to E. 37th Street over to 15th Avenue and to E. 38th Street over to S Crest Road and also following Westside Drive to Interstate 24. See Attached Map.

X. ONGOING CRIMINAL ACTIVITY AND CONDUCT

44. Since the inception of this investigation, the Gangster Disciples and the Grape Street Crips' disregard for laws and lack of respect for community members has continued. Petitioners have been unable to abate the nuisance through traditional law enforcement means. As recently as the week prior to the filing of this injunction, law enforcement officers have seen gang members engage in the nuisance behavior detailed in this Petition.

45. Members of the general public who live and work within the Safety Zone

do not have the freedom to enjoy their homes or public facilities. In the weeks preceding the filing of this Petition, law enforcement officers have spoken with individuals afraid to leave their homes at night and individuals afraid to walk alone to their cars after work at night.

46. Without equitable relief from this Court, the Gangster Disciples and the Grape Street Crips will continue to commit acts of violence and drug sales, and the communities inside the Safety Zones will continue to suffer. The citizens and business owners of the East Lake community fully support the relief sought in this Petition.

XI. RELIEF SOUGHT

Pursuant to Tennessee Code Annotated § 29-3-101 et seq, Petitioners pray that this Court allow the filing of this Petition and service of process to seek a permanent injunction against the Gangster Disciples and the Grape Street Crips. Furthermore, Petitioners pray that, upon the hearing of this matter, the Court declare the Gangster Disciples and the Grape Street Crips a public nuisance under Tennessee Code Annotated § 29-3-101 et seq and the common law, permanently enjoining its members from the activities stated below:

A. Activities enjoined in Safety Zone

1. Do not Associate: Standing, sitting, walking, driving, gathering or appearing anywhere in public view or any place accessible to the public, with any known member of the Gangster Disciples and the Grape Street Crips, but not including:

(a) when all individuals are inside a school attending class or on school business, or

(b) when all individuals are inside a place of worship; provided however that this prohibition against associating shall apply to all claims of travel to or from any of those locations; and

2. No Intimidation: Confronting, intimidating, annoying, harassing, threatening, challenging, provoking, assaulting or battering any person known to be a witness to any activity of the Gangster Disciples or the Grape Street Crips, known to be a victim of any activity of the Gangster Disciples or the Grape Street Crips, or known to be a person who has complained about any activity of the Gangster Disciples, or Grape Street Crips; and

3. No Guns or Dangerous Weapons: Anywhere in public view or any place accessible to the public, (1) possessing any gun, ammunition, or otherwise prohibited weapon as defined in Tennessee Code Annotated § 39-17-1302, (2) knowingly remaining in the presence of anyone who is in possession of such gun, ammunition, or otherwise prohibited weapon, or (3) knowingly remaining in the presence of such gun, ammunition, or otherwise prohibited weapon; and

4. No Graffiti or Graffiti Tools: Damaging, defacing, or making a public property or private property of another, or possessing any spray can, felt tip marker, or other graffiti tool; and

5. Stay Away from Drugs: Without a prescription (1) selling, possessing,

or using any controlled substance or related paraphernalia, including, but not limited to, rolling papers, pipes, syringes, and hypodermic needles used for illegal drug use, (2) knowingly remaining in the presence of anyone selling, possessing or using any controlled substance or related paraphernalia, or (3) knowingly remaining in the presence of any controlled substance or such related paraphernalia; and

6. Do Not Act as a Lookout: Acting as a lookout, whistling, yelling, making

hand signals, using cell phones, or otherwise signaling another person to warn of the approach or presence of a law enforcement officer; and

7. Stay Away from Alcohol: Anywhere in public view or any place accessible to the public, (1) possessing an open container of an alcoholic beverage, (2) knowingly remaining in the presence of anyone possessing an open container of an alcoholic beverage, or (3) knowingly remaining in the presence of an open container of an alcoholic beverage; and

8. No Trespassing: Being present on or in any property not open to the general public, except (1) with the prior written consent of the owner, owner's agent, or the person in lawful possession of the property, or (2) in the presence of and with the voluntary consent of the owner, owner's agent, or the person in lawful possession of the property; and

9. No Forcible Recruiting: Making any threats, or doing anything threatening, including striking or battering a person, destroying or damaging personal property, or disturbing the peace, or causing or

encouraging a person to join the Gangster Disciples or the Grape Street Crips;
and

10. No Preventing a Member from Leaving the Gang: Making any threats, or doing anything threatening, including striking or battering a person, destroying or damaging personal property, or disturbing the peace, (1) to prevent a person from leaving the Gangster Disciples or the Grape Street Crips, or (2) because a person is known to have left the Gangster Disciples or the Grape Street Crips; and

11. Obey All Laws: Failing to obey all laws that prohibit (1) violence and threatened violence, including murder, rape, robbery by force or fear, and assault and battery, (2) interference with the property rights of others, including trespass, theft, driving, or taking a vehicle without the owner's consent and vandalism, or (3) the commission of acts that create a nuisance, including the illegal sale of controlled substances and blocking the sidewalk.

