

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,)	FILED UNDER SEAL
)	
Plaintiff,)	
)	
v.)	Cr. No. <u>2:22-CR-20068-JPM</u>
)	
MARTIVUS BASKERVILLE)	
a/k/a "Tavis,")	18 U.S.C. § 2
TOMARCUS BASKERVILLE)	18 U.S.C. § 922(g)
a/k/a "TC")	18 U.S.C. § 924(c)
a/k/a "Glove,")	18 U.S.C. § 924(j)
CHRISTOPHER PEELER)	18 U.S.C. § 1111(a)
a/k/a "Lil Chris,")	18 U.S.C. § 1959 (a)(5)
THOMAS SMITH)	18 U.S.C. § 1959 (b)(1)
a/k/a "TJ,")	18 U.S.C. § 1959 (b)(2)
DAVAIUS WORRLES)	18 U.S.C. § 1961(1)
a/k/a "Mighty")	18 U.S.C. § 1961(5)
a/k/a "Mighty Shun,")	18 U.S.C. § 1962(d)
CURTIS BASKERVILLE)	21 U.S.C. § 841(a)(1)
a/k/a "CB,")	21 U.S.C. § 843
MONTAVEEN TAYLOR)	21 U.S.C. § 846
a/k/a "CGE Tay,")	
MARDARIUS MCNEAL,)	
DEANDRA RIVERS)	
a/k/a "Dre,")	
DEONTE WALKER,)	
a/k/a "Tez,")	
TREVIN HULLOM)	
a/k/a "Scooter,")	
TORRANCE FITZPATRICK)	
a/k/a "Phat,")	
BIANCA JACKSON and)	
COURTLAND SPRINGFIELD)	
a/k/a "Hot Box,")	
)	
Defendants.)	

FIRST SUPERSEDING INDICTMENT

COUNT 1
(Conspiracy to Participate in Racketeering Activity)

THE GRAND JURY CHARGES THAT:

THE RACKETEERING ENTERPRISE: THE TRAVELING VICE LORDS/JUNK YARD DOGS

1. At various times relevant to this Indictment, in the Western District of Tennessee and elsewhere, the defendants, **TOMARCUS BASKERVILLE a/k/a “TC” a/k/a “Glove,” CHRISTOPHER PEELER a/k/a “Lil Chris,” MARTIVUS BASKERVILLE a/k/a “Tavis,” THOMAS SMITH a/k/a “TJ,” DAVAIUS WORRLES a/k/a “Mighty” a/k/a “Mighty Shun,” CURTIS BASKERVILLE a/k/a “CB,” MONTAVEEN TAYLOR a/k/a “CGE TAY,” MARDARIUS MCNEAL, DEANDRA RIVERS a/k/a “Dre,” DEONTE WALKER a/k/a “Tez,” TREVIN HULLOM a/k/a “Scooter,” TORRANCE FITZPATRICK a/k/a “Phat,” BIANCA JACKSON and COURTLAND SPRINGFIELD a/k/a/ “Hot Box,”** and others known and unknown to the Grand Jury, were members and associates of the Traveling Vice Lords / Junk Yard Dogs (TVL/JYD, or “Enterprise”), a criminal organization whose members and associates engaged in acts involving murder, attempted murder, and drug trafficking.

2. TVL/JYD, including its leadership, membership, and associates, constituted an “enterprise” as defined in Title 18, United States Code, Sections 1961(4) and 1959(b)(2), that is, a group of individuals associated in fact, which was engaged in, and activities of which, affected interstate and foreign commerce. The enterprise constituted an ongoing organization whose members and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. At various times relevant to this Indictment, the TVL/JYD, through its leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), that is, acts involving murder,

in violation of Tennessee state law, and offenses involving drug trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance), 843 (b) (use of a communication facility), and 846 (conspiracy to distribute and possess with intent to distribute a controlled substance).

Background and Structure of The Enterprise

4. The TVL/JYD is a violent criminal street gang that operates throughout the Western District of Tennessee. The TVL is a subset of the Almighty Vice Lord Nation which originated in Chicago, Illinois and eventually spread to other parts of the United States, including Tennessee.

5. The Traveling Vice Lords (TVL) has several subsets, including the Junk Yard Dogs (JYD) which originated in Chicago, Illinois and was brought to West Tennessee by its originator. Rivals of the TVL/JYD include, but are not limited to, the Gangster Disciples, other Vice Lord sets and local street gangs.

