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8 PEOPLE OF THE STATE OF CALIFORNIA

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF SAN FRANCISCO  
11 UNLIMITED JURISDICTION

12 PEOPLE OF THE STATE OF  
13 CALIFORNIA, by and through Dennis J.  
14 Herrera, City Attorney for the City and  
County of San Francisco,

15 Plaintiff,

16 vs.

17  
18 CHOPPER CITY, a criminal street gang,  
sued as an unincorporated association,  
19 EDDY ROCK, a criminal street gang,  
sued as an unincorporated association,  
20 KNOCK OUT POSSE, a criminal street  
gang, sued as an unincorporated  
21 association, and DOES 1 THROUGH 500,

22 Defendants.

Case No. 464-493

EXPERT DECLARATION OF SAN  
FRANCISCO POLICE DEPARTMENT  
OFFICER DAVID Q. DO IN SUPPORT  
OF PLAINTIFF'S APPLICATION FOR  
AN ORDER TO SHOW CAUSE RE:  
PRELIMINARY INJUNCTION AND  
PRELIMINARY INJUNCTION

Hearing Date: July 12, 2007  
Hearing Judge: Busch  
Time: 11:00 a.m.  
Place: Department 301  
Date Action Filed: June 21, 2007  
Trial Date: Not yet set

23  
24 DECLARATION OF OFFICER DAVID Q. DO

25 I, Officer DAVID Q. DO, declare as follows:  
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1           1.       I have personal knowledge of the following facts, except those stated on information  
2 and belief. As to those facts, I believe them to be true. If called upon to testify, I could and would  
3 testify competently to the contents of this Declaration.

4           2.       I am a police officer employed by the San Francisco Police Department ("SFPD"). I  
5 make this Declaration in support of Plaintiff for a civil gang injunction against the Knock Out  
6 Posse, Chopper City and Eddy Rock criminal street gangs.

7 **Special Knowledge, Skill, Experience and Education Concerning Criminal Street Gangs and**  
8 **Gang Members**

9           3.       I have been employed as a police officer with the San Francisco Police Department  
10 since August 1998. From November 2004 to the present time, I have been assigned to the Gang  
11 Task Force. My primary responsibilities are to investigate gang-related crimes, specifically  
12 focusing on African-American gangs in the Western Addition of the City and County of San  
13 Francisco, including Knock Out Posse criminal street gang (also known as "KOP" or "KO"),  
14 Chopper City criminal street gang (also known as "Choppa City"), and Turkwood criminal street  
15 gang. To supplement those investigations, I also gather information for a number of criminal street  
16 gangs, including Knock Out Posse, Chopper City and Turkwood. That information includes the  
17 number and names of the members of that gang, the gang's method of operation and criminal  
18 activities, gang terminology and trends, and the gang's turf, rivalries, alliances, dress, tattoos,  
19 philosophy, loyalty, lifestyle, graffiti, web postings and music.

20           4.       My tasks include identifying and photographing active gang members, documenting  
21 gang members activities, investigating gang-related crimes, working with the Homicide Unit to  
22 solve gang-related crimes, working with and assisting probation and parole departments to ensure  
23 gang members are in compliance with their conditions of supervised release and working with  
24 various outside law enforcement agencies regarding gang-related issues.

25           5.       As a gang inspector, I come in contact with gang members, including members of  
26 Knock Out Posse, Chopper City and Turkwood, through traffic stops, pedestrian stops, consensual  
27 encounters, preliminary investigations and follow-up investigations involving gang members as  
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1 victims, witnesses, or suspects, and through parole and probation compliance investigations. I talk  
2 with gang members, including members of Knock Out Posse, Chopper City and Turkwood,  
3 frequently, sometimes on a daily basis. I also obtain information on gangs by conducting custodial  
4 and non-custodial interviews with gang members and former gang members, including members of  
5 Knock Out Posse, Chopper City and Turkwood. In addition, I frequently discuss gang-involved and  
6 gang-related events, trends and issues with other Gang Task Force officers, narcotics officers, and  
7 officers at SFPD stations, including the Park Station and the Northern Station. I also obtain  
8 information on gangs, including Knock Out Posse, Chopper City and Turkwood, and the gang  
9 members by reviewing police reports of gang-involved and gang-related incidents and incidents  
10 occurring in gang territories. In addition, I obtain information on these gangs and gang members by  
11 interviewing victims and witnesses to gang related crimes and interviewing other members of the  
12 community. I also read and review literature on gangs, gang trends and issues and gang related  
13 crimes. In addition, I obtain information on gangs through conversations with other law  
14 enforcement agencies. I have been contacted by law enforcement in other jurisdictions for  
15 information about gangs in the Western Addition.

16         6. I also obtain information on gangs, including Knock Out Posse Chopper City and  
17 Turkwood, and the gang members by viewing websites on the Internet that are utilized by the gang  
18 members. I also listen to the gang members latest music releases, the lyrics of which often contain  
19 information about the gang members' recently committed crimes, plans for future criminal activity,  
20 and dedication to the gang.

21         7. During my two and one half years at Gang Task Force, I have been assigned at least  
22 one hundred gang cases, including cases involving Knock Out Posse, Chopper City and Turkwood.  
23 I have also assisted other gang investigators on hundreds of gang cases, including cases involving  
24 Knock Out Posse, Chopper City and Turkwood.

25         8. I have more than 50 hours of training on criminal street gangs, including standard  
26 training at the San Francisco Police Academy and San Francisco Police Department Detective  
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1 School and training at the 2006 National Gang Conference, the 2006 California Gang Conference  
2 and at the Institute of Criminal Investigations.

3 9. I am a Court-qualified gang expert. I have qualified and testified in Superior Court  
4 as a gang expert on Knock Out Posse criminal street gang, one of the defendants in this gang  
5 abatement action.

6 10. In addition, I train officers at the various San Francisco Police Department District  
7 Stations on the subject of Western Addition African-American criminal street gangs, including  
8 Knock Out Posse, Chopper City and Turkwood. I update the officers on the Western Addition  
9 gangs, the active members of such gangs and the gang practices. These trainings occur  
10 approximately every six months. In addition to these more structured trainings, I also update  
11 officers at the San Francisco Police Department Park Station on a weekly basis regarding gang  
12 activity, crime and trends within the Western Addition.

13 11. Before I was assigned to the Gang Task Force, from August 1998 through January  
14 1999, I was assigned to Northern Station as a patrol officer. I was then assigned to the Bayview  
15 Station from January 1999 through January 2000 where I served as both a patrol officer and a  
16 plainclothes officer. While assigned to the Bayview Station I investigated Bayview gangs and gang  
17 related crimes. From January 2000 through November 2004 (except for six months in 2003 where I  
18 was temporarily assigned to the Bayview Station), I was assigned to the Park Station where I served  
19 as a plainclothes officer investigating primarily narcotics, weapons, assaults, drive-by-shootings and  
20 other gang related crimes in the Western Addition of San Francisco. The gangs that I investigated  
21 included Knock Out Posse, Chopper City and Turkwood.

22 12. During my six years at Northern, Bayview and Park Stations, I worked on hundreds  
23 of gang-related cases. I worked with the Gang Task Force and helped conduct follow-up  
24 investigations into gang crimes. As part of my duties, I interviewed gang members as suspects, as  
25 victims, and as witnesses to the gang crimes that I investigated. I interviewed victims of gang  
26 crimes, witnesses to gang crimes and other members of the community as to what they saw or heard  
27 about the gang members and their associated activities.

1           13. Throughout the last nine years with the San Francisco Police Department I have  
2 investigated hundreds of gang crimes, including crimes involving Knock Out Posse, Chopper City  
3 and Turkwood, and made hundreds of arrests in cases involving gangs or gang related activity.  
4 These cases have included homicides, aggravated assaults, weapons, narcotics, and other crimes  
5 committed in the Western Addition of San Francisco.

6           14. What I talk about in this declaration, except where I state it to be based on my own  
7 personal observation, is my opinion as a gang expert or is the information that I use in forming my  
8 opinions. The information I use to form my opinions on the Knock Out Posse and Chopper City  
9 gangs and other street gangs includes my own personal observations, discussions with my fellow  
10 law enforcement officers and gang experts, conversations with gang members, former gang  
11 members, rival gang members, victims of gang crimes, witnesses to gang crimes and members of  
12 the community, review of gang graffiti, writings, Internet materials, music, cds, documentaries, and  
13 review of gang member convictions, police reports, field contact reports, other law enforcement  
14 records, court documents, including criminal convictions, and all officer declarations submitted in  
15 support of Plaintiffs' Application For An Order To Show Cause Re: Preliminary Injunction And  
16 Preliminary Injunction in this matter.

17 **San Francisco Western Addition Gangs**

18           15. The Western Addition neighborhood of San Francisco has several criminal street  
19 gangs within its borders. These gangs are comprised of predominantly African American men and  
20 juveniles. Each gang claims its own particular territory with the Western Addition. Within their  
21 territory, these gangs terrorize their communities through violent crimes and witness intimidation.  
22 As a result, the residents who live within a territory controlled by one of these gangs are fearful of  
23 calling the police or cooperating with police when they see crime occur in their neighborhood. The  
24 gangs, therefore, freely engage in income generating drug sales and burglaries within their territory  
25 with little fear of police intervention.

1           16.     The gangs in the Western Addition fall into two groups. Those gangs who claim  
2 territory west of Fillmore Street are known as the Uptown gangs.<sup>1</sup> The Uptown gangs include  
3 Knock Out Posse (also known as "KOP" or "KO"), Chopper City (also known as "Choppa City"),  
4 and Turkwood.<sup>2</sup> The Uptown gangs are allied with each other. In the Uptown alliance of gangs,  
5 while each gang claims their particular territory, their own members and their own identifiers, those  
6 within the alliance work together to further their gangs. Those gangs who claim territory east of  
7 Fillmore are known as Downtown gangs. Eddy Rock (also known as "Paypa Bound" and "OC") is  
8 a Downtown gang. The Uptown gangs and Downtown gang Eddy Rock are archrivals and mortal  
9 enemies of each other. I am aware of numerous incidents of assaults and homicides that the  
10 Uptown gangs and Eddy Rock have committed against each other.

11 **The Knock Out Posse Criminal Street Gang**

12           17.     Knock Out Posse criminal street gang is a violent, turf based, predominantly  
13 African-American gang situated in the Western Addition neighborhood of San Francisco. Knock  
14 Out Posse is a criminal street gang under the definition Penal Code Section 186.22. The gang is an  
15 ongoing association of three or more persons that has as one of its primary activities the  
16 commission of crimes enumerated in Penal Code Section 186.22(e), including but not limited to the  
17 distribution of narcotics, possession of firearms, robberies, aggravated assaults and homicides. The  
18 gang and its members also identify themselves through a common name and common signs and  
19 symbols. In addition, the gang members individually and collectively engage in a pattern of  
20 criminal activity by committing, attempting to commit, conspiring to commit and being convicted  
21 of crimes enumerated in Penal Code Section 186.22(e), including but not limited to the distribution  
22 of narcotics, possession of firearms, robberies, aggravated assaults and homicides.

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26           <sup>1</sup> The only gang east of Fillmore that considers itself an Uptown gang is 800 Block.

27           <sup>2</sup> There are other Uptown gangs. However, because this Injunction applies only to KOP,  
28 Chopper City and Turkwood, I will only discuss these gangs in detail in this Declaration.

1 **History Of The Knock Out Posse Criminal Street Gang**

2 18. Knock Out Posse started in the mid 1980s as a way for young black males living in  
3 the Martin Luther King/Marcus Garvey Public Housing Complex, which is bordered by Ellis,  
4 Steiner, Turk and Pierce Streets, to engage in the narcotic trade in that geographic area without fear  
5 of being arrested, robbed or killed. The sale of narcotics is one of the primary purposes of Knock  
6 Out Posse and after its formation the gang established operating procedures for drug sales in its  
7 claimed territory, such as lookout posts, alarm systems, collection enforcement, modes of  
8 transportation, safe houses within its territory and outdoor stash locations. The gang had an  
9 informal hierarchy from shot callers (leaders who occasionally give orders to other members of the  
10 gang) to lookouts (persons assigned to watch for police, enemies and potential buyers.)

11 19. During the early period of the gang, violence was kept to a minimum and was  
12 basically limited to in-house fistfights and periodic altercations with other gangs, mainly within the  
13 City and County of San Francisco.

14 20. As Knock Out Posse evolved in the 1990s, it became more covert with less sign  
15 flashing and the wearing of like attire among the gang members. At this time, in addition to the sale  
16 of narcotics, the gang also began to engage in more violent activities, such as robberies, aggravated  
17 assaults, shootings and homicides. The purpose of these crimes was to protect the gang's territory  
18 against rival gang members, to build up the gang's reputation as a violent gang, and to protect their  
19 drug trade within their claimed territory.

20 **How Knock Out Posse Is Organized**

21 21. At this time, I believe there are approximately 20 documented adult members of  
22 Knock Out Posse. In addition, although juvenile members of the gang are not subject to this  
23 injunction, there are numerous juvenile members of Knock Out Posse.

24 22. Knock Out Posse has no formal hierarchy like other more organized gangs.  
25 Similarly, the gang has no formal officers or managers. Nevertheless, the gang does have more  
26 senior members who occasionally give orders to other members of the gang. The gang has no  
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1 business address or mailing address. All the gang members tend to communicate through word of  
2 mouth or on the telephone

3 23. Knock Out Posse's roster of members constantly evolves as new members join the  
4 gang and work their way up the ranks. Gang members from Knock Out Posse will recruit persons  
5 living in the gang's claimed territory or going to school in San Francisco. They will also recruit  
6 persons who have family living in the territory.

7 24. When a new gang member joins Knock Out Posse, he must first prove himself with  
8 low-level tasks. For instance, a new member may serve as a lookout for others who are committing  
9 crimes. The lookout warns the other gang members if police or rival gang members are  
10 approaching and watches for potential drug buyers. New members also prove themselves with less  
11 serious crimes, such as graffiti or harassment of local merchants. Gang members increase their  
12 status with the gang through any act, usually criminal, that benefits the gang. An act benefits the  
13 gang, for instance, if it helps to solidify the gang's turf and the gang's asserted right to sell drugs in  
14 the turf, increases the gang's profile amongst other gangs and the community, furthers the gang's  
15 reputation amongst other gang's, or terrorizes the community. Such crimes include selling  
16 narcotics, tagging the territory with gang graffiti, robberies, burglaries, assaults, and homicides,  
17 especially those involving the murder of rival gang members. If a gang member kills someone,  
18 particularly, if he kills a rival gang member, he will greatly increase his status in the gang. Gang  
19 members also increase their status in the gang by serving time in jail or prison.

20 25. While gang activities are primarily criminal or otherwise unlawful, gang members do  
21 socialize with each other.

### 22 **Identifying The Knock Out Posse Criminal Street Gang**

23 26. The Knock Out Posse criminal street gang primarily identifies itself through its  
24 name, territory, graffiti, hand signs and tattoos. Knock Out Posse also identifies itself through its  
25 alliance with other Uptown gangs in the Western Addition of San Francisco.

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1           **The Significance Of The Gang's Name**

2           27.     The gang's name is very important to the gang's identity. The name is what gang  
3 members "claim" and it helps to separate Knock Out Posse and its gang members from other gangs  
4 in the area. Members of Knock Out Posse often write or otherwise mark their gang name on  
5 clothing and other personal belonging. Members of Knock Out Posse also often include the gang's  
6 name in song lyrics and other writings and mark the gang's name in graffiti in Knock Out Posse's  
7 territory.

8           **The Significance Of Knock Out Posse's Territory**

9           28.     The territory or "turf" for Knock Out Posse is the geographic area that the gang  
10 claims as its own. When a criminal street gang claims a territory, it means that the gang intends to  
11 exclusively occupy the area for its drug sales and other gang related activity. In Knock Out Posse's  
12 territory gang members and their associates move freely in the area, congregate day and night,  
13 brandish weapons to intimidate citizens and rival gang members, display or "throw" gang signs,  
14 commit acts of graffiti to assert the gang's presence in the territory, and routinely sell narcotics to  
15 their customers with little fear of being reported to the police. Knock Out Posse members do not  
16 fear being reported to the police because the community lives in fear of them. The gang members  
17 routinely threaten and harass residents who call or cooperate with the police. By instigating this  
18 culture of intimidation, the gang members make the residents fearful of cooperating with the police.  
19 I am aware of hundreds of gang-related crimes in Knock Out Posse's claimed territory where  
20 witnesses and victims of violent crimes have refused to cooperate with police investigations out of  
21 fear of retaliation by the gang members. This allows Knock Out Posse members to commit crimes  
22 with little interference and few witnesses who are willing to speak out or testify against them.

23           29.     Even when Knock Out Posse gang members themselves are victims of a crime  
24 within their territory and elsewhere, they often refuse to cooperate with police. The gang members  
25 prefer to go after the culprit themselves rather than work with the criminal justice system.  
26 Consequently, I have found that once a Knock Out Posse member is assaulted or shot, a member of  
27 a rival gang is usually assaulted or shot shortly thereafter. I am aware of numerous incidents where  
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1 Knock Out Posse gang members were shot or assaulted. The majority of these cases, however,  
2 remain unsolved because the victim gang member refuses to cooperate with police and goes so far  
3 as to sign an Affidavit requesting that the police investigation into their case be terminated.

4 30. In addition to carrying weapons in their territory, Knock Out Posse gang members  
5 also store firearms and other weapons in various areas within the territory so that they have easy  
6 access to the weapons to commit crimes. The gang members also store their weapons within the  
7 territory to avoid being caught by police with weapons in their possession. I am aware of numerous  
8 incidents where Knock Out Posse gang members were caught in the territory with weapons in their  
9 possession. I am also aware of numerous incidents where weapons, hidden in various areas of  
10 Knock Out Posse's territory, were found by officers or member of the community.

11 31. I am aware of incidents where Knock Out Posse gang members have taken over  
12 homes from frightened citizens and have used the homes to sell and store drugs, congregate after  
13 committing crimes, hide from police and rival gang members and store weapons.

14 32. Knock Out Posse gang members feel safe in their territory. They know that they will  
15 find other Knock Out Posse members and associates in their territory and that the area will  
16 generally be free of rival gang members. Knock Out Posse members are also assured that other  
17 gang members will be nearby so that should a rival gang member be seen in their territory, the gang  
18 members will work together to deal with the rival member. Rival gang members, such as Eddy  
19 Rock, know that they cannot enter Knock Out Posse territory without retribution for such an act. In  
20 fact, rival gang members who enter Knock Out Posse territory will often be shot or otherwise  
21 assaulted.

### 22 **The Significance Of Knock Out Posse's Alliance With Other Uptown Gangs**

23 33. Members of Knock Out Posse are also members of the Uptown alliance of gangs.  
24 Although each gang within the Uptown alliance has its own territory within the Uptown territory,  
25 members of one Uptown gang can freely travel in the territories claimed by other Uptown gangs. In  
26 addition, members of one Uptown gang frequently conspire with members of other Uptown gangs  
27 to commit crimes in the Uptown territories. Members of one Uptown gang are frequently seen with  
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1 members of other Uptown gangs in the Uptown territories. Members of one Uptown gang  
2 frequently run from their territory to other Uptown territories when fleeing from police or other  
3 gang members and seek refuge in homes in the other Uptown gangs' territories. Members of  
4 Uptown gangs feel safe within their own territory as well as the other Uptown territories. While  
5 Uptown gangs can freely travel and congregate within Uptown territory, rival gang members cannot  
6 enter Uptown territory without fear of retribution from Uptown gang members.

7 **Proposed Safety Zone for Knock Out Posse Criminal Street Gang**

8 34. Knock Out Posse claims as its territory or turf the geographic area within the  
9 Western Addition of San Francisco that includes Turk Street between and including Pierce and  
10 Steiner Streets, Steiner Street between and including Turk and Ellis Streets, Ellis Street between and  
11 including Pierce and Steiner Streets and Pierce Street between and including Ellis and Turk Streets  
12 as well as the entire geographic area within these borders, including the Marcus Garvey Public  
13 Housing Complex and the Martin Luther King Public Housing Complex.

14 35. The Uptown gang Chopper City claims as its territory or turf the geographic area  
15 within the Western Addition of San Francisco that includes Turk Street between and including Scott  
16 and Divisadero Street, Scott Street between and including Turk and Ellis Streets, Ellis Street  
17 between and including Scott and Divisadero Streets, and Divisadero Street between and including  
18 Ellis and Turk Street, as well as the entire geographic area within these borders, including the Pitts  
19 Plaza Public Housing Complex.

20 36. In between the two territories claimed by Knock Out Posse and Chopper City is the  
21 territory claimed by the smaller Uptown criminal street gang, Turkwood. Currently, Turkwood has  
22 only about seven documented members and they are very closely aligned with the Chopper City  
23 gang. They are also allied with the Knock Out Posse gang. Turkwood claims as its territory or turf  
24 the geographic area within the Western Addition of San Francisco that includes Turk Street between  
25 and including Pierce and Scott Streets, Pierce Street between and including Ellis and Turk Streets,  
26 Ellis Street between and including Scott and Pierce Streets and Scott Street between and including  
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1 Ellis and Turk Streets as well as the entire geographic area within these borders, including the Pitts  
2 Plaza Public Housing Complex.

3 37. The entire geographic area described in paragraph ## 34-36 above is part of the  
4 Uptown gang territories. Members of Knock Out Posse, Chopper City and Turkwood freely travel  
5 in the all three territories. In addition, members of Knock Out Posse, Chopper City and Turkwood  
6 frequently conspire with each other to commit crimes in all three territories. Members of Knock  
7 Out Posse, Turkwood and Chopper City are frequently seen together in all three territories.  
8 Members of Knock Out Posse, Turkwood and Chopper City also frequently run from their territory  
9 to the other described Uptown territories when fleeing from police or other gang members and seek  
10 refuge in homes in other territories. Members of Knock Out Posse, Turkwood and Chopper City  
11 feel safe within their own territory as well as the other described territories. While members of  
12 Knock Out Posse, Chopper City and Turkwood can freely travel and congregate within all three  
13 territories, rival gang members cannot enter these three territories without fear of retribution from  
14 Knock Out Posse, Chopper City and Turkwood gang members.

15 38. The entire geographic area described in ## 34-36 above is the proposed Safety Zone  
16 for Chopper City and Knock Out Posse for purposes of this Injunction.<sup>3</sup> **Attached hereto as**  
17 **Exhibit A** is a true and correct copy of a map of the proposed Safety Zone. The area outlined in  
18 pink and bordered by Divisadero, Ellis, Steiner and Turk Street is the proposed Safety Zone for  
19 Knock Out Posse and Chopper City.

20 **The Significance of Knock Out Posse's Graffiti, Hand Signs and Tattoos**

21 39. Knock Out Posse members publicly identify themselves as gang members and mark  
22 the gang's territory by committing graffiti vandalism throughout their territory.

23 40. The Knock Out Posse gang uses graffiti to literally mark their territory and  
24 demonstrate the gang's claim to it. The graffiti announces to the neighborhood that the gang is

25 \_\_\_\_\_  
26 <sup>3</sup> Although Turkwood is not named in this injunction, members of Turkwood directly  
27 participate in and act in concert with Chopper City and Knock Out Posse to commit crimes and  
28 other nuisances within the Injunction's proposed Safety Zone. Therefore, these members of  
Turkwood, who will be discussed later in this declaration, should be subject to the Injunction

1 staking claim to the particular area and serves to intimidate members of the community. It  
2 announces to rival gangs that this is Knock Out Posse's turf.

3 41. The graffiti is a public nuisance in that it creates visual blight and diminishes  
4 property's value.

5 42. Examples of commonly seen graffiti in the Safety Zone, which evidences the Knock  
6 Out Posse gang's claim to the area include the following: "Knock Out Posse," "KOP," "KO," "567,"  
7 "1600," and "Uptown." "567" refers to the phone numbers that spell KOP. "1600" refers to the  
8 1600 block of Eddy (the Martin Luther King Housing Complex) and is another manner in which  
9 Knock Out Posse members refer to the gang. "Uptown" refers to Knock Out Posse's membership in  
10 the Uptown alliance. These examples reflect the Knock Out Posse gang marking its territory.

11 43. Knock Out Posse gang graffiti in the Safety Zone is also used as a means of  
12 communication. The gang graffiti serves as a newsletter for gang members. The graffiti will often  
13 indicate which rival gangs currently have conflicts with Knock Out Posse and which gangs have  
14 formed an alliance with Knock Out Posse. The graffiti will also often include memorials to dead  
15 gang members.