Opt Out Provision

Any person served an Order of this Court as a Gangster Disciple or Grape Street Crip member may move to be dismissed from this action. In the event that a person is dismissed pursuant to this Opt Out provision, any injunction shall not be enforceable against him or her. The terms of Petitioners' proposed opt-out provision are as follows:

a. Requirements: Petitioners agree not to object to an individual's motion to be dismissed from this action, so long as the dismissal is to be without prejudice and with each side to bear its own costs and fees, and so long as the motions satisfies

the following requirements:

- 1) Proper Notice: A motion under this provision shall be made on 30 days' notice, properly served upon the District Attorney General of Hamilton County, Tennessee;
- 2) Not (or No Longer) a Gangster Disciple or Grape Street Crip: An individual seeking to opt-out of the Court's injunction must declare in writing that he or she is either a reformed or former Gangster Disciples or Grape Street Crip member, he or she is not active with the Gangster Disciples, or Grape Street Crips and has renounced the Gangster Disciples or Grape Street Crips and gang life. This declaration regarding the Gangster Disciples and Grape Street Crips and gang life is an essential part of this provision; and
- 3) Proof Required: An individual included in the injunction by the Court as a Gangster Disciple or Grape Street Crip who is seeking to be dismissed from the this action must truthfully declare that he or she (1) has not been arrested for the past two years, not including any time spent incarcerated; and (2) has not been in the company or association of any person known as a Gangster Disciple or Grape Street Crip, other than an immediate family member for the last two years; and (3) has not obtained any new gang related tattoos for the last two years.

b. No Third-Party Beneficiaries: It shall not be a defense to any civil or criminal

charge of any nature whatsoever that any person involved in the facts underlying that charge, including the person to be charged, was eligible to apply for a

dismissal under this opt-out provision.

c. Effect in Other Proceedings: Petitioners shall not be bound by the criteria of

this opt-out provision in any action, civil or criminal, other than a motion to opt-out brought in this action.

d. Judgment not Admissible: This gang injunction shall not be admissible in any

criminal or other civil action related to a successfully “opted-out” individual, and cannot be used against any such individual, except in a proceeding brought for the violation of this injunction.

e. Dismissed Individual Committing New Violation: Successfully obtaining a

dismissal under this provision (an “opt-out”) will not permit any individual to rejoin the Gangster Disciples or the Grape Street Crips.

If a dismissed individual re-associates with the Gangster Disciples or the Grape Street Crips, who is the named Respondent, is arrested for any crime that is a gang-related crime, obtains new gang tattoos, or otherwise conducts himself as a member of the Gangster Disciples or the Grape Street Crips, such person may be added as an active gang member; subject again to the the gang injunction.