6. The TVL/JYD uses colors, hand signs, symbols, and tattoos to identify themselves to friendly and rival gang members. The Almighty Vice Lord Nation uses the colors black and gold to distinguish themselves from other gangs, such as the Crips and the Bloods. The Almighty Vice Lord Nation wears red when they are going to war. TVL members and associates use hand signs to signify their membership in, and allegiance to, the gang, including making the letter "T" with their hand(s) or holding their hand with their palms facing up. The TVL also use a five-pointed star, 55, 5, a crescent moon and a star, a top hat, a cane, a champagne glass and a playboy bunny to represent the gang. They often have these symbols tattooed on their bodies.

7. The TVL/JYD employ a structured organization that bestows upon its members certain titles indicative of the member's role or function within the gang. The TVL/JYD use certain terminology to describe meetings, subgroups, and members. For example, meetings are often called "goals" and it is during these meetings that dues may be collected, gang membership and business may be discussed, literature may be disseminated, and criminal activity may be spoken of or engaged in.

- a. Leaders of the TVL subsets hold the rank of "Five Star Universal Elite" (5UE). Each TVL subset usually has a 5UE who holds the function of "Chief of the Streets" and directs the subsets in a regional area. The 5UEs for the subset report directly to the Chief of the Streets. The responsibilities of the Chief of the Streets range from membership recruitment, enforcement of gang codes and rules, collection and disbursement of dues or funds, and approval of certain forms of criminal activity to be carried out by members of the gang. As this is the highest-ranking member of the TVL/JYD, the Chief of the Streets is responsible for coordinating much of the criminal activity that occurred in his region. The 5UEs make decisions relating to acts of violence and drug trafficking, referred to as "putting in work."
- b. The "Three Star Universal Elite" (3UE) is the next rank under the 5UE. The 3UEs are responsible for different leadership functions of the gang. 3UEs are to oversee Branch Elites and ensure that their members are instructed correctly.

- c. After 5UEs and 3UEs, the next ranks are the “Five Star Branch Elites” (5BE) and the “Three Star Branch Elites” (3BE). Usually, 5BEs and 3BEs hold a leadership function within the gang as well.
- d. One 5BE functions as the “deck holder”. The “deck” is a name for the representative members as a whole. The “deck holder” is in charge of the actions of the representative members. The “deck holder” takes his orders directly from the Chief of the Streets and makes sure that those orders are carried out.
- e. Other members are known as “Representatives.” A Representative may have a higher rank due to their function in the gang such as: “first seat,” “second seat,” “enforcer,” “treasurer,” “chief of security” and “man of literature” to name a few.
- f. The “enforcer” is responsible for enforcing the gang’s codes, rules and regulations. Enforcers are also responsible for administration of punishment of members who violate gang rules. Enforcers maintain close physical and verbal contact with higher ranking members and assist in carrying out orders issued from above.
- g. The “chief of security” is responsible for ensuring the security of fellow gang members, providing protection to higher ranking gang members, and/or responding to requests from high-ranking members to provide security and protection during times when law enforcement or rival gangs were exerting pressure on the gang.

- h. The “first seat” is responsible for being the messenger between the ranking members and the non-ranking members, the representatives.
- i. The “man of literature” is responsible for maintaining literature such as contact lists, meeting minutes, membership applications and other documents. They also conduct literature classes with members in order to teach members about the gang, its codes, rules, regulations, and language that each member is required to learn and use. The man of literature is often assisted by an “assistant man of literature” who works directly under and takes orders from the “man of literature.”
- j. The “treasurer” is responsible for collecting dues and funds from the members and tracking the expenses of the gang.

8. TVL members are required to take an oath to gain membership and pay dues to maintain membership. Participation in criminal activity by a member and associate, particularly violent acts directed at rival gangs or as directed by gang leadership, increases the respect accorded to that member or associate, or results in membership, maintenance, and increased position in the gang, and opens the door to promotion to a leadership position. Members must follow rules set forth by the gang and must follow orders of higher-ranking members. Violations of rules or orders may result in loss of membership, physical punishment in the form of beatings and in some instances, death.

9. In West Tennessee, the TVLs and their subsets often align, conspire to commit, and commit criminal activity together. Members of different subsets also commit violent crimes with one another.