16 44. Knock Out Posse graffiti is prevalent in the gang's territory within the Safety Zone.  
17 **Attached hereto as Exhibit B** are true and correct copies of photographs of Knock Out Posse  
18 graffiti within the Martin Luther King Housing Complex within Knock Out Posse's territory taken  
19 by Officer Kevin Murray on March 1, 2006. The graffiti includes, "KOP", "567", "Eddy 1600",  
20 "KO", "RIP Spank", and "Uptown in da building." "Eddy 1600" refers to the 1600 block of Eddy.  
21 "RIP Spank" refers to Chopper City gang member Demorea Jacobs who was killed in 2004.  
22 "Uptown in da building" refers to Knock Out Posse's membership in the Uptown alliance of gangs.  
23 **Attached hereto as Exhibit C** are true and correct copies of photographs of Knock Out Posse  
24 graffiti within the Martin Luther King Housing Complex within Knock Out Posse's territory taken  
25 in the summer of 2005 by Officer Reese Burrows. The graffiti includes, "KOP to da Choppa",  
26 "567" and "RIP Spank." "Choppa" refers to the Chopper City criminal street gang. As I mentioned  
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1 above, Knock Out Posse and Chopper City are close allies and often associate with each other and  
2 commit crimes together within the Safety Zone.

3 45. Knock Out Posse uses a hand sign particular to its gang to indicate gang membership  
4 to other members of the gang, rival gang members and members of the community. When a gang  
5 member uses hand signs, it is often called "throwing gang signs" or "flashing gang signs."

6 46. The Knock Out Posse members flash their hand sign by putting their thumb and first  
7 or second finger together to form a circle with the remaining three fingers extended up and out  
8 (what is commonly referred to as the "okay" sign.) Sometimes, the remaining three fingers are also  
9 extended slightly down to form a "K."

10 47. Knock Out Posse gang members frequently flash their hand sign to intimidate rival  
11 gangs and members of the community and to make the Knock Out Posse's presence known in its  
12 territory. For instance, a Knock Out Posse member will drive by community members within the  
13 territory and flash the gang's hand sign to indicate his membership in Knock Out Posse and the  
14 gang's presence in the territory. In addition, Knock Out Posse members will flash hand signs while  
15 committing crimes within the territory as a way for the gang to claim responsibility for the crime.  
16 Knock Out Posse gang members also flash the gang's hand sign to indicate pride in their gang as  
17 well. I have seen numerous photographs of Knock Out Posse members, alone or with other gang  
18 members, flashing their hand sign. Frequently these pictures are taken within the gang's territory as  
19 a further indication that the gang is claiming the territory.

20 48. Knock Out Posse gang members use tattoos to exhibit a dedication and commitment  
21 to the gang. Tattoos are a permanent marker on one's body and serve as a constant reminder or a  
22 display showing that one is aligned with or belongs to that gang. I have seen that Knock Out Posse  
23 members will often tattoo "KO," "KOP," "567," or "1600" on their body. In addition, they will  
24 often tattoo their individual gang moniker and memorials to dead gang members on their body.  
25 Rival gangs and community members are familiar with the Knock Out Posse's name and other  
26 monikers and an individual would never display Knock Out Posse's tattoos unless he or she were a  
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1 member of Knock Out Posse. If an individual did display a Knock Out Posse tattoo and was not a  
2 member of the gang, the gang would retaliate against that individual.

3 49. In addition to Knock Out Posse's gang's own particular graffiti and hand signs,  
4 Uptown gangs have graffiti and hand signs that reference their membership in Uptown and separate  
5 them from other criminal street gangs. For instance, Uptown gang members will use the thumbs up  
6 hand sign to indicate that they are members of the Uptown association of gangs. Uptown gang  
7 members will also often graffiti the words "Uptown" next to their own gang's graffiti within their  
8 territory to symbolize that they are members of the larger Uptown association of gangs.

### 9 **The Chopper City Criminal Street Gang**

10 50. Chopper City criminal street gang is a violent, turf based, predominantly African-  
11 American gang situated in the Western Addition neighborhood of San Francisco. Chopper City is a  
12 criminal street gang under the definition Penal Code Section 186.22. The gang is an ongoing  
13 association of three or more persons that has as one of its primary activities the commission of  
14 crimes enumerated in Penal Code Section 186.22(e), including but not limited to the distribution of  
15 narcotics, possession of firearms, robberies, aggravated assaults and homicides. The gang and its  
16 members also identify themselves through a common name and common signs and symbols. In  
17 addition, the gang members individually and collectively engage in a pattern of criminal activity by  
18 committing, attempting to commit, conspiring to commit and being convicted of crimes enumerated  
19 in Penal Code Section 186.22(e), including but not limited to the distribution of narcotics,  
20 possession of firearms, robberies, aggravated assaults and homicides.

### 21 **History Of The Chopper City Criminal Street Gang**

22 51. The Chopper City criminal street gang evolved from the Turkwood criminal street  
23 gang. According to some gang members with whom I have talked, Chopper City evolved from  
24 Turkwood in approximately 2004, after Demorea Jacobs (also known as "Spank"), a well known  
25 and well liked Uptown gang associate was murdered.<sup>4</sup>

26 \_\_\_\_\_  
27 <sup>4</sup> The suspect in the murder of Demorea Jacobs is a member of the Eddy Rock criminal  
28 street gang.

1           52.     The Turkwood criminal street gang has been around since at least the mid 1980s and  
2 that gang's primary activities include the sale of narcotics, robberies, aggravated assaults, shootings  
3 and homicides within a portion of the Pitts Plaza Public Housing Complex. The geographic area  
4 claimed by Turkwood is bordered by and includes Pierce, Turk, Scott and Ellis Streets. When  
5 Chopper City formed, that gang claimed the territory immediately to the west of Turkwood's  
6 territory, which is also within the Pitts Plaza Public Housing Complex but is bordered by and  
7 includes Ellis, Scott, Turk and Divisadero Streets. Currently, Turkwood and Chopper City appear  
8 to be merging into one gang. In fact, the lines are now so blurred between the two gangs that older,  
9 original members of Turkwood will still claim affiliation with Turkwood as well as the Chopper  
10 City gang. However, new gang member recruits in either Turkwood or Chopper City's territory will  
11 claim membership in only Chopper City.

12           53.     The sale of narcotics is one of the primary purposes of Chopper City and after its  
13 formation the gang established operating procedures for drug sales in its claimed territory, such as  
14 lookout posts, alarm systems, collection enforcement, modes of transportation, safe houses within  
15 its territory and outdoor stash locations. Similar to Knock Out Posse, the gang has an informal  
16 hierarchy from shot callers (leaders who occasionally give orders to other members of the gang) to  
17 lookouts (persons assigned to watch for police, enemies and potential buyers.)

18           54.     In addition to the sale of narcotics, one of the primary purposes of the gang is to  
19 engage in more violent activities, such as robberies, aggravated assaults, shootings and homicides.  
20 The purpose of these crimes is to protect that gang's territory against rival gang members, to build  
21 up the gang's reputation as a violent gang, and to protect their drug trade within their claimed  
22 territory.

### 23 **How Chopper City Is Organized**

24           55.     At this time, I believe there are approximately 25 documented adult members of  
25 Chopper City. In addition, although juvenile members of the gang are not subject to this injunction,  
26 there are numerous juvenile members of Chopper City.

27

28



1           56.     Chopper City has no formal hierarchy like other more organized gangs. Similarly,  
2 the gang has no formal officers or managers. Nevertheless, the gang does have more senior  
3 members who occasionally give orders to other members of the gang. The gang has no business  
4 address or mailing address. All the gang members tend to communicate through word of mouth or  
5 on the telephone.

6           57.     Chopper City's roster of members constantly evolves as new members join the gang  
7 and work their way up the ranks. Gang members from Chopper City will recruit persons living in  
8 the gang's claimed territory and Turkwood's claimed territory, or going to school in San Francisco.  
9 They will also recruit persons who have family living in the two territories.

10          58.     When a new gang member joins Chopper City, he must first prove himself with low-  
11 level tasks. For instance, a new member may serve as a lookout for others who are committing  
12 crimes. The lookout warns other gang members if police or rival gang members are approaching  
13 and watches for potential drug buyers. New members also prove themselves with less serious  
14 crimes, such as graffiti or harassment of local merchants. Gang members increase their status with  
15 the gang through any act, usually criminal, that benefits the gang. An act benefits the gang, for  
16 instance, if it helps to solidify the gang's turf and the gang's asserted right to sell drugs in the turf,  
17 increases the gang's profile amongst other gangs and the community, furthers the gang's reputation  
18 amongst other gang's, or terrorizes the community. Such crimes include selling narcotics, tagging  
19 the territory with graffiti, robberies, burglaries, assaults, and homicides, especially those involving  
20 the murder of rival gang members. If a gang member kills someone, particularly, if he kills a rival  
21 gang member, he will greatly increase his status in the gang. Gang members also increase their  
22 status in the gang by serving time in jail or prison.

23          59.     While gang activities are primarily criminal or otherwise unlawful, gang members do  
24 socialize with each other.

25 ///

26 ///

27 ///

1 **Identifying The Chopper City Criminal Street Gang**

2 60. The Chopper City criminal street gang primarily identifies itself through its name,  
3 territory, graffiti, hand signs and tattoos. Chopper City also identifies itself through its alliance with  
4 other Uptown gangs in the Western Addition of San Francisco.

5 **The Significance Of The Gang's Name**

6 61. The gang's name is very important to the gang's identity. The name is what gang  
7 members "claim" and it helps to separate Chopper City and its gang members from other gangs in  
8 the area. Members of Chopper City often write or otherwise mark their gang name on clothing and  
9 other personal belonging. Members of Chopper City also often include the gang's name in writings  
10 and mark the gang's name in graffiti in Chopper City's territory.

11 **The Significance Of Chopper City's Territory**

12 62. The territory or "turf" for Chopper City is the geographic area that the gang claims as  
13 its own. When a criminal street gang claims a territory, it means that the gang intends to  
14 exclusively occupy the area for its drug sales and other gang related activity. In Chopper City's  
15 territory gang members and their associates move freely in the area, congregate day and night,  
16 brandish weapons to intimidate citizens and rival gang members, display or "throw" gang signs,  
17 commit acts of graffiti to assert the gang's presence in the territory, and routinely sell narcotics to  
18 their customers with little fear of being reported to the police. Chopper City members do not fear  
19 being reported to the police because the community lives in fear of them. The gang members  
20 routinely threaten and harass residents who call or cooperate with the police. By instigating this  
21 culture of intimidation, the gang members make the residents fearful of cooperating with the police.  
22 I am aware of hundreds of gang-related crimes in Chopper City's claimed territory where witnesses  
23 and victims of violent crimes have refused to cooperate with police investigations out of fear of  
24 retaliation by the gang members. This allows Chopper City members to commit crimes with little  
25 interference and few witnesses who are willing to speak out or testify against them.

26 63. Even when Chopper City gang members themselves are victims of a crime within  
27 their territory and elsewhere, they often refuse to cooperate with police. The gang members prefer

1 to go after the culprit themselves rather than work with the criminal justice system. Consequently, I  
2 have found that once a Chopper City member is assaulted or shot, a member of a rival gang is  
3 usually assaulted or shot shortly thereafter. I am aware of numerous incidents where Chopper City  
4 gang members were shot or assaulted. The majority of these cases, however, remain unsolved  
5 because the victim gang member refuses to cooperate with police and goes so far as to sign an  
6 Affidavit requesting that the police investigation into their case be terminated.

7 64. In addition to carrying weapons in their territory, Chopper City gang members also  
8 store firearms and other weapons in various areas within the territory so that they have easy access  
9 to the weapons to commit crimes. The gang members also store their weapons within the territory  
10 to avoid being caught by police with weapons in their possession. I am aware of numerous  
11 incidents where Chopper City gang members were caught in the territory with weapons in their  
12 possession. I am also aware of numerous incidents where weapons, hidden in various areas of  
13 Chopper City's territory, were found by officers or member of the community.

14 65. I am aware of incidents where Chopper City gang members have taken over homes  
15 from frightened citizens and have used the homes to sell and store drugs, congregate after  
16 committing crimes, hide from police and rival gang members and store weapons.

17 66. Chopper City gang members feel safe in their territory. They know that they will  
18 find other Chopper City members and associates in their territory and that the area will generally be  
19 free of rival gang members. Chopper City members are also assured that other gang members will  
20 be nearby so that should a rival gang member be seen in their territory, the gang members will work  
21 together to deal with the rival member. Rival gang members, such as Eddy Rock, know that they  
22 cannot enter Chopper City territory without retribution for such an act. In fact, rival gang members  
23 who enter Chopper City territory will often be shot or otherwise assaulted.

#### 24 **The Significance Of Chopper City's Alliance With Other Uptown Gangs**

25 67. Members of Chopper City are also members of the Uptown alliance of gangs.  
26 Although each gang within the Uptown alliance has its own territory within the Uptown territory,  
27 members of one Uptown gang can freely travel in the territories claimed by other Uptown gangs. In  
28

1 addition, members of one Uptown gang frequently conspire with members of other Uptown gangs  
2 to commit crimes in the Uptown territories. Members of one Uptown gang are frequently seen with  
3 members of other Uptown gangs in the Uptown territories. Members of one Uptown gang  
4 frequently run from their territory to other Uptown territories when fleeing from police or other  
5 gang members and seek refuge in homes in the other Uptown gangs' territories. Members of  
6 Uptown gangs feel safe within their own territory as well as the other Uptown territories. While  
7 Uptown gangs can freely travel and congregate within Uptown territory, rival gang members cannot  
8 enter Uptown territory without fear of retribution from Uptown gang members.

9 68. Chopper City is particularly closely allied with the Turkwood criminal street gang  
10 and the two gangs appear to be evolving into one. Older, original members of Turkwood will still  
11 claim affiliation with that gang as well as the Chopper City gang. However, new gang member  
12 recruits in either Turkwood or Chopper City's territory will claim membership in Chopper City.  
13 Members of each gang can freely travel into the other gang's territory to sell narcotics and commit  
14 other crimes. In addition, members of the two gangs are frequently seen together and frequently  
15 commit crimes together within both of their territories. Members of Turkwood also frequently  
16 supply members of Chopper City with drugs to sell in both territories. In addition, I have observed  
17 that members of the two gangs frequently refer to themselves together in their writings and graffiti.  
18 **Attached hereto as Exhibit D** are true and correct copies of two collages and a drawing that I  
19 understand and believe were found on-line by officers at the San Francisco Police Department Park  
20 Station. The first image is a Turkwood/Chopper City computer generated collage that includes the  
21 names Turkwood and Chopper City, the number "223", and the word, "Uptown." The collage also  
22 includes a picture of a documented Chopper City gang member and a documented Turkwood gang  
23 member. The second image is a copy of the San Francisco Police Department criminal bulletin for  
24 homicide victim and Chopper City associate Demorea Jacobs. Over the bulletin, the words  
25 "Turkwood", "Choppa City!", "Happy Birthday 9/17", "UPT", and "RIP Spank" have been written.<sup>5</sup>

26 <sup>5</sup> Another copy of the crime bulletin with the words written over it was found during the  
27 execution of a search warrant at 200 Randolph Street #11 on June 28, 2007. The resident of that  
28 apartment is Chopper City member Demarco Peace.

1 "Spank" was Jacobs gang moniker. "UPT" is a reference to Uptown. The third image is a drawing  
2 that references "Uptown", "223 Chopper City", "894 Turkwood", "567 KOP", and "237 D-Block."  
3 D-Block is an Uptown gang that is allied with Chopper City and Knock Out Posse. The drawing  
4 also includes a memorial to dead Chopper City, D-Block and Knock Out Posse gang members.

### 5 **Proposed Safety Zone for Chopper City Criminal Street Gang**

6 69. As I mentioned in paragraph #35 above, Chopper City claims as its territory or turf  
7 the geographic area within the Western Addition of San Francisco that includes Turk Street between  
8 and including Scott and Divisadero Streets, Scott Street between and including Turk and Ellis  
9 Streets, Ellis Street between and including Scott and Divisadero Streets, and Divisadero Street  
10 between and including Ellis and Turk Streets, as well as the entire geographic area within these  
11 borders, including the Pitts Plaza Public Housing Complex.

12 70. As more fully detailed in paragraphs ## 34-38 above, the entire geographic area  
13 described in ## 34-36 is the proposed Safety Zone for Chopper City and Knock Out Posse for  
14 purposes of this Injunction.

### 15 **The Significance of Chopper City's Graffiti, Hand Signs and Tattoos**

16 71. Chopper City members publicly identify themselves as gang members and mark the  
17 gang's territory by committing graffiti vandalism throughout their territory.

18 72. The Chopper City gang uses graffiti to literally mark their territory and demonstrate  
19 the gang's claim to it. The graffiti announces to the neighborhood that the gang is staking claim to  
20 the particular area and serves to intimidate members of the community. It announces to rival gangs  
21 that this is Chopper City's turf.

22 73. The graffiti is a public nuisance in that it creates visual blight and diminishes  
23 property's value.

24 74. Examples of commonly seen graffiti in the Safety Zone, which evidences the  
25 Chopper City gang's claim to the area include the following: "Chopper City", "Choppa City",  
26 "Chop", "1800", "1800 Block", "223", and "Uptown." "1800" and "1800 Block" refer to the 1800  
27 block of Eddy (the Pitts Plaza Housing Complex) and is another manner in which Chopper City  
28

1 members refer to the gang. "223" refers to assault rifle ammunition and is another manner in which  
2 Chopper City members refer to the gang. "Uptown" refers to Chopper City's membership in the  
3 Uptown alliance. These examples reflect the Chopper City gang marking its territory.

4 75. Chopper City gang graffiti in the Safety Zone is also used as a means of  
5 communication. The gang graffiti serves as a newsletter for gang members. The graffiti will often  
6 indicate which rival gangs currently have conflicts with Chopper City and which gangs have formed  
7 an alliance with Chopper City. The graffiti will also often include memorials to dead gang  
8 members.

9 76. Chopper City graffiti is prevalent in the gang's territory within the Safety Zone.  
10 **Attached hereto as Exhibit E** are true and correct copies of photographs of Chopper City graffiti  
11 within the Pitts Plaza Housing Complex within Chopper City's territory taken by me on April 18,  
12 2006. The photographs fairly and accurately depict the graffiti that I observed. The graffiti  
13 includes, "223", "Uptown", "Choppa Boy", "RIP Spank", "RIP Ra-Ra Speeze", "2 Thumbs Up!",  
14 "Uptown Movement", "Uptown Fuck Tha Otha Shit U Know", "Choppa City 223", "1600 Block",  
15 and "567." "567" and "1600 Block" are references to Chopper City's ally, the Knock Out Posse  
16 criminal street gang. "2 Thumbs Up!" is a reference to the Uptown alliance hand sign. "RIP  
17 Spank" and "RIP Ra-Ra Speeze" are memorials to dead gang members. "Uptown Fuck Tha Otha  
18 Shit, U Know" is a put down of rival gangs. **Attached hereto as Exhibit F** are true and correct  
19 copies of photographs of Chopper City graffiti within the Pitts Plaza Housing Complex within  
20 Chopper City's territory taken by me in January 2007. The photographs fairly and accurately depict  
21 the graffiti that I observed. The graffiti includes, "Chop", "223", "Uptown", "Choppa City", and  
22 "1700." "1700" is a reference to Chopper City's ally, the Turkwood criminal street gang. The  
23 graffiti also includes "RIP Spank" and "RIP Rece", memorials to dead gang members. **Attached**  
24 **hereto as Exhibit G** are true and correct copies of photographs of Chopper City graffiti within the  
25 Pitts Plaza Housing Complex within Chopper City's territory taken by me on April 17, 2007. The  
26 photographs fairly and accurately depict the graffiti that I observed. The graffiti includes, "223",  
27  
28

1 "Uptown", "Chopp City", "Choppa City", and "Fuck OC." "Fuck OC" refers to Chopper City's  
2 rivalry with the Eddy Rock criminal street gang.

3 77. Chopper City uses a hand sign particular to its gang to indicate gang membership to  
4 other members of the gang, rival gang members and members of the community. When a gang  
5 member uses hand signs, it is often called "throwing gang signs" or "flashing gang signs."

6 78. The Chopper City members flash their hand sign by forming a "C" with their hand  
7 and fingers.

8 79. Chopper City gang members frequently flash their hand sign to intimidate rival  
9 gangs and members of the community and to make Chopper City's presence known in its claimed  
10 territory. For instance, a Chopper City member will drive by community members within the  
11 territory and flash the gang's hand sign to indicate his membership in Chopper City and the gang's  
12 presence in the territory. In addition, Chopper City members will flash hand signs while  
13 committing crimes within the territory as a way for the gang to claim responsibility for the crime.  
14 Chopper City gang members also flash the gang's hand sign to indicate pride in their gang as well. I  
15 have seen numerous photographs of Chopper City members, alone or with other gang members,  
16 flashing their hand sign. Frequently these pictures are taken within the gang's territory as a further  
17 indication that the gang is claiming the territory.

18 80. Chopper City gang members use tattoos to exhibit a dedication and commitment to  
19 the gang. Tattoos are a permanent marker on one's body and serve as a constant reminder or a  
20 display showing that one is aligned with or belongs to that gang. I have seen that Chopper City  
21 members will often tattoo "Chopper City", "Choppa City", "223", or "1800" on their body. In  
22 addition, they will often tattoo their individual gang moniker and memorials to dead gang members  
23 on their body. Rival gangs and community members are familiar with the Chopper City's name and  
24 other monikers and an individual would never display Chopper City's tattoos unless he or she were  
25 a member of Chopper City. If an individual did display a Chopper City tattoo and was not a  
26 member of the gang, the gang would retaliate against that individual.

1           81.     In addition to Chopper City's gang's own particular graffiti and hand signs, Uptown  
2 gangs have graffiti and hand signs that reference their membership in Uptown and separate them  
3 from other criminal street gangs. For instance, Uptown gang members will use the thumbs up hand  
4 sign to indicate that they are members of the Uptown association of gangs. Uptown gang members  
5 will also often graffiti the words "Uptown" next to their own gang's graffiti within their territory to  
6 symbolize that they are members of the larger Uptown association of gangs.

7 **Knock Out Posse And Chopper City Criminal And Other Nuisance Activities Within The**  
8 **Safety Zone**

9           82.     The primary purposes of Knock Out Posse criminal street gang and Chopper City  
10 criminal street gang are the sale of narcotics and the commission of violent activities such as  
11 robberies, aggravated assaults, shootings and homicides. I have taken part in hundreds of arrests  
12 and/or investigations involving Knock Out Posse and Chopper City members or associates in the  
13 Safety Zone engaging in the distribution of narcotics, transportation of narcotics, manufacturing of  
14 narcotics, possessing narcotics for sale, the possession of firearms, and other felonies such as those  
15 enumerated in the California Penal Code Section 186.22(e), including robberies, aggravated assaults  
16 (including shootings), and homicides. In addition, I have reviewed hundreds of police reports and  
17 investigations involving Knock Out Posse and Chopper City members or associates in the Safety  
18 Zone engaging in the distribution of narcotics, possession of narcotics for sale, the possession of  
19 firearms, and other felonies such as those enumerated in the California Penal Code Section  
20 186.22(e), including robberies, aggravated assaults (including shootings), and homicides. In  
21 addition, I have reviewed all officer declarations submitted in support of Plaintiffs' Application For  
22 An Order To Show Cause Re: Preliminary Injunction And Preliminary Injunction in this matter.  
23 These declarations document Knock Out Posse and Chopper City's nuisance activity in the Safety  
24 Zone.

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1 **Knock Out Posse and Chopper City's Drug Dealing And Other Crimes Within The Safety**  
2 **Zone**

3 83. When Knock Out Posse and Chopper City gang members sell drugs within the  
4 Safety Zone, this creates a public nuisance. The members conduct their illegal drug sales in public  
5 spaces which interferes with vehicle and pedestrian traffic, interferes with lawful activity by  
6 community members in the area, generates complaints to police, exhausts police resources, and  
7 diminishes the quality of life in the Safety Zone. Knock Out Posse and Chopper City's drug trade  
8 within the Safety zone also leads to loitering, littering, noise, verbal altercations, physical  
9 altercations, and public use of illegal drugs as drug dealers and drug users converge on the area.  
10 The street level drug dealing also leads to the commission of other kinds of crimes, including  
11 robbery, burglary, assaults, shootings and homicides as drug dealers fight for their territory from  
12 other criminal street gangs and drug users struggle to find money to feed their addiction.

