

Presentment

STATE OF TENNESSEE

vs.

ARTERRIUS ALLEN

TERRY LEE ANDERSON  
aliases "Terry Scott" and "Thumpa Park"

DARRELL ARMSTRONG  
alias "Diesel"

MARTREL ARNOLD  
alias "Trikey Trel"

JAMAAL ATKINSON  
aliases "Mal" and "Lil Baby"

[REDACTED]

HENRY BEARD  
alias "Fat Boy"

TERRY BEASLEY

[REDACTED]

[REDACTED]

LADARREL BRADLEY  
alias "Lil Trel"

RAVEN BRAGG  
alias "Deuce Doll"

CLARENCE BURTON  
aliases "Man Man" and "Lil Athens"

[REDACTED]

CHE'ANTHONY CANNON  
alias "3K"

[REDACTED]

COUNTESS CLEMONS  
alias "Count"

JOHNNY CLEMONS  
alias "Juise"

CORDELLE COLLIER  
alias "Brazzy Blood"

*70al*  
*Paul Anderson*  
*James T. Allen*  
*John M. Burton*  
*John T. Cannon*

*Paula Lott*  
*Lakisha Carter*  
*Sharon Rison*  
*Theresa Lewis*  
*Shirley E. Johnson*  
*Shirley Patton*

*Jimmy Colless*  
Grand Jury Foreperson

FD-101 (REV. 11-6-81)

FLOYD DAVIS  
 alias "Lil Southside"  
 DANIELLE DEAN  
 alias "Danni"  
 JEREMY ELLIS  
 alias "Dub"  
 MARQUITA ESTES  
 alias "Big Blood"  
 MELVIN GREEN  
 alias "Durdy"  
 ANDRE GRIER  
 alias "Hollywood"  
 LACHARLESTON HAGGARD  
 alias "L.A."  
 LAWANDE HAGGARD  
 aliases "Peanut" and "Nut Crack"  
 COURTNEY HIGH  
 aliases "Killa Red" and "Red Rage"

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 TYCHIUS JOHNSON  
 alias "Parkboy Ty"  
 [REDACTED]  
 [REDACTED]

*70 Dan H*  
*James + James Lambert*  
*Shelby Johnson*  
*Joseph D. Qupton*  
*Shelly Ann*  
*Jade Fain*

*Janette*  
*Shakisha Carter*  
*James Rutch*  
*James D. [unclear]*  
*Monica [unclear]*  
*Shirley [unclear]*

BRODERICK LAY  
 aliases "Ko Ko" and "Parkboy Ko"  
 ANTWON LEE  
 alias "Funeral Home"

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

*Jimmy Anderson*  
 Grand Jury Foreperson

KERRY MCKINNEY  
 alias "Lil Kerry"  
 ERIC MCREYNOLDS  
 alias "Donkie"

[REDACTED]  
 [REDACTED]

DEXTER MAYES  
 alias "Lil Dexter"

[REDACTED]  
 [REDACTED]

JERMAINE MYRICKS  
 alias "Gator"

MONTEZ MURPHY  
aliases "Tezzo Park" and "So Icey"

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CLARENCE ORTON  
alias "Bj Blood"

DEMETRIC POINTER  
alias "Robert Davis"

CHENIKA RAMSEY

CHARLES SHELTON  
alias "Slick Blood"

JAMAL SHEPHERD

CORTEZ SIMS  
alias "Awax"

COYNESHA SIMS

[REDACTED]

BARRIUS SNEED  
alias "Sneed"

JESSE STAMPS  
alias "Lil Heavy"

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

*Adrian [unclear]*  
*James [unclear]*  
*James [unclear]*  
*James [unclear]*  
*Phil [unclear]*  
*John [unclear]*

*John Bell*  
*Chakisha Carter*  
*Sham [unclear]*  
*Sham [unclear]*  
*Sham [unclear]*  
*Sham [unclear]*

*Jimmy Anderson*  
Grand Jury Foreperson

**CHARGES:**

- Count One:** Racketeering Tennessee Code Annotated 39-12-204(c)
- Count Two:** Racketeering Conspiracy Tennessee Code Annotated 39-12-204 (d)
- Count Three:** First Degree Premeditated Murder Tennessee Code Annotated 39-13-202
- Count Four:** First Degree Premeditated Murder Tennessee Code Annotated 39-13-202
- Count Five:** First Degree Premeditated Murder Tennessee Code Annotated 39-13-202
- Count Six:** Conspiracy to Commit First Degree Premeditated Murder Tennessee Code Annotated 39-13-202
- Count Seven:** First Degree Felony Murder Tennessee Code Annotated 39-13-202
- Count Eight:** Conspiracy to Commit First Degree Felony Murder Tennessee Code Annotated 39-13-202
- Count Nine:** Especially Aggravated Kidnapping Tennessee Code Annotated 39-13-305
- Count Ten:** Conspiracy to Commit Especially Aggravated Kidnapping Tennessee Code Annotated 39-13-305
- Count Eleven:** First Degree Premeditated Murder Tennessee Code Annotated 39-13-202
- Count Twelve:** Coercion of a Witness Tennessee Code Annotated 39-16-507
- Count Thirteen:** First Degree Premeditated Murder Tennessee Code Annotated 39-13-202

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**COUNT ONE: THE RACKETEERING ENTERPRISE**