The Defendants

10. At various times relevant to this Indictment, the following individuals, among others, were members or associates of the TVL/JYD in the various capacities set forth below:

- a. **TOMARCUS BASKERVILLE** a/k/a “TC” a/k/a “Glove” held the rank of 5UE and functioned as the “Chief of the Streets.”
- b. **CHRISTOPHER PEELER** a/k/a “Lil Chris” held the rank of 3UE.
- c. **MARTIVUS BASKERVILLE** a/k/a “Tavis” held the rank of 5BE and functioned as the “deck holder.”
- d. **THOMAS SMITH** a/k/a “TJ” held the rank of 5BE.
- e. **DAVAIUS WORRLES** a/k/a “Mighty” a/k/a “Mighty Shun” held the rank of 5BE.
- f. **CURTIS BASKERVILLE** a/k/a “CB” held the rank of 3BE.
- g. **MONTAVEEN TAYLOR** a/k/a “CGE Tay” held the rank of “representative” and functioned as the “first seat.”
- h. **MARDARIUS MCNEAL** held the rank of “representative” and functioned as the “enforcer.”
- i. **DEANDRA RIVERS** a/k/a “Dre” held the rank of “representative” and functioned as “chief of security.”

- j. **DEONTE WALKER** a/k/a “Tez” held the rank of “representative” and functioned as the “man of literature.”
- k. **TREVIN HULLOM** a/k/a “Scooter” held the rank of “representative” and functioned as the “assistant man of literature.”
- l. **TORRANCE FITZPATRICK** a/k/a “Phat” held the rank of “representative.”
- m. **BIANCA JACKSON** held the rank of “representative.”
- n. **COURTLAND SPRINGFIELD** a/k/a “Hot Box” held the rank of “representative.”

Purposes of the Enterprise

- 11. The purposes of the TVL/JYD include:
 - a. Preserving and protecting the power, territory, reputation, and proceeds of the Enterprise through the use of intimidation, threats of violence, and violence, including, but not limited to, acts involving murder;
 - b. Promoting and enhancing the Enterprise and its leaders’, members’, and associates’ activities, including, but not limited to, acts involving murder, drug trafficking, and other criminal activities;
 - c. Keeping rival gang members, and victims of, and potential informants and witnesses to, the Enterprise’s illegal activities, in fear of the Enterprise through violence and threats of violence;
 - d. Providing assistance and support to gang leaders, members, and associates who commit crimes on behalf of the Enterprise; and

- e. Hindering, obstructing, and preventing law enforcement officers from identifying participants in the Enterprise's criminal activity, from apprehending the perpetrators of those crimes, and from successfully prosecuting and punishing the offenders.

Means and Methods of the Enterprise

12. The means and methods by which members and associates conducted and participated in the conduct of the affairs of the TVL/JYD included, but were not limited to, the following:

- a. The leaders of the Enterprise directed, sanctioned, approved, and permitted other members and associates of the Enterprise to carry out criminal acts in furtherance of the Enterprise.
- b. Members and associates of the Enterprise attended regular meetings where gang membership, gang business, and criminal activities were discussed, including acts of murder, and financial proceeds from criminal activity (including drug trafficking) were collected as "dues" to benefit the Enterprise and its leaders and members.
- c. To generate income, members and associates of the Enterprise engaged in illegal activities under the protection of the Enterprise, including drug trafficking and violent crimes.
- d. For protection and to carry out criminal conduct, members and associates of the Enterprise acquired, carried, and used firearms.
- e. Members and associates of the Enterprise used gang-related

terminology, symbols, phrases, and gestures to demonstrate affiliation with the Enterprise.

- f. Members and associates of the Enterprise hid, misrepresented, concealed, and caused to be hidden, misrepresented, and concealed, the objectives of acts done in furtherance of the Enterprise, and used coded language and other means of communication to avoid detection and apprehension by law enforcement authorities.

The Racketeering Conspiracy

13. Beginning on a date unknown to the Grand Jury, but continuing to on or about March 2022, in the Western District of Tennessee and elsewhere, the defendants,

TOMARCUS BASKERVILLE

a/k/a “TC”

a/k/a “Glove”

MARTIVUS BASKERVILLE

a/k/a “Tavis”

THOMAS SMITH

a/k/a “TJ”

CURTIS BASKERVILLE

a/k/a “CB”

MONTAVEEN TAYLOR

a/k/a “CGE Tay”

MARDARIUS MCNEAL

DEANDRA RIVERS

a/k/a “Dre”

DEONTE WALKER

a/k/a “Tez”

AND

COURTLAND SPRINGFIELD

a/k/a “Hot Box”

each were members and associates of the Traveling Vice Lord / Junk Yard Dog (TVL/JYD), an enterprise engaged in, and the activities of which affected, interstate and

foreign commerce, together with others known and unknown to the Grand Jury, did knowingly and intentionally conspire to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, as defined in Sections 1961(1) and (5) of Title 18, United States Code, which pattern of racketeering activity consisted of multiple acts involving murder in violation of T.C.A. §§ 39-11-402; 39-13-202(a)(1); 39-12-103; and 39-12-101; and multiple offenses involving narcotics trafficking in violation of Title 21 U.S.C. §§ 841(a)(1), 843, and 846. It was part of this conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