13 84. When members of Knock Out Posse and Chopper City sell drugs on the street within  
14 the Safety Zone, they often carry dangerous weapons, including firearms, in case they encounter a  
15 rival gang member or a threatening situation. With members carrying dangerous weapons, this  
16 increases the likelihood that a violent act will be committed in the neighborhood, creating,  
17 contributing to, and exacerbating the public nuisance. The mere presence of dangerous weapons is  
18 a public nuisance, in that neighbors or merchants become rightfully intimidated and scared to live  
19 in, work in, and enjoy their own neighborhood.

20 85. In addition to selling drugs within the Safety Zone, member of Knock Out Posse and  
21 Chopper City also commit other crimes within the Safety Zone, such as assaults, burglary, robbery,  
22 home takeovers for the storage of weapons and the storage and manufacturing of narcotics to sell,  
23 and trespassing. When Knock Out Posse and Chopper City gang members commit these crimes  
24 within the Safety Zone, this creates a public nuisance, interferes with lawful activity by community  
25 members in the area, generates complaints to police, exhausts police resources, and diminishes the  
26 quality of life in the Safety Zone.

1           86.    **The following are just some examples drug-related crimes committed by**  
2 **members of Knock Out Posse and Chopper City criminal street gangs within the Safety Zone:**

- 3       • On June 30, 1998, officers saw documented Knock Out Posse member Floyd Barrow and a  
4 juvenile member of Knock Out Posse loitering next to the children's playground in the  
5 courtyard of the Martin Luther King/Marcus Garvey Public Housing Complex. Barrow was  
6 arrested on an outstanding warrant. Officers found crack cocaine on Barrow's person and an  
7 extra stash 10-15 feet from Barrow. The extra stash appeared to belong to Barrow because it  
8 was in a piece of a baggie and the other piece of the baggie was found in Barrow's pocket.  
9 Barrow was arrested possessing crack cocaine for sale.
- 10      • On January 13, 1999, officers observed documented Knock Out Posse members Ladario  
11 Derosane, Laveaux Derosane, Scott Young, Charles Chatman, Floyd Barrow, and two  
12 juvenile members of Knock Out Posse loitering near Eddy and Pierce Street. These  
13 individuals were known to deal drugs and keep a stash hidden nearby. Both the Derosane  
14 brothers had court stay away orders from this area and both were arrested. Officers searched  
15 the area and found numerous rocks of crack cocaine and numerous individually wrapped  
16 bags of marijuana on top of a bush near where the gang members were loitering.
- 17      • On October 7, 1999, officers learned that the criminal street gang Knock Out Posse had  
18 taken over 1675 Eddy Street #313 in the Martin Luther King/Marcus Garvey Housing  
19 Complex from the elderly resident and were selling drugs out of the unit. Officers  
20 responded to the residence and knocked on the door. Documented Knock Out Posse  
21 member Floyd Barrow answered the door while holding baggies of crack cocaine and  
22 marijuana. Officers also found additional crack cocaine, digital scales, strainers, empty  
23 plastic baggies, baking soda and baking powder in the residence. Officers believed that  
24 crack cocaine was being manufactured and sold in the residence. Barrow was arrested for  
25 possessing crack cocaine and marijuana for sale and opening or maintaining a place for  
26 trafficking in controlled substances.

- 1 • On February 8, 2000, documented Knock Out Posse members Juan Allen and Laveaux  
2 Derosane were seen loitering on the walkway behind the Martin Luther King/Marcus  
3 Garvey Public Housing Complex at 1675 Eddy Street. At the time, Derosane had an active  
4 court stay away order from the area. Derosane was arrested. Allen was pat searched for  
5 weapons and officers found a clear plastic bag with 39 individually wrapped rocks of crack  
6 cocaine on his person. Allen was arrested for possessing crack cocaine for sale.
- 7 • On June 5, 2001, documented Knock Out Posse member Trevor Green was in the process of  
8 selling crack cocaine to an individual at Steiner and Eddy Streets when he was interrupted  
9 by police officers. Green fled and ran through the Marcus Garvey/Martin Luther King  
10 Housing Complex. As he was running, Green took a baggie of crack cocaine out of his  
11 pocket and placed it in his mouth. Officers eventually tackled Green and as they did so,  
12 Green spit out the baggie. Officers retrieved the baggie, which contained numerous off  
13 white crumbs. Inside Green's mouth, officers found off white chalky matter. Green was  
14 arrested for possessing crack cocaine for sale, loitering with intent to commit a drug offense  
15 and resisting arrest.
- 16 • On June 11, 2001, Leonard Boone and Knock Out Posse member Brandon Paillette were  
17 detained at Eddy and Steiner Street after officers observed the two involved in a drug  
18 transaction. After the detention, officers noticed that Boone appeared to be swallowing  
19 something. Officers ordered Boone to spit out the object and he eventually spit a rock of  
20 crack cocaine onto the sidewalk. Paillette had two separate court orders to stay at least 150  
21 yards away from the area. Paillette was arrested for unlawful sale of a controlled substance  
22 and violation of the stay away orders.
- 23 • On November 8, 2002, police learned from documented Page Street gang member Kenneth  
24 Mays that the Knock Out Posse gang took over #1520 Turk Street #605 from the female  
25 resident and her two sons. According to Mays, documented Knock Out Posse member Gary  
26 Owens was processing crack cocaine at the residence for documented Knock Out Posse  
27 member Ivory Collins.

- 1 • On December 18, 2002, officers saw documented Knock Out Posse members Ivory Collins,  
2 Juan Allen, Gary Owens, Paris Willis and Derosane Laveaux standing in front of 1520 Turk  
3 Street #605. As officers approached to execute a search warrant at the residence, the five  
4 gang members fled inside the residence and barricaded the door. Officers eventually gained  
5 entry to the residence and heard a toilet being flushed. Officers found cocaine and baggies  
6 of marijuana in the toilet. Officers also found a box of ammunition, digital scales,  
7 packaging material, cocaine residue and additional cocaine and marijuana in the residence.  
8 Collins, Allen, Owens, Willis and Laveaux were arrested for possessing marijuana and  
9 cocaine for sale, maintaining a place for trafficking in controlled substances, participation in  
10 a criminal street gang and resisting/delaying arrest. Owens was in possession of \$2,426 at  
11 the time of his arrest. Allen was in possession of \$971. Collins was in possession of \$487.  
12 Drug dealers are known to carry large amounts of cash on their person from their drug sales.
- 13 • On April 29, 2003, officers responded to shots fired and found documented Chopper City  
14 gang member Carnell Taylor loitering in the area of 1150 Scott Street. As officers  
15 approached, Taylor ran and attempted to discard two bags of marijuana in a trash can.  
16 Officers recovered the marijuana and arrested Taylor for possessing marijuana for sale.  
17 During a booking search, Taylor was found in possession of additional marijuana. Taylor  
18 admitted tossing marijuana in the garbage can.
- 19 • On September 16, 2003, officers saw documented Chopper City member Byron Cheeves  
20 loitering at Scott and Eddy Streets. Cheeves was on probation at the time with a warrantless  
21 search condition as a condition of his probation. As the officers approached him, Cheeves  
22 dropped a clear plastic baggie containing one large rock and three smaller rocks of crack  
23 cocaine onto the sidewalk. Cheeves was arrested for possessing crack cocaine for sale.
- 24 • On November 12, 2003, security guards at the Martin Luther King/Marcus Garvey Public  
25 Housing Complex located at 1675 Eddy Street witnessed documented Knock Out Posse  
26 member Darrell Luckett selling drugs in the complex. The security guards alerted the San  
27 Francisco Police Department. As officers approached, Luckett ran away. As he was  
28

1 running, Lockett threw two bags containing crack cocaine to the ground. Officers recovered  
2 the bags, containing 70 rocks of crack cocaine. Lockett was arrested for possessing crack  
3 cocaine for sale.

- 4 • On November 10, 2004, officers observed documented Chopper City member Raheshi  
5 Horace and documented Turkwood member Karwarn Thorn loitering in the courtyard of  
6 Pitts Plaza Housing Complex. Horace was on probation for a drug related offense with a  
7 search condition. Officers searched Horace and found 45 rocks of crack cocaine in his  
8 pocket. Horace was arrested for possessing crack cocaine for sale. Horace later admitted  
9 that he sold over 15 rocks of crack cocaine that day.
- 10 • On November 25, 2004, officers observed documented Knock Out Posse members Marcus  
11 Mays and Robert Mays loitering in the parking lot at 1625 Eddy Street. Both individuals  
12 were the subject of a search warrant. Therefore, both individuals were taken to the station  
13 and searched. Officers found six individually wrapped rocks of crack cocaine between  
14 Marcus Mays' buttocks. Marcus Mays was arrested for possessing crack cocaine for sale.
- 15 • On April 29, 2005, officers observed documented Chopper City members Byron Cheeves  
16 and Dennis Anderson loitering on the 1100 block of Scott Street. Officers saw Cheeves sell  
17 drugs to an individual. Cheeves was detained but officers were unable to detain the  
18 individual to whom Cheeves sold drugs. Officer found approximately \$200 in small bills on  
19 Cheeves. Officers also observed Dennis Anderson sell drugs to an individual after  
20 Anderson retrieved the drugs from under the car cover of a parked car. Officers arrested  
21 Anderson and recovered the drugs. Anderson had \$800 in small bills in his pants pocket.  
22 Anderson was arrested for possessing crack cocaine for sale.
- 23 • On May 20, 2005, an undercover officer bought crack cocaine from Byron Cheeves,  
24 Elizabeth Cheeves and a juvenile member of Chopper City in the area of 1150 Scott Street.
- 25 • On November 16, 2005, documented Chopper City member Clarence Cook was arrested at  
26 Eddy and Scott Street for possessing a concealed loaded semi-automatic handgun and  
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1 possessing 13 individually wrapped rocks of crack cocaine. Cook admitted to the officers  
2 that he possessed the loaded handgun and sold crack cocaine.

- 3 • On January 26, 2006, officers observed Juan Allen and Darrell Luckett at Turk and Pierce  
4 Streets. Allen had a court stay away order from the area and Luckett had an outstanding  
5 warrant for possession of narcotics for sale. When officers approached, Allen and Luckett  
6 ran away. Allen ran toward 1520 Turk Street #611. Officers eventually caught up with  
7 Allen and arrested him for violating the stay away order and resisting arrest. Officers found  
8 Luckett at 1150 Pierce Street, #213, a known hang out for Knock Out Posse members.  
9 Luckett was arrested and found in possession of a plastic baggie containing several rocks of  
10 crack cocaine. Luckett was booked for possession of crack cocaine for sale.
- 11 • On February 15, 2006, officers observed documented Knock Out Posse members Juan Allen  
12 and Floyd Barrow loitering with documented Chopper City members Dennis Anderson and  
13 Byron Cheeves in the Martin Luther King Housing Complex courtyard between 1150 Pierce  
14 Street and 1675 Eddy Street. Allen had a court stay away order from the area. Officers  
15 observed Allen retrieve narcotics hidden nearby and sell them to an unidentified male. After  
16 the transaction was complete, officers detained Allen, Barrow, Anderson and Cheeves.  
17 Officers then searched the area where they observed Allen retrieve the narcotics and found a  
18 scale and crack cocaine. Allen was arrested for possessing crack cocaine for sale and  
19 violating the stay away order. During the booking search, Allen was found in possession of  
20 a plastic baggie containing marijuana and \$271.
- 21 • On March 16, 2006, an undercover officer bought crack cocaine from Byron Cheeves in the  
22 area of 1150 Scott Street.
- 23 • On June 14, 2006, a confidential source purchased crack cocaine from documented Chopper  
24 City gang member Jamal Gaines at Turk and Scott Streets.
- 25 • On June 27, 2006, Sala Thorn, a documented Turkwood member and an associate of  
26 Chopper City, sold crack cocaine to a DEA confidential informant.

- 1 • On July 31, 2006, an officer observed documented Turkwood member and Chopper City  
2 associate Karwarn Thorn in a car at Scott and Turk Street. The car was pulled over for  
3 vehicle code violations and Thorn was arrested. In a search incident to arrest, officers  
4 discovered 25 large rocks of crack cocaine and many smaller rocks in Thorn's pants pocket.  
5 Thorn was arrested for possessing crack cocaine for sale.
- 6 • On August 17, 2006, a confidential source purchased crack cocaine from Jamal Gaines at  
7 Turk and Scott Streets.
- 8 • On August 30, 2006, officers saw documented Knock Out Posse member Brian Hill in the  
9 Pitts Plaza courtyard near Eddy and Scott Street. Hill was on parole for aggravated assault  
10 with a firearm. Hill ran from the officers and pounded on the rear door of 1771 Eddy Street,  
11 a known hang out for Chopper City gang members. Someone let Hill inside the residence.  
12 Officers forced their way through the rear door of the residence and saw Hill and  
13 documented Chopper City member Ricky Rounds running out the front door. Hill ran  
14 towards Eddy and Pierce Street screaming to occupants of the Martin Luther King Housing  
15 Complex to open the gate for him. Officers tackled Hill and found one large rock of crack  
16 cocaine and a baggie of marijuana in his pant pocket. Hill was arrested for possessing crack  
17 cocaine for sale, resisting arrest and participating in a criminal street gang.
- 18 • On October 19, 2006, officers observed documented Chopper City member Dennis  
19 Anderson in the area of 1151 Scott Street. As the officers approached, Anderson ran away  
20 and dropped a handgun over the side of a fence. Officers retrieved the gun and arrested  
21 Anderson. During a search incident to arrest, officers discovered two ziplock baggies of  
22 marijuana and \$918 on Anderson. Anderson was arrested for possessing marijuana for sale,  
23 possessing the handgun and participating in a criminal street gang. Officers also located  
24 Deron Cheeves, Dwight Hart and Antoine Johnson nearby.
- 25 • On November 11, 2006, officers saw documented Knock Out Posse member Juan Allen at  
26 Ellis and Pierce Streets. When the officers approached him, Allen ran into the Martin  
27 Luther King Housing Complex. Officers observed Allen discard two plastic baggies  
28

1 containing rocks of crack cocaine. Allen ran toward another gate in the complex and a black  
2 female held the gate open for him. After Allen ran through the gate, the female closed the  
3 gate on the officers. The officers lost sight of Allen. Officers recovered the crack cocaine.  
4 Based on the amount recovered, officers believed it was possessed for sale. At the time of  
5 the incident, Allen was on active probation for possession of narcotics for sale.

6 **87. The following are examples of other crimes committed by members of Knock**  
7 **Out Posse and Chopper City criminal street gangs within the Safety Zone:**

- 8 • On February 14, 2004, Martin Luther King/Marcus Garvey Housing Complex security  
9 guards were attempting to detain Darrell Luckett in the area of 1675 Eddy Street, when they  
10 were attacked by two black male suspects. One of the security guards recognized one of the  
11 suspects as a juvenile member of Knock Out Posse.
- 12 • October 9, 2004, documented Chopper City gang member Deon Anderson violated a court  
13 stay away order by going to Pearl Market at 1201 Divisadero Street and harassing the store  
14 clerk.
- 15 • On November 16, 2004, officers saw Juan Allen and Gary Owens loitering in the Marcus  
16 Garvey/Martin Luther King Public Housing Complex. As the officers approached, Allen  
17 ran away while holding his waistband area. Officers eventually caught up to Allen and  
18 tackled him. Allen fell to the ground and a loaded revolver and baggie of marijuana fall out  
19 of his waistband. Allen was arrested for possessing marijuana and a concealed loaded  
20 revolver and for trespassing and participating in a criminal street gang.
- 21 • In 2005, documented Knock Out Posse member Floyd Barrow threatened the store clerk at  
22 Pearl Market located at 1201 Divisadero. The threats were caught on store videotape. In the  
23 videotape, Barrow also claimed that he was a gangster.
- 24 • On March 2, 2005, officers observed documented Chopper City gang member Ricky  
25 Rounds and two other subjects standing at the edge of the parking lot at 1869 Eddy Street.  
26 Rounds was detained and pat searched and officers discovered a loaded pistol in his left pant  
27  
28



1 leg. The pistol's serial number was partially scratched off. Rounds told officers that he  
2 found the gun the day before in the bushes at Eddy and Divisadero Streets.

- 3 • On July 7, 2005, documented Chopper City members Ricky Rounds, Byron Cheeves and  
4 Deron Cheeves and two other individuals broke into a home at 1843 Eddy Street after  
5 forcing the owner to give them the key. Security guards caught the subjects and called the  
6 police. When officers arrived at the residence, Byron Cheeves, Deron Cheeves and the two  
7 unidentified individuals ran out the back door. Officers chased after the subjects and  
8 discovered a Glock handgun on a pathway approximately fifteen feet from the back door to  
9 1843 Eddy Street. This was the same pathway that the suspects ran across as they ran out  
10 the back door. Officers searched Rounds and found 15 rounds of 9 mm bullets and two  
11 magazines filled with 9 rounds of 9 mm bullets, two baggies of crack cocaine and a scale.
- 12 • On July 8, 2005, officers responded to Eddy and Steiner Streets regarding shots fired.  
13 Officers found 6-8 black males standing near a car parked on the east side of the gate to the  
14 parking lot at 1625 Eddy Street. After the officers approached, documented Knock Out  
15 Posse member Floyd Barrow dropped a semi-automatic gun inside the car and ran away  
16 from the officers. Officers recovered the gun and arrested Barrow.
- 17 • On July 20, 2005, Deon Anderson violated a court stay away order by going to Pearl Market  
18 at 1201 Divisadero Street and harassing the store clerk.
- 19 • On August 7, 2005, Deon Anderson violated a court stay away order by going to Pearl  
20 Market at 1201 Divisadero Street and harassing the store clerk.
- 21 • On August 8, 2005, Deon Anderson was caught in the act of breaking into a home at 1800  
22 Turk Street.
- 23 • On September 30, 2005, Deon Anderson violated a court stay away order by going to Pearl  
24 Market at 1201 Divisadero and throwing gang hand signs at the store clerk.
- 25 • On January 7, 2006, Deon Anderson violated a court stay away order by going to Pearl  
26 Market at 1201 Divisadero Street and harassing the store clerk.

- 1 • On January 25, 2006, a confidential informant told police that Juan Allen, Gary Owens and  
2 Dante Levezier were selling drugs in the area of 1675 Eddy Street. According to the  
3 informant, Allen, Owens and Levezier were also in possession of a firearm and had stashed  
4 the firearm in the bushes near 1675 Eddy Street. Officers responded to the scene and found  
5 Allen still loitering in the area. Officers also found a stolen firearm in the bushes near Allen.
- 6 • On March 23, 2006, Jelvon Helton and a juvenile member of Knock Out Posse and seven  
7 other black males surrounded two Martin Luther King/Marcus Garvey security guards at  
8 Eddy and Pierce Street. Helton and the juvenile threatened one of the security guards. At  
9 the time that Helton threatened the security guard, he was wearing gold teeth with the letters  
10 "KO" in his mouth and a gold earring in his left ear that had the letters "KOP" on it.
- 11 • On June 26, 2006, Juan Allen was arrested for violating a stay away order after he was  
12 observed at Turk and Pierce Street with Jelvon Helton and a juvenile member of Knock Out  
13 Posse. In addition, Allen, Helton and the juvenile were suspected of beating another  
14 individual in the area of 1655 Turk Street before police arrived. Allen made comments to  
15 the police that he was only trying to break up the fight.
- 16 • On July 5, 2006, officers executed a search warrant at 1150 Pierce Street #213, a known  
17 hang out for Knock Out Posse members. Inside the residence they found several  
18 individuals, including Darrell Luckett and Jelvon Helton. Officers also found a loaded .38  
19 caliber revolver in the living room inside the front speaker of the television.
- 20 • On July 12, 2006, officers learned that documented Knock Out Posse members Floyd  
21 Barrow and Terry Luckett were processing and storing crack cocaine and storing firearms,  
22 including an AK 47 assault rifle, at 1652 Eddy Street #6. Officers responded to the  
23 residence and received consent to search from the resident. Officers found a pump action  
24 shotgun, seven shotgun shells, two boxes of 223 ammunition rounds and a leather holster.  
25 Officers also seized mail addressed to Floyd Barrow at 1652 Eddy Street #6.
- 26 • On August 7, 2006, officers learned that Knock Out Posse gang members were storing  
27 firearms inside a trailer parked in front of 1625 Eddy Street.

- 1 • On August 23, 2006, officers located a pistol hidden in the bushes near the northwest  
2 courtyard area of Pitts Plaza (Eddy and Scott Street).
- 3 • On September 13, 2006, officers received a tip from a confidential informant that someone  
4 had broken into a trailer parked in front of 1652 Eddy Street, a known hang out for Knock  
5 Out Posse gang members. According to the informant, Knock Out Posse gang members  
6 were angry, had armed themselves, and were holding the alleged perpetrators captive inside  
7 the trailer. Police responded to the scene and observed documented Knock Out Posse  
8 members Jelvon Helton, Kilamanjaro Bell and Laveaux Derosane entering and exiting the  
9 trailer and Marcus Mays standing outside the trailer near the entrance. Marcus Mays  
10 conferred with the other three individuals when they were outside the trailer. Police also  
11 observed Robert Mays enter the trailer. Officers detained Marcus Mays, Helton, Bell and  
12 Derosane outside the trailer and then entered the trailer. Inside, they found Robert Mays,  
13 and Chopper City members Ricky Rounds and Michael Craig. Rounds and Craig were  
14 sitting in folding chairs and had serious injuries to their heads. Both Rounds and Craig were  
15 dazed and covered in blood. Robert Mays, Marcus Mays, Helton, Bell and Derosane were  
16 arrested for assault with a deadly weapon or by force likely to produce great bodily injury,  
17 false imprisonment, conspiracy and participation in a criminal street gang. Rounds later told  
18 police that he and Craig were beaten by KOP gang members because the gang members  
19 thought that Rounds and Craig stole from the gang. Rounds also implicated documented  
20 Knock Out Posse members Floyd Barrow, Gary Owens and Donte Levexier in the false  
21 imprisonment and beating.
- 22 • On September 20, 2006, at the bail hearing for Marcus Mays, Kilamanjaro Bell, Jelvon  
23 Helton, Laveaux Derosane and Robert Mays related to the September 13, 2006 incident,  
24 officers observed Juan Allen, William Helm and a juvenile male, all documented member of  
25 Knock Out Posse, in the spectator gallery of the courtroom. As the hearing concluded,  
26 Helm stood up and flashed the KOP hand sign towards the defendants. Helm, Allen and the  
27 juvenile then left the courtroom together.
- 28

- 1 • On October 4, 2006, Allen and a juvenile member of Knock Out Posse appeared at the Hall  
2 of Justice to watch a court hearing for Robert Mays, Laveaux Derosane, Jelvon Helton,  
3 Marcus Mays and Kilamanjaro Bell. At the hearing, victim Ricky Rounds was present.  
4 Two women from the Martin Luther King/Marcus Garvey Housing Complex who were also  
5 present at the hearing called the victim a "snitch ass nigga." Immediately after the hearing,  
6 these same women made contact with Allen and the juvenile.
- 7 • On October 11, 2006, a confidential informant told an officer that the Chopper City gang hid  
8 guns around the Pitts Plaza Housing Complex. The confidential informant described the  
9 location of one of the guns. Officers responded to the area at 1150 Scott Street and located a  
10 loaded handgun and additional bullets in a plastic bag in the garbage area of the complex.
- 11 • On October 21, 2006, officers observed several men, including documented Chopper City  
12 gang members Dennis Anderson and Antoine Johnson loitering in a parking lot located on  
13 the 1100 block of Scott Street. Officers located a firearm hidden nearby.
- 14 • On May 8, 2007, officers observed several individuals, including documented Knock Out  
15 Posse member Dana Ball, documented Chopper City member Dennis Anderson and  
16 documented CDP gang members Reginald Elmore and Esau Ferdinand and a juvenile  
17 member of Knock Out Posse loitering at Eddy and Scott Street in the Pitts Plaza Housing  
18 Complex. As the officers approached, the subjects ran away. In the same area where the  
19 subjects were loitering, officers found a loaded semi-automatic handgun.
- 20 • On May 25, 2007, Dana Ball was arrested in the Marcus Garvey Public Housing Complex  
21 for a violation of a court stay away order. Ball resisted arrest and an officer was injured

## 22 **Crimes Related To Knock Out Posse and Chopper City's Rivalry With Eddy Rock**

23 88. As stated previously, Uptown gangs, including Knock Out Posse and Chopper City,  
24 have a deadly rivalry with the Downtown gang, Eddy Rock. It is common to find graffiti in the  
25 Knock Out Posse/Chopper City Safety Zone documenting the rivalry between Uptown gangs and  
26 Eddy Rock, such as "Fuck OC." "OC" refers to the Eddy Rock criminal street gang. Members of  
27 Knock Out Posse and Chopper City will assault any Eddy Rock gang member found in the Knock  
28

1 Out Posse/Chopper City Safety Zone. Likewise, members of Knock Out Posse or Chopper City  
2 who are seen in the territory claimed by members of Eddy Rock will be assaulted. If members of  
3 Knock Out Posse and Chopper City seek to assault an Eddy Rock rival gang member, they will  
4 travel to Eddy Rock's territory because they know that they will find rival gang members in that  
5 area. As a result, the majority of rivalry-related shootings and homicides against Knock Out Posse  
6 and Chopper City members have occurred within the Knock Out Posse/Chopper City Safety Zone,  
7 and vice versa for Eddy Rock.