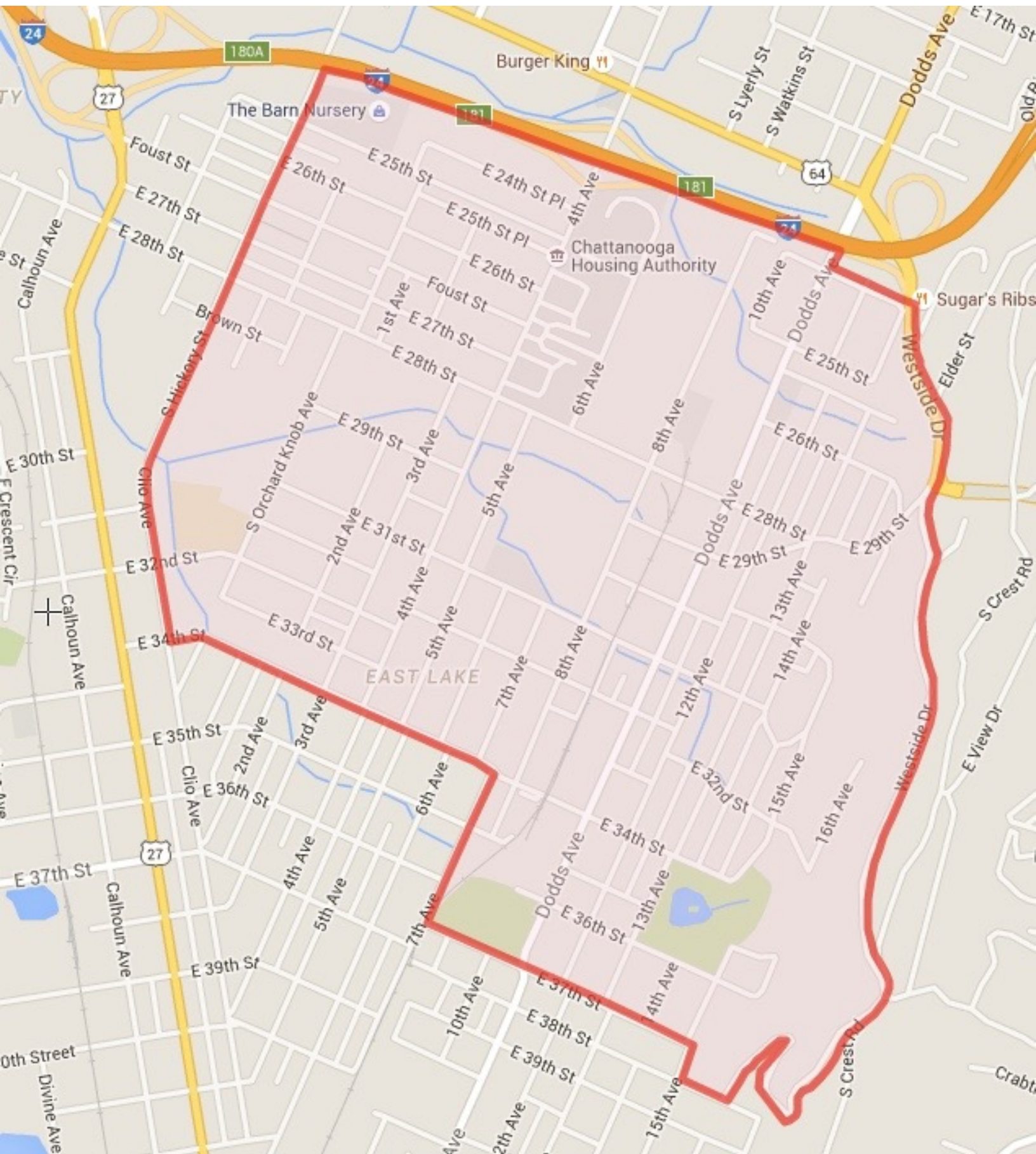
CONCLUSION

Petitioners pray that this Court declare the Gangster Disciples and the Grape Street Crips a nuisance and permanently enjoin the Gangster Disciples and the Grape Street Crips from the above acts in the Safety Zone. Petitioners further pray

Respectfully submitted,

A handwritten signature in black ink that reads "Neal Pinkston". The signature is written in a cursive style and is positioned above a solid horizontal line.

Neal Pinkston
District Attorney General
600 Market Street, Suite 310
Chattanooga, TN 37402
423-209-7400



VIOLENCE IN THE EAST LAKE SAFETY ZONE

Homicides 2010-2015

Shootings 2012-2015

**Crimes involving gang members are highlighted*

HOMICIDE VICTIMS

4/30/10	Michael Johnson	2138 East 27th Street
5/1/10	Jaylen Ramsey	10th Avenue
9/7/11	Demetrius Roshelle	3020 13th Avenue
9/8/12	Kenyeta Trimble	2213 East 25th Street Ct
3/19/13	Eric Fluellen	3200 blk 13th Avenue
1/28/14	Rafael White	2753 6th Avenue
7/10/14	Dominic Wright	2108 Foust Street
7/27/14	Jeffrey Jackson	2525 6th Avenue Ct
9/7/15	Wonsik No	2500 4th Avenue
10/20/15	Percy Allen	2221 East 28th Street

OTHER SHOOTING VICTIMS

1/2/12	Sean Jones	2600 12th Avenue
1/10/12	Joe Houston	2200 blk East 26th Street
3/12/12	Connie Freeman	3206 1st Avenue
4/24/12	Guy Wilkerson	2601 4th Avenue
5/28/12	Jerry Jones	2217 East 28th Street
"	Karona Cunningham	"
7/17/12	Jeffrey House	2116 Foust Street
7/22/12	Courtney Birt	3700 blk 7th Avenue
7/30/12	Thomas Armstrong	2125 East 25th Street
12/16/12	Brian Hall, Jr.	2800 5th Avenue
12/20/12	Lawarren Smith	3800 blk 9th Avenue
12/30/12	Michael Ford	2200 East 27th Street
1/7/13	Alexander Hughlett	2700 blk 4th Avenue
1/11/13	Joshua Brewer	2100 blk Foust Street
3/12/13	William McMillan	2219 26th Street Ct
5/2/13	LeMario Branham	2200 blk East 27th Street Ct
5/12/13	Trashaunda Green	2600 blk East 24th Street
5/27/13	Shannon Cooley	2218 East 27th Street Ct
5/29/13	Juvenile	2200 blk East 25th Street Ct
8/13/13	Juvenile	2243 East 25th Street
8/15/13	Michael Hudgins	2600 4th Avenue
10/15/13	Robert Allen	2421 4th Avenue
1/5/14	Antonio Beavers	2800 Dodds Avenue
4/27/14	Marice Manghanu	2600 4th Avenue
7/5/14	Juvenile	2424 Dodds Avenue
9/29/14	Juvenile	2255 26th Street Ct
10/1/14	Lakita Bowling	2600 4th Avenue
1/7/15	Brian Posley, Jr.	2214 East 26th Street
3/2/15	Keith Goodwin	2800 Dodds Avenue
3/21/15	Gary Mitchell	3100 3rd Avenue
3/26/15	Kendre Allen	2500 6th Avenue
4/16/15	Bethany Kindred	2413 4th Avenue
5/31/15	Javon Clark	2100 East 35th Street
7/24/15	Korrielle Redding	2200 East 26th Street
8/9/15	Reginald McGruder	2700 4th Avenue
9/21/15	Jonathan Joseph Black	2800 3rd Avenue
10/20/15	Thomas Simmons	2800 blk 4th Avenue
"	Antonio Watkins	"
12/31/15	Arterrius Bonds	2714 6th Avenue