OVERT ACTS:

14. In furtherance of the conspiracy and to achieve the objective thereof, at least one of the conspirators performed or caused to be performed at least one of the following overt acts, among others, in the Western District of Tennessee and elsewhere:

- a. On or about June 17, 2020, TVL/JYD leader, TOMARCUS BASKERVILLE, ordered subordinate gang member/members to kill members of a rival gang, the Gangster Disciples.
- b. On or about June 17, 2020, TVL/JYD members and associates, MARTIVUS BASKERVILLE, DEONTE WALKER, TORRENCE FITZPATRICK, DEANDRA RIVERS, TREVIN HULLOM and others known and unknown to the Grand Jury, aiding and abetting each other and armed with firearms, fired multiple rounds into a residence they believed housed rival gang member/members with the expressed intent to kill those inside.

- c. On or about June 17, 2020, TVL/JYD leader, TOMARCUS BASKERVILLE, ordered subordinate gang member/members to kill member/members of a rival gang, the Four Corner Hustlers.
- d. On or about June 17, 2020, TVL/JYD members and associates, MARTIVUS BASKERVILLE, THOMAS SMITH, CURTIS BASKERVILLE, MARDARIUS MCNEAL and DAVAIUS WORRLES, and others known and unknown to the Grand Jury, aiding and abetting each other and armed with firearms, fired multiple rounds at people in the front yard of the home of a rival gang member with the expressed intent to kill those in the yard.
- e. On or about August 9, 2020, TVL/JYD leader, TOMARCUS BASKERVILLE ordered subordinate gang member/members to kill member/members of a rival gang, the Gangster Disciples.
- f. On or about August 9, 2020, TVL/JYD members and associates, MARTIVUS BASKERVILLE, CHRISTOPHER PEELER, DEONTE WALKER, and COURTLAND SPRINGFIELD, and others known and unknown to the Grand Jury, aiding and abetting each other and armed with firearms, fired multiple rounds into a residence they believed housed rival gang members/member with the expressed intent to kill those inside.
- g. On or about August 10, 2020, TVL/JYD leader, TOMARCUS BASKERVILLE, ordered subordinate gang member/members to kill member/members of a rival gang, the Gangster Disciples.

- h. On or about August 10, 2020, TVL/JYD members and associates, MARTIVUS BASKERVILLE, MARDARIUS MCNEAL, CURTIS BASKERVILLE and COURTLAND SPRINGFIELD, and others known and unknown to the Grand Jury, aiding and abetting each other and armed with firearms, fired multiple rounds into a residence they believed housed rival gang members/member with the express intent to kill those inside.
- i. On or about August 23, 2020, Gangster Disciples arrived at an event attended by and in the geographical territory of the TVL/JYDs. TOMARCUS BASKERVILLE ordered subordinate TVL/JYD members and associates to kill member/members of a rival gang, the Gangster Disciples.
- j. On or about August 23, 2020, TVL/JYD members and associates, DEANDRA RIVERS, COURTLAND SPRINGFIELD, BIANCA JACKSON, MARTIVUS BASKERVILLE and MONTAVEEN TAYLOR and others known and unknown to the Grand Jury, aiding and abetting each other and armed with firearms, fired multiple shots at Gangster Disciples at the location, killing one person and injuring others.
- k. Beginning on a date unknown to the Grand Jury, but at least in or around 2018 and continuing through on or about August of 2020 TOMARCUS BASKERVILLE and THOMAS SMITH sold and distributed quantities of marijuana.

- l. Beginning on a date unknown to the Grand Jury, but at least in or around 2018 and continuing through on or about August of 2020 TOMARCUS BASKERVILLE sold and distributed quantities of cocaine.
- m. Beginning on a date unknown to the Grand Jury, but at least in or around 2019 and continuing through on or about August of 2020 MONTAVEEN TAYLOR sold and distributed quantities of marijuana.
- n. On or about February 21, 2020, THOMAS SMITH used a group chat conversation to notify TVL/JYD members of when he had marijuana to sell.
- o. On or about March 25, 2020, TOMARCUS BASKERVILLE set up narcotic deals through his cellphone and received payment for the narcotics via CashApp.
- p. On or about March 16, 2020, TOMARCUS BASKERVILLE taught another person how to distribute marijuana and cocaine by way of a cell phone chat.
- q. On or about June 22, 2020, TOMARCUS BASKERVILLE taught another TVL.JYD member how to distribute marijuana by way of a cell phone chat.