8 89. This rivalry between the Uptown gangs, including Knock Out Posse and Chopper  
9 City, and the Downtown gang Eddy Rock has created a public nuisance within the proposed Knock  
10 Out Posse/Chopper City Safety Zone and Eddy Rock Safety Zone. Members of the community  
11 within the two proposed Safety Zones are frequently innocent victims of the violence created by the  
12 rivalry. I am aware of numerous incidents where cars, businesses and homes of community  
13 members in the two Safety Zones have been damaged by stray bullets or otherwise as a result of this  
14 rivalry violence. I am also aware of numerous incidents within the two proposed Safety Zones  
15 where innocent bystanders have been forced to seek cover or shelter from stray bullets as a result of  
16 the rivalry violence within the two proposed Safety Zones.

17 90. I have found that rivalry related crimes between the Uptown gangs and Eddy Rock  
18 often follow each other in rapid sequence. For instance, if a member of Eddy Rock is assaulted by  
19 Uptown gang members, then Eddy Rock gang members will quickly retaliate with an assault on an  
20 Uptown gang member. Since 2002, I am aware of numerous shootings and homicides that have  
21 occurred as a result of the deadly rivalry between Uptown gangs and Eddy Rock.

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1           91.    **The following are examples of crimes related to the deadly rivalry between**  
2 **Uptown gangs, including Knock Out Posse and Chopper City, and Eddy Rock.**<sup>67</sup>

- 3       • On April 27, 2002, a shootout occurred at Eddy and Fillmore Street between members of  
4       Knock Out Posse and Eddy Rock. Knock Out Posse member Robert Chatman and Eddy  
5       Rock members Leslie Howard and Edward Leslie were injured during the shootout.
- 6       • In July 2002, Sean Williams, a documented member of Eddy Rock, was shot and killed in  
7       the Bayview neighborhood of San Francisco.
- 8       • On January 5, 2004, Ivory Collins, a documented member of Knock Out Posse, was shot and  
9       wounded in the 1600 block of Eddy Street. The suspects in the case are Eddy Rock gang  
10      members.
- 11     • On January 12, 2004, Demarea Corgile, a documented member of Knock Out Posse, was  
12      shot and wounded in the parking lot at 1625 Eddy Street. Corgile told officers that a black  
13      male wearing all dark clothing shot him but he did not know the suspect. Corgile was  
14      otherwise uncooperative with the officers.
- 15     • On January 17, 2004, Sharod Fleming, a documented member of Eddy Rock, was murdered  
16      in front of the YMCA, located at 220 Golden Gate Avenue.
- 17     • On July 2, 2004, Quelacy Hubbard, a documented member of Eddy Rock was shot and  
18      wounded in front of the Third World Market, located at Fillmore and Turk Streets. The  
19      suspects in the case are Knock Out Posse members.
- 20     • On August 21, 2004, Demorea Jacobs (also known as "Spank"), a documented member of  
21      Chopper City was murdered in front of 1234 Divisadero Street. The suspects in the case are  
22      Eddy Rock members.

23  
24       <sup>6</sup> I personally investigated or assisted in the investigation of many of these crimes. As for  
25      the crimes that I did not personally investigate, I reviewed police reports related to the crimes and  
26      spoke to other San Francisco Police Department officers to gather information regarding the crimes.

27       <sup>7</sup> In many of the listed crimes, the suspects are known to the police department, even if no  
28      arrests have been made in the case. However, even where the suspects are unknown, it is my  
29      opinion, based on the nature and circumstances of the crimes, the area where the crimes occurred,  
30      the victims involved in the crimes, and the timing of the crimes, that the crimes are rivalry related.

- 1 • On September 3, 2004, Cedrick Rucker, a documented member of Eddy Rock, was  
2 murdered in front of 695 Larch Way.
- 3 • On September 8, 2004, Raheshi Horace, a documented member of Chopper City, was shot  
4 and wounded while walking on Eddy Street between Divisadero and Scott Streets.
- 5 • On September 24, 2004, Chris Kelly, Demetrius Smith and Jason Thomas, all documented  
6 members of Eddy Rock, and associate Justin Hernandez were driving in a vehicle in the area  
7 of McAllister and Webster Streets when the vehicle was shot at by unknown suspects. Chris  
8 Kelly was wounded in the assault.
- 9 • On October 31, 2004, Charlie Chatman, a documented member of Knock Out Posse, was  
10 shot inside the courtyard of the Martin Luther King housing complex. The suspects in the  
11 case are Eddy Rock members.
- 12 • On February 24, 2005, Gaylon Smith, a documented member of Eddy Rock, was shot and  
13 killed on Golden Gate Avenue at Lyon. The suspects in the case are Knock Out Posse  
14 members.
- 15 • On June 11, 2005, John Brown, a documented member of Eddy Rock and Jason Robinson, a  
16 documented member of the Thomas Paine gang were shot and wounded near the intersection  
17 of Turk and Laguna Streets. Thomas Paine is a Downtown criminal street gang.
- 18 • On August 3, 2005 at 2:00 a.m., Fred Ayatch was murdered in front of 1867 Eddy. Ayatch's  
19 family was from the territory claimed by the Eddy Rock criminal street gang. By 8:00 a.m.  
20 the next day, San Francisco police officers observed fresh graffiti in the immediate area of  
21 the murder. The graffiti included, "Choppa City," "Uptown", "RIP Spank", "223", and  
22 "Fuck ER." "ER" refers to the Eddy Rock criminal street gang. Dennis Anderson, a  
23 documented Chopper City gang member, is the suspect in Ayatch's murder.
- 24 • On November 17, 2005, Wayne Bernard, a documented member of Eddy Rock, was shot  
25 and killed on the corner of Eddy and Webster Streets. The suspect in the crime, Dwight  
26 Hart, is a documented member of Chopper City. Hart was booked and released for the  
27 murder.

- 1 • On November 17, 2005, Jason Thomas, a documented member of Eddy Rock, was shot and  
2 wounded in front of 4799 3<sup>rd</sup> Street. The suspects in the case are Chopper City gang  
3 members and Central Divisadero Players gang members. Central Divisadero Players (also  
4 known as "CDP") is an Uptown gang and is allied with Chopper City and Knock Out Posse.
- 5 • On November 22, 2005, Skylar Stewart, a documented member of Chopper City, and  
6 Antonio Gilton, a documented member of Central Divisadero Players, were shot while  
7 sitting in a vehicle in front of 1231 Silver Avenue. Stewart died from his injuries. The  
8 suspects in the case are Eddy Rock gang members.
- 9 • On March 6, 2006, Robert Mays, Marcus Mays and a juvenile member of Knock Out Posse  
10 were inside 1349 Steiner Street #2 with two other juveniles when an unknown suspect began  
11 to shoot into the residence. Officers recovered seven bullet casings outside the apartment  
12 and three bullet fragments inside the apartment.
- 13 • On April 1, 2006, Robert Chatman, a documented member of Knock Out Posse, was  
14 murdered in front of 285 Herman Street. The suspects in the case are Eddy Rock gang  
15 members.
- 16 • On June 3, 2006, Hannibal Thompson, a documented member of Eddy Rock, was shot and  
17 wounded on the corner of Bush and Fillmore Streets. The suspects in the case are Knock  
18 Out Posse members.
- 19 • On June 25, 2006, John Brown, a documented member of Eddy Rock, was shot and  
20 wounded in the 600 block of Larch Way.
- 21 • On July 22, 2006, John Brown was shot and killed in front of 600 Larch Way. The suspects  
22 in the case are 800 Block gang members. 800 Block is a Western Addition gang and is  
23 allied with Chopper City and Knock Out Posse.
- 24 • On August 5, 2006, a juvenile documented member of Eddy Rock and another juvenile were  
25 shot while attending a funeral reception for deceased Eddy Rock member John Brown in the  
26 600 block of Larch Way. The suspects in the case are Knock Out Posse gang members.



- 1 • On August 14, 2006, Aubrey Abrakasa, a documented member of the Central Divisadero  
2 Players, was murdered on Grove Street at Lyon Street. The suspects in the case are Eddy  
3 Rock gang members.
- 4 • On September 10, 2006, documented Knock Out Posse member Jelvon Helton was inside  
5 1150 Pierce Street #213 with several other individuals, including a juvenile member of  
6 Knock Out Posse, when two unknown black males shot into the home.
- 7 • On October 1, 2006, Paul Tanner, an associate of Eddy Rock, was murdered in front of 1619  
8 Polk Street.
- 9 • On October 7, 2006, documented Eddy Rock members Burnett Raven and Steven Johnson  
10 were shot in front of 618 Larch Way. Raven died, and Johnson was injured.
- 11 • On November 24, 2006, Dwight Hart, a documented member of Chopper City, was shot and  
12 wounded near 1600 Turk Street. Hart told the police he heard ten shots but saw nothing.  
13 One of the gunshots broke the window at 1115 Pierce Street.
- 14 • On January 27, 2007, Jamal Smith, a documented member of Eddy Rock, was shot and  
15 killed in front of 1118 Eddy Street. The suspects in the case are Chopper City gang  
16 members.
- 17 • On February 3, 2007, Leon Parker, a documented member of Central Divisadero Players and  
18 Floyd Barrow, a documented member of Knock Out Posse, were shot in front of 2855 Geary  
19 Street. The suspects in the case are Eddy Rock members.
- 20 • On February 11, 2007, Anthony Hunter, a documented member of Eddy Rock, was shot and  
21 killed in front of 1221 Eddy Street. The suspects in the case are documented members of  
22 Central Divisadero Players and Chopper City.
- 23 • On February 11, 2007, a thirteen year old girl was shot while walking in the 600 block of  
24 Grove Street with two documented members of the 800 Block gang. Deshawn Campbell  
25 and two juveniles, all documented members of Eddy Rock, were arrested for the crime.  
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- 1 • On February 12, 2007, Tony McDougal, a documented member of the Central Divisadero  
2 Players, was murdered in his car at Hayes and Baker Streets. The suspects in the case are  
3 Eddy Rock gang members.
- 4 • On February 12, 2007, Eric Sailor was shot at the corner of Haight and Fillmore Streets.  
5 Sailors is related to Leon Parker, a documented member of the Central Divisadero Players.
- 6 • On April 16, 2007, Leslie Howard, a documented member of Eddy Rock, was shot and  
7 wounded near 146 Westpoint Road.
- 8 • On April 20 2007, Deon Anderson, a documented member of Chopper City, was shot at  
9 Divisadero and Golden Gate Streets. The suspects in the case are Eddy Rock gang  
10 members.
- 11 • On May 18, 2007, Dontaye Hubbard and Carnell Taylor, Jr., both documented members of  
12 Eddy Rock, were shot in the area of McAllister and Buchanan Streets. It is suspected that  
13 both Taylor and Hubbard had handguns and were trying to attack 800 Block members.  
14 Three guns were recovered at the scene. The suspects in the shooting of Taylor and  
15 Hubbard are 800 Block members.
- 16 • On May 19, 2007, Antoine Mackey, a documented member of the 800 Block gang, was shot  
17 while standing on the 800 block of Buchanan Street. The suspects in the case are Eddy  
18 Rock gang members.
- 19 • On May 22, 2007, Deon Anderson, a documented member of Chopper City, was shot and  
20 wounded while at Pearl Market, located at 1201 Divisadero. Numerous bullet holes were  
21 found within the market. The suspects in the case are Eddy Rock gang members.
- 22 • On May 24, 2007, Jamar Lake, a documented member of Eddy Rock, was shot and killed at  
23 the corner of Eddy and Laguna Streets.
- 24 • On June 12, 2007, Larue Shaw, a documented member of Eddy Rock, was shot at Eddy and  
25 Buchanan Streets.
- 26 • On June 13, 2007, three juvenile associates of 800 Block and a bystander were shot on the  
27 1100 block of McAllister Street. The suspects in the case are Eddy Rock gang members.

- 1 • On June 14, 2007, three juvenile associates of 800 Block were shot on Friendship Court  
2 between McAllister and Fulton Streets. The suspects in the case are Eddy Rock gang  
3 members.

4 **Knock Out Posse And Chopper City Gang Member Convictions**

5 92. The Penal Code requires that a gang, through its members, commit, attempt to  
6 commit, conspire to commit, or be convicted of two or more "predicate crimes" to qualify as a  
7 criminal street gang under Penal Code Section 186.22. Above, I have listed numerous predicate  
8 crimes that members of Knock Out Posse and Chopper City committed, attempted to commit or  
9 conspired to commit. In addition, however, the following is a list of predicate crimes committed by  
10 Knock Out Posse and Chopper City gang members for which they were convicted.<sup>8</sup>

11 **Knock Out Posse**

- 12 • Court #201174, March 2, 2007, Defendant Juan Allen, Health & Safety Code Section  
13 11351.5 and Penal Code Section 186.22
- 14 • Court #196288, May 3, 2006, Defendant Juan Allen, Penal Code Section 12025
- 15 • Court #198437, May 3, 2006, Defendant Juan Allen, Health & Safety Code Section 11351.5
- 16 • Court #181522, September 21, 2001, Defendant Floyd Barrow, Health & Safety Code  
17 Section 11351.5
- 18 • United States District Court, Northern District of California, Court #30670661, March 27,  
19 2007, Defendant Brian Hill, possession with intent to distribute cocaine base
- 20 • Court #198920, June 26, 2006, Defendant William Helm, Health & Safety Code Section  
21 11351.5
- 22 • Court #198444, January 12, 2007, Defendant Darrell Lockett, Health & Safety Code Section  
23 11351.5 and Penal Code Section 148
- 24 • Court #191305, May 7, 2004, Defendant Darrell Lockett, Health & Safety Code Section  
25 11351.5

26 \_\_\_\_\_  
27 <sup>8</sup> This list is not exhaustive and does not include all of the criminal convictions of Knock  
28 Out Posse and Chopper City members.

- 1 • Court #200391-03, November 20, 2006, Defendant Terry Lockett, Penal Code Section  
2 12025(a)(2)(B)
- 3 • Court #1864209, January 24, 2004, Defendant Paris Willis, Penal Code Section 12025(a)(1)  
4 and Health & Safety Code Section 11357
- 5 **Chopper City**
- 6 • Court #196505-02, August 23, 2005, Defendant Deon Anderson, Penal Code Section 459
- 7 • Court #199239, August 7, 2006, Defendant Byron Cheeves, Health & Safety Code Section  
8 11352
- 9 • Court #200730, February 7, 2007, Defendant Deron Cheeves, Penal Code Section  
10 12025(a)(3)
- 11 • Court #197576, December 23, 2005, Mack Craig III, Penal Code Section 487(C)
- 12 • Court #200168, December 5, 2006, Michael Craig, Health & Safety Code Section 11352(a)
- 13 • Court #198406, March 23, 2006, Dwight Hart, Penal Code Section 12031(a)(2)(F)
- 14 • Court #2190529, November 10, 2004, Defendant Raheshi Horace, Health & Safety Code  
15 Section 11351.5
- 16 • Court # 196271, September 23, 2005, Defendant Ricky Rounds, Penal Code Section 487(C)
- 17 • Court #2207067, October 14, 2005, Defendant Ricky Rounds, Penal Code Section  
18 12031(a)(2)(F)

### 19 **Individual Gang Members**

20 93. When determining whether an individual is a member of the Knock Out Posse or  
21 Chopper City criminal street gangs, I look at several factors, including self-admission, criminal  
22 history, association with known members of gang, gang symbols, gang tattoos, photographs and  
23 writings. This criteria is also used by law enforcement agencies throughout the state of California.

24 94. I consider admissions of membership by individuals to law enforcement to be  
25 reliable evidence of their membership in the gang. Within the gang culture, only members are  
26 permitted to claim their membership within the gang. If a non-member were to claim membership,  
27 members would retaliate against the non-member. As a result, if an individual claims membership  
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1 in a gang, it is because the individual is a member of the gang. Gang members will make  
2 admissions to law enforcement officers during consensual encounters, when they are victims or  
3 suspects in a crime or when they are being admitted to a jail. As gang members have come to  
4 realize that their admissions can be used against them in court, however, fewer members are now  
5 willing to admit membership to law enforcement.

6 95. An individual's criminal history is also important in determining an individual's  
7 membership status in a gang. I review an individual's history to see what crimes he has committed,  
8 where the crimes were committed, and who, if any, committed the crimes with the individual. I also  
9 review an individual's criminal convictions to see what criminal convictions he has suffered. If the  
10 individual committed the crime in the gang's turf, and/or the crime promoted the gang's reputation, I  
11 consider this to be evidence of the individual's membership in the gang.

12 96. The individual's association with other known gang members is another important  
13 factor in my analysis. Gang members will generally associate with only other members of their  
14 own gang and gangs with which their gang has an alliance because they trust these other gang  
15 members. Gang members will also generally associate with each other in their claimed territory  
16 because they feel safe there. Therefore, if an individual is seen associating with other known  
17 members of Knock Out Posse or Chopper City, in Knock Out Posse and Chopper City's territory, I  
18 consider this to be evidence of the individual's membership in the gang.

19 97. Gang tattoos are another factor I consider when determining whether an individual is  
20 a gang member. A tattoo is permanent and signifies a permanent commitment to the gang.  
21 Moreover, within the gang culture, non-members are not permitted to sport tattoos of gangs on their  
22 bodies. For instance, if a Knock Out Posse or Chopper City member saw a non-member sporting a  
23 Knock Out Posse or Chopper City tattoo, the member would retaliate against the non-member.  
24 Consequently, if an individual sports a gang tattoo, I consider this to be very strong evidence of that  
25 individual's membership status within the gang.

26 98. I also consider whether the person is depicted in any gang photos, with other known  
27 members of the gang, flashing gang signs, showing gang tattoos, and/or brandishing weapons. It is  
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1 very common for members of Knock Out Posse and Chopper City to pose for, keep, and display  
2 photos, evidencing pride in their gang membership.

3 99. I also consider any writings made by a person, such as letters, song lyrics, stories and  
4 poems about gang members. In addition, I consider personal belongings of persons, such as photo  
5 albums, wall hangings and clothing that have been marked with gang names, signs and symbols.

6 100. I have been asked to offer an opinion as to whether certain named individuals are  
7 members, associates or affiliates of Defendants Knock Out Posse gang or Chopper City gang. As  
8 discussed below (including reference to some of the evidence specific to each gang member that I  
9 used to form my opinion), the following are documented adult members of the Knock Out Posse  
10 criminal street gang and documented adult members and associates of the Chopper City Criminal  
11 Street Gang:

12 **Knock Out Posse:**

- 13 • JUAN ALLEN
- 14 • DANA BALL
- 15 • FLOYD BARROW
- 16 • KILAMANJARO BELL
- 17 • LAVEAUX DEROSANE
- 18 • JELVON HELTON
- 19 • BRIAN HILL
- 20 • DARRELL LUCKETT
- 21 • TERRY LUCKETT
- 22 • MARCUS MAYS
- 23 • ROBERT MAYS
- 24 • GARY OWENS

25 **Chopper City:**

- 26 • DENNIS ANDERSON
- 27 • DEON ANDERSON

- 1 • BYRON CHEEVES
- 2 • DERON CHEEVES
- 3 • CLARENCE COOK
- 4 • JAMAL GAINES
- 5 • DWIGHT HART
- 6 • ANTOINE JOHNSON
- 7 • MAKIA JOHNSON
- 8 • RICKY ROUNDS
- 9 • CARNELL TAYLOR
- 10 • KARWARN THORN
- 11 • SALA THORN

12 **Knock Out Posse Individual Gang Members**

13 101. JUAN ALLEN: I know Juan Allen through previous contacts and arrests. It is my  
14 opinion that Allen is a member of Defendant Knock Out Posse gang and is a more senior member  
15 of the gang.

16 Allen's Convictions:

- 17 • On April 4, 2000, Allen was convicted of Penal Code Section 32, accessory to a  
18 felony, San Francisco Superior Court Case # 1903646.
- 19 • On May 3, 2006, Allen was convicted of Penal Code Section 12025(b)(6), unlawful  
20 possession of a concealed firearm, a misdemeanor, San Francisco Superior Court  
21 Case #196288.
- 22 • On May 3, 2006, Allen was convicted of Health & Safety Code Section 11351.5,  
23 possession of crack cocaine for sale, a felony, San Francisco Superior Court Case  
24 #198437. As part of his guilty plea, Allen agreed to special conditions of probation  
25 for gang members and associates. Among other things, Allen agreed to stay away  
26 from documented Knock Out Posse members Floyd Barrow, Byron Cheeves,  
27 Demaria Corgile, Gary Owens, Deon Anderson, Brandon Paillett, Darrell Luckett,

1 Jelvon Helton, Paris Willis and Charles Chatman. He also agreed to stay away from  
2 documented Chopper City member Dennis Anderson. As part of his guilty plea,  
3 Allen agreed not to possess gang paraphernalia and not to display gang hand signs,  
4 including "KOP," "Knock Out Posse", and "567."

- 5 • On March 2, 2007, Allen was convicted of Health & Safety Code Section 11351.5,  
6 possession of narcotics for sale, a felony, and Penal Code Section 186.22,  
7 participation in a criminal street gang, a misdemeanor, San Francisco Superior Court  
8 Case #201174.

9 Allen's Admissions:

- 10 • On November 15, 2005, Allen admitted to the San Francisco Sheriff's Department  
11 Jail Classification Unit that he was a member of Knock Out Posse.
- 12 • On June 19, 2007, Allen admitted to police that he had been a member of Knock Out  
13 Posse for ten years. He stated that there were currently approximately twenty  
14 members of Knock Out Posse, that the gang's weapon of choice was a handgun, that  
15 the gang's symbol was "567" and that the gang's territory included the Martin Luther  
16 King and Marcus Garvey Public Housing Complexes.

17 Allen's Tattoos:

- 18 • Allen has "567" tattooed on his right forearm. **Attached hereto as Exhibit H** is a  
19 true and correct copy of Allen flashing the tattoo. I am familiar with Allen's tattoo  
20 and the photograph fairly and accurately depicts the tattoo.

21 Allen's Photographs:

- 22 • Allen was photographed with KOP gang members Donte Levexier, Floyd Barrow,  
23 Kilimanjaro Bell, Gary Owens and Jelvon Helton. **Attached as Exhibit I** is a true  
24 and correct copy of the photograph (faces of two individuals whom I have not  
25 identified have been blacked out.) Allen is on the far right, flashing his "567" tattoo.  
26 Owens is in the back, fourth from the left, flashing the "thumbs up" sign. Bell is in  
27 the back, third from the left, Barrow is in the back, second from left, Levexier is in  
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1 the back, far left, and Helton is in the front, far left. I am aware that this photograph  
2 was found on-line on My Space by officers at the San Francisco Police Department  
3 Park Station. I recognize all of the individuals whom I have identified.

4 Criminal And Nuisance Activity Involving Allen

- 5 • On February 8, 2000, Allen was arrested on the walkway behind 1675 Eddy Street in  
6 the Safety Zone for possessing 39 rocks of individually wrapped crack cocaine for  
7 sale. Allen was with documented Knock Out Posse gang member Laveaux Derosane  
8 at the time of his arrest. This arrest led to the April 4, 2000 conviction discussed  
9 above.
- 10 • On November 1, 2001, an officer observed Allen loitering at Eddy and Steiner Street  
11 in the Safety Zone with documented Knock Out Posse members Scott Young,  
12 Charles Chatman, Brandon Paillett, Gary Owens and Royal Holyfield.
- 13 • On December 18, 2002, Allen and documented Knock Out Posse members Ivory  
14 Collins, Gary Owens, Paris Willis and Laveaux Derosane were arrested at 1520 Turk  
15 Street #605 in the Safety Zone for possessing marijuana and cocaine for sale,  
16 maintaining a place for trafficking in controlled substances, participating in a  
17 criminal street gang and delaying arrest. Allen had \$971 on his person at the time of  
18 his arrest. Based on my training and experience, I know that drug dealers are known  
19 to carry large amounts of cash on their person from their drug transactions.
- 20 • On November 16, 2004, Allen was arrested in the Martin Luther King Housing  
21 Complex, in the Safety Zone for possessing a concealed loaded revolver, possessing  
22 marijuana, trespassing and participating in a criminal street gang. At the time of his  
23 arrest, Allen was with Gary Owens.
- 24 • On January 13, 2005, Allen was arrested in the Martin Luther King Housing  
25 Complex in the Safety Zone for violating a stay away order and possessing two  
26 baggies of marijuana.