The Grand Jurors for the State of Tennessee, and Hamilton County, Tennessee, upon their oaths, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforementioned, present that ARTERRIUS ALLEN, TERRY LEE ANDERSON aliases "Terry Scott" and "Thumpa Park", DARRELL ARMSTRONG alias "Diesel", MARTREL ARNOLD alias "Trippy Trel", JAMAAL ATKINSON aliases "Mal" and "Lil Baby", [REDACTED], HENRY BEARD alias "Fat Boy", TERRY BEASLEY, [REDACTED], [REDACTED], LADARREL BRADLEY alias "Lil Trel", RAVEN BRAGG alias "Deuce Doll", CLARENCE BURTON aliases "Man Man" and [REDACTED], CHE'ANTHONY CANNON alias "3K", [REDACTED], COUNTESS CLEMONS alias "Count", JOHNNY CLEMONS alias "Juise", CORDELLE COLLIER alias "Brazzy Blood", FLOYD DAVIS alias "Lil Southside", DANIELLE DEAN alias "Danni", JEREMY ELLIS alias "Dub", MARQUITA ESTES alias "Big Blood", MELVIN GREEN alias "Durdy", ANDRE GRIER alias "Hollywood", LACHARLESTON HAGGARD alias "L.A.", LAWANDE HAGGARD aliases "Peanut" and "Nut Crack", COURTNEY HIGH aliases "Killa Red" and "Red Rage", [REDACTED], TYCHIUS JOHNSON alias "Parkboy Ty", DIMESHA KIRK alias "Mesha Blood", BRODERICK LAY alias "Parkboy Ko", ANTWON LEE alias "Funeral Home", [REDACTED], KERRY MCKINNEY alias "Lil Kerry", ERIC MCREYNOLDS alias "Donkie", [REDACTED], DEXTER MAYES alias "Lil Dexter", [REDACTED], JERMAINE MYRICKS alias "Gator", CLARENCE ORTON alias "BJ Blood", DEMETRIC POINTER alias "Robert Davis", CHENIKA RAMSEY, CHARLES SHELTON alias "Slick Blood", JAMAL SHEPHERD, CORTEZ SIMS alias "Awax", [REDACTED], DARRIUS SNEED alias "Sneed", JESSE STAMPS alias "Lil Heavy", [REDACTED], [REDACTED] heretofore, in the County aforesaid, were unlawfully employed by, or were associated with, any enterprise to knowingly conduct or participate, directly indirectly, in the enterprise through a pattern of racketeering activity, in violation of Tennessee Code Annotated 39-12-204 (c), against the peace and dignity of the State.

**THE RACKETEERING ENTERPRISE**

1. There existed and continues to exist a criminal street gang, that is, a group of individuals which are known as the Athens Park Bloods of Chattanooga. The Athens Park Bloods of Chattanooga have operated in and around the city of Chattanooga and in Hamilton County, Tennessee.
2. The above listed defendants are current members or associates of the Athens Parks Bloods.
3. This criminal street gang, including its leadership, membership, and associates, constitute an "enterprise" as that term is defined in Tennessee

Annotated Code § 39-12-203(3), that is, any individual, sole proprietorship, partnership, corporation, business trust, union chartered under the laws of this state, or other legal entity, or any unchartered union, association, or group of individuals associated in fact, although not a legal entity, and it includes illicit as well as licit enterprises and government, as well as other entities, including criminal gangs, as defined in T.C.A. § 40-35-121(a).

4. The Athens Park Bloods constitute an ongoing organization whose members function as a continuing unit for a common purpose of achieving the objectives of the enterprise.

#### PURPOSES OF THE ENTERPRISE

1. The purposes of the Athens Park Bloods include, but are not limited to the following:
  - a. Enriching the leaders, members, and associates of the enterprise through the use of threats, intimidation, and violence, including, but not limited to, acts of murder, robbery, and illegal trafficking of controlled substances;
  - b. Promoting and enhancing the enterprise and its members' and associates' activities;
  - c. Preserving and protecting the power, territory, operations, and proceeds of the enterprise through the use of threats, intimidation, and violence;
  - d. Keeping victims and witnesses in fear of the enterprise and in fear of its leaders, members, and associates through acts and threats of violence; and
  - e. Taking steps designed to prevent law enforcement's detection of the enterprise's criminal activities.

#### COUNT TWO: RACKETEERING CONSPIRACY

The Grand Jurors for the State of Tennessee, and Hamilton County, Tennessee, upon their oaths, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforementioned, present that ARTERRIUS ALLEN, TERRY LEE ANDERSON aliases "Terry Scott" and "Thumpa Park", DARRELL ARMSTRONG alias "Diesel", MARTREL ARNOLD alias "Trippy Trel", JAMAAL ATKINSON aliases "Mal" and "Lil Baby", [REDACTED], HENRY BEARD alias "Fat Boy", TERRY BEASLEY, [REDACTED], [REDACTED], LADARREL BRADLEY alias "Lil Trel", RAVEN BRAGG alias "Deuce Doll", CLARENCE BURTON aliases "Man Man" and "Lil Athens", [REDACTED], CHE' ANTHONY CANNON alias "3K", [REDACTED], COUNTESS CLEMONS alias "Count", JOHNNY CLEMONS alias "Juise", CORDELLE COLLIER alias "Brazzy Blood", FLOYD DAVIS alias "Lil Southside", DANIELLE DEAN alias "Danni", JEREMY

