

IN THE SUPERIOR COURT OF CHEROKEE COUNTY

STATE OF GEORGIA

THE STATE OF GEORGIA

INDICTMENT NO. 21CR0935

VERSUS

MAY TERM, 2021

JAMAINNE CHARLES HALL,

MIGUEL J. BAEZ,

JULE W. HUSTON,

RONALD JOHN CROWE,

ROBERT PETER BLACKWOOD,

ROMAINE MATTHEW ROBERTS,

KAVON KEITH THOMPSON,

KIYA A. JEFFERSON,

DOMINIQUE PROVOST,

KIVA VIOLA CLARKE,

ISAIAH RUBEN CORDERO,

NATHAN JAMES JACKSON,

RAHEEM ICARUS POPLEY CARVEY,


AARON YUSEF ABDULLAH,

**CHRISTOPHER M. CARR
ATTORNEY GENERAL**

- Count 1 Racketeering, O.C.G.A. § 16-14-4
- Count 2 Trafficking of Persons for Labor Servitude, O.C.G.A. § 16-5-46
- Count 3 Trafficking of Persons for Labor Servitude, O.C.G.A. § 16-5-46
- Count 4 Trafficking of Persons for Labor Servitude, O.C.G.A. § 16-5-46
- Count 5 Trafficking of Persons for Labor Servitude, O.C.G.A. § 16-5-46
- Count 6 Violation of the Georgia Street Gang Terrorism and Prevention Act, O.C.G.A. § 16-5-4
- Count 7 Violation of the Georgia Street Gang Terrorism and Prevention Act, O.C.G.A. § 16-5-4
- Count 8 Violation of the Georgia Street Gang Terrorism and Prevention Act, O.C.G.A. § 16-5-4
- Count 9 Violation of the Georgia Street Gang Terrorism and Prevention Act, O.C.G.A. § 16-5-4
- Count 10 Money Laundering, O.C.G.A. § 7-1-912
- Count 11 Money Laundering, O.C.G.A. § 7-1-912
- Count 12 Money Laundering, O.C.G.A. § 7-1-912
- Count 13 Money Laundering, O.C.G.A. § 7-1-912
- Count 14 Money Laundering, O.C.G.A. § 7-1-912
- Count 15 Charity Fraud O.C.G.A. § 43-17-12

WITNESS: Special Agent Jonathan Leach, Georgia Bureau of Investigation

TRUE BILL


Grand Jury Foreperson

This 9 day of August, 2021.

Alan Day Grand Jury Bailiff

Filed In Office

This 9 day of Aug 2021



Patty Baker, Clerk of Superior Court

The Defendant _____ waives
copy of indictment, list of witnesses, formal
arraignment, and pleads:

Defendant

Defendant's Attorney

Prosecuting Attorney

This ____ day of _____, 202_.

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Prosecuting Attorney

IN THE SUPERIOR COURT OF CHEROKEE COUNTY

STATE OF GEORGIA

THE GRAND JURORS selected, chosen, and sworn for the County of Cherokee, to wit:

1. Deana Murphy, Foreperson
2. Alexander Butler, Asst. Foreperson
3. Kelsey Kennedy, Secretary
4. Christine Johnson, Asst. Secretary
5. Willette Kinnie
6. Stacie Pugh
7. Susan Alongi
8. Kathryn Hamilton
9. Alexander Callina
10. Ken Altman
11. Daniel Waddell
12. Steven Shillcutt
13. Kimberly Cox
14. Melinda Marie Schwarz
15. Julie Long
16. Gabriela Gordon
17. Joshua Pantaleon
18. Nicolas Straughan
19. Divino Silva
20. Glen Harlow
21. Sean Hutton
22. Shelby Hopson
23. Rollin Smith
24. Mitchell Fowler
25. Pamela Homitter
26. Noah Sanchez

COUNT 1

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE, ROBERT BLACKWOOD, ROMAINE ROBERTS, KAVON THOMPSON, KIYA JEFFERSON, DOMINIQUE PROVOST, KIVA CLARKE, ISAIAH CORDERO, NATHAN JACKSON, RAHEEM POPLEY, AARON ABDULLAH**, (hereafter referred to collectively as “**THE ACCUSED**”) with the offense of **RACKETEERING**, in violation of **O.C.G.A. § 16-14-4(c)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, between the dates of October

1, 2017, and May 12, 2021, did endeavor to acquire and maintain, directly and indirectly, an interest in and control of personal property, to wit: money, through a pattern of racketeering activity, contrary to the laws of said State, the good order, peace, and dignity thereof, as follows:

PART ONE – THE SCHEME

Background

1.