- 1 • On May 3, 2005, Allen was arrested on the 1600 block of Eddy Street in the Safety  
2 Zone for violating a stay away order. At the time of his arrest, Allen was in  
3 possession of \$532.
- 4 • On July 20, 2005, Allen was arrested at Eddy and Pierce Street in the Safety Zone  
5 for violating a stay away order and possessing marijuana.
- 6 • On August 19, 2005, documented Chopper City gang member Dennis Anderson  
7 confirmed that Juan Allen was a member of Knock Out Posse and was an "OG."  
8 The term "OG" refers to old or original gangster and is a manner of describing more  
9 senior members of a gang.
- 10 • On January 25, 2006, a confidential informant told police that Allen, Gary Owens  
11 and Dante Levezier were selling drugs in the area of 1675 Eddy Street in the Safety  
12 Zone. According to the informant, Allen, Owens and Levezier were also in  
13 possession of a firearm and had stashed the firearm in the bushes near 1675 Eddy  
14 Street. Officers responded to the scene and found Allen still loitering in the area.  
15 Officers also found a stolen firearm in the bushes near Allen.
- 16 • On January 26, 2006, Allen was arrested at Turk and Pierce Street in the Safety Zone  
17 for violating a stay away order and resisting arrest. At the time of his arrest, Allen  
18 was with documented Knock Out Posse member Darrell Luckett.
- 19 • On February 15, 2006, Allen was arrested at Eddy and Pierce Street in the Safety  
20 Zone after officers observed him selling crack cocaine. Allen also had marijuana  
21 and \$271 in his pants pocket. In addition, Allen was in violation of a court stay away  
22 order. At the time of his arrest, Allen was with Knock Out Posse member Floyd  
23 Barrow and Chopper City members Dennis Anderson and Byron Cheeves. This  
24 incident led to the May 3, 2006, possession of crack cocaine for sale conviction  
25 discussed above.
- 26 • On June 26, 2006, Allen was arrested for violating a stay away order after he was  
27 observed at Turk and Pierce Street in the Safety Zone with documented Knock Out  
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1 Posse member Jelvon Helton and a juvenile member of Knock Out Posse. In  
2 addition, Allen, Helton and the juvenile were suspected of beating another individual  
3 in the area of 1655 Turk Street in the Safety Zone before police arrived. Allen made  
4 comments to the police that he was only trying to break up the fight.

- 5 • On September 20, 2006, Allen, documented Knock Out Posse member William  
6 Helm and a juvenile member of Knock Out Posse appeared at the Hall of Justice to  
7 watch a court hearing for Knock Out Posse members Robert Mays, Laveaux  
8 Derosane, Jelvon Helton, Marcus Mays and Kilimanjaro Bell related to an assault  
9 that occurred on September 13, 2006. At the hearing, Helm stood up and flashed the  
10 KOP hand sign at the defendants. Helm, Allen and the juvenile then departed the  
11 courtroom together.
- 12 • On October 4, 2006, Allen and a juvenile member of Knock Out Posse appeared at  
13 the Hall of Justice to watch a court hearing for Robert Mays, Laveaux Derosane,  
14 Jelvon Helton, Marcus Mays and Kilimanjaro Bell related to the September 13, 2006  
15 assault incident. At the hearing assault victim Ricky Rounds was present. Two  
16 women from the Martin Luther King/Marcus Garvey Housing Complex who were  
17 sitting in the spectator section of the courtroom called the victim a "snitch ass nigga."  
18 Immediately after the hearing, these same women made contact with Allen and the  
19 juvenile.
- 20 • On November 11, 2006, officers observed Allen at Ellis and Pierce Street in the  
21 Safety Zone. As the officers approached him, Allen ran away and discarded two  
22 baggies containing numerous rocks of crack cocaine. Officers recovered the cocaine  
23 and based on the amount of cocaine recovered, believed it was possessed for sale. At  
24 the time of the incident, Allen was on probation for possessing narcotics for sale.  
25 This incident led to Allen's March 2, 2007 conviction discussed above.



1           Barrow's Photographs:

- 2           • Barrow was photographed with Knock Out Posse gang members Donte Levexier,  
3           Juan Allen, Kilamanjaro Bell, Gary Owens and Jelvon Helton. See Exhibit I.  
4           Barrow is in the back, second from left.
- 5           • Barrow was photographed in the Safety Zone with documented Knock Out Posse  
6           gang members Gary Owens, Ladario Derosane, Laveaux Derosane and Donte  
7           Levexier. **Attached hereto as Exhibit K** is a true and correct copy of the  
8           photograph.<sup>9</sup> In the photograph, Barrow is third from the right, in the white  
9           sunglasses and red hat. Levexier is second from the right in the red hat. Owens is  
10          second from the left and is flashing "thumbs up" and "okay" hand signs. The twin  
11          Derosane brothers (one lying on the car and one in the white hat) are also flashing  
12          the "thumbs up" and "okay" hand signs. In this picture, I believe that the gang  
13          members are on their way to a funeral for a murdered gang member. I know that  
14          members of Knock Out Posse wear the same colors to funerals to show their  
15          solidarity. I am aware that this photograph was found on-line on My Space by  
16          officers at the San Francisco Police Department Park Station. I recognize all of the  
17          individuals whom I have identified.
- 18          • Barrow was photographed with Chopper City gang members Dennis Anderson,  
19          Demorea Jacobs and Byron Cheeves. **Attached hereto as Exhibit L** is a true and  
20          correct copy of the photograph. In the photograph, Anderson is on the left and is  
21          flashing the "C" hand sign and holding money. Cheeves is on the right and is also  
22          holding money. Barrow is in between Cheeves and Anderson in the picture. Jacobs  
23          is in the back, holding a cell phone. The photograph was found during the execution  
24          of a search warrant at 22 Dakota Street on May 24, 2007. The resident of 22 Dakota  
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27           <sup>9</sup> The faces of some individuals, whom I do not identify above, have been blocked out.

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1 Street is an affiliate of Chopper City and other Western Addition gangs. I recognize  
2 Anderson, Jacobs and Cheeves in the photograph.

- 3 • Barrow was photographed with documented Knock Out Posse members Terry  
4 Luckett and Gary Owens in front of a trailer used by the Knock Out Posse gang. I  
5 know that this trailer is parked in front of 1652 Eddy Street in the Safety Zone. This  
6 is the same trailer where Ricky Rounds and Michael Craig were held captive and  
7 beaten on September 13, 2006. **Attached hereto as Exhibit M** is a true and correct  
8 copy of the picture (the face of an individual whom I have not identified has been  
9 blacked out). Barrow is kneeling in the picture. Luckett is on the far left and Owens  
10 is second from the left. The photograph was found during the execution of a search  
11 warrant at 22 Dakota Street on May 24, 2007. The resident of 22 Dakota Street is an  
12 affiliate of Chopper City and other Western Addition gangs. I recognize Barrow,  
13 Luckett and Owens in the photograph.

#### 14 Criminal And Nuisance Activity Involving Barrow

- 15 • On June 30, 1998, Barrow was arrested for possessing crack cocaine for sale in the  
16 Martin Luther King/Marcus Garvey Public Housing Complex in the Safety Zone.  
17 Barrow also had \$239 in small bills on his person. At the time of his arrest, Barrow  
18 was seen loitering with a juvenile member of Knock Out Posse.
- 19 • On January 13, 1999, officers observed Barrow loitering at Eddy and Pierce Street in  
20 the Safety Zone with documented Knock Out Posse members Ladario Derosane,  
21 Laveaux Derosane, Scott Young, Charles Chatman and two juvenile members of  
22 Knock Out Posse. Officers found a plastic bag with numerous rocks of crack  
23 cocaine and numerous individually packaged baggies of marijuana on top of a bush  
24 near the gang members. Gang members often hide their drugs nearby to avoid being  
25 caught by police with the drugs.
- 26 • On June 16, 1999, Barrow was arrested for trespassing in the Martin Luther  
27 King/Marcus Garvey Housing Complex in the Safety Zone and loitering with intent  
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1 to violate narcotics laws. At the time of his arrest, Barrow in possession of \$826 and  
2 was with Gary Owens.

- 3 • On October 7, 1999, officers learned that the Knock Out Posse gang had taken over  
4 1675 Eddy Street #313 from the elderly tenant living there and that the gang  
5 members were selling drugs out of the residence. Officers responded to the  
6 residence and found Barrow inside the residence in possession of crack cocaine and  
7 marijuana. Officers also found additional crack cocaine, digital scales, strainers,  
8 empty plastic baggies, baking soda and baking powder in the residence. Officers  
9 believed that crack cocaine was being manufactured and sold in the residence.  
10 Barrow was arrested and booked for possessing crack cocaine and marijuana for sale  
11 and opening or maintaining a place for trafficking in controlled substances
- 12 • On July 23, 2000, officers observed Barrow at 1625 Eddy Street in the Safety Zone.
- 13 • On December 5, 2000, Barrow was arrested at Pierce and Ellis Street in the Safety  
14 Zone on an outstanding warrant for possession of narcotics for sale. When officers  
15 approached him, Barrow threw something in a car and resisted arrest. The car left  
16 the scene before officers could see what Barrow threw in the car.
- 17 • On January 4, 2001, Barrow was arrested at 1225 Steiner Street #502 in the Safety  
18 Zone for possessing crack cocaine for sale. This incident led to the September 21,  
19 2001 conviction discussed above.
- 20 • Toward the end of 2004, a confidential informant who was a member of Chopper  
21 City told police that Barrow had provided the informant with crack cocaine to sell on  
22 Chopper City's turf in the Safety Zone.
- 23 • On February 24, 2005, officers observed Barrow loitering with a group of males,  
24 including documented Chopper City member Byron Cheeves, in the Pitts Plaza  
25 Public Housing Complex in the Safety Zone. When the police arrived, the group ran  
26 out of the complex. Barrow was on felony probation at the time.

- 1 • On July 8, 2005, officers responded to Eddy and Steiner Streets after they received a  
2 call regarding shots fired. Officers found Barrow and a group black males standing  
3 near a car parked on the east side of the gate to the parking lot at 1625 Eddy Street in  
4 the Safety Zone. After the officers approached, Barrow dropped a semi-automatic  
5 gun inside the car and ran away from the officers. Officers apprehended Barrow and  
6 arrested him for possessing the firearm. At the time of his arrest, Barrow was on  
7 felony probation for possession of crack cocaine for sale.
- 8 • On July 20, 2005, Barrow was arrested at Eddy and Steiner Streets in the Safety  
9 Zone for possessing marijuana and resisting arrest.
- 10 • On February 15, 2006, officers observed Barrow loitering with Juan Allen and  
11 Chopper City members Dennis Anderson and Byron Cheeves at Eddy and Pierce  
12 Street in the Safety Zone. Officers observed Allen sell crack cocaine to an individual  
13 and they arrested him.
- 14 • On July 12, 2006, a confidential informant told police that the tenant at 1652 Eddy  
15 Street #6 in the Safety Zone was allowing Barrow to cook crack cocaine in her  
16 kitchen. According to the informant, the tenant was also allowing Knock Out Posse  
17 member Terry Luckett to hide an assault rifle at her apartment. Police searched the  
18 apartment and found a shotgun, shotgun shells, 223 ammunition rounds and a picture  
19 of the tenant posing with the rifle.
- 20 • On September 13, 2006, officers received a tip from a confidential informant that  
21 someone had broken into a trailer parked in front of 1652 Eddy Street, a known hang  
22 out for Knock Out Posse gang members. According to the informant, Knock Out  
23 Posse gang members were angry, had armed themselves, and were holding the  
24 alleged perpetrators captive inside the trailer. Police responded to the scene and  
25 observed Knock Out Posse members Jelvon Helton, Kilamanjaro Bell and Laveaux  
26 Derosane entering and exiting the trailer and Marcus Mays standing outside the  
27 trailer near the entrance. Marcus Mays conferred with the other three individuals  
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1 when they were outside the trailer. Police also observed Robert Mays enter the  
2 trailer. Officers detained Marcus Mays, Helton, Bell and Derosane outside the trailer  
3 and then entered the trailer. Inside, they found Robert Mays and Chopper City  
4 members Ricky Rounds and Michael Craig. Rounds and Craig were sitting in  
5 folding chairs and had serious injuries to their heads. Both Rounds and Craig were  
6 dazed and covered in blood. Robert Mays, Marcus Mays, Helton, Bell and Derosane  
7 were arrested for assault with a deadly weapon or by force likely to produce great  
8 bodily injury, false imprisonment, conspiracy and participation in a criminal street  
9 gang. Rounds later told police that he and Craig were beaten by KOP gang members  
10 because the gang members thought that Rounds and Craig stole from the gang.  
11 Rounds specifically stated that Barrow was a member of Knock Out Posse and was  
12 present in the trailer. Rounds believed that Barrow beat him.

- 13 • On February 3, 2007, Barrow was in front of Krage's at 3855 Geary Boulevard with  
14 documented Central Divisadero Player member Leon Parker when both he and  
15 Parker were shot by a black male who then fled the scene in a van.

16 104. **KILAMANJARO BELL**: I know Kilamanjaro Bell through previous contacts and  
17 arrests. It is my opinion that Bell is a member of Defendant Knock Out Posse gang.

18 Bell's Photographs:

- 19 • Bell was photographed with documented Knock Out Posse gang members Floyd  
20 Barrow Donte Levexier, Juan Allen, Gary Owens and Jelvon Helton. **See Exhibit I.**  
21 In the photograph, Bell is in the back and is third from the left.

22 Criminal And Nuisance Activity Involving Bell

- 23 • On July 27, 2006, Bell and a second black male were suspects in an attempted  
24 robbery at Stanyon and Page Streets.
- 25 • On August 27, 2006, Bell and several other black males were arrested for breaking  
26 into parked cars at Tandang Sora and Rizal.

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- On September 13, 2006, officers received a tip from a confidential informant that someone had broken into a trailer parked in front of 1652 Eddy Street, a known hang out for Knock Out Posse gang members. According to the informant, Knock Out Posse gang members were angry, had armed themselves, and were holding the alleged perpetrators captive inside the trailer. Police responded to the scene and observed Knock Out Posse members Jelvon Helton, Kilamanjaro Bell and Laveaux Derosane entering and exiting the trailer and Marcus Mays standing outside the trailer near the entrance. Marcus Mays conferred with the other three individuals when they were outside the trailer. Police also observed Robert Mays enter the trailer. Officers detained Marcus Mays, Helton, Bell and Derosane outside the trailer and then entered the trailer. Inside, they found Robert Mays and Chopper City members Ricky Rounds and Michael Craig. Rounds and Craig were sitting in folding chairs and had serious injuries to their heads. Both Rounds and Craig were dazed and covered in blood. Robert Mays, Marcus Mays, Helton, Bell and Derosane were arrested for assault with a deadly weapon or by force likely to produce great bodily injury, false imprisonment, conspiracy and participation in a criminal street gang. Rounds later told police that he and Craig were beaten by KOP gang members because the gang members thought that Rounds and Craig stole from the gang.
  - On September 20, 2006, Juan Allen, William Helm and a juvenile member of Knock Out Posse appeared at the Hall of Justice to watch a court hearing for Bell, Robert Mays, Marcus Mays, Laveaux Derosane, and Jelvon Helton related to the September 13, 2006 trailer incident. At the hearing, Helm stood up and flashed the KOP hand sign at the defendants. Allen, Helm and the juvenile then left the courtroom together.
  - On October 4, 2006, Juan Allen and a juvenile member of Knock Out Posse appeared at the Hall of Justice to watch a court hearing for Bell, Robert Mays, Laveaux Derosane, Jelvon Helton and Marcus Mays. At the hearing, Ricky Rounds,

1 one of the victims, was present. Two women from the Martin Luther King/Marcus  
2 Garvey Housing Complex who were also present at the hearing called the victim a  
3 "snitch ass nigga." Immediately after the hearing, these same women made contact  
4 with Allen and the juvenile.

- 5 • On April 8, 2007, Bell was arrested at Eddy and Pierce Streets in the Safety Zone on  
6 an outstanding warrant for burglary.

7 105. **LAVEAUX DEROSANE**: I know Laveaux Derosane through previous contacts  
8 and arrests. It is my opinion that Derosane is a member of Defendant Knock Out Posse gang and is  
9 a more senior member of the gang.

10 Derosane's Convictions:

- 11 • On April 17, 2001, Derosane was convicted of Penal Code Section 470(A), forgery,  
12 a felony, San Francisco Superior Court Case # 1961325.

13 Derosane's Tattoos:

- 14 • The Sheriff's Department Jail Classification Unit noted on September 14, 2006 that  
15 Derosane as a MOB KO tattoo on his left forearm.

16 Derosane's Photographs:

- 17 • Derosane was photographed with documented Knock Out Posse gang members Gary  
18 Owens, Floyd Barrow, Ladario Derosane, and Donte Levexier in the Safety Zone.

19 **See Exhibit K**. In the picture, one of the two Derosane twin brothers is lying on the  
20 car and flashing two "thumbs up" signs. The other Derosane brother is wearing a  
21 white hat and flashing an "okay sign."

22 Criminal And Nuisance Activity Involving Derosane:

- 23 • In October 1998, a confidential informant with close ties to Knock Out Posse told  
24 police that Derosane sold marijuana on the street and kept large quantities of  
25 marijuana in a house protected by at least two assault weapons. The informant also  
26 stated that Derosane was a pawn of documented Knock Out Posse member Andre  
27 Dow. Dow is now in custody in Las Vegas on murder charges.

- 1           • On January 13, 1999, officers saw Derosane loitering at Eddy and Pierce Street in  
2           the Safety Zone with Knock Out Posse members Ladario Derosane, Floyd Barrow,  
3           Scott Young, Charles Chatman and two juvenile members of Knock Out Posse.  
4           Officers found a plastic bag with numerous rocks of crack cocaine and numerous  
5           individually packaged baggies of marijuana on top of a bush near the gang members.
- 6           • On February 8, 2000, Derosane was arrested in the area of 1675 Eddy Street in the  
7           Safety Zone for loitering and violating a court stay away order. At the time of his  
8           arrest, Derosane was with Juan Allen. Allen was arrested for possessing crack  
9           cocaine for sale.
- 10          • On December 18, 2002, Derosane, Ivory Collins, Gary Owens, Paris Willis and Juan  
11          Allen were arrested at 1520 Turk Street #605 in the Safety Zone for possessing  
12          marijuana and cocaine for sale, maintaining a place for trafficking in controlled  
13          substances, participating in a criminal street gang and delaying arrest. At the time of  
14          his arrest, Derosane was on active probation.
- 15          • On August 19, 2005, Chopper City gang member Dennis Anderson confirmed that  
16          Derosane was a member of Knock Out Posse and was an "OG."
- 17          • On September 13, 2006, officers received a tip from a confidential informant that  
18          someone had broken into a trailer parked in front of 1652 Eddy Street, a known hang  
19          out for Knock Out Posse gang members. According to the informant, Knock Out  
20          Posse gang members were angry, had armed themselves, and were holding the  
21          alleged perpetrators captive inside the trailer. Police responded to the scene and  
22          observed Knock Out Posse members Jelvon Helton, Kilamanjaro Bell and Laveaux  
23          Derosane entering and exiting the trailer and Marcus Mays standing outside the  
24          trailer near the entrance. Marcus Mays conferred with the other three individuals  
25          when they were outside the trailer. Police also observed Robert Mays enter the  
26          trailer. Officers detained Marcus Mays, Helton, Bell and Derosane outside the trailer  
27          and then entered the trailer. Inside, they found Robert Mays and Chopper City  
28

1 members Ricky Rounds and Michael Craig. Rounds and Craig were sitting in  
2 folding chairs and had serious injuries to their heads. Both Rounds and Craig were  
3 dazed and covered in blood. Robert Mays, Marcus Mays, Helton, Bell and Derosane  
4 were arrested for assault with a deadly weapon or by force likely to produce great  
5 bodily injury, false imprisonment, conspiracy and participation in a criminal street  
6 gang. Rounds later told police that he and Craig were beaten by KOP gang members  
7 because the gang members thought that Rounds and Craig stole from the gang.  
8 Rounds identified Derosane as a member of Knock Out Posse.

- 9 • On September 20, 2006, Juan Allen, William Helm, and a juvenile member of Knock  
10 Out Posse appeared at the Hall of Justice to watch a court hearing for Derosane,  
11 Robert Mays, Marcus Mays, Jelvon Helton, and Kilamanjaro Bell related to the  
12 September 13, 2006 trailer incident. At the hearing, Helm stood up and flashed the  
13 KOP hand sign at the defendants. Allen, Helm and the juvenile then left the  
14 courtroom together.
- 15 • On October 4, 2006, Juan Allen and a juvenile member of Knock Out Posse  
16 appeared at the Hall of Justice to watch a court hearing for Derosane, Robert Mays,  
17 Jelvon Helton, Marcus Mays and Kilamanjaro Bell. At the hearing, Ricky Rounds,  
18 one of the victims, was present. Two women from the Martin Luther King/Marcus  
19 Garvey Housing Complex who were also present at the hearing called the victim a  
20 "snitch ass nigga." Immediately after the hearing, these same women made contact  
21 with Allen and the juvenile.

22 106. **JELVON HELTON**: I know Jelvon Helton through previous contacts and arrests.  
23 Helton turned eighteen on March 18, 2006. It is my opinion that Helton is a member of Defendant  
24 Knock Out Posse gang. In addition, I was told by a confidential informant that Helton is being  
25 considered for a more senior membership role in the gang.

26 Helton's Convictions:  
27  
28

- 1 • On July 26, 2006, Helton was convicted of Penal Code Section 32, accessory, a  
2 felony, San Francisco Superior Court Case # 198571. Helton was ordered to stay  
3 away from documented Knock Out Posse members Juan Allen, Floyd Barrow,  
4 Darrell Luckett, Terry Luckett and Robert Mays.

5 Helton's Photographs:

- 6 • Helton was photographed with Knock Out Posse gang members Donte Levexier,  
7 Floyd Barrow, Kilamanjaro Bell, Gary Owens and Juan Allen. **See Exhibit I.** In the  
8 photograph, Helton is in the front, on the far left.
- 9 • Helton was photographed in the Safety Zone with Knock Out Posse members Gary  
10 Owens and Marcus Mays. **Attached hereto as Exhibit N** is a true and correct copy  
11 of the photograph.<sup>10</sup> In the photograph, Helton is in the back, holding the child, and  
12 is flashing the "okay" hand sign. Owens is in the back, second from left and is  
13 flashing the "thumbs up" and "okay" hand signs. Mays is kneeling in the front. I  
14 believe that the gang members are dressed for a funeral for a murdered gang  
15 member. I am aware that this photograph was found on-line on My Space by  
16 officers at the San Francisco Police Department Park Station. I recognize all of the  
17 individuals whom I have identified. A copy of the same picture was found on My  
18 Space with the caption, "doin it big on da day of da funeral." The picture with the  
19 caption is **attached hereto as Exhibit O.**
- 20 • Helton was photographed in the Safety Zone with Knock Out Posse members  
21 Marcus Mays, Donte Levexier, Carlos Levexier and Robert Mays and Chopper City  
22 gang member Byron Cheeves. **Attached hereto as Exhibit P** is a true and correct  
23 copy of the photograph.<sup>11</sup> Helton is in the back, wearing a red hat and is flashing  
24 two "thumbs up" hand signs. Cheeves is fifth from the right and appears to be

25  
26 <sup>10</sup> In both Exhibits N and Exhibit O, the faces of two juvenile and one individual whom I do  
not identify above have been blocked out.

27 <sup>11</sup> The faces of some individuals, whom I do not identify above, have been blocked out.

1 flashing the "thumbs up" hand sign. Donte Levezier is fourth from the right, Marcus  
2 Mays is third from the right, Carlos Levezier is second from the right and Robert  
3 Mays is on the far right. I believe that the gang members are dressed up for a funeral  
4 for a murdered gang member. I am aware that this photograph was found on-line on  
5 My Space by officers at the San Francisco Police Department Park Station. I  
6 recognize all of the individuals whom I have identified.