Notice of Enhanced Sentencing

15. On or about August 23, 2020, in the Western District of Tennessee, TVL/JYD members and associates, TOMARCUS BASKERVILLE, DEANDRA RIVERS, COURTLAND SPRINGFIELD, BIANCA JACKSON, MARTIVUS BASKERVILLE, and

MONTAVEEN TAYLOR, did unlawfully, intentionally, and with premeditation kill T.L., in violation of Tennessee Code Annotated Sections 39-13-202(a)(1), 39-13-202(c)(1)(C) (First Degree Murder) and 39-11-402 (Criminal Responsibility for the Conduct of Another).

All in violation of 18 U.S.C. §1962(d).

COUNT 2
Attempted Murder of S.M.

16. Paragraphs 1 through 12 of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

17. At all times relevant to this Indictment, the TVL/JYD, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, offenses involving narcotics trafficking, in violation of Title 21, United States Code, Sections 841(a)(1), 843, and 846 and acts involving murder in violation of the laws of Tennessee.

18. On or about June 17, 2020, in the Western District of Tennessee and elsewhere, the defendants,

TOMARCUS BASKERVILLE
aka "TC"
aka "Glove"
MARTIVUS BASKERVILLE
aka Tavis
DEANDRA RIVERS
aka "Dre"
DEONTE WALKER
aka "Tez"
TREVIN HULLOM
aka "Scooter"
AND
TORRANCE FITZPATRICK
aka "Phat"

together and with others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of gaining entrance to and maintaining and increasing position in the TVL/JYD, an enterprise engaged in racketeering activity did knowingly and intentionally attempt to murder S.M., and in so doing, shot S.M. and T.M., in violation of Tennessee Code Annotated Sections 39-12-101 (Criminal Attempt), 39-13-202(a)(1) (First Degree Murder), and 39-11-402 (Criminal Responsibility for the Conduct of Another).

All in violation of Title 18, United States Code, Section 1959(a)(5), and Title 18, United States Code, Section 2.

COUNT 3
Use, Carry, Brandish, and Discharge of a Firearm During and in Relation to a Crime of Violence

19. On or about June 17, 2020, in the Western District of Tennessee, the defendants,

TOMARCUS BASKERVILLE
aka "TC"
aka "Glove"
MARTIVUS BASKERVILLE
aka "Tavis"
DEANDRA RIVERS
aka "Dre"
DEONTE WALKER
aka "Tez"
TREVIN HULLOM
aka "Scooter"
AND
TORRANCE FITZPATRICK
aka "Phat"

together and with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, as alleged in Count Two

of this Indictment, which is incorporated by reference herein, and did in the course of such offense brandish and discharge a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii), and Title 18, United States Code, Section 2.

COUNT 4
Attempted Murder of W.P.

20. Paragraphs 1 through 12 of this Indictment and paragraph 17 of Count Two of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

21. On or about June 17, 2020, in the Western District of Tennessee and elsewhere, the defendants,

TOMARCUS BASKERVILLE
aka "TC"
aka "Glove"
MARTIVUS BASKERVILLE
aka "Tavis"
THOMAS SMITH
aka "TJ"
DAVAIUS WORRLES
aka Mighty
aka "Mighty Shun"
CURTIS BASKERVILLE
aka "CB"
AND
MARDARIUS MCNEAL

together and with others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of gaining entrance to and maintaining and increasing position in the TVL/JYD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder W.P., and in so doing, shot V.M. and D.P.W., in violation of Tennessee Code Annotated Sections 39-12-101 (Criminal Attempt), 39-13-202(a)(1)

(First Degree Murder). and 39-11-402 (Criminal Responsibility for the Conduct of Another).

All in violation of Title 18, United States Code, Section 1959(a)(5), and Title 18, United States Code, Section 2.

COUNT 5
Use, Carry, Brandish, and Discharge of a Firearm During and in Relation to a Crime of Violence

22. On or about June 17, 2020, in the Western District of Tennessee, the defendants,

TOMARCUS BASKERVILLE
aka "TC"
aka "Glove"
MARTIVUS BASKERVILLE
aka "Tavis"
THOMAS SMITH
aka "TJ"
DAVAIUS WORRLES
aka "Mighty"
aka "Mighty Shun"
CURTIS BASKERVILLE
aka "CB"
AND
MARDARIUS MCNEAL

together and with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, as alleged in Count Four of this Indictment, which is incorporated by reference herein, and did in the course of such offense brandish and discharge a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii), and Title 18, United States Code, Section 2.