Georgia Peach Youth Club (hereinafter “GPYC”) was a registered corporation that existed in the State of Georgia during the relevant times. GPYC operated in numerous counties in Georgia, including Cherokee County. GPYC purported to be a work and recreation program for minors that claimed to be against gangs, gun violence, and drugs.

2.

GPYC adult supervisors recruited children from economically disadvantaged areas of Atlanta using posters, word of mouth, and a website that advertised prizes and trips for the children. These prizes and rewards were supposed to be awarded to the children for selling items such as candy and other food items. Once recruited, the children were told that GPYC used a system whereby a certain amount of sales resulted in corresponding prizes and/or trips.

3.

On days that the children sold candy and food items, GPYC supervisors picked up the children in vans and drove the children to areas around Georgia to make sales, including Cherokee County. The children would go door-to-door in residential areas soliciting sales, or the children would stand outside of retail stores and solicit passing citizens. These minor children would carry buckets or tubs of small food items, including candy, and offer the sale of these items in

exchange for a donation to GPYC. Some citizens simply made donations to GPYC under the assumption that the donations would help the children achieve fundraising goals.

Manner of Conducting the Scheme

3.

THE ACCUSED engaged in a scheme in which they recruited children to solicit monetary donations under the guise of operating as a charity, when in fact Georgia Peach Youth Club operated as a human labor trafficking organization.

4.

As part of the scheme, the accused told and promised minors that meeting certain benchmarks of soliciting donations and sales would result in certain prizes. These children were transported in vans to numerous counties in Georgia. Some minor children were dropped off to solicit funds for hours without adult supervision.

5.

The minors who solicited donations and sales were not rewarded and given the all of the prizes and trips as promised.

6.

Instead, **THE ACCUSED** kept money for themselves for their own personal financial gain and promotion of the Nine Trey Bloods street gang.

7.

As a result of the scheme, the minors were deprived of the promised compensation.

PART TWO – RACKETEERING ACTIVITY

7.

THE ACCUSED, individually and together, endeavored to commit the following crimes that constitute racketeering activity in Georgia:

- (a) **TRAFFICKING OF PERSONS FOR LABOR SERVITUDE** in violation of **O.C.G.A. § 16-5-46** and constituting racketeering activity pursuant to **O.C.G.A. 16-14-3(5)(A)(vi)**

8.

To effect the object of their endeavor and in furtherance of their scheme, **THE ACCUSED** engaged in multiple overt acts, at least one of which occurred in Cherokee County, Georgia, as shown below in the following paragraphs:

9.

On or about August 16, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Jordan Manuel for the purpose of labor servitude.

10.

On or about August 16, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Jaylyn Manuel for the purpose of labor servitude.

11.

On or about October 20, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Donquize Ponder for the purpose of labor servitude.

11.

On or about December 14, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Tobias Robinson for the purpose of labor servitude.

12.

On or about August 11, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Jontavius Clark for the purpose of labor servitude.

13.

On or about October 17, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Taivon Hayes for the purpose of labor servitude.

14.

On or about October 20, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport T'yna Rayner for the purpose of labor servitude.

15.

On or about October 20, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Kelton Hillman for the purpose of labor servitude.

16.

On or about July 1, 2020 through September 30, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Montazja Griffin for the purpose of labor servitude.

17.

On or about July 1, 2020 **THE ACCUSED** did knowingly recruit, entice, and transport Ayanna Dennis for the purpose of labor servitude.

18.

On or about September 15, 2020 through October 15, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Malik Hickson for the purpose of labor servitude.

19.

On or about August 1, 2020 through September 30, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Hope Willis for the purpose of labor servitude.

20.

On or about August 1, 2020 through October 31, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Dacorian Cason for the purpose of labor servitude.

21.

On or about August 1, 2020 through September 30, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Brianna Cason for the purpose of labor servitude.

22.

On or about October 24, 2018, **THE ACCUSED** did knowingly recruit, entice, and transport Jarell Norwood for the purpose of labor servitude.

23.

On or about July 1, 2020 through October 11, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Omari Graham for the purpose of labor servitude.

24.