- 7 • Helton was photographed with Chopper City gang member Larry Robinson.

8 **Attached hereto as Exhibit Q** is a true and correct copy of the photograph. In the  
9 photograph, Helton is flashing the "okay" hand sign. I am aware that this photograph  
10 was found during the execution of a search warrant at 1771 Eddy Street on April 20,  
11 2006. I recognize both Helton and Robinson in the photograph.

12 Criminal And Nuisance Activity Involving Helton:

- 13 • On March 23, 2006, Helton, a juvenile member of Knock Out Posse and seven other  
14 black males surrounded two Martin Luther King/Marcus Garvey security guards at  
15 Eddy and Pierce Street in the Safety Zone. Helton and the juvenile then threatened  
16 one of the security guards. At the time that Helton threatened the security guard, he  
17 was wearing gold teeth with the letters "KO" in his mouth and a gold earring in his  
18 left ear that had the letters "KOP" on it. This incident led to the July 26, 2006  
19 conviction discussed above.
- 20 • On June 26, 2006, officers observed Helton with Juan Allen and a juvenile member  
21 of Knock Out Posse at Turk and Pierce Street in the Safety Zone. Allen was arrested  
22 for violating a stay away order. In addition, Allen, Helton and the juvenile were  
23 suspected of beating another individual in the area of 1655 Turk Street in the Safety  
24 Zone before police arrived.
- 25 • On July 5, 2006, officers executed a search warrant at 1150 Pierce Street #213 in the  
26 Safety Zone, a known hang out for Knock Out Posse members. Inside the residence  
27 they found several individuals, including Helton and Knock Out Posse member  
28

1 Darrell Lockett. Officers also found a loaded .38 caliber revolver in the living room  
2 inside the front speaker of a television.

- 3 • On September 10, 2006, Helton was inside 1150 Pierce Street #213 with several  
4 other individuals, including a juvenile member of Knock Out Posse, when two  
5 unknown black males shot into the home.
- 6 • On September 13, 2006, officers received a tip from a confidential informant that  
7 someone had broken into a trailer parked in front of 1652 Eddy Street, a known hang  
8 out for Knock Out Posse gang members. According to the informant, Knock Out  
9 Posse gang members were angry, had armed themselves, and were holding the  
10 alleged perpetrators captive inside the trailer. Police responded to the scene and  
11 observed Knock Out Posse members Jelvon Helton, Kilamanjaro Bell and Laveaux  
12 Derosane entering and exiting the trailer and Marcus Mays standing outside the  
13 trailer near the entrance. Marcus Mays conferred with the other three individuals  
14 when they were outside the trailer. Police also observed Robert Mays enter the  
15 trailer. Officers detained Marcus Mays, Helton, Bell and Derosane outside the trailer  
16 and then entered the trailer. Inside, they found Robert Mays and Chopper City  
17 members Ricky Rounds and Michael Craig. Rounds and Craig were sitting in  
18 folding chairs and had serious injuries to their heads. Both Rounds and Craig were  
19 dazed and covered in blood. Robert Mays, Marcus Mays, Helton, Bell and Derosane  
20 were arrested for assault with a deadly weapon or by force likely to produce great  
21 bodily injury, false imprisonment, conspiracy and participation in a criminal street  
22 gang. Rounds later told police that he and Craig were beaten by KOP gang members  
23 because the gang members thought that Rounds and Craig stole from the gang.  
24 Rounds specifically stated that Helton was a member of Knock Out Posse and was  
25 present in the trailer during the incident.
- 26 • On September 20, 2006, Juan Allen, William Helm and a juvenile member of Knock  
27 Out Posse appeared at the Hall of Justice to watch a court hearing for Helton, Robert  
28



1 Mays, Marcus Mays, Derosane and Kilamanjaro Bell related to the September 13,  
2 2006 trailer incident. At the hearing, Helm stood up and flashed the KOP hand sign  
3 at the defendants. Allen, Helm and the juvenile then left the courtroom together.

- 4 • On October 4, 2006, Juan Allen and a juvenile member of Knock Out Posse  
5 appeared at the Hall of Justice to watch a court hearing for Knock Out Posse  
6 members Helton, Robert Mays, Laveaux Derosane, Marcus Mays and Kilamanjaro  
7 Bell. At the hearing, Ricky Rounds, one of the victims, was present. Two women  
8 from the Martin Luther King/Marcus Garvey Housing Complex who were also  
9 present at the hearing called the victim a "snitch ass nigga." Immediately after the  
10 hearing, these same women made contact with Allen and the juvenile.

11 107. **BRIAN HILL**: I know Brian Hill through previous contacts and arrests. It is my  
12 opinion that Hill is a member of Defendant Knock Out Posse gang.

13 Hill's Convictions:

- 14 • In 2003, Hill was convicted of Penal Code Section 245(A)(2), assault with a deadly  
15 weapon, firearm, assault weapon or machine gun, a felony. Hill was sentenced to  
16 five years in prison. I am aware that Hill was paroled from prison in July 2006.
- 17 • On March 27, 2007, Hill was convicted of possession with intent to distribute  
18 cocaine base, Federal Court Case # 30670661, based on incidents that occurred on  
19 August 10, 2006, August 15, 2006, August 24, 2006 and August 30, 2006. Hill was  
20 sentenced to seventy months in prison.

21 Criminal And Nuisance Activity Involving Hill:

- 22 • I am aware that Hill committed assault with a deadly weapon, firearm, assault  
23 weapon or machine gun. This incident led to his 2003 conviction discussed above.
- 24 • On August 30, 2006, officers observed Hill in the Pitts Plaza courtyard near Eddy  
25 and Scott Street in the Safety Zone. Hill ran from the officers and pounded on the  
26 rear door of 1771 Eddy Street, a known hang out for Chopper City gang members.  
27 Someone lets Hill inside the residence. Officers forced their way through the rear  
28

1 door of the residence and saw Hill and Chopper City member Ricky Rounds running  
2 out the front door. Hill ran towards Eddy and Pierce Street screaming to occupants  
3 of the Martin Luther King Housing Complex to open the gate for him. The officers  
4 tackled Hill and found crack cocaine and marijuana in his pant pocket. Hill was  
5 arrested for possessing crack cocaine for sale, resisting arrest and participating in a  
6 criminal street gang. This incident led to Hill's March 27, 2007 conviction discussed  
7 above.

8 108. **DARRELL LUCKETT**: I know Darrell Luckett through previous contacts and  
9 arrests. It is my opinion that Luckett is a member of Defendant Knock Out Posse gang.

10 Luckett's Convictions:

- 11 • On May 7, 2004, Luckett was convicted of Health & Safety Code Section 11351.5,  
12 possession of crack cocaine for sale, San Francisco Superior Court Case #191305.  
13 • On January 12, 2007, Luckett was convicted of Health & Safety Code Section  
14 11351.5, possession of crack cocaine for sale and Penal Code Section 148, resisting  
15 arrest, San Francisco Superior Court Case #198444. Luckett was sentenced to one  
16 year in county jail.

17 Luckett's Tattoos:

- 18 • Luckett has a "1600" tattoo on his right arm. **Attached hereto as Exhibit R** are four  
19 pictures of Luckett taken by me on January 26, 2006. One picture shows the tattoo  
20 on Luckett's right arm. The pictures fairly and accurately depict Luckett and the  
21 tattoo.

22 Criminal And Nuisance Activity Involving Luckett:

- 23 • On November 12, 2003, security guards at the Martin Luther King/Marcus Garvey  
24 Public Housing Complex located at 1675 Eddy Street in the Safety Zone saw Luckett  
25 selling drugs in the complex. The security guards alerted the San Francisco Police  
26 Department. As officers approached, Luckett ran away. As he was running, Luckett  
27 threw two bags containing crack cocaine to the ground. Officers recovered the bags,  
28

1 containing 70 rocks of crack cocaine. Luckett was arrested for possessing crack  
2 cocaine for sale. This incident led to the May 7, 2004 conviction discussed above.

- 3 • On February 14, 2004, Martin Luther King/Marcus Garvey Housing Complex  
4 security guards were attempting to detain Luckett at the north entrance gate to 1675  
5 Eddy Street in the Safety Zone when they were attacked by two black male suspects.  
6 One of the suspects was a juvenile member of Knock Out Posse.
- 7 • On January 26, 2006, officers saw Luckett and Juan Allen at Turk and Pierce Streets  
8 in the Safety Zone. Luckett had an outstanding warrant for possession of narcotics  
9 for sale and Allen had a court stay away order from the area. When officers  
10 approached, Luckett and Allen ran away. Officer found Darrell Luckett at 1150  
11 Pierce Street, #213, a known hang out for Knock Out Posse members. Terry  
12 Luckett, a juvenile member of Knock Out Posse, and other individuals were present  
13 inside the residence. The juvenile member of Knock Out Posse, Terry Luckett and  
14 several other individuals blocked the officers path and tried to pull Darrell Luckett  
15 from police custody. Darrell Luckett was eventually arrested and was found in  
16 possession of a plastic baggie containing several rocks of crack cocaine. Darrell  
17 Luckett was arrested for possessing crack cocaine for sale. This incident led to the  
18 January 12, 2007 conviction discussed above.
- 19 • On July 5, 2006, police executed a search warrant at 1150 Pierce Street #213, a  
20 known hang out for Knock Out Posse members. Inside the residence they found  
21 several individuals, including Luckett and Jelvon Helton. Officers also found a  
22 loaded .38 caliber revolver in the living room inside the front speaker of a television.

23 109. **TERRY LUCKETT**: I know Terry Luckett through previous contacts and arrests.

24 It is my opinion that Luckett is a member of Defendant Knock Out Posse gang and is a more senior  
25 member of the gang.

26 ///

27 ///

1                   Lockett's Convictions:

- 2                   • On November 20, 2006, Lockett was convicted of Penal Code Section  
3                   12025(a)(2)(B), unlawful carrying of a concealed firearm, a felony, San Francisco  
4                   Superior Court #200391-03. Lockett was sentenced to 146 days in jail.

5                   Lockett's Admissions:

- 6                   • Lockett was photographed with his girlfriend Devin Reagans while flashing gang  
7                   hand signs. Lockett admitted to police that he was flashing "Uptown" hand signs in  
8                   the photograph.
- 9                   • On January 10, 2007, Lockett admitted to police that he had been a member of  
10                  Knock Out Posse for thirteen to fourteen years. He stated that there were currently  
11                  approximately fifteen to twenty members of Knock Out Posse, that the gang's  
12                  weapon of choice was a .40 caliber Glock handgun, that the gang's territory included  
13                  Steiner to Pierce Street and Turk to Ellis Street, that the gang members primarily  
14                  sold marijuana and crack cocaine and that the gang's rival was the Eddy Rock  
15                  criminal street gang.
- 16                 • Lockett admitted to the Sheriff's Department Jail Classification Unit on March 29,  
17                  2007 that he was a member of Knock Out Posse and that his enemies were members  
18                  of the Eddy Rock criminal street gang.

19                 Lockett's Tattoos:

- 20                 • The Sheriff's Department Jail Classification Unit noted on March 29, 2007 that Terry  
21                  Lockett had a "567" tattoo on the right side of his neck.

22                 Lockett's Photographs:

- 23                 • Lockett was photographed with documented Knock Out Posse members Floyd  
24                  Barrow and Gary Owens in front of a trailer used by the Knock Out Posse gang. **See**  
25                  **Exhibit M.** In the photograph, Lockett is on the far left.
- 26                 • Lockett was photographed with his girlfriend Devin Reagans while flashing gang  
27                  hand signs. **Attached hereto as Exhibit S** is a true and correct copy of the  
28

1 photograph. This photograph was seized during the execution of a search warrant at  
2 1150 Pierce Street #213 on August 18, 2005. I recognize Lockett and Reagans in the  
3 photographs.

4 Criminal And Nuisance Activity Involving Lockett:

- 5 • On August 17, 2005, police executed a search warrant at 1150 Pierce #213 in the  
6 Safety Zone. This residence was a known hangout for the Knock Out Posse gang.  
7 Lockett was present with Knock Out Posse members Paris Willis and Robert  
8 Huntley as well as a juvenile member of Knock Out Posse. Knock Out Posse  
9 member Andre Dow arrived at the residence, became agitated and yelled at the  
10 officers, causing a large crowd to form outside. Officers were forced to detain Dow  
11 to diffuse the situation. During the search of the residence, officers found the  
12 pictures of Lockett and Devin Reagans mentioned above. Officers also found plastic  
13 baggies, known as apple baggies, that are often used to store narcotics.
- 14 • On August 19, 2005, Chopper City member Dennis Anderson spoke to police and  
15 confirmed that Terry Lockett was a member of Knock Out Posse and was an "OG."
- 16 • On December 28, 2005, Lockett was loitering at Eddy and Pierce Street in the Safety  
17 Zone.
- 18 • On January 26, 2006, Darrell Lockett was chased by police and ran into 1150 Pierce  
19 #213. When officers arrived, Terry Lockett, a juvenile member of Knock Out Posse  
20 and other individuals were present inside the residence. The juvenile member of  
21 Knock Out Posse, Terry Lockett and other individuals blocked the officers path and  
22 tried to pull Darrell Lockett from police custody.
- 23 • On April 1, 2006, Lockett was loitering at Eddy and Steiner Streets in the Safety  
24 Zone.
- 25 • On June 28, 2006, Lockett was seen by Officer Sean Griffin and Officer Reese  
26 Burrows with Uptown associate (and documented 800 Block gang member) Antoine  
27 Mackey at Buchanan and Fulton Streets. Lockett and Mackey were walking  
28

1 northbound in the direction of Eddy Rock criminal street gang's claimed territory.  
2 Lockett was dressed in a white suit with white gloves. Mackey was wearing a black  
3 bandanna that covered his neck and lower face. When the officers drove up to the  
4 two men, both men turned to face the officers. Both men then quickly walked away  
5 northbound on Buchanan Street. The officers exited their patrol car and told both  
6 men to stop. Lockett ran away. Officer Burrows chased Lockett on foot while  
7 Officer Griffin chased Lockett by car. Lockett turned around and ran backwards for  
8 a few seconds while he placed his right hand inside his jacket pocket and pointed it  
9 at Officer Burrows. Lockett then pulled a semi-automatic handgun out of the same  
10 pocket and threw it over a metal fence in the 600 block of Fulton Street in the 800  
11 Block gang's claimed territory. Officer Griffin finally stopped Lockett by exiting his  
12 car, chasing Lockett and tackling him to the ground. Lockett tried to pull away and  
13 began swinging his elbows. After a long physical struggle, Officer Griffin finally  
14 obtained control of Lockett. Lockett was arrested and the officers retrieved the gun.  
15 The gun had a bullet jacket protruding from the barrel and the hammer cocked back.  
16 The gun appeared to have been fired and malfunctioned, causing the bullet to break  
17 apart in the barrel of the handgun. This offense led to Lockett's November 20, 2006  
18 conviction discussed above.

- 19 • On July 12, 2006, a confidential informant told police that the tenant at 1652 Eddy  
20 Street #6 in the Safety Zone was allowing Lockett to hide an assault rifle at her  
21 apartment and Floyd Barrow to cook crack cocaine in her kitchen. Police searched  
22 the apartment and found a shotgun, shotgun shells, 223 ammunition rounds and a  
23 picture of the tenant posing with the rifle.

24 110. **MARCUS MAYS**: I know Marcus Mays through previous contacts and arrests. It  
25 is my opinion that Mays is a member of Defendant Knock Out Posse gang and is a more senior  
26 member of the gang.

27 ///



- 1 • On July 7, 2005, Eddy Rock gang member Clinton Sims was shot at Fillmore and  
2 O'Farrell Streets. A witness to the shooting followed the suspects into the Marcus  
3 Garvey Housing Complex in the Safety Zone. Sims told officers that the shooter was  
4 Robert Mays and that Marcus May was with Robert Mays at the time of the  
5 shooting.
- 6 • On August 19, 2005, Chopper City member Dennis Anderson spoke to police and  
7 confirmed that Marcus Mays was a member of Knock Out Posse and was an "OG."
- 8 • On March 6, 2006, Marcus Mays, Robert Mays, and a juvenile member of Knock  
9 Out Posse were inside 1349 Steiner Street #2 in the Safety Zone with two other  
10 juveniles and an adult when an unknown suspect began to shoot into the residence.  
11 Officers recovered seven bullet casings outside the apartment and three bullet  
12 fragments inside the apartment.
- 13 • On September 13, 2006, officers received a tip from a confidential informant that  
14 someone had broken into a trailer parked in front of 1652 Eddy Street, a known hang  
15 out for Knock Out Posse gang members. According to the informant, Knock Out  
16 Posse gang members were angry, had armed themselves, and were holding the  
17 alleged perpetrators captive inside the trailer. Police responded to the scene and  
18 observed Knock Out Posse members Jelvon Helton, Kilamanjaro Bell and Laveaux  
19 Derosane entering and exiting the trailer and Marcus Mays standing outside the  
20 trailer near the entrance. Marcus Mays conferred with the other three individuals  
21 when they were outside the trailer. Police also observed Robert Mays enter the  
22 trailer. Officers detained Marcus Mays, Helton, Bell and Derosane outside the trailer  
23 and then entered the trailer. Inside, they found Robert Mays and Chopper City  
24 members Ricky Rounds and Michael Craig. Rounds and Craig were sitting in  
25 folding chairs and had serious injuries to their heads. Both Rounds and Craig were  
26 dazed and covered in blood. Robert Mays, Marcus Mays, Helton, Bell and Derosane  
27 were arrested for assault with a deadly weapon or by force likely to produce great  
28



1 bodily injury, false imprisonment, conspiracy and participation in a criminal street  
2 gang. Rounds later told police that he and Craig were beaten by KOP gang members  
3 because the gang members thought that Rounds and Craig stole from the gang.  
4 Rounds specifically stated that Marcus Mays was a member of Knock Out Posse.

- 5 • On September 20, 2006, Juan Allen, William Helm and a juvenile member of Knock  
6 Out Posse appeared at the Hall of Justice to watch a court hearing for Robert Mays,  
7 Marcus Mays, Derosane, Helton, and Bell regarding the September 13, 2006 trailer  
8 incident. At the hearing, Helm stood up and flashed the KOP hand sign at the  
9 defendants. Allen, Helm and the juvenile then left the courtroom together.
- 10 • On October 4, 2006, Juan Allen and a juvenile member of Knock Out Posse  
11 appeared at the Hall of Justice to watch a court hearing for Robert Mays, Laveaux  
12 Derosane, Jelvon Helton, Marcus Mays and Kilamanjaro Bell. At the hearing, Ricky  
13 Rounds, one of the victims, was present. Two women from the Martin Luther  
14 King/Marcus Garvey Housing Complex who were also present at the hearing called  
15 the victim a "snitch ass nigga." Immediately after the hearing, these same women  
16 made contact with Allen and the juvenile.

17 111. **ROBERT MAYS:** I know Robert Mays through previous contacts and arrests. It is  
18 my opinion that Mays is a member of Defendant Knock Out Posse gang and is a more senior  
19 member of the gang.

20 Mays' Tattoos:

- 21 • The San Francisco Sheriff's Department Jail Classification Unit noted on September  
22 14, 2006, that Mays had a MOB KO tattoo on his left forearm.

23 Mays' Photographs:

- 24 • Mays was photographed with Knock Out Posse members Jelvon Helton, Donte  
25 Levezier, Carlos Levezier and Marcus Mays and documented Chopper City gang  
26 member Byron Cheeves in the Safety Zone. **See Exhibit P.** In the photograph,  
27 Robert Mays is on the far right.

1                   Mays' Gang Writings And Other Gang Indicia:

- 2                   • On December 18, 2002, police seized Robert Mays cell phone and notebook during  
3                   the execution of a search warrant. The cell phone identifier read "Knock out Po\$\$e."  
4                   The notebook contained KOP logo and lyrics. Mays admitted that the notebook  
5                   belonged to him and contained his "raps." During the search, police also found  
6                   ammunition that Mays stated was "just decoration."

7                   Criminal And Nuisance Activity Involving Mays:

- 8                   • On November 25, 2004, Robert Mays was with Marcus Mays in the parking lot of  
9                   1625 Eddy Street in the Safety Zone when Marcus Mays was arrested for possessing  
10                  crack cocaine for sale.
- 11                  • On July 7, 2005, Eddy Rock gang member Clinton Sims was shot at Fillmore and  
12                  O'Farrell Streets. A witness to the shooting followed the suspects into the Marcus  
13                  Garvey Housing Complex in the Safety Zone. Sims told officers that the shooter was  
14                  Robert Mays. Sims also stated that Marcus May was with Robert Mays at the time  
15                  of the shooting.
- 16                  • On August 19, 2005, Chopper City member Dennis Anderson spoke to police and  
17                  confirmed that Robert Mays was a member of Knock Out Posse and was an "OG."
- 18                  • On March 6, 2006, Robert Mays, Marcus Mays and a juvenile member of Knock Out  
19                  Posse were inside 1349 Steiner Street #2 in the Safety Zone with two other juveniles  
20                  and an adult when an unknown suspect began to shoot into the residence. Officers  
21                  recovered seven bullet casings outside the apartment and three bullet fragments  
22                  inside the apartment.
- 23                  • On September 13, 2006, officers received a tip from a confidential informant that  
24                  someone had broken into a trailer parked in front of 1652 Eddy Street, a known hang  
25                  out for Knock Out Posse gang members. According to the informant, Knock Out  
26                  Posse gang members were angry, had armed themselves, and were holding the  
27                  alleged perpetrators captive inside the trailer. Police responded to the scene and  
28

1 observed Knock Out Posse members Jelvon Helton, Kilamanjaro Bell and Laveaux  
2 Derosane entering and exiting the trailer and Marcus Mays standing outside the  
3 trailer near the entrance. Marcus Mays conferred with the other three individuals  
4 when they were outside the trailer. Police also observed Robert Mays enter the  
5 trailer. Officers detained Marcus Mays, Helton, Bell and Derosane outside the trailer  
6 and then entered the trailer. Inside, they found Robert Mays and Chopper City  
7 members Ricky Rounds and Michael Craig. Rounds and Craig were sitting in  
8 folding chairs and had serious injuries to their heads. Both Rounds and Craig were  
9 dazed and covered in blood. Robert Mays, Marcus Mays, Helton, Bell and Derosane  
10 were arrested for assault with a deadly weapon or by force likely to produce great  
11 bodily injury, false imprisonment, conspiracy and participation in a criminal street  
12 gang. Rounds later told police that he and Craig were beaten by KOP gang members  
13 because the gang members thought that Rounds and Craig stole from the gang.  
14 Rounds specifically stated that Robert Mays was a member of Knock Out Posse and  
15 was in the trailer when he and Craig were held captive.

- 16 • On September 20, 2006, Juan Allen, William Helm and a juvenile member of Knock  
17 Out Posse appeared at the Hall of Justice to watch a court hearing for Robert Mays,  
18 Marcus Mays, Derosane, Helton, and Bell regarding the September 13, 2006 trailer  
19 incident. At the hearing, Helm stood up and flashed the KOP hand sign at the  
20 defendants. Allen, Helm and the juvenile then left the courtroom together.
- 21 • On October 4, 2006, Juan Allen and a juvenile member of Knock Out Posse  
22 appeared at the Hall of Justice to watch a court hearing for Robert Mays, Laveaux  
23 Derosane, Jelvon Helton, Marcus Mays and Kilamanjaro Bell. At the hearing, Ricky  
24 Rounds, one of the victims, was present. Two women from the Martin Luther  
25 King/Marcus Garvey Housing Complex who were also present at the hearing called  
26 the victim a "snitch ass nigga." Immediately after the hearing, these same women  
27 made contact with Allen and the juvenile.

1           112. **GARY OWENS**: I know Gary Owens through previous contacts and arrests. It is  
2 my opinion that Owens is a member of Defendant Knock Out Posse gang and is a more senior  
3 member of the gang.

4           Owens' Photographs:

- 5           • Owens was photographed with Floyd Barrow, Donte Levezier, Juan Allen,  
6 Kilamanjaro Bell, and Jelvon Helton. **See Exhibit I**. In the picture, Owens is in the  
7 back, fourth from the left and is flashing the "thumbs up" hand sign.
- 8           • Owens was photographed with Floyd Barrow, Ladario Derosane, Laveaux Derosane  
9 and Donte Levezier in the Safety Zone. **See Exhibit K**. In the picture, Owens is  
10 second from the left and is flashing a "thumbs up" sign and "okay" sign.
- 11          • Owens was photographed with Floyd Barrow and Terry Luckett in front of a trailer  
12 used by the Knock Out Posse gang. This is the same trailer where Ricky Rounds and  
13 Michael Craig were held captive and beaten on September 13, 2006. **See Exhibit**  
14 **M**. In the picture, Owens is second from the left.
- 15          • Owens was photographed flashing the "okay" hand sign. **Attached hereto as**  
16 **Exhibit T** is a true and correct copy of the photograph. I recognize Owens in the  
17 photograph.