COUNT 6
Attempted Murder of M.W.

23. Paragraphs 1 through 12 of this Indictment and paragraph 17 of Count Two of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

24. On or about August 9, 2020, in the Western District of Tennessee, the defendants,

TOMARCUS BASKERVILLE
aka "TC"
aka "Glove"
CHRISTOPHER PEELER
aka "Lil Chris"
MARTIVUS BASKERVILLE,
aka "Tavis"
DEONTE WALKER
aka "Tez"
AND
COURTLAND SPRINGFIELD
aka "Hot Box"

together and with others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of gaining entrance to and maintaining and increasing position in the TVL/JYD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder M.W., and in so doing, shot D.G., in violation of Tennessee Code Annotated Sections 39-12-101 (Criminal Attempt), 39-13-202(a)(1) (First Degree Murder), and 39-11-402 (Criminal Responsibility for the Conduct of Another).

All in violation of Title 18, United States Code, Section 1959(a)(5), and Title 18, United States Code, Section 2.

COUNT 7
Use, Carry, Brandish, and Discharge of a Firearm During and in Relation to a Crime of Violence

25. On or about August 9, 2020, in the Western District of Tennessee, the defendants,

TOMARCUS BASKERVILLE
aka "TC"
aka "Glove"
CHRISTOPHER PEELER
aka "Lil Chris"
MARTIVUS BASKERVILLE
aka "Tavis"
DEONTE WALKER
aka "Tez"
AND
COURTLAND SPRINGFIELD
aka "Hot Box"

together and with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, as alleged in Count Six of this Indictment, which is incorporated by reference herein, and did in the courses of such offense brandish and discharge a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii), and Title 18, United States Code, Section 2.

COUNT 8
Attempted Murder of M.P.

26. Paragraphs 1 through 12 of this Indictment and Paragraph 17 of Count Two of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

27. On or about August 10, 2020, in the Western District of Tennessee and elsewhere, the defendants,

TOMARCUS BASKERVILLE
aka "TC"

aka "Glove"
MARTIVUS BASKERVILLE
aka "Tavis"
CURTIS BASKERVILLE
aka "CB"
MARDARIUS MCNEAL
AND
COURTLAND SPRINGFIELD
aka "Hot Box"

together and with others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of gaining entrance to and maintaining and increasing position in the TVL/JYD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder M.P., in violation of Tennessee Code Annotated Sections 39-12-101 (Criminal Attempt), 39-13-202(a)(1) (First Degree Murder), and 39-11-402 (Criminal Responsibility for the Conduct of Another).

All in violation of Title 18, United States Code, Section 1959(a)(5), and Title 18, United States Code, Section 2.

COUNT 9
Use, Carry, Brandish, and Discharge of a Firearm During and in Relation to
a Crime of Violence

28. On or about August 10, 2020, in the Western District of Tennessee, the defendants,

TOMARCUS BASKERVILLE
aka "TC"
aka "Glove"
MARTIVUS BASKERVILLE
aka "Tavis"
CURTIS BASKERVILLE
aka "CB"
MARDARIUS MCNEAL
AND
COURTLAND SPRINGFIELD
aka "Hot Box"

together and with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, as alleged in Count Eight of this Indictment, which is incorporated herein by reference, and did in the course of such offense brandish and discharge a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii), and Title 18, United States Code, Section 2.

COUNT 10
Murder in Aid of Racketeering

29. Paragraphs 1 through 12 of this Indictment and Paragraph 17 of Count Two of this Indictment are hereby re-alleged and incorporated by reference as though fully set forth herein.

30. On or about August 23, 2020, in the Western District of Tennessee, the defendants,

TOMARCUS BASKERVILLE
a/k/a "TC"
a/k/a "Glove"
MARTIVUS BASKERVILLE
a/k/a "Tavis"
MONTAVEEN TAYLOR
a/k/a "CGE Tay"
DEANDRA RIVERS
a/k/a "Dre"
BIANCA JACKSON
AND
COURTLAND SPRINGFIELD
a/k/a "Hot Box"

together and with others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of gaining entrance to and maintaining and increasing position in the TVL/JYD, an enterprise engaged in racketeering activity, did unlawfully, intentionally,

and with premeditation kill T.L., in violation of Tennessee Code Annotated Sections 39-13-202(a)(1) and 39-13-202(c)(1)(C) (First Degree Murder), and 39-11-402 (Criminal Responsibility for the Conduct of Another).