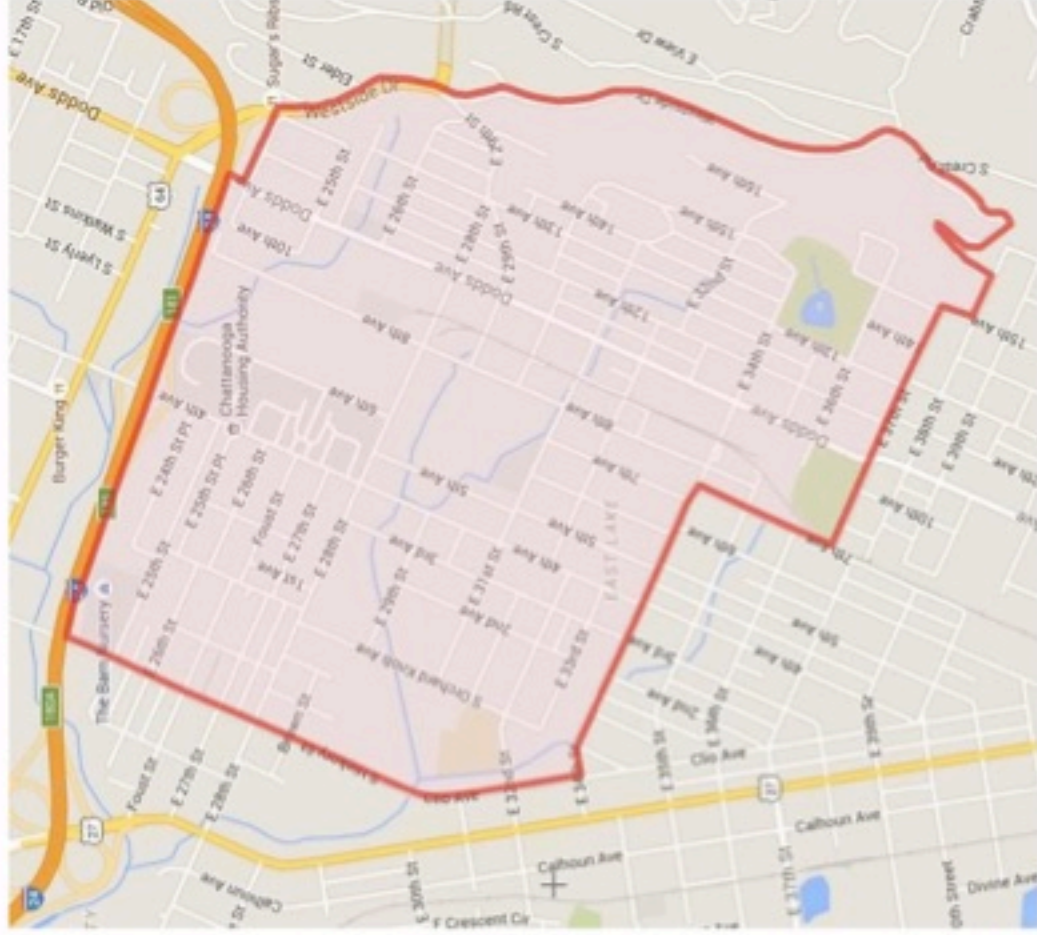
EAST LAKE CRIME DATA

2014-2016 (GEOGRAPHIC DESIGNATED AREA)