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ELLIS alias "Dub", MARQUITA ESTES alias "Big Blood", MELVIN GREEN alias "Durdy", ANDRE GRIER alias "Hollywood", LACHARLESTON HAGGARD alias "L.A.", LAWANDE HAGGARD aliases "Peanut" and "Nut Crack", COURTNEY HIGH aliases "Killa Red" and "Red Rage", [REDACTED], [REDACTED], TYCHIUS JOHNSON alias "Parkboy Ty", [REDACTED], BRODERICK LAY alias "Parkboy Ko", ANTWON LEE alias "Funeral Home", [REDACTED], [REDACTED], KERRY MCKINNEY alias "Lil Kerry", ERIC MCREYNOLDS alias "Donkie", [REDACTED], DEXTER MAYES alias "Lil Dexter", [REDACTED], [REDACTED], JERMAINE MYRICKS alias "Gator", CLARENCE ORTON alias "BJ Blood", DEMETRIC POINTER alias "Robert Davis", CHENIKA RAMSEY, CHARLES SHELTON alias "Slick Blood", JAMAL SHEPHERD, CORTEZ SIMS alias "Awax", COYNESHA SIMS, [REDACTED], [REDACTED], DARRIUS SNEED alias "Sneed", JESSE STAMPS alias "Lil Heavy", [REDACTED], [REDACTED], [REDACTED]

[REDACTED] tofore, in the County aforesaid, unlawfully conspired or endeavored to violate any of the provisions of Tennessee Code Annotated § 39-12-204 subsections (a),(b) or (c) in violation of Tennessee Code Annotated § 39-12-204 (d) against the peace and dignity of the State.

1. The above listed defendants are current members or associates of the Athens Parks Bloods, being persons employed by and associated with the Athens Park Bloods, which engaged in, that is, to conduct and participate, directly and indirectly, in the conduct and affairs of the enterprise through a pattern of racketeering activity consisting of to commit, attempt to commit, conspire to commit, or to solicit, coerce, or intimidate another person to commit a criminal gang offense, as defined in Tennessee Code Annotated § 40-35-121 (a)

#### MEANS AND METHODS OF THE CONSPIRACY

2. It is further part of the conspiracy that the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise included the following:

a. Members of the enterprise and their associates employed and used gang-related terminology, symbols, gestures as well as dressing predominantly in the color red;

b. To perpetuate the enterprise and to maintain and extend their power, members of the enterprise and their associates committed illegal acts, including murder, attempted murder, and other criminal gang offenses;

c. Members of the enterprise and their associates shared in the proceeds of the enterprise's illegal activities, including, but not limited to, robberies and the sale of controlled substances;



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d. Members of the enterprise and their associates used multiple cellular telephones to communicate with one another concerning and during the commission of the enterprise's illegal activities;

e. Members of the enterprise and their associates obtained, used, carried, possessed, brandished, and discharged firearms in connection with the enterprise's illegal activities;

f. Members of the enterprise and their associates managed the procurement, transfer, use, concealment, and disposal of firearms and dangerous weapons within the enterprise to protect their territory, personnel, and operations, and to deter, eliminate, and retaliate against rival criminal street gangs as well as witnesses to the enterprise's illegal activities;

g. Members of the enterprise and their associates concealed and hid, and caused to be concealed and hidden, the purposes of the acts done in furtherance of the enterprise, and used coded language on social media and in jail letters commonly referred to as "kites" and other means to avoid detection and apprehension by law enforcement and provided security to members and associates of the enterprise;

h. Members of the enterprise and their associates had nominees obtain rental vehicles for the purpose of concealing members' and associates' use of those vehicles during the commission of the enterprise's illegal activities;

i. Members of the enterprise and their associates conducted surveillance of intended murder and robbery victims;

j. Members of the enterprise and their associates used threats of violence, violence, intimidation, and retaliatory acts of violence to cause victims and witnesses to not report, and not be truthful about, the Athens Park Bloods criminal acts to law enforcement;

k. Members of the enterprise and their associates would use proceeds from their illegal activities to aid members of the enterprise and their associates who were incarcerated by, including but not limited to: paying lawyer fees, placing money on their jail commissaries, and raising funds to get members of the enterprise and their associates released from custody on monetary bonds;

l. Members of the enterprise and their associates would use multiple cellular telephones to allow members of the enterprise and their associates who were incarcerated to have three way phone calls with members of the enterprise and their associates not in custody to discuss and plan the enterprise's illegal activities;

m. Members of the enterprise and their associates possessed, distributed, and possessed with the intent to distribute controlled substances in the conduct of the affairs of the enterprise;

n. Members of the enterprise and their associates committed or attempted to commit arsons in the conduct of the affairs of the enterprise including, but not limited to, the following:

i. The arsons or attempted arsons committed by [REDACTED], [REDACTED], [REDACTED], [REDACTED], and [REDACTED] of an apartment duplex located at [REDACTED] in Hamilton County, Tennessee and two automobiles on or about June 26<sup>th</sup>, 2008;

ii. The arsons or attempted arsons committed by Courtney High, [REDACTED], [REDACTED], and [REDACTED] on two residential homes located at 4813 Tomahawk Trail and at 4814 Tomahawk Trail in Hamilton County, Tennessee on or about September 30<sup>th</sup>, 2009;

o. Members of the enterprise and their associates committed murders and attempted murders in the conduct of the affairs of the enterprise including, but not limited to, the following:

i. The murder of Edward Glenn, Jr. by [REDACTED] and [REDACTED] on or about January 10<sup>th</sup>, 2013;

ii. The murder of Deontray Southers by Cortez Sims on or about January 20<sup>th</sup>, 2014;

iii. The murder of Cedric Mikes by Cordelle Collier, Martrel Arnold, and Johnny Clemons on or about June 25<sup>th</sup>, 2014.