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

COUNT 11
Causing death by use of a Firearm During and in Relation to
a Crime of Violence

31. On or about August 23, 2020, in the Western District of Tennessee, the defendants,

TOMARCUS BASKERVILLE
a/k/a "TC"
a/k/a "Glove"
MARTIVUS BASKERVILLE
a/k/a "Tavis"
MONTAVEEN TAYLOR
a/k/a "CGE Tay"
DEANDRA RIVERS
a/k/a "Dre"
BIANCA JACKSON
AND
COURTLAND SPRINGFIELD
a/k/a "Hot Box"

together and with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, Murder in Aid of Racketeering, as alleged in Count Ten of this Indictment, which is incorporated by reference herein, and did in the course of such offense did discharge a firearm, causing the death of T.L., which killing is a murder as defined by Title 18, United States Code, Section 1111(a).

All in violation of Title 18, United States Code, Sections 924(j) and 924 (c), and Title 18, United States Code, Section 2.

COUNT 12
Attempted Murder of D.D.

32. Paragraphs 1 through 12 of this Indictment and Paragraph 17 of Count Two of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

33. On or about August 23, 2020, in the Western District of Tennessee and elsewhere, the defendants,

TOMARCUS BASKERVILLE
a/k/a “TC”
a/k/a “Glove”
MARTIVUS BASKERVILLE
a/k/a “Tavis”
MONTAVEEN TAYLOR
a/k/a “CGE Tay”
DEANDRA RIVERS
a/k/a “Dre”
BIANCA JACKSON
AND
COURTLAND SPRINGFIELD
a/k/a “Hot Box”

together and with others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of gaining entrance to and maintaining and increasing position in the TVL/JYD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder D.D., and in doing so shot D.D., L.S., T.M., and C.M., in violation of Tennessee Code Annotated Sections 39-12-101 (Criminal Attempt), 39-13-202(a)(1) (First Degree Murder), and 39-11-402 (Criminal Responsibility for the Conduct of Another).

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

United States Code, Section 2.

COUNT 13
Use, Carry, Brandish, and Discharge of a Firearm During and in Relation to
a Crime of Violence

34. On or about August 23, 2020, in the Western District of Tennessee, the defendants,

TOMARCUS BASKERVILLE
a/k/a “TC”
a/k/a “Glove”
MARTIVUS BASKERVILLE
a/k/a “Tavis”
MONTAVEEN TAYLOR
a/k/a “CGE Tay”
DEANDRA RIVERS
a/k/a “Dre”
BIANCA JACKSON
AND
COURTLAND SPRINGFIELD
a/k/a “Hot Box”

together and with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, as alleged in Count Twelve of this Indictment, which is incorporated herein by reference, and did in the course of such offense brandish and discharge a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii), and Title 18, United States Code, Section 2.

COUNT 14
Attempted Murder of L.S.

35. Paragraphs 1 through 12 of this Indictment and Paragraph 17 of Count Two of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

36. On or about August 23, 2020, in the Western District of Tennessee and elsewhere, the defendants,

TOMARCUS BASKERVILLE
a/k/a “TC”
a/k/a “Glove”
MARTIVUS BASKERVILLE
a/k/a “Tavis”
MONTAVEEN TAYLOR
a/k/a “CGE Tay”
DEANDRA RIVERS
a/k/a “Dre”
BIANCA JACKSON
AND
COURTLAND SPRINGFIELD
a/k/a “Hot Box”

together and with others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of gaining entrance to and maintaining and increasing position in the TVL/JYD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder L.S., and in doing so, shot D.D., L.S., T.M., and C.M., in violation of Tennessee Code Annotated Sections 39-12-101 (Criminal Attempt), 39-13-202(a)(1) (First Degree Murder), and 39-11-402 (Criminal Responsibility for the Conduct of Another).

All in violation of Title 18, United States Code, Section 1959(a)(5), and Title 18, United States Code, Section 2.

COUNT 15
Use, Carry, Brandish, and Discharge of a Firearm During and in Relation to a Crime of Violence

37. On or about August 23, 2020, in the Western District of Tennessee, the defendants,

TOMARCUS BASKERVILLE
a/k/a “TC”

**a/k/a “Glove”
MARTIVUS BASKERVILLE
a/k/a “Tavis”
MONTAVEEN TAYLOR
a/k/a “CGE Tay”
DEANDRA RIVERS
a/k/a “Dre”
BIANCA JACKSON
AND
COURTLAND SPRINGFIELD
a/k/a “Hot Box”**

together and with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, as alleged in Count Fourteen of this Indictment, which is incorporated herein by reference, and did in the course of such offense brandish and discharge a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii), and Title 18, United States Code, Section 2.