18           Criminal And Nuisance Activity Involving Owens:

- 19          • In October 1998, a confidential informant with close ties to Knock Out Posse told  
20 police that Owens was an active member of Knock Out Posse.
- 21          • On November 1, 2001, Owens was seen by an officer loitering at Eddy and Steiner  
22 Street in the Safety Zone with known gang members.
- 23          • On June 16, 1999, Owens was with Floyd Barrow at Eddy and Pierce Streets in the  
24 Safety Zone when Barrow was arrested for loitering. At the time of his arrest,  
25 Barrow was in possession of \$826.

- 1 • On December 5, 2001, Owens was seen by an officer on the sidewalk near 1625  
2 Eddy Street with Knock Out Posse members. The group was standing near an  
3 apparently abandoned vehicle with the "KOP" and "CHOPPA" spray painted inside.
- 4 • On November 8, 2002, police learned from documented Page Street gang member  
5 Kenneth Mays that the Knock Out Posse gang took over #1520 Turk Street #605  
6 from the female resident and her two sons. According to Mays, Owens was  
7 processing crack cocaine at the residence for documented Knock Out Posse member  
8 Ivory Collins.
- 9 • On December 18, 2002, Owens, Juan Allen, Ivory Collins, Paris Willis and Laveaux  
10 Derosane were arrested at 1520 Turk Street in the Safety Zone for possessing  
11 marijuana and cocaine for sale, maintaining a place for trafficking in controlled  
12 substances, participating in a criminal street gang and delaying arrest. Owens had  
13 \$2,426.00 on his person at the time of his arrest.
- 14 • On November 16, 2004, Owens was with Juan Allen in the Martin Luther King  
15 Housing Complex in the Safety Zone when Allen was arrested for possessing a  
16 concealed loaded revolver, possessing marijuana, trespassing and participating in a  
17 criminal street gang. When officers arrested Allen, Owens left the scene.
- 18 • On January 25, 2006, a confidential informant told police that Owens, Juan Allen,  
19 and Dante Levexier were selling drugs in the area of 1675 Eddy Street in the Safety  
20 Zone. According to the informant, Owens, Allen, and Levexier were also in  
21 possession of a firearm and had stashed the firearm in the bushes near 1675 Eddy  
22 Street. Officers responded to the scene and found Allen still loitering in the area.  
23 Officers also found a stolen firearm in the bushes near Allen.
- 24 • On September 13, 2006, officers received a tip from a confidential informant that  
25 someone had broken into a trailer parked in front of 1652 Eddy Street, a known hang  
26 out for Knock Out Posse gang members. According to the informant, Knock Out  
27 Posse gang members were angry, had armed themselves, and were holding the  
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1 alleged perpetrators captive inside the trailer. Police responded to the scene and  
2 observed Knock Out Posse members Jelvon Helton, Kilamanjaro Bell and Laveaux  
3 Derosane entering and exiting the trailer and Marcus Mays standing outside the  
4 trailer near the entrance. Marcus Mays conferred with the other three individuals  
5 when they were outside the trailer. Police also observed Robert Mays enter the  
6 trailer. Officers detained Marcus Mays, Helton, Bell and Derosane outside the trailer  
7 and then entered the trailer. Inside, they found Robert Mays and Chopper City  
8 members Ricky Rounds and Michael Craig. Rounds and Craig were sitting in  
9 folding chairs and had serious injuries to their heads. Both Rounds and Craig were  
10 dazed and covered in blood. Robert Mays, Marcus Mays, Helton, Bell and Derosane  
11 were arrested for assault with a deadly weapon or by force likely to produce great  
12 bodily injury, false imprisonment, conspiracy and participation in a criminal street  
13 gang. Rounds later told police that he and Craig were beaten by KOP gang members  
14 because the gang members thought that Rounds and Craig stole from the gang.  
15 Rounds stated that Owens was a member of Knock Out Posse and was present in the  
16 trailer. Rounds believed that Owens beat him.

### 17 **Chopper City Individual Gang Members**

18 113. **DENNIS ANDERSON**: I know Anderson through previous contacts and arrests. It  
19 is my opinion that Anderson is a member of Defendant Chopper City gang and is a more senior  
20 member of the gang.

#### 21 Anderson's Admissions:

- 22 • On December 21, 2003, Anderson admitted to the San Francisco Sheriff's  
23 Department Jail Classification Unit that he was a member of the Fillmore 223 gang  
24 located at Pierce and Eddy Street. Pierce and Eddy Street is territory claimed by the  
25 Turkwood criminal street gang, a close ally of Chopper City.
- 26 • On August 19, 2005, Anderson admitted to me that he was an active member of  
27 Chopper City. Anderson stated that "223" is a symbol for Chopper City. Anderson  
28

1 admitted that Chopper City has a close association with the criminal street gang,  
2 Knock Out Posse.

- 3 • On August 24, 2005, Anderson admitted to the San Francisco Sheriff's Department  
4 Jail Classification Unit that he was a member of Chopper City.

5 Anderson's Tattoos:

- 6 • Anderson has "223" tattooed on his left hand and "RIP Spank" and "giggs" (his street  
7 moniker) tattooed on his arms. **Attached hereto as Exhibit U** are true and correct  
8 copies of photographs of Anderson's tattoos. I recognize Anderson in the  
9 photographs. The photographs fairly and accurately depict Anderson's tattoos.

10 Anderson's Writings:

- 11 • When Anderson was arrested on August 19, 2005, police noted that his cell phone  
12 screen read "RIP Spank Choppa City."

13 Anderson's Photographs:

- 14 • Anderson was photographed with documented Knock Out Posse member Floyd  
15 Barrow and documented Chopper City gang members Demorea Jacobs and Byron  
16 Cheeves. **See Exhibit L.** In the photograph, Anderson is on the left and is flashing  
17 the "C" hand sign and holding money.
- 18 • Anderson was photographed with Byron Cheeves and Demorea Jacobs. **Attached**  
19 **hereto as Exhibit V** is a true and correct copy of the photograph. In the photograph,  
20 Anderson is on the right. Jacobs is flashing the "C" hand sign. Cheeves is on the  
21 left. The photograph was found during the execution of a search warrant at 22  
22 Dakota Street on May 24, 2007. The resident of 22 Dakota Street is an affiliate of  
23 Chopper City and other Western Addition gangs. I recognize Anderson, Cheeves  
24 and Jacobs in the photograph.
- 25 • Anderson was photographed in the Safety Zone flashing the "C" hand sign.  
26 **Attached hereto as Exhibit W** is a true and correct copy of the photograph. The  
27 photograph was found during the execution of a search warrant at 22 Dakota Street  
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1 on May 24, 2007. The resident of 22 Dakota Street is an affiliate of Chopper City  
2 and other Western Addition gangs. I recognize Anderson in the photograph.

- 3 • Anderson was photographed with documented Chopper City member Harold Gaines  
4 and another individual in the courtyard of the 1800 block of Eddy Street in the Safety  
5 Zone. **Attached hereto as Exhibit X** is a true and correct copy of the photograph.  
6 Anderson, Gaines and the other individual are standing in front of a wall that has  
7 been defaced with Chopper City graffiti. Anderson is on the right and is holding  
8 money. He also appears to be holding narcotics. Gaines is on the left and is holding  
9 money. The photograph was found during the execution of a search warrant at  
10 Karwarn Thorn's residence at 1652 Turk Street on August 9, 2006. I recognize  
11 Anderson and Gaines in the photograph.
- 12 • Anderson was photographed with another individual in the courtyard of the 1800  
13 block of Eddy Street in the Safety Zone. Anderson is again standing in front of a  
14 wall that has been defaced with Chopper City graffiti. **Attached hereto as Exhibit**  
15 **Y** is a true and correct copy of the photograph. The photograph was found during  
16 the execution of a search warrant at Karwarn Thorn's residence at 1652 Turk Street  
17 on August 9, 2006. I recognize Anderson in the photograph.
- 18 • Anderson was photographed on the 1700 block of Eddy Street in the Safety Zone. In  
19 the photograph, Anderson is holding money. **Attached hereto as Exhibit Z** is a true  
20 and correct copy of the photograph. The photograph was found during the execution  
21 of a search warrant at Karwarn Thorn's residence at 1652 Turk Street on August 9,  
22 2006. I recognize Anderson in the photograph.

23 Criminal And Nuisance Activity Involving Anderson

- 24 • In late 2004, a member of Chopper City who claimed to no longer be an active  
25 member of the gang told police that Dennis Anderson was a member of Chopper  
26 City and that his street moniker was "Gigs."



- 1           • On April 29, 2005, officers observed Anderson loitering on the 1100 block of Scott  
2           Street in the Safety Zone with Chopper City member Byron Cheeves. Officers saw  
3           Anderson sell drugs to an individual after Anderson retrieved the drugs from under  
4           the car cover of a parked car. Officers arrested Anderson for possessing crack  
5           cocaine for sale and recovered the drugs hidden in the car cover. At the time of his  
6           arrest, Anderson had \$800 in small bills in his pants pocket.
- 7           • On August 3, 2005, Fred Ayatch was murdered in front of 1867 Eddy Street in the  
8           Safety Zone. Anderson is the suspect in Ayatch's murder.
- 9           • On February 15, 2006, officers observed Anderson loitering with Knock Out Posse  
10          members Juan Allen and Floyd Barrow and Chopper City member Byron Cheeves at  
11          Eddy and Pierce Street in the Safety Zone. Officers saw Allen sell crack cocaine to  
12          an individual and arrested him.
- 13          • On April 20, 2006, officers executed a search warrant at 1771 Eddy Street in the  
14          Safety Zone. When the occupants refused to open the door to the residence, officers  
15          were forced to use a breaching ram to open the door. Officers found Chopper City  
16          members Anderson, Jamal Gaines and Antoine Johnson inside the residence.  
17          Officers also located 15 rocks of crack cocaine on the bathroom floor next to the  
18          toilet and inside the toilet, a 45 caliber semi-automatic handgun, 45 caliber  
19          ammunition and a digital scale with cocaine residue on it. Officers also found a  
20          backpack and a towel with gang writing on it and pictures of gang members flashing  
21          gang hand signs. Anderson, Johnson and Gaines were arrested for possession of  
22          crack cocaine for sale and possession of the handgun. Anderson had \$721 on his  
23          person at the time of his arrest.
- 24          • On October 19, 2006, officers observed Anderson in the parking lot of 1151 Scott in  
25          the Safety Zone. As the officers approached, Anderson ran away and dropped a  
26          handgun over the side of the fence. Officers retrieved the gun and arrested  
27          Anderson. Officers retrieved the gun and arrested Anderson. During a search  
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1 incident to arrest, officers discovered two ziplock baggies of marijuana and \$918 on  
2 Anderson. Anderson was arrested for possessing marijuana for sale, possessing the  
3 handgun and participating in a criminal street gang. Officers also located Chopper  
4 City members Deron Cheeves, Dwight Hart and Antoine Johnson nearby.

- 5 • On October 21, 2006, officers observed Anderson loitering with Chopper City  
6 member Antoine Johnson and several other men in a parking lot on the 1100 block of  
7 Scott Street in the Safety Zone. The men were drinking from a plastic bottle with no  
8 label and dancing. Anderson never went far from a small planted area over a short  
9 fence and he walked past the area several times. When officers approached,  
10 Anderson walked away. Officers located a firearm hidden in the planted area.
- 11 • On November 2, 2006, officers saw Chopper City member Dwight Hart at Turk and  
12 Divisadero in the Safety Zone. At the time, Hart was on probation for possession of  
13 a firearm. When Hart noticed the officers, he ran into 1151 Scott Street, an address  
14 frequented by the Chopper City gang. Inside the residence, officers found Anderson  
15 and Chopper City members Larry Robinson and Jamal Gaines.
- 16 • On May 8, 2007, officers saw Anderson loitering at Eddy and Scott Street in the  
17 Safety Zone with ten individuals, including Knock Out Posse member Dana Ball,  
18 Central Divisadero Players members Reginald Elmore and Esau Ferdinand and a  
19 juvenile member of Knock Out Posse. Officers found a semi-automatic handgun  
20 hidden nearby

21 114. **DEON ANDERSON**: I know Anderson through previous contacts and arrests. It is  
22 my opinion that Anderson is a member of Defendant Chopper City gang.

23 **Anderson's Convictions:**

- 24 • On August 23, 2005, Anderson was convicted of Penal Code Section 459, felony  
25 burglary, San Francisco Superior Court #196505-02. On June 14, 2007, Anderson's  
26 probation was revoked and he was remanded into custody.

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1           Anderson's Admissions:

- 2           • On May 22, 2007, Anderson admitted to police that he was part of the Chopper City  
3           criminal street gang.

4           Criminal And Nuisance Activity Involving Anderson

- 5           • On October 9, 2004, Anderson violated a court stay away order by going to Pearl  
6           Market, at 1201 Divisadero Street in the Safety Zone, and harassing the store clerk.
- 7           • On May 9, 2005, Anderson was with Chopper City member Ricky Rounds at Market  
8           and Jones Street when Rounds robbed a man. Rounds and Anderson then fled the  
9           scene but were eventually detained by police. The victim identified Rounds as the  
10          individual who robbed him. Rounds was arrested.
- 11          • On July 20, 2005, Anderson violated a court stay away order by going to Pearl  
12          Market, at 1201 Divisadero Street in the Safety Zone, and refusing to leave.
- 13          • On August 7, 2005, Anderson violated a court stay away order by going to Pearl  
14          Market, at 1201 Divisadero Street in the Safety Zone, harassing the store clerk and  
15          refusing to leave.
- 16          • On August 8, 2005, Anderson was arrested for breaking into a home at 1800 Turk  
17          Street in the Safety Zone. This incident led to Anderson's August 23, 2005  
18          conviction discussed above.
- 19          • On August 7, 2005, Anderson violated a court stay away order by going to Pearl  
20          Market, at 1201 Divisadero Street in the Safety Zone, harassing the store clerk and  
21          throwing gang hand signs.
- 22          • On December 9, 2005, officers observed Anderson and Chopper City members  
23          Jamal Gaines and Mack Craig III in a double parked car that was blocking vehicles  
24          in the parking lot of 1151 Scott Street in the Safety Zone. Officers arrested Craig on  
25          an outstanding robbery warrant.
- 26          • On January 7, 2006, Anderson violated a court stay away order by going to Pearl  
27          Market, at 1201 Divisadero Street in the Safety Zone and harassing the store clerk.
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- On May 10, 2006, police executed a search warrant at 1771 Eddy Street in the Safety Zone. This residence was a known hang-out for members of Chopper City. Inside, officers found Chopper City members Joel Russell, Deon Anderson, a juvenile member of Chopper City, and Chopper City associate Makia Johnson. Johnson was found in possession of a bag of marijuana and due to the quantity of marijuana, officers believed it was possessed for sale. Officers also found a compact disc in the living room with the words, "uptown 2 thubs up" written on it and a boom box with "uptown", "223 Choppa City", "Young Neily", and "Turkwood 223" written on it.
  - On April 20, 2007, Anderson was shot in the arm at Divisadero and Golden Gate Streets. Anderson told the police that he had been hanging out with friends on Eddy between Scott and Divisadero Streets in the Safety Zone when he decided to walk to the corner store at Divisadero and McAllister Streets. As Anderson was walking, a car pulled up to him and a black male got out of the vehicle with a gun in his hand Anderson ran away and then heard two shot fired at him. Anderson fell to the ground and the male with the gun then stood over him and pressed the trigger. The gun apparently jammed and Anderson got up and ran to the store on Divisadero and McAllister Street with the suspect chasing him. As Anderson reached the store, the suspect turned and ran back to his car.
  - On April 27, 2007, police conducted a probation search of Chopper City member Jamal Gaines' residence at 1151 Scott Street in the Safety Zone and found paintball guns, a pellet rifle, two CO2 cylinders, and a binder with numerous writings containing references to Chopper City on Gaines' bed. Gaines admitted that all the items belonged to him. Anderson was also present at the residence during the search.
  - On May 22, 2007, Anderson was shot in the abdomen while at Pearl Market, located at 1201 Divisadero, in the Safety Zone. The store clerk, who was present at the time of the shooting, told police that Anderson was just outside the store (in violation of a

1 court stay away order) when the clerk heard gunshots. Anderson ran into the back of  
2 the store and the clerk dove to the floor for cover. Police found fresh shell casing on  
3 the ground in front of the store and bullet holes in the store's door frame, glass door,  
4 wine, cooler door and ice cream freezer. Anderson told police he was out in front of  
5 the store for a minute when four unknown persons in dark clothing and ski masks  
6 came running down Eddy Street shooting at him. Anderson fled inside the store and  
7 the suspects chased him into the store and continued shooting at him. Anderson  
8 admitted that the persons who shot him could have committed the shooting because  
9 of Anderson's association with Chopper City. Anderson admitted that he was part of  
10 the Chopper City criminal street gang.

11 115. **BYRON CHEEVES**: I know Cheeves through previous contacts and arrests. It is  
12 my opinion that Cheeves is a member of Defendant Chopper City gang and is a more senior  
13 member of the gang.

14 Cheeves's Convictions:

- 15 • On August 7, 2006, Cheeves was convicted of Health and Safety Code Section  
16 11352, unlawful transportation or sale of a controlled substance, a felony, San  
17 Francisco Superior Court Case #199239. Cheeves was sentenced to one year in jail.  
18 Cheeves was ordered to stay away from 1150 Scott Street, Turk and Eddy Streets.

19 Cheeves's Admissions:

- 20 • On September 10, 2004, Cheeves told police that he and his friends refer to the area  
21 where they live as "Chopper City" and associate themselves with Chopper City.  
22 Cheeves also stated that Turkwood was the block of projects between Pierce, Scott,  
23 Turk and Eddy Streets.

24 Cheeves's Tattoos:

- 25 • On September 10, 2004, officers noted that Cheeves has "223", "1800", and "Bud  
26 Luv" tattooed on his forearms. Cheeves gang moniker is Buddy.

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1 Cheeves's Photographs:

- 2 • Cheeves was photographed with Knock Out Posse member Floyd Barrow and  
3 Chopper City gang members Demorea Jacobs and Dennis Anderson. See Exhibit L.  
4 In the photograph, Cheeves is on the right.
- 5 • Cheeves was photographed with Dennis Anderson and Demorea Jacobs. In the  
6 photograph, Cheeves is standing on the left. See Exhibit V.
- 7 • Cheeves was photographed with Knock Out Posse members Marcus Mays, Jelvon  
8 Helton, Donte Levexier, Carlos Levexier and Robert Mays in the Safety Zone. See  
9 Exhibit P. In the photograph, Cheeves is fifth from the right.

10 Cheeves's Writings:

- 11 • On April 20, 2005, officers searched Cheeves residence at 1160 Scott Street in the  
12 Safety Zone pursuant to a search warrant and found numerous writings with  
13 references to Chopper City.

14 Criminal And Nuisance Activity Involving Cheeves:

- 15 • On September 13, 2003, Cheeves was arrested at Scott and Eddy Street in the Safety  
16 Zone for possessing one large rock and three small rocks of crack cocaine for sale.
- 17 • On December 3, 2003, Cheeves was arrested at Divisadero and Eddy Streets in the  
18 Safety Zone on an outstanding warrant.
- 19 • On September 10, 2004, Cheeves was arrested at 1160 Scott Street in the Safety  
20 Zone for unlawful possession of a loaded firearm and receiving stolen property after  
21 officers searched his home and found a shotgun, shotgun shells, a loaded assault  
22 weapon, a loaded revolver, a loaded semi-automatic pistol and \$5,210.
- 23 • On November 4, 2004, an officer observed Cheeves at Eddy and Scott Street run  
24 through a stop sign in a vehicle with no license plates. Cheeves made eye contact  
25 with the officer and then accelerated away from the officer. The officer activated his  
26 lights and siren, however, Cheeves refused to pull over. Cheeves ran through two  
27 stops signs and then he and his passenger jumped out of the moving vehicle. After  
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1 Cheeves and his passenger jumped out of the car, the vehicle struck the passenger's  
2 feet and crashed into parked cars. Cheeves ran from the scene and entered 1727  
3 Eddy Street where he was arrested by officers for resisting arrest and fleeing from a  
4 peace officer in a vehicle in willful or wanton disregard for the safety of persons or  
5 property.

- 6 • In late 2004, a member of Chopper City who claimed to no longer be an active  
7 member of the gang told police that Byron Cheeves was a member of Chopper City  
8 and that his street moniker was "Buddy."
- 9 • On February 24, 2005, Cheeves was loitering with a group of males, including  
10 Knock Out Posse member Floyd Barrow, in the Pitts Plaza Public Housing Complex  
11 in the Safety Zone. When the police arrived, the group ran out of the complex.
- 12 • On April 9, 2005, police observed Cheeves and a passenger in a car near 121 Cole.  
13 Police observed the passenger sell drugs to another individual. After the transaction,  
14 Cheeves drove to Divisadero and Fulton and parked his car. Police searched the car  
15 and discovered one large rock of crack cocaine inside the car. Cheeves was arrested  
16 for possessing crack cocaine for sale and transporting crack cocaine. Cheeves had  
17 \$483 on his person at the time of his arrest.
- 18 • On April 29, 2005, officers observed Cheeves and Dennis Anderson loitering on the  
19 1100 block Scott Street in the Safety Zone. Cheeves appeared to sell drugs to an  
20 unknown male. Officers detained Cheeves and found approximately \$200 in small  
21 bills on his person. Officers were unable to detain the suspected buyer in the  
22 narcotics transaction. Officers also observed Anderson retrieve crack cocaine hidden  
23 under a car cover of a parked car and sell it to an individual. Anderson was arrested  
24 and police recovered the crack cocaine hidden under the car cover.
- 25 • On May 20, 2005, an undercover officer purchased crack cocaine from Byron  
26 Cheeves, Elizabeth Cheeves and a juvenile member of Chopper City at Eddy and  
27 Scott Street in the Safety Zone.

- On July 7, 2005, Byron Cheeves, and Chopper City members Ricky Rounds, Deron Cheeves and two other individuals broke into a home at 1843 Eddy Street in the Safety Zone. When officers arrived, Byron Cheeves, Deron Cheeves and the two unidentified individuals ran out the back door. Officers discovered a Glock gun on a pathway approximately fifteen feet from the back door to 1843 Eddy Street. This was the same pathway that Byron Cheeves, Deron Cheeves and the two unidentified individuals ran across as they ran out the back door. Rounds was found in possession of 15 rounds of 9 mm bullets, two magazines filled with 9 rounds of 9 mm bullets, two baggies of crack cocaine and a scale.
- On February 15, 2006, officers saw Cheeves loitering with Juan Allen, Dennis Anderson and Floyd Barrow at Eddy and Pierce Street in the Safety Zone. Officers saw Allen sell crack cocaine to an individual and arrested him.
- On March 16, 2006, an undercover officer bought crack cocaine from Byron Cheeves in the area of 1150 Scott Street in the Safety Zone.

116. **DERON CHEEVES**: I know Cheeves through previous contacts and arrests. It is my opinion that Cheeves is a member of Defendant Chopper City gang.

Cheeves's Convictions:

- On February 7, 2007, Cheeves was convicted of Penal Code Section 12025(a)(3), carrying a concealed firearm, a felony, San Francisco Superior Court Case #200730.

Cheeves's Admissions:

- On September 30, 2006, Cheeves was asked by the police how long he had been a member of Chopper City and Cheeves stated, "it's complicated, I got family members that are Chopper City." Cheeves then admitted that he was an associate of Chopper City.

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- On October 19, 2006, Cheeves was with Chopper City members Dwight Hart and Antoine Johnson in front of 1153 Scott Street in the Safety Zone. Chopper City member Dennis Anderson was nearby and was arrested for possession of marijuana for sale, possession of a handgun and participation in a criminal street gang.
- On April 24, 2007, Cheeves was with CDP member Reginald Elmore near the playground structure across from 1153 Scott Street in the Safety Zone. When officers approached, Elmore ran away and reached into his waistband and threw a handgun.

117. **CLARENCE COOK**: I know Cook through previous contacts and arrests. It is my opinion that Cook is a member of Defendant Chopper City gang.

Cook's Convictions:

- Cook was convicted in San Francisco Superior Court Case #2285455. I am aware that he is currently in Folsom Prison and his release date 10/28/07.