iv. The murder of Talitha Bowman by Cortez Sims on or about January 7<sup>th</sup>, 2015;

v. The attempted murders of Marcell Christopher, Bianca Horton, and Zoe Duncan by Cortez Sims on or about January 7<sup>th</sup>, 2015;

vi. The murder of Bianca Horton by Courtney High, Andre Grier, and Charles Shelton on or about May 25<sup>th</sup>, 2016;

vii. The murder of Jerica Jackson by Courtney High on or about June 12, 2016;

viii. The murder of Marquise Jackson by Courtney High and a juvenile on or about August 7<sup>th</sup>, 2016;

p. Members of the enterprise and their associates committed robberies in the conduct of the affairs of the enterprise; and

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q. Members of the enterprise and their associates committed obstruction of justice, coercion of witnesses, attempted obstruction of justice, and conspiracy to attempt to obstruct justice and obstruct justice, in the conduct of the affairs of the enterprise.

### **COUNT THREE: FIRST DEGREE PREMEDITATED MURDER**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That CORTEZ SIMS, alias Awax, heretofore on or about January 20th 2014, in the County aforesaid, did unlawfully, intentionally and with premeditation kill Deontray Southers, in violation of Tennessee Code Annotated 39-13-202, against the peace and dignity of the State.

### **COUNT FOUR: FIRST DEGREE PREMEDITATED MURDER**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That CORDELLE COLLIER, alias Brazzy Blood, MARTREL ARNOLD, alias Trippy Trel, and JOHNNY CLEMONS, alias Juise , heretofore on or about June 25<sup>th</sup> 2014, in the County aforesaid, did unlawfully, intentionally and with premeditation kill Cedric Mikes, in violation of Tennessee Code Annotated 39-13-202, against the peace and dignity of the State.

### **COUNT FIVE: FIRST DEGREE PREMEDITATED MURDER**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That COURTNEY HIGH, aliases Killa Red and Red Rage, CHARLES SHELTON, alias Slick Blood, and ANDRE GRIER, aka Hollywood , heretofore on or about May 25<sup>th</sup> 2016, in the County aforesaid, did unlawfully, intentionally and with premeditation kill Bianca Horton, in violation of Tennessee Code Annotated 39-13-202, against the peace and dignity of the State.

### **COUNT SIX: CONSPIRACY TO COMMIT FIRST DEGREE PREMEDITATED MURDER**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That COURTNEY HIGH aliases Killa Red and Red Rage, CHARLES SHELTON, alias Slick Blood, and ANDRE GRIER, alias Hollywood , heretofore on or before May 25<sup>th</sup> 2016, in the County aforesaid, did unlawfully, intentionally and knowingly agree to engage in conduct that constitutes the offense of Premeditated Murder and to escape from

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said crime and to conceal their involvement in said crime and/or obstruct justice in relation to it, with each having the culpable mental state required for the commission of that offense, and with each acting for the purpose of promoting or facilitating the commission of the offense, and in furtherance of this conspiracy, the following overt acts, among others were committed:

1. Sometime prior to May 2016, Courtney High, aliases Killa Red and Red Rage, and Charles Shelton, alias Slick Blood, and Andre Grier, alias Hollywood, became members and/or associates of a Chattanooga street gang known as the Athens Park Bloods. The Athens Park Bloods are and were a set gang of the Bloods who themselves were formed and based out of Los Angeles County, California. Set gangs affiliate themselves with the larger gangs such as the Bloods but are located in a different geographic location in the same city or another part of the United States of America.
2. Within the Bloods and their affiliate set gangs, a hierarchy was established among members and associates based upon age and experience. Members and associates lacking age and experience report to and are controlled by the senior members. In order to join a criminal street gang, individuals must perform various criminal offenses known as "putting in work" and also have to be beaten into the gang by members or associates. Courtney High, aliases Killa Red and Red Rage, and Andre Grier, alias Hollywood, had or obtained status in the Athens Park Bloods sometime before or during 2016. Charles Shelton, alias Slick Blood, became an associate of the Athens Park Bloods before or during 2016.
3. The Athens Park Bloods meet on a regular basis to discuss gang activities and collect money to fund their gang functions. At these meetings, orders were given to members and associates to carry out gang activities. Failure of a younger gang member or associate to follow orders could result in severe punishment up to and including death.
4. That on January 7<sup>th</sup> 2015 in Hamilton County Tennessee, an Athens Park Blood member or associate, Cortez Sims, alias Awax, murdered Talitha Bowman and attempted to murder Marcell Christopher, Bianca Horton, and Zoey Duncan, the daughter of Bianca Horton. Christopher was a member or associate of a rival Chattanooga street gang known as the Bounty Hunter Bloods.
5. That after January 7<sup>th</sup> 2015, Cortez Sims, alias Awax, was charged with various criminal offenses including first degree murder and attempted murders. Sims was a juvenile at the time of the offense and his charges were filed in Hamilton County Juvenile Court.
6. That after January 7<sup>th</sup> 2015, a hearing was held in Hamilton County Juvenile Court to transfer Cortez Sims', alias Awax, murder and attempted murder charges to Hamilton County Criminal Court.

7. That at this transfer hearing, Bianca Horton appeared and testified to the events of January 7<sup>th</sup>, 2015, wherein Bianca Horton identified Cortez Sims, alias Awax, as the individual responsible for the murder and attempted murders of January 7<sup>th</sup>, 2015. Horton had previously identified Sims as the perpetrator to the Chattanooga Police Department in an oral statement and also identified Sims in a photo array.