SUBMITTED BY:
INV. CURTIS PENNEY #354
CHATTANOOGA POLICE DEPARTMENT
ORGANIZED CRIME DIVISION/CRIMINAL
INTELLIGENCE UNIT

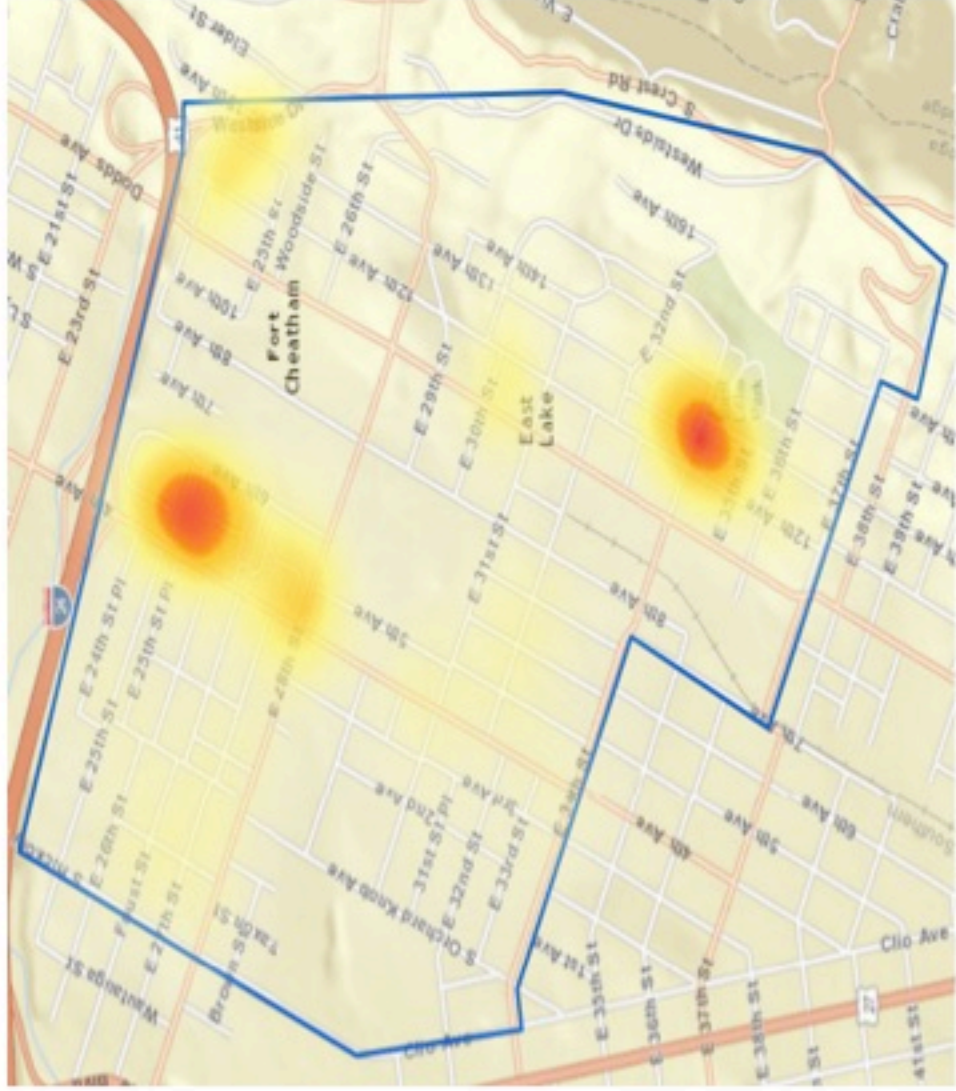
EAST LAKE DEFINED SAFETY ZONE

- CRIME DATA WAS PULLED FROM THE DEFINED AREA MARKED IN RED
- CRIME DATA WAS PULLED FROM JANUARY 1, 2014 TO SEPTEMBER 1, 2016



2016 CRIME DATA

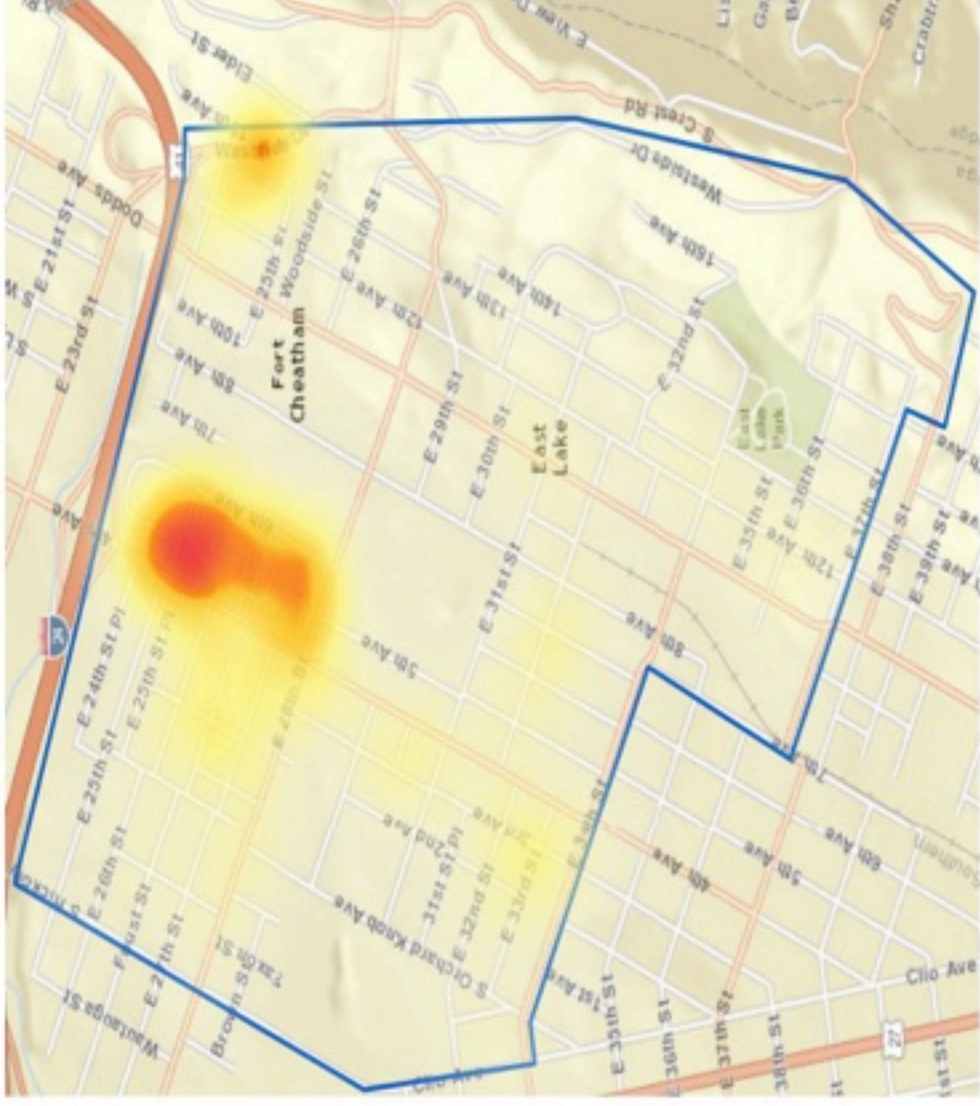
1	STOLEN PROPERTY
5	TRESPASSING
18	WEAPONS OFFENSE
86	VANDALISM
6	RAPE
74	SIMPLE ASSAULT
4	SEX CRIME
25	ROBBERY
3	FAMILY OFFENSE
8	FRAUD
5	FORGERY
1	BAD CHECKS
48	AGGRAVATED ASSAULT
46	BURGLARY
64	DRUG VIOLATION
1	DISORDERLY CONDUCT
6	INDECENT EXPOSURE
2	LARCENY - PURSE SNATCHING
34	LARCENY - FROM VEHICLE
3	LARCENY - SHOPLIFTING
2	MURDER
29	MOTOR VEHICLE THEFT
3	KIDNAPPING
2	INTIMIDATION
30	LARCENY - ALL OTHER
29	LARCENY - FROM BUILDING