On or about August 1, 2020 through September 17, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Bryan Tillman for the purpose of labor servitude.

25.

On or about July 29, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Jayden Barber for the purpose of labor servitude.

26.

On or about July 1, 2020 through December 31, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Deandre Fortson for the purpose of labor servitude.

27.

On or about July 1, 2020 through August 15, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Jaquavious Willis for the purpose of labor servitude.

28.

On or about October 1, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Deanthony Griggs for the purpose of labor servitude.

29.

On or about August 1, 2020 through November 30, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Adam Yamini for the purpose of labor servitude.

30.

On or about August 1, 2020 through November 30, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Elijah Yamini for the purpose of labor servitude.

31.

On or about August 1, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Kermarion Huff for the purpose of labor servitude.

32.

On or about January 3, 2021 through March 5, 2021, **THE ACCUSED** did knowingly recruit, entice, and transport Ade Ison for the purpose of labor servitude.

33.

On or about January 3, 2021 through March 5, 2021, **THE ACCUSED** did knowingly recruit, entice, and transport Azevion Ison for the purpose of labor servitude.

34.

On or about October 1, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Kyrie Langford for the purpose of labor servitude.

35.

On or about October 1, 2020, **THE ACCUSED** did knowingly recruit, entice, and transport Ameer Thomas for the purpose of labor servitude.

PART THREE - THE PROPERTY

61.

Through their pattern of racketeering activity, **THE ACCUSED** endeavored to acquire and maintain personal property from said above listed individuals.

COUNT 2

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE, ROBERT BLACKWOOD, ROMAINE ROBERTS, KAVON THOMPSON, KIYA JEFFERSON, DOMINIQUE PROVOST, KIVA CLARKE, ISAIAH CORDERO, NATHAN JACKSON, RAHEEM POPLEY, AARON ABDULLAH**, (hereafter referred to collectively as "**THE ACCUSED**") with the offense of **HUMAN TRAFFICKING**, in violation of **O.C.G.A. § 16-5-46(b)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about December

20, 2020, did knowingly recruit, entice, and transport Jordan Manuel for the purpose of labor servitude.

COUNT 3

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE, ROBERT BLACKWOOD, ROMAINE ROBERTS, KAVON THOMPSON, KIYA JEFFERSON, DOMINIQUE PROVOST, KIVA CLARKE, ISAIAH CORDERO, NATHAN JACKSON, RAHEEM POPLEY, AARON ABDULLAH**, (hereafter referred to collectively as “**THE ACCUSED**”) with the offense of **HUMAN TRAFFICKING**, in violation of **O.C.G.A. § 16-5-46(b)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about December 20, 2020, did knowingly recruit, entice, and transport Jayden Barber for the purpose of labor servitude.

COUNT 4

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE, ROBERT BLACKWOOD, ROMAINE ROBERTS, KAVON THOMPSON, KIYA JEFFERSON, DOMINIQUE PROVOST, KIVA CLARKE, ISAIAH CORDERO, NATHAN JACKSON, RAHEEM POPLEY, AARON ABDULLAH**, (hereafter referred to collectively as “**THE ACCUSED**”) with the offense of **HUMAN TRAFFICKING**, in violation of **O.C.G.A. § 16-5-46(b)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about October 11, 2020, did knowingly recruit, entice, and transport Ameer Thomas for the purpose of labor servitude.

COUNT 5

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE, ROBERT BLACKWOOD, ROMAIN ROBERTS, KAVON THOMPSON, KIYA JEFFERSON, DOMINIQUE PROVOST, KIVA CLARKE, ISAIAH CORDERO, NATHAN JACKSON, RAHEEM POPLEY, AARON ABDULLAH**, (hereafter referred to collectively as “**THE ACCUSED**”) with the offense of **HUMAN TRAFFICKING**, in violation of **O.C.G.A. § 16-5-46(b)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about December 20, 2020, did knowingly recruit, entice, and transport Kyrie Langford for the purpose of labor servitude.