8. That in July 2015, Cortez Sims, alias Awax, was indicted by the Hamilton County Grand Jury for first degree murder and attempted first degree murder. His cases were subsequently set for a jury trial in September 2016.

9. That Bianca Horton was a witness the State of Tennessee intended to call in the trial of Cortez Sims, alias Awax. That Bianca Horton was a witness against Cortez Sims, alias Awax, and her previous testimony was known to members and associates of the Athens Park Bloods.

10. That before May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, Andre Grier, alias Hollywood, and other members and associates of the Athens Park Bloods had telephone conversations about not wanting Bianca Horton to testify in the jury trial of Cortez Sims, alias Awax.

11. That before May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, Andre Grier, alias Hollywood, and other members of the Athens Park Bloods made plans to prevent Bianca Horton from testifying.

12. That before May 25<sup>th</sup> 2016, Andre Grier, alias Hollywood, had a conversation with Cordelle Collier, alias Brazzy Blood, wherein Grier stated "... was supposed to be going to pick up a van for the other little situation that was going on."

13. That before May 25<sup>th</sup> 2016, Andre Grier, alias Hollywood, purchased a vehicle. Said vehicle was a van and the title was in the possession of Andre Grier, alias Hollywood.

14. That before May 25<sup>th</sup> 2016, Andre Grier, alias Hollywood, paid for the van to be painted the color white.

15. That on May 24<sup>th</sup> 2016, Bianca Horton was at work with a company located at Quintus Loop in Hamilton County, Tennessee. She left work sometime after 10 pm and eventually made it to the parking lot of her apartment located at 1020 W. 37<sup>th</sup> Street in Hamilton County, Tennessee. Her car was found parked with her keys and two cellular phones scattered around the exterior of her car.

16. That on May 25<sup>th</sup> 2016, Bianca Horton was found murdered and dumped on the side of the road at 2165 Elder Street in Hamilton County, Tennessee.

17. That sometime after May 25<sup>th</sup> 2016, law enforcement agents retrieved cellular telephone data from three different cellular towers. One tower was located near Bianca

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Horton's place of work, one was located near her apartment, and one was located near where her body was located. That data revealed three phone numbers hit on all three towers the evening of the kidnapping and murder. Two of those phone numbers were attributed to Charles Shelton, alias Slick Blood, and one phone number was attributed to Andre Grier, alias Hollywood.

18. Forensic evaluation of the telephone data revealed those three phones were near the area of Bianca Horton when she left work, near the area of when she returned to her apartment, and also near the site where she was dumped.

19. That sometime after May 25<sup>th</sup> 2016, Courtney High, aliases Killa Red and Red Rage made a number of telephone calls to members or associates of the Athens Park Bloods about the Bianca Horton homicide. He admits to being present and participating in the kidnapping and murder of Bianca Horton along with various members and associates of the Athens Park Bloods.

20. That sometime after May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood and Andre Grier, alias Hollywood, caused the van to be moved away from where the Athens Park Bloods housed the van to a location in Hamilton County Tennessee at 5510 O'Leary Street.

21. That sometime after May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, Andre Grier, alias Hollywood, and other members and associates of the Athens Park Bloods took measures to clean out the interior of the van that Grier had purchased.

22. That sometime after May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, boasted no evidence would be found in the van because it had been cleaned out by he and other members and associates of the Athens Park Bloods.

23. That sometime after May 25<sup>th</sup> 2016, a white van was located at 5510 O' Leary Street in Hamilton County, Tennessee. Members of the Federal Bureau of Investigation processed the white van for possible evidence and discovered a fingerprint and possible DNA inside of the van. Charles Shelton, alias Slick Blood, was determined to be the source of the fingerprint and the DNA.

24. That at various times after May 25<sup>th</sup> 2016, Courtney High, aliases Killa Red and Red Rage, Charles Shelton, alias Slick Blood, and Andre Grier, alias Hollywood, have continued to hide their involvement in the murder of Bianca Horton.

Wherefore, Courtney High, aliases Killa Red and Red Rage, Charles Shelton, alias Slick Blood, and Andre Grier, alias Hollywood, did conspire to violate Tennessee Code Annotated 39-13-202 against the peace and dignity of the State.

**COUNT SEVEN: FIRST DEGREE FELONY MURDER**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That COURTNEY HIGH, aliases Killa Red and Red Rage, CHARLES SHELTON, alias Slick Blood, and ANDRE GRIER, alias Hollywood , heretofore on or about May 25<sup>th</sup> 2016, in the County aforesaid, did unlawfully kill Bianca Horton during the perpetration of or an attempt to perpetrate a kidnapping, in violation of Tennessee Code Annotated 39-13-202, against the peace and dignity of the State.