HOTSPOT MAP INDICATES AREA OF HIGH LEVELS OF CRIME
January 1-September 1, 2016

2015 CRIME DATA

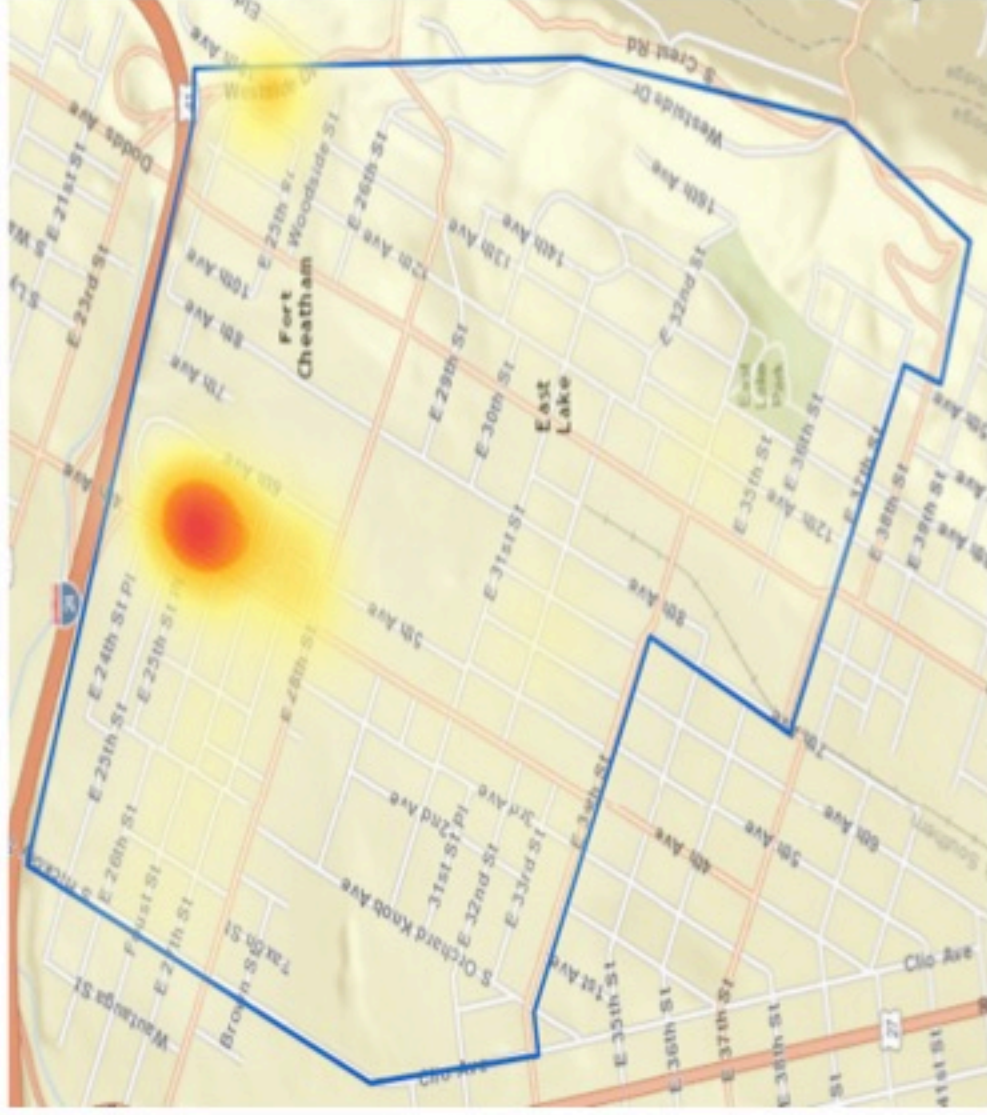
2	STOLEN PROPERTY
2	TRESPASSING
27	WEAPONS OFFENSE
115	VANDALISM
5	RAPE
110	SIMPLE ASSAULT
3	SEX CRIME
16	ROBBERY
1	DUI
2	FAMILY OFFENSE
1	GAMBLING
14	FRAUD
2	FORGERY
65	AGGRAVATED ASSAULT
53	BURGLARY
1	DRUNKENNESS
97	DRUG VIOLATION
2	DISORDERLY CONDUCT
2	INDECENT EXPOSURE
30	LARCENY - FROM VEHICLE
3	LARCENY - SHOPLIFTING
2	MURDER
41	MOTOR VEHICLE THEFT
2	KIDNAPPING
4	INTIMIDATION
40	LARCENY - ALL OTHER