COUNT 6

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, AND ROBERT BLACKWOOD**, with the offense of **VIOLATION OF GEORGIA STREET GANG TERRORISM AND PREVENTION ACT**, in violation of **O.C.G.A. § 16-5-46(b)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about December 20, 2020, being associated with the Nine Trey Bloods, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Racketeering by using money unlawfully acquired by Georgia Peach Youth Club by said accused to maintain their status in the Nine Trey Bloods,

COUNT 7

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, AND ROBERT BLACKWOOD**, with the offense of **VIOLATION OF GEORGIA STREET GANG TERRORISM AND PREVENTION ACT**, in violation of **O.C.G.A. § 16-5-46(b)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about December 20, 2020, being associated with the Nine Trey Bloods, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Human Trafficking by using money unlawfully acquired by Georgia Peach Youth Club by said accused to maintain their status in the Nine Trey Bloods,

COUNT 8

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, AND ROBERT BLACKWOOD**, with the offense of **VIOLATION OF GEORGIA STREET GANG TERRORISM AND PREVENTION ACT**, in violation of **O.C.G.A. § 16-5-46(b)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about October 11, 2020, being associated with the Nine Trey Bloods, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Money Laundering by using money unlawfully acquired by Georgia Peach Youth Club by said accused to maintain their status in the Nine Trey Bloods,

COUNT 9

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, AND ROBERT BLACKWOOD**, with the offense of **VIOLATION OF GEORGIA STREET GANG TERRORISM AND PREVENTION ACT**, in violation of **O.C.G.A. § 16-5-46(b)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about December 20, 2020, being associated with the Nine Trey Bloods, a criminal street gang, did unlawfully participate in criminal gang activity through the commission of the offense of Money Laundering by using money unlawfully acquired by Georgia Peach Youth Club by said accused to maintain their status in the Nine Trey Bloods,

COUNT 10

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE**, with the offense of **MONEY LAUNDERING** in violation of **O.C.G.A. § 7-1-915(c)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about October 11, 2020, knowing that moneys involved in a currency transaction represent a form of unlawful activity, conducts such transaction involving the proceeds of Human Trafficking with the intent to promote the carrying on Human Trafficking,

COUNT 11

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE**, with the offense of **MONEY LAUNDERING** in violation of **O.C.G.A. § 7-1-915(c)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about December 19, 2020, knowing that moneys involved in a currency transaction represent a form of unlawful activity, conducts such transaction involving the proceeds of Human Trafficking with the intent to promote the carrying on Human Trafficking,

COUNT 12

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE**, with the offense of **MONEY LAUNDERING** in violation of **O.C.G.A. § 7-1-915(c)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about October 11, 2020, knowing that moneys involved in a currency transaction represent a form of unlawful activity, conducts such transaction involving the proceeds of Human Trafficking with the intent to promote the carrying on Human Trafficking,

COUNT 13

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE**, with the offense of **MONEY LAUNDERING** in violation of **O.C.G.A. § 7-1-915(c)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about February 21, 2021, knowing that moneys involved in a currency transaction represent a form of unlawful activity, conducts such transaction involving the proceeds of Human Trafficking with the intent to promote the carrying on Human Trafficking,

COUNT 14

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE**, with the offense of **MONEY LAUNDERING** in violation of **O.C.G.A. § 7-1-915(c)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, on or about August 15, 2020, knowing that moneys involved in a currency transaction represent a form of unlawful activity, conducts such transaction involving the proceeds of Human Trafficking with the intent to promote the carrying on Human Trafficking,

COUNT 15

in the name and behalf of the citizens of Georgia, charge and accuse **JAMAINNE HALL, MIGUEL BAEZ, JULE HUSTON, RONALD CROWE, ROBERT BLACKWOOD, ROMAINE ROBERTS, KAVON THOMPSON, KIYA JEFFERSON, DOMINIQUE PROVOST, KIVA CLARKE, ISAIAH CORDERO, NATHAN JACKSON, RAHEEM POPLEY, AARON ABDULLAH**, (hereafter referred to collectively as “**THE ACCUSED**”) with the offense of **CHARITY FRAUD**, in violation of **O.C.G.A. § 43-17-12(d)(2)**, for that **THE ACCUSED**, in the County of Cherokee and the State of Georgia, between the dates of October 1, 2017, and May 12, 2021, did, in connection with the planning, conduct, and execution of charitable solicitations and charitable sales promotions by Georgia Peach Youth Club, directly and indirectly engage in a course of business operates fraud and deceit upon a person,

ALL CHARGES BEING CONTRARY TO THE LAWS SAID STATE, GOOD ORDER, PEACE, AND DIGNITY THEREOF.

**CHRISTOPHER M. CARR
ATTORNEY GENERAL**