**COUNT EIGHT: CONSPIRACY TO COMMIT FIRST DEGREE FELONY MURDER**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That COURTNEY HIGH, aliases Killa Red and Red Rage, CHARLES SHELTON, alias Slick Blood, and ANDRE GRIER, alias Hollywood , heretofore on or before May 25<sup>th</sup> 2016, in the County aforesaid, did unlawfully, intentionally and knowingly agree to engage in conduct that constitutes the offense of Felony Murder and to escape from said crime, to share in the distribution of the proceeds of said crime and to conceal their involvement in said crime and/or obstruct justice in relation to it, with each having the culpable mental state required for the commission of that offense, and with each acting for the purpose of promoting or facilitating the commission of the offense, and in furtherance of this conspiracy, the following overt acts, among others were committed:

1. Sometime prior to May 2016, Courtney High, aliases Killa Red and Red Rage, and Charles Shelton, alias Slick Blood, and Andre Grier, alias Hollywood, became members and/or associates of a Chattanooga street gang known as the Athens Park Bloods. The Athens Park Bloods are and were a set gang of the Bloods who themselves were formed and based out of Los Angeles County, California. Set gangs affiliate themselves with the larger gangs such as the Bloods but are located in different geographic location in the same city or another part of the United States of America.
2. Within the Bloods and their affiliate set gangs, a hierarchy was established among members and associates based upon age and experience. Members and associates lacking age and experience report to and are controlled by the senior members. In order to join a criminal street gang, individuals must perform various criminal offenses known as "putting in work" and also have to be beaten into the gang by members or associates. Courtney High, aliases Killa Red and Red Rage, and Andre Grier, alias Hollywood, had or obtained status in the Athens Park Bloods sometime before or during 2016. Charles Shelton, alias Slick Blood, was an associate of the Athens Park Bloods before or during 2016.

3. The Athens Park Bloods meet on a regular basis to discuss gang activities and collect money to fund their gang functions. At these meetings, orders were given to members and associates to carry out gang activities. Failure of a younger gang member or associate to follow orders could result in severe punishment up to and including death.

4. That on January 7<sup>th</sup> 2015 in Hamilton County Tennessee, an Athens Park Blood member or associate, Cortez Sims, alias Awax, murdered Talitha Bowman and attempted to murder Marcell Christopher, Bianca Horton, and Zoey Duncan, the daughter of Bianca Horton. Christopher was a member or associate of a rival Chattanooga street gang known as the Bounty Hunter Bloods.

5. That after January 7<sup>th</sup> 2015, Cortez Sims, alias Awax, was charged with various criminal offenses including first degree murder and attempted murders. Sims was a juvenile at the time of the offense and his charges were filed in Hamilton County Juvenile Court.

6. That after January 7<sup>th</sup> 2015, a hearing was held in Hamilton County Juvenile Court to transfer Cortez Sims', alias Awax, murder and attempted murder charges to Hamilton County Criminal Court.

7. That at this transfer hearing, Bianca Horton appeared and testified to the events of January 7<sup>th</sup>, 2015, wherein Bianca Horton identified Cortez Sims, alias Awax, as the individual responsible for the murder and attempted murders of January 7<sup>th</sup>, 2015. Horton had previously identified Sims as the perpetrator to the Chattanooga Police Department in an oral statement and also identified Sims in a photo array.

8. That in July 2015, Cortez Sims, alias Awax, was indicted by the Hamilton County Grand Jury for first degree murder and attempted first degree murder. His cases were subsequently set for a jury trial in September 2016.

9. That Bianca Horton was a witness the State of Tennessee intended to call in the trial of Cortez Sims, alias Awax. That Bianca Horton was a witness against Cortez Sims, alias Awax, and her previous testimony was known to members and associates of the Athens Park Bloods.

10. That before May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, Andre Grier, alias Hollywood, and other members and associates of the Athens Park Bloods had telephone conversations about not wanting Bianca Horton to testify in the jury trial of Cortez Sims, alias Awax.

11. That before May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, Andre Grier, alias Hollywood, and other members of the Athens Park Bloods made plans to prevent Bianca Horton from testifying.



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12. That before May 25<sup>th</sup> 2016, Andre Grier, alias Hollywood, had a conversation with Cordelle Collier, alias Brazzy Blood, wherein Grier stated "... was supposed to be going to pick up a van for the other little situation that was going on."
13. That before May 25<sup>th</sup> 2016, Andre Grier, alias Hollywood, purchased a vehicle. Said vehicle was a van and the title was in the possession of Andre Grier, alias Hollywood.
14. That before May 25<sup>th</sup> 2016, Andre Grier, alias Hollywood, paid for the van to be painted the color white.
15. That on May 24<sup>th</sup> 2016, Bianca Horton was at work with a company located at Quintus Loop in Hamilton County, Tennessee. She left work sometime after 10 pm and eventually made it to the parking lot of her apartment located at 1020 W. 37<sup>th</sup> Street in Hamilton County, Tennessee. Her car was found parked with her keys and two cellular phones scattered around the exterior of her car.
16. That on May 25<sup>th</sup> 2016, Bianca Horton was found murdered and dumped on the side of the road at 2165 Elder Street in Hamilton County, Tennessee.
17. That sometime after May 25<sup>th</sup> 2016, law enforcement agents retrieved cellular telephone data from three different cellular towers. One tower was located near Bianca Horton's place of work, one was located near her apartment, and one was located near where her body was located. That data revealed three phone numbers hit on all three towers the evening of the kidnapping and murder. Two of those phone numbers were attributed to Charles Shelton, alias Slick Blood, and one phone number was attributed to Andre Grier, alias Hollywood.
18. Forensic evaluation of the telephone data revealed those three phones were near the area of Bianca Horton when she left work, near the area of when she returned to her apartment, and also near the site where she was dumped.
19. That sometime after May 25<sup>th</sup> 2016, Courtney High, aliases Killa Red and Red Rage, made a number of telephone calls to members or associates of the Athens Park Bloods about the Bianca Horton homicide. He admits to being present and participating in the kidnapping and murder of Bianca Horton along with various members and associates of the Athens Park Bloods.
20. That sometime after May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood and Andre Grier, alias Hollywood, caused the van to be moved away from where the Athens Park Bloods housed the van to a location in Hamilton County Tennessee at 5510 O'Leary Street.
21. That sometime after May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, Andre Grier, alias Hollywood, and other members and associates of the Athens Park Bloods took measures to clean out the interior of the van that Grier had purchased.