COUNT 16
Attempted Murder of T.M.

38. Paragraphs 1 through 12 of this Indictment and Paragraph 17 of Count Two of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

39. On or about August 23, 2020, in the Western District of Tennessee and elsewhere, the defendants,

**TOMARCUS BASKERVILLE
a/k/a “TC”
a/k/a “Glove”
MARTIVUS BASKERVILLE
a/k/a “Tavis”
MONTAVEEN TAYLOR
a/k/a “CGE Tay”**

**DEANDRA RIVERS
a/k/a “Dre”
BIANCA JACKSON
AND
COURTLAND SPRINGFIELD
a/k/a “Hot Box”**

together and with others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of gaining entrance to and maintaining and increasing position in the TVL/JYD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder T.M., and in doing so, shot D.D., L.S., T.M., and C.M., in violation of Tennessee Code Annotated Sections 39-12-101 (Criminal Attempt), 39-13-202(a)(1) (First Degree Murder), and 39-11-402 (Criminal Responsibility for the Conduct of Another).

All in violation of Title 18, United States Code, Section 1959(a)(5), and Title 18, United States Code, Section 2.

**COUNT 17
Use, Carry, Brandish, and Discharge of a Firearm During and in Relation to
a Crime of Violence**

40. On or about August 23, 2020, in the Western District of Tennessee, the defendants,

**TOMARCUS BASKERVILLE
a/k/a “TC”
a/k/a “Glove”
MARTIVUS BASKERVILLE
a/k/a “Tavis”
MONTAVEEN TAYLOR
a/k/a “CGE Tay”
DEANDRA RIVERS
a/k/a “Dre”
BIANCA JACKSON
AND
COURTLAND SPRINGFIELD
a/k/a “Hot Box”**

together and with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, as alleged in Count Sixteen of this Indictment, which is incorporated herein by reference, and did in the course of such offense brandish and discharge a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii), and Title 18, United States Code, Section 2.

COUNT 18
Attempted Murder of C.M.

41. Paragraphs 1 through 12 of this Indictment and Paragraph 17 of Count Two of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

42. On or about August 23, 2020, in the Western District of Tennessee and elsewhere, the defendants,

TOMARCUS BASKERVILLE
a/k/a "TC"
a/k/a "Glove"
MARTIVUS BASKERVILLE
a/k/a "Tavis"
MONTAVEEN TAYLOR
a/k/a "CGE Tay"
DEANDRA RIVERS
a/k/a "Dre"
BIANCA JACKSON
AND
COURTLAND SPRINGFIELD
a/k/a "Hot Box"

together and with others known and unknown to the Grand Jury, aiding and abetting each other, for the purpose of gaining entrance to and maintaining and increasing position in

the TVL/JYD, an enterprise engaged in racketeering activity, did knowingly and intentionally attempt to murder C.M., and in doing so, shot D.D., L.S., T.M., and C.M., in violation of Tennessee Code Annotated Sections 39-12-101 (Criminal Attempt), 39-13-202(a)(1) (First Degree Murder), and 39-11-402 (Criminal Responsibility for the Conduct of Another).

All in violation of Title 18, United States Code, Section 1959(a)(5), and Title 18, United States Code, Section 2.

COUNT 19
Use, Carry, Brandish, and Discharge of a Firearm During and in Relation to
a Crime of Violence

43. On or about August 23, 2020, in the Western District of Tennessee, the defendants,

TOMARCUS BASKERVILLE
a/k/a “TC”
a/k/a “Glove”
MARTIVUS BASKERVILLE
a/k/a “Tavis”
MONTAVEEN TAYLOR
a/k/a “CGE Tay”
DEANDRA RIVERS
a/k/a “Dre”
BIANCA JACKSON
AND
COURTLAND SPRINGFIELD
a/k/a “Hot Box”

together and with others known and unknown to the Grand Jury, aiding and abetting each other, did knowingly use and carry a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, as alleged in Count Eighteen of this Indictment, which is incorporated herein by reference, and did in the course of such offense brandish and discharge a firearm.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i)-(iii), and Title 18, United States Code, Section 2.

COUNT 20

44. On or about August 23, 2020, in the Western District of Tennessee, the defendant,

MARTIVUS BASKERVILLE

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, a Tactical Omni Hybrid multi-caliber pistol, said firearm having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL:

FOR PERSON

DATED: _____

JOSEPH C. MURPHY JR.
UNITED STATES ATTORNEY