HOTSPOT MAP INDICATES AREA OF HIGH LEVELS OF CRIME

2014 CRIME DATA

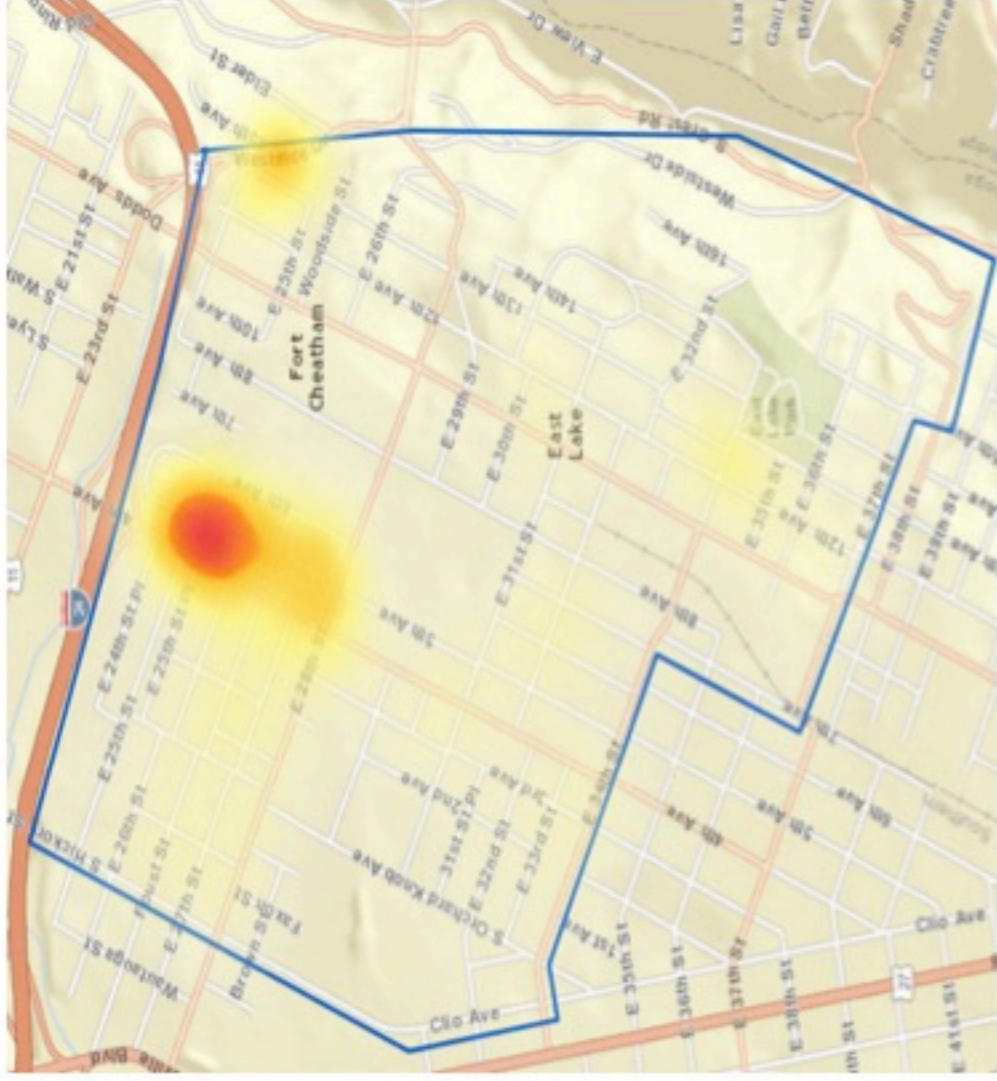
2	STOLEN PROPERTY
1	STALKING
4	TRESPASSING
19	WEAPONS OFFENSE
113	VANDALISM
2	PROSTITUTION
5	RAPE
122	SIMPLE ASSAULT
6	SEX CRIME
25	ROBBERY
1	EMBEZZLEMENT
6	FAMILY OFFENSE
17	FRAUD
3	FORGERY
56	AGGRAVATED ASSAULT
82	BURGLARY
4	DRUNKENNESS
95	DRUG VIOLATION
1	DISORDERLY CONDUCT
3	INDECENT EXPOSURE
40	LARCENY - FROM VEHICLE
4	LARCENY - SHOPLIFTING
3	MURDER
50	MOTOR VEHICLE THEFT
4	KIDNAPPING
3	INTIMIDATION
52	LARCENY - ALL OTHER
53	LARCENY - FROM BUILDING



HOTSPOT MAP INDICATES AREA OF HIGH LEVELS OF CRIME

2014-2016 CRIME DATA

5	STOLEN PROPERTY
65	WEAPONS OFFENSE
2	PROSTITUTION
16	RAPE
314	SIMPLE ASSAULT
13	SEX CRIME
69	ROBBERY
11	FAMILY OFFENSE
39	FRAUD
11	FORGERY
2	ARSON
177	AGGRAVATED ASSAULT
188	BURGLARY
5	DRUNKENNESS
263	DRUG VIOLATION
4	DISORDERLY CONDUCT
11	INDECENT EXPOSURE
3	LARCENY - PURSE SNATCHING
111	LARCENY - FROM VEHICLE
10	LARCENY - SHOPLIFTING
7	MURDER
123	MOTOR VEHICLE THEFT
9	KIDNAPPING
125	LARCENY - ALL OTHER
124	LARCENY - FROM BUILDING