22. That sometime after May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, boasted no evidence would be found in the van because it had been cleaned out by he and other members and associates of the Athens Park Bloods.

23. That sometime after May 25<sup>th</sup> 2016, a white van was located at 5510 O' Leary Street in Hamilton County, Tennessee. Members of the Federal Bureau of Investigation processed the white van for possible evidence and discovered a fingerprint and possible DNA inside of the van. Charles Shelton, alias Slick Blood, was determined to be the source of the fingerprint and the DNA.

24. That at various times after May 25<sup>th</sup> 2016, Courtney High, aliases Killa Red and Red Rage, Charles Shelton, alias Slick Blood, and Andre Grier, alias Hollywood, have continued to hide their involvement in the murder of Bianca Horton.

Wherefore, Courtney High, aliases Killa Red and Red Rage, Charles Shelton, alias Slick Blood, and Andre Grier, alias Hollywood, did conspire to violate Tennessee Code Annotated 39-13-202 against the peace and dignity of the State.

### **COUNT NINE: ESPECIALLY AGGRAVATED KIDNAPPING**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That COURTNEY HIGH, aliases Killa Red and Red Rage, CHARLES SHELTON, alias Slick Blood, and ANDRE GRIER, alias Hollywood, heretofore on or about May 25<sup>th</sup> 2016, in the County aforesaid, did unlawfully and knowingly remove or confine Bianca Horton, so as to interfere substantially with the victim's liberty, and the victim suffered serious bodily injury, in violation of Tennessee Code Annotated 39-13-305(a)(4), against the peace and dignity of the State.

### **COUNT TEN: CONSPIRACY TO COMMIT ESPECIALLY AGGRAVATED KIDNAPPING**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That COURTNEY HIGH, aliases Killa Red and Red Rage, CHARLES SHELTON, alias Slick Blood, and ANDRE GRIER, alias Hollywood, heretofore on or before May 25<sup>th</sup> 2016, in the County aforesaid, did unlawfully, intentionally and knowingly agree to engage in conduct that constitutes the offense of Kidnapping and to escape from said crime and to conceal their involvement in said crime and/or obstruct justice in relation to it, with each having the culpable mental state required for the commission of that offense, and with each acting for the purpose of promoting or facilitating the commission of the offense, and in furtherance of this conspiracy, the following overt acts, among others were committed:

1. Sometime prior to May 2016, Courtney High, aliases Killa Red and Red Rage, Charles Shelton, alias Slick Blood, and Andre Grier, alias Hollywood, became members and/or associates of a Chattanooga street gang known as the Athens Park Bloods. The Athens Park Bloods are and were a set gang of the Bloods who themselves were formed and based out of Los Angeles County, California. Set gangs affiliate themselves with the larger gangs such as the Bloods but are located in a different geographic location in the same city or another part of the United States of America.
2. Within the Bloods and their affiliate set gangs, a hierarchy was established among members and associates based upon age and experience. Members and associates lacking age and experience report to and are controlled by the senior members. In order to join a criminal street gang, individuals must perform various criminal offenses known as "putting in work" and also have to be beaten into the gang by members or associates. Courtney High, aliases Killa Red and Red Rage, and Andre Grier, alias Hollywood, had or obtained status in the Athens Park Bloods sometime before or during 2016. Charles Shelton, alias Slick Blood, was an associate of the Athens Park Bloods before or during 2016.
3. The Athens Park Bloods meet on a regular basis to discuss gang activities and collect money to fund their gang functions. At these meetings, orders were given to members and associates to carry out gang activities. Failure of a younger gang member or associate to follow orders could result in severe punishment up to and including death.
4. That on January 7<sup>th</sup> 2015 in Hamilton County Tennessee, an Athens Park Blood member or associate, Cortez Sims, alias Awax, murdered Talitha Bowman and attempted to murder Marcell Christopher, Bianca Horton, and Zoey Duncan, the daughter of Bianca Horton. Christopher was a member or associate of a rival Chattanooga street gang known as the Bounty Hunter Bloods.
5. That after January 7<sup>th</sup> 2015, Cortez Sims, alias Awax, was charged with various criminal offenses including first degree murder and attempted murders. Sims was a juvenile at the time of the offense and his charges were filed in Hamilton County Juvenile Court.
6. That after January 7<sup>th</sup> 2015, a hearing was held in Hamilton County Juvenile Court to transfer Cortez Sims', alias Awax, murder and attempted murder charges to Hamilton County Criminal Court.
7. That at this transfer hearing, Bianca Horton appeared and testified to the events of January 7<sup>th</sup>, 2015, wherein Bianca Horton identified Cortez Sims, alias Awax, as the individual responsible for the murder and attempted murders of January 7<sup>th</sup>, 2015. Horton had previously identified Sims as the perpetrator to the Chattanooga Police Department in an oral statement and also identified Sims in a photo array.

8. That in July 2015, Cortez Sims, alias Awax, was indicted by the Hamilton County Grand Jury for first degree murder and attempted first degree murder. His cases were subsequently set for a jury trial in September 2016.

9. That Bianca Horton was a witness the State of Tennessee intended to call in the trial of Cortez Sims, alias Awax. That Bianca Horton was a witness against Cortez Sims, alias Awax, and her previous testimony was known to members and associates of the Athens Park Bloods.