HOTSPOT MAP INDICATES AREA OF HIGH LEVELS OF CRIME

2014-2016 VIOLENT CRIME DATA



HOMICIDES 2014-2016



ROBBERIES 2014-2016

2014-2016 VIOLENT CRIME DATA



AGGRAVATED ASSAULT 2014-2016



SIMPLE ASSAULT 2014-2016

2014-2016 PROPERTY CRIME DATA



BURLARIES 2014-2016



VANDALISM 2014-2016

2014-2016 PROPERTY CRIME DATA



THEFTS (ALL TYPES) 2014-2016

VERIFICATION

STATE OF TENNESSEE

COUNTY OF HAMILTON

I, Curtis Penney, have direct and personal knowledge of the following:

1. I am over the age of 18 and am competent to testify to the matters set forth in this affidavit.
2. I have been a sworn police officer with the Chattanooga Police Department, and have been since July 2000. At the present time I currently assigned to the Organized Crime Division, specifically as an Investigator with the Criminal Intelligence Unit. As an investigator I am tasked with conducting proactive policing techniques in determined "High Crime" areas. In addition to that the unit tracks, and identifies criminal street gangs that conduct unlawful criminal acts to include, but not limited to: narcotics violations, weapons violations, assaults, aggravated assaults, robbery, property damage and thefts. My current role within the unit consists of conducting intelligence gathering to aid in the prediction, prevention, investigation and prosecution of criminals. A great deal of the investigations that I conduct is accomplished with the use of using OSINT "Open Source Intelligence". I have received specialized training in the use of open source tools up to and including the use of social media/networking sites.
3. Prior to being assigned to the Criminal Intelligence Unit I was assigned to the Crime Suppression Unit from 2010-2015. The Crime Suppression Unit is a proactive investigative unit that addresses criminal activity, specifically street level narcotics investigations and criminal street gangs. The unit's primary responsibility is identifying and tracking criminal street gang activity. As a Gang Investigator I received specialized

training in which consisted of basic knowledge understanding of gang through historical information, the signs and symbols used for each gang and how to conduct successful gang investigations.

4. Additionally I have received Advanced Criminal Street Gang Training, which consisted of gang prosecution strategies, prevention/intervention techniques, and alternative suppression techniques to employ while conducting investigations.

I have received extensive training and application of the gang validation process. I now conduct training for law enforcement on how to properly validate a person that is associated with a criminal street gang. I construct and teach Basic Gang Signs/Symbols curriculum for Law Enforcement as well as presenting similar curriculum to local community groups and organizations.

5. I am familiar with the Gangster Disciples and the Grape Street Crips. Over the course of my time as a police officer, I have interviewed members of each gang. I am familiar with where they congregate, where they commit their crimes, and their membership. Additionally, as part of this investigation, I have spent significant time observing the Gangster Disciples and the Grape Street Crips through their use of the internet and social media.

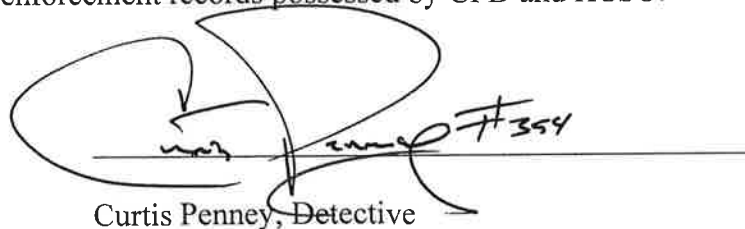
6. As part of my duties at CPD, I have access to the records and reports of CPD and Hamilton County Sheriff's Office (HCSO). I have personal knowledge of and have reviewed all records, reports, and investigative files (records) referenced in this Petition which were used to support it. All persons compiling and recording the information contained in these Records reference within and supporting the Petition had a business duty to do so truthfully and accurately. The records were made and

kept in the regular course of CPD and HCSO operations/criminal investigations and were made at or near the times of the events described therein. I have knowledge of the methods used by CPD and HCS, especially as they relate to my work as a Detective at CPD, to prepare and maintain records.

7. I reviewed true and accurate copies of the Records reflecting the allegation in this Petition. This petition accurately reflects the information contained within the records.

8. The allegations in this Petition are true and accurate to the best of my knowledge, information and belief, based upon my review of the Records, my case notes, my personal knowledge of many of the events and investigations, and my experience with criminal gangs and, specifically, the Gangster Disciples and the Grape Street Crips.

9. All photographs and reports mentioned or included in the Petition are true and accurate copies of law enforcement records possessed by CPD and HCSO.



Curtis Penney, Detective

Chattanooga Police Department

STATE OF TENNESSEE)
COUNTY OF HAMILTON)

Personally appeared before me, the undersigned, a Notary Public, in and for said county and state, the within named Curtis Penney with whom I am personally acquainted (or upon the basis of satisfactory evidence presented to me), who, after being duly sworn, made oath that he executed the foregoing for the purposes therein contained.

Witness my hand and official seal this the 23 day of September, 2016.

Barbie Branum
NOTARY PUBLIC

My Commission Expires: 5/27/18