10. That before May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, Andre Grier, alias Hollywood, and other members and associates of the Athens Park Bloods had telephone conversations about not wanting Bianca Horton to testify in the jury trial of Cortez Sims, alias Awax.

11. That before May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, Andre Grier, alias Hollywood, and other members of the Athens Park Bloods made plans to prevent Bianca Horton from testifying.

12. That before May 25<sup>th</sup> 2016, Andre Grier, alias Hollywood, had a conversation with Cordelle Collier, alias Brazzy Blood, wherein Grier stated "... was supposed to be going to pick up a van for the other little situation that was going on."

13. That before May 25<sup>th</sup> 2016, Andre Grier, alias Hollywood, purchased a vehicle. Said vehicle was a van and the title was in the possession of Andre Grier, alias Hollywood.

14. That a before May 25<sup>th</sup> 2016, Andre Grier, alias Hollywood, paid for the van to be painted the color white.

15. That on May 24<sup>th</sup> 2016, Bianca Horton was at work with a company located at Quintus Loop in Hamilton County, Tennessee. She left work sometime after 10 pm and eventually made it to the parking lot of her apartment located at 1020 W. 37<sup>th</sup> Street in Hamilton County, Tennessee. Her car was found parked with her keys and two cellular phones scattered around the exterior of her car.

16. That on May 25<sup>th</sup> 2016, Bianca Horton was found murdered and dumped on the side of the road at 2165 Elder Street in Hamilton County, Tennessee.

17. That sometime after May 25<sup>th</sup> 2016, law enforcement agents retrieved cellular telephone data from three different cellular towers. One tower was located near Bianca Horton's place of work, one was located near her apartment, and one was located near where her body was located. That data revealed three phone numbers hit on all three towers the evening of the kidnapping and murder. Two of those phone numbers were attributed to Charles Shelton, alias Slick Blood, and one phone number was attributed to Andre Grier, alias Hollywood.

18. Forensic evaluation of the telephone data revealed those three phones were near the area of Bianca Horton when she left work, near the area of when she returned to her apartment, and also near the site where she was dumped.
19. That sometime after May 25<sup>th</sup> 2016, Courtney High, aliases Killa Red and Red Rage, made a number of telephone calls to members or associates of the Athens Park Bloods about the Bianca Horton homicide. He admits to being present and participating in the kidnapping and murder of Bianca Horton along with various members and associates of the Athens Park Bloods.
20. That sometime after May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood and Andre Grier, alias Hollywood, caused the van to be moved away from where the Athens Park Bloods housed the van to a location in Hamilton County Tennessee at 5510 O'Leary Street.
21. That sometime after May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, Andre Grier, alias Hollywood, and other members and associates of the Athens Park Bloods took measures to clean out the interior of the van that Grier had purchased.
22. That sometime after May 25<sup>th</sup> 2016, Charles Shelton, alias Slick Blood, boasted no evidence would be found in the van because it had been cleaned out by he and other members and associates of the Athens Park Bloods.
23. That sometime after May 25<sup>th</sup> 2016, a white van was located at 5510 O' Leary Street in Hamilton County, Tennessee. Members of the Federal Bureau of Investigation processed the white van for possible evidence and discovered a fingerprint and possible DNA inside of the van. Charles Shelton, alias Slick Blood, was determined to be the source of the fingerprint and the DNA.
24. That at various times after May 25<sup>th</sup> 2016, Courtney High, aliases Killa Red and Red Rage, Charles Shelton, alias Slick Blood, and Andre Grier, alias Hollywood, have continued to hide their involvement in the murder of Bianca Horton.

Wherefore, Courtney High, aliases Killa Red and Red Rage, Charles Shelton, alias Slick Blood, and Andre Grier, alias Hollywood, did conspire to violate Tennessee Code Annotated 39-13-305 against the peace and dignity of the State.

### **COUNT ELEVEN: FIRST DEGREE PREMEDITATED MURDER**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That COURTNEY HIGH, aliases Killa Red and Red Rage, heretofore on or about June 12, 2016, in the County aforesaid, did unlawfully, intentionally and with premeditation kill Jerica Jackson, in violation of Tennessee Code Annotated 39-13-202, against the peace and dignity of the State.

**COUNT TWELVE: COERCION OF A WITNESS**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That ANDRE GRIER, alias Hollywood, heretofore on or about August 16, 2016, in the County aforesaid, did unlawfully and knowingly, by means or coercion, influence or attempt to influence a witness or prospective witness in an official proceeding with intent to influence the witness to withhold any truthful testimony or truthful information in violation of Tennessee Code Annotated 39-16-507, against the peace and dignity of the State.

**COUNT THIRTEEN: FIRST DEGREE PREMEDIATED MURDER**

The Grand Jurors for the State aforesaid, being duly summoned, elected, impaneled, sworn and charged to inquire for the body aforesaid, upon their oaths present:

That COURTNEY HIGH, aliases Killa Red and Red Rage, and a JUVENILE heretofore on or about August 7, 2016, in the County aforesaid, did unlawfully, intentionally and with premeditation kill Marquise Jackson, in violation of Tennessee Code Annotated 39-13-202, against the peace and dignity of the State.

  
DISTRICT ATTORNEY GENERAL

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WITNESSES

1. Chris Blackwell      Chattanooga Police Department
2. Lucas Fuller        Chattanooga Police Department
3. Ben Scott            Hamilton County District Attorney General's Office
4. Taylor Walker       Chattanooga Police Department
5. Jeremy Winbush     Federal Bureau of Investigation