Cook's Admissions:

- On September 30, 2006, Cook admitted to police that he had been "running with Chopper City" since he was fourteen years old.

Criminal And Nuisance Activity Involving Cook:

- On November 16, 2005, Cook was arrested at Eddy and Scott Street in the Safety Zone for possessing a concealed loaded semi-automatic handgun and possessing 13 individually wrapped rocks of crack cocaine for sale. Cook admitted to police that he possessed the loaded handgun and sold crack cocaine.
- On November 29, 2005, officers searched Cook's home at 1153 Scott Street in the Safety Zone pursuant to a warrant and found a .22 caliber handgun. Cook's mother stated that the gun belonged to Cook's deceased grandmother. Police also found a 9 mm bullet, a shotgun shell, a photograph of Cook flashing gang hand signs, plastic baggies and a box cutter with possible cocaine residue in Cook's closet.

- 1           • On September 30, 2006, Cook was a passenger in a car when the police pulled the  
2 vehicle over at Buchanan and Fell Streets for a vehicle code violation. Chopper City  
3 members Dwight Hart, Deron Cheeves and two other individuals were also  
4 passengers in the vehicle. After officers watched the occupants of the vehicle  
5 moving suspiciously inside the vehicle and after officers determined that Cook was  
6 on probation with a search condition, they searched the vehicle. Officers located two  
7 loaded handguns and a loaded revolver in a purse in the vehicle. Cook, Cheeves,  
8 Hart and the driver of the vehicle were arrested for possession of concealed firearms.  
9 Cook admitted that he handled the revolver. He also admitted that when the police  
10 pulled over the vehicle, everybody in the car discussed hiding the guns and getting  
11 rid of the guns. Cook admitted placing the revolver in the purse. He also stated he  
12 could only talk about what he did. DNA tests later confirmed that Cook had handled  
13 the firearms.

14           118. **JAMAL GAINES**: I know Gaines through previous contacts and arrests. It is my  
15 opinion that Gaines is a member of Defendant Chopper City gang.

16           Gaines' Convictions:

- 17           • Gaines was convicted in San Francisco Superior Court Case #2291081.

18           Gaines' Writings:

- 19           • On April 27, 2007, officers searched Gaines' residence at 1151 Scott Street in the  
20 Safety Zone pursuant to a search warrant and found a binder with numerous writings  
21 containing references to Chopper City, including "them Choppa Boyz only play with  
22 Choppa toys", "Choppa City 223 Flatland, JG", "223 Fillmoe, JG", "Choppa City",  
23 and "223 Choppa City, Bloody Knuckles, Fillmoe." Gaines also wrote his name and  
24 initials throughout the notebook. In addition, Gaines wrote the gang monikers for  
25 several documented Chopper City members, including "DA" (Deron Cheeves),  
26 "Woo Woo" (Larry Robinson), "Bud" (Byron Cheeves), "Too Too" (Harold Gaines),  
27  
28

1 and "Toine" (Antoine Johnson). Gaines admitted to police that the binder belonged  
2 to him.

3 Criminal And Nuisance Activity Involving Gaines:

- 4 • On December 9, 2005, officers observed Gaines and Chopper City members Deon  
5 Anderson and Mack Craig III in a double parked car that was blocking vehicles in  
6 the parking lot of 1151 Scott Street in the Safety Zone. Officers arrested Craig on an  
7 outstanding robbery warrant.
- 8 • On April 20, 2006, officers executed a search warrant at 1771 Eddy Street in the  
9 Safety Zone. When the occupants refused to open the door to the residence, officers  
10 were forced to use a breaching ram to open the door. Officers found Jamal Gaines,  
11 Dennis Anderson, and Antoine Johnson inside the residence. Officers also located  
12 15 rocks of crack cocaine on the bathroom floor next to the toilet and inside the  
13 toilet, a 45 caliber semi-automatic handgun, 45 caliber ammunition and a digital  
14 scale with cocaine residue on it. Officers also found a backpack and a towel with  
15 gang writing on it and pictures of gang members flashing gang hand signs. Gaines,  
16 Anderson and Johnson were arrested for possession of crack cocaine for sale and  
17 unlawful possession of the handgun. Gaines had \$161 on his person at the time of  
18 his arrest.
- 19 • On June 14, 2006, a confidential source purchased crack cocaine from Gaines at  
20 Turk and Scott Streets in the Safety Zone.
- 21 • On July 26, 2006, a victim was robbed at Clay and Polk Street by a black male who  
22 pointed a gun at the victim's face, grabbed the victim's laptop bag and fled. The  
23 victim chased the suspect to Sacramento Street between Polk and Van Ness where  
24 the suspect jumped into a waiting Chevrolet sedan with the license plate 5RIT172.  
25 One day later, Gaines was pulled over in the same vehicle at Eddy and Pierce Streets  
26 in the Safety Zone. Gaines admitted to police that he bought the vehicle in early  
27 July. However, Gaines denied driving the vehicle at the time of the robbery and  
28

1 stated that he was asleep when the robbery occurred. Gaines also denied giving  
2 anyone permission to drive the vehicle.

- 3 • On November 2, 2006, officers saw Chopper City member Dwight Hart at Turk and  
4 Divisadero Street in the Safety Zone. Hart was on probation at the time for unlawful  
5 possession firearm. When Hart saw the officers, he ran away. Hart ran into 1151  
6 Scott Street in the Safety Zone, a residence frequented by Chopper City gang  
7 members. As officers approached the residence, Hart exited the residence. Hart had  
8 removed his green sweatshirt and hat he was wearing, in an apparent attempt elude  
9 the police. Officers entered 1151 Scott and found Chopper City members Gaines,  
10 Dennis Anderson and Larry Robinson inside.
- 11 • On November 8, 2006, Gaines was arrested at Eddy and Divisadero Streets in the  
12 Safety Zone on an outstanding warrant for selling crack cocaine.
- 13 • On April 27, 2007, officers conducted a probation search of Gaines' residence at  
14 1151 Scott Street in the Safety Zone and found paintball guns, a pellet rifle, two CO2  
15 cylinders, and a binder with numerous writings containing references to Chopper  
16 City on Gaines' bed. Gaines admitted that all the items belonged to him. Also  
17 present at the residence during the search was Deon Anderson.

18 119. **DWIGHT HART**: I know Hart through previous contacts and arrests. It is my  
19 opinion that Hart is a member of Defendant Chopper City gang.

20 **Hart's Convictions:**

- 21 • On March 23, 2006, Hart was convicted of Penal Code Section 12031(a)(2)(F),  
22 unlawful carrying of a loaded firearm, a felony, San Francisco Superior Court  
23 #198406.

24 **Criminal And Nuisance Activity Involving Hart:**

- 25 • Hart is the suspect in the shooting death of Wayne Bernard, a member of Eddy Rock.  
26 Bernard was killed on the corner of Eddy and Webster Streets on November 17,  
27 2005.

- 1           • On February 4, 2006, officers effected a traffic stop of a vehicle at Bayshore  
2 Boulevard and Alemany, an area well known as a dumping ground for stolen cars.  
3 Hart was a passenger in the vehicle. The driver of the vehicle had no proof of  
4 registration or insurance. When officers ran a computer check of the vehicle, it came  
5 back registered to Auto Dismantlers, Inc. The driver, who was on probation,  
6 consented to a search of the vehicle. Directly below the seat where Hart was sitting,  
7 officers located a loaded .38 caliber revolver. Officers also found crack cocaine on  
8 Hart's person. Hart admitted that the gun was in his possession and that he had it for  
9 protection. This incident led to Hart's March 23, 2006 conviction discussed above.
- 10          • On September 30, 2006, Hart was a passenger in a car when the police pulled the  
11 vehicle over at Buchanan and Fell Streets for a vehicle code violation. Chopper City  
12 members Clarence Cook, Deron Cheeves and two other individuals were also  
13 passengers in the vehicle. After officers watched the occupants of the vehicle  
14 moving suspiciously inside the vehicle and after officers determined that Cook was  
15 on probation with a search condition, they searched the vehicle. Officers located two  
16 loaded handguns and a loaded revolver in a purse in the vehicle. Hart, Cook, and  
17 Cheeves and the driver of the vehicle were arrested for possession of concealed  
18 firearms. Cook admitted that when the police pulled over the vehicle, everybody in  
19 the car discussed hiding the guns and getting rid of the guns. Cook admitted placing  
20 the revolver in the purse. He also stated he could only talk about what he did. DNA  
21 tests later confirmed that Hart had handled the firearms as well.
- 22          • On October 19, 2006, Hart was with Chopper City members Deron Cheeves and  
23 Antoine Johnson in front of 1153 Scott Street in the Safety Zone. Chopper City  
24 member Dennis Anderson was nearby and was arrested for possession of marijuana  
25 for sale, possession of the handgun and participation in a criminal street gang.
- 26          • On November 2, 2006, officers saw Chopper City member Dwight Hart at Turk and  
27 Divisadero in the Safety Zone. Hart was on probation at the time for unlawful  
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1 possession firearm. When Hart saw the officers, he ran away. Hart ran into 1151  
2 Scott Street in the Safety Zone, a residence frequented by Chopper City gang  
3 members. As officers approached the residence, Hart exited the residence. Hart had  
4 removed his green sweatshirt and hat he was wearing, in an apparent attempt elude  
5 the police. Officers entered 1151 Scott and found Chopper City members Jamal  
6 Gaines, Dennis Anderson and Larry Robinson inside.

- 7 • On November 24, 2006, Hart was shot and wounded near the parking lot of 1600  
8 Turk Street in the Safety Zone. Hart told the officers that he heard ten shots but saw  
9 nothing. One of the gunshots broke the window at 1115 Pierce Street. Officers also  
10 found numerous spent casings on the street and sidewalk.

11 120. ANTOINE JOHNSON: I know Johnson through previous contacts and arrests. It  
12 is my opinion that Johnson is a member of Defendant Chopper City gang and is a more senior  
13 member of the gang.

14 Criminal And Nuisance Activity Involving Johnson:

- 15 • In late 2004, a member of Chopper City who claimed to no longer be an active  
16 member of the gang told police that Antoine Johnson was a member of Chopper City  
17 and that his street moniker was "Toine."
- 18 • On April 20, 2006, officers executed a search warrant at 1771 Eddy Street in the  
19 Safety Zone. When the occupants refused to open the door to the residence, officers  
20 were forced to use a breaching ram to open the door. Officers found Antoine  
21 Johnson, Dennis Anderson and Jamal Gaines inside the residence. Officers also  
22 located 15 rocks of crack cocaine on the bathroom floor next to the toilet and inside  
23 the toilet, a 45 caliber semi-automatic handgun, 45 caliber ammunition and a digital  
24 scale with cocaine residue on it. Officers also found a backpack and a towel with  
25 gang writing on it and pictures of gang members flashing gang hand signs.  
26 Anderson, Johnson and Gaines were arrested for possession of crack cocaine for sale

1 and unlawful possession of the handgun. Johnson had \$119 on his person at the time  
2 of his arrest.

- 3 • On June 3, 2006, Eddy Rock member Hannibal Thompson was shot and wounded at  
4 Bush and Fillmore Street. Witnesses stated that a black male chased Thompson  
5 down and shot him while standing over him, execution style. The car that the  
6 shooter left the scene in was registered to the girlfriend of Johnson. Thompson was  
7 uncooperative with officers and signed an affidavit asking that the investigation into  
8 his case be terminated.
- 9 • On October 19, 2006, Johnson was with Chopper City members Deron Cheeves and  
10 Dwight Hart in front of 1153 Scott Street in the Safety Zone. Chopper City member  
11 Dennis Anderson was nearby and was arrested for possessing marijuana for sale,  
12 possessing a handgun and participation in a criminal street gang.
- 13 • On October 21, 2006, officers observed Johnson loitering with Chopper City  
14 member Dennis Anderson and several other men in a parking lot located on the 1100  
15 block of Scott Street in the Safety Zone. The men were drinking from a plastic bottle  
16 with no label and dancing. Anderson never went far from a small planted area over a  
17 short fence and he walked past the area several times. When officers approached,  
18 Anderson walked away. A short time later, Johnson walked away. Officers located  
19 a firearm hidden in the planted area.

20 121. **MAKIA JOHNSON**: I know Johnson through previous contacts and arrests. It is  
21 my opinion that Johnson is an associate of Defendant Chopper City gang and participates in the  
22 gang's criminal and nuisance activity and acts in concert with the gang.

23 Criminal And Nuisance Activity Involving Johnson:

- 24 • On May 10, 2006, police executed a search warrant at 1771 Eddy Street in the Safety  
25 Zone, a known hang-out for members of Chopper City. Inside, officers found  
26 Chopper City members Joel Russell, Deon Anderson, a juvenile member of Chopper  
27 City, and Chopper City associate Makia Johnson. Johnson was in possession of a  
28



1 bag of marijuana and due to the quantity of marijuana, officers believed it was  
2 possessed for sale. Johnson was arrested for possessing marijuana for sale. Officers  
3 also found a compact disc in the living room with the words, "uptown 2 thubs up"  
4 written on it and a boom box with "uptown", "223 Choppa City", "Young Neily",  
5 and "Turkwood 223" written on it.

- 6 • On August 18, 2006, Johnson and an unknown black male attempted to rob a man on  
7 McAllister Street near Divisadero Street. When the victim tried to escape, the male  
8 suspect punched the victim in the face. A short scuffle ensued and the victim fell to  
9 the ground, causing an abrasion to his left knee. The victim then ran to Divisadero  
10 Street and called 911. The police detained Johnson at Scott and Eddy Streets in the  
11 Safety Zone. The victim positively identified Johnson as the female who attempted  
12 to rob him.
- 13 • On April 14, 2007, police saw a juvenile member of Chopper City, Makia Johnson  
14 and Elizabeth Cheeves loitering on the southeast corner of Eddy and Scott Street in  
15 the Safety Zone. The officers drove past the group three times and observed that the  
16 three subjects continued to loiter at the corner. Each time the officers drove by the  
17 location, Johnson and Cheeves appeared to motion to the juvenile. The juvenile  
18 would look in the officers direction and walk through an open gate into the public  
19 housing complex at Eddy and Scott Street and hide from view. When the officers  
20 drove away from the area, the juvenile would walk out of the gate again. Due to the  
21 suspicious activity, the officers stopped and detained the juvenile. Johnson and  
22 Cheeves walked in the officers direction and repeatedly asked, "Why are you jacking  
23 him?" Johnson and Cheeves walked closer to the officers and continued to demand  
24 that the officers answer their questions. Due to the actions of Johnson and Cheeves,  
25 the officers turned their attention to them. The juvenile then ran from the scene.

26 122. **RICKY ROUNDS**: I know Rounds through previous contacts and arrests. It is my  
27 opinion that Rounds is a member of Defendant Chopper City gang.

1        Round's Convictions:

- 2            • On September 23, 2005, Rounds was convicted of Penal Code Section 487(C), grand  
3            theft from a person, a felony, San Francisco Superior Court #196271.
- 4            • On October 14, 2005, Rounds was convicted of Penal Code Section 12031(a)(2)(F),  
5            unlawful possession of a loaded firearm, a misdemeanor, San Francisco Superior  
6            Court Case #2207067.

7        Rounds' Admissions:

- 8            • On September 13, 2006, Rounds admitted to police that he was a member of  
9            Chopper City.

10       Criminal And Nuisance Activity Involving Rounds:

- 11           • On March 2, 2005, police saw Rounds and two other subjects standing at the edge of  
12           the parking lot at 1869 Eddy Street in the Safety Zone. When Rounds saw the  
13           officers, he walked away at a high rate of speed. Officers detained Rounds and  
14           discovered a loaded pistol in his left pant leg. The pistols serial number had been  
15           partially scratched off. Rounds told officers that he found the gun the day before in  
16           the bushes at Eddy and Divisadero Street in the Safety Zone and kept the gun for his  
17           protection.
- 18           • On May 9, 2005, Rounds robbed a man at Market and Jones Street. At the time of  
19           the robbery, Rounds was with Chopper City member Deon Anderson. Rounds and  
20           Anderson then fled the scene but were eventually detained by police. The victim  
21           identified Rounds as the individual who robbed him and Rounds was arrested. This  
22           incident led to the September 23, 2005 conviction discussed above.
- 23           • On July 7, 2005, Rounds, Chopper City members Byron Cheeves, Deron Cheeves  
24           and two other individuals broke into a home at 1843 Eddy Street in the Safety Zone.  
25           When officers arrived, Byron Cheeves, Deron Cheeves and the two unidentified  
26           individuals ran out the back door. Officers discover Glock gun on a pathway  
27           approximately fifteen feet from the back door to 1843 Eddy Street. This was the  
28

1 same pathway that Byron Cheeves, Deron Cheeves and the two unidentified  
2 individuals ran across as they ran out the back door. Rounds was found in  
3 possession of 15 rounds of 9 mm bullets, two magazines filled with 9 rounds of 9  
4 mm bullets, two baggies of crack cocaine and a scale. Rounds was arrested for  
5 receiving or concealing stolen property, trespassing and possessing crack cocaine for  
6 sale.

- 7 • On August 30, 2006, officers saw Knock Out Posse member Brian Hill in the Pitts  
8 Plaza courtyard near Eddy and Scott Street in the Safety Zone. Hill ran from the  
9 officers and pounded on the rear door of 1771 Eddy Street, a known hang out for  
10 Chopper City gang members. Someone lets Hill inside the residence. Officers  
11 forced their way through the rear door of the residence and saw Hill and Rounds  
12 running out the front door. Hill ran towards Eddy and Pierce Street screaming to  
13 occupants of the Martin Luther King Housing Complex to open the gate for him.  
14 Officers tackled Hill and found crack cocaine and marijuana in his pant pocket.
- 15 • On September 13, 2006, police received a tip from a confidential informant that the  
16 Knock Out Posse trailer parked in front of 1652 Eddy Street in the Safety Zone had  
17 been broken into and that Knock Out Posse members were angry, had armed  
18 themselves, and were holding the alleged perpetrators captive inside the trailer.  
19 Police responded to the scene and observed Knock Out Posse members Jelvon  
20 Helton, Kilamanjaro Bell and Laveaux Derosane entering and exiting the trailer. In  
21 addition, police saw Marcus Mays standing outside the trailer near the entrance.  
22 Marcus Mays conferred with the other three individuals when they were outside the  
23 trailer. Police also observed Robert Mays enter the trailer. Police detained Marcus  
24 Mays, Helton, Bell and Derosane outside the trailer. Police then entered the trailer.  
25 Inside, they found Robert Mays. Police also found Chopper City members Rounds  
26 and Michael Craig inside the trailer in folding chairs with serious injuries to their  
27 head. Both Rounds and Craig were dazed and covered in blood. Robert Mays,  
28

1 Marcus Mays, Helton, Bell and Derosane were arrested for assault with a deadly  
2 weapon or by force likely to produce great bodily injury, false imprisonment,  
3 conspiracy and participation in a criminal street gang. Rounds later told police that  
4 he and Craig were beaten by KOP gang members because the gang members thought  
5 that Rounds and Craig stole from the gang. According to Rounds, he and Michael  
6 Craig were members of Chopper City.

7 123. **CARNELL TAYLOR**: I know Taylor through previous contacts and arrests. It is  
8 my opinion that Taylor is a member of Defendant Chopper City gang.

9 Taylor's Convictions:

- 10 • On June 25, 2003, Taylor was convicted of Health & Safety Code Section 11357(c),  
11 possession of more than 28.5 grams of marijuana, a misdemeanor, San Francisco  
12 Superior Court #2106043.

13 Criminal And Nuisance Activity Involving Taylor:

- 14 • On April 29, 2003, officers found Taylor loitering in the area of 1150 Scott Street in  
15 the Safety Zone. As officers approached, Taylor attempted to discard two bags of  
16 marijuana. Taylor was arrested for possessing marijuana for sale. During the  
17 booking search, Taylor was found in possession of additional marijuana. This  
18 incident led to the June 25, 2003 conviction discussed above.
- 19 • On November 30, 2006, officers executed a search warrant at 1690 Turk Street in the  
20 Safety Zone, a residence controlled by the Chopper City criminal street gang. Taylor  
21 was one of the residents of the unit. When no one answered the door, officers  
22 breeched the door. After officers entered the residence, an officer saw Carnell  
23 Taylor walking out of a bathroom and heard a toilet flushing. The officer entered the  
24 bathroom and saw pieces of marijuana in the toilet and on the floor next to the toilet.  
25 Officers located additional marijuana and a digital scale on a television stand in the  
26 south bedroom. They also located two wall hangings and a fake cellular phone with  
27 the words "Chopper City" and "223" written on them, and photographs showing  
28

1 Carnell Taylor with other members of the Chopper City criminal street gang.  
2 Officers also located eight video game players, two DVD players still in their  
3 original packaging, and jewelry in the closet. These items matched items taken in  
4 recent burglaries in the Pitts Plaza Housing Projects. In addition, officers found two  
5 plastic baggies of cocaine in the bathroom hall closet and \$5,394.00 in cash and a  
6 check from Citibank to Carnell Taylor for \$5,000.00 in a woman's purse on the bed  
7 in the north bedroom. Taylor was arrested for possessing marijuana for sale,  
8 possessing cocaine, violating probation, destroying evidence and resisting arrest.

9 124. **KARWARN THORN**: I know Thorn through previous contacts and arrests. It is  
10 my opinion that Thorn is a member of the Turkwood criminal street gang and an associate of  
11 Defendant Chopper City gang and that Thorn participates in the Chopper City gang's criminal and  
12 nuisance activity and acts in concert with the Chopper City gang.

13 Criminal And Nuisance Activity Involving Thorn:

- 14 • In late 2004, a member of Chopper City who claimed to no longer be an active  
15 member of the gang told police that Thorn was a member of Chopper City and that  
16 his street moniker was "Crazy." I know that although Thorn is a member of  
17 Turkwood, some of the members of Chopper City do not distinguish between  
18 Turkwood and Chopper City. To them, a member of Turkwood is a member of  
19 Chopper City.
- 20 • On November 10, 2004, officers observed Thorn and documented Chopper City  
21 member Raheshi Horace loitering in the courtyard of the Pitts Plaza Housing  
22 Complex in the Safety Zone. Horace was on probation for a drug related offense.  
23 Officers searched Horace and found 45 rocks of crack cocaine in his pocket. Horace  
24 was arrested and admitted that he sold over 15 rocks of crack cocaine that day.
- 25 • On July 31, 2006, an officer observed Thorn driving a vehicle at Scott and Turk  
26 Street in the Safety Zone. Thorn was pulled over for vehicle code violations. Thorn  
27 had no identification on his person and therefore, was taken into custody for the  
28

1 vehicle code violations. Officers searched Thorn and found a clear plastic baggie  
2 containing approximately twenty-five large rocks of crack cocaine and many smaller  
3 rocks in Thorn's left front pants pocket. Thorn was booked for possessing crack  
4 cocaine for sale and transporting crack cocaine.

- 5 • On August 9, 2006, officers executed a search warrant at Thorn's residence at 1652  
6 Turk Street in the Safety Zone. Thorn was present during the search and officers  
7 found a baggie of crack cocaine on Thorn. Inside the residence, officers also found  
8 additional crack cocaine, \$389, an air soft pellet gun that looked like a sub machine  
9 gun and ten photographs of Chopper City and Turkwood gang members and  
10 associates, including some photographs of individuals flashing gang signs and  
11 individuals standing in front of gang graffiti in the Safety Zone. Thorn admitted that  
12 he was in possession of the drugs on his person and in his home. Thorn also stated  
13 that he sold drugs when he was arrested at the end of July. Thorn was arrested for  
14 possessing crack cocaine for sale.

15 125. **SALA THORN**: I know Thorn through previous contacts and arrests. It is my  
16 opinion that Thorn is a member of the Turkwood criminal street gang and an associate of Defendant  
17 Chopper City gang and that Thorn participates in the Chopper City gang's criminal and nuisance  
18 activity and acts in concert with the Chopper City gang.

19 Thorn's Convictions:

- 20 • On August 29, 2005, Thorn was convicted of Vehicle Code Section 2800.2, a felony,  
21 fleeing a police officer in willful or wanton disregard for the safety of persons or  
22 property, San Francisco Superior Court #183729-01. By the time he was sentenced,  
23 Thorn had spent 1787 days in jail.

24 Criminal And Nuisance Activity Involving Thorn:

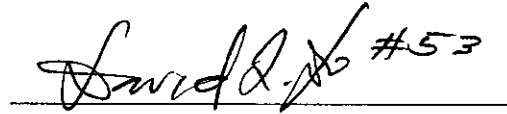
- 25 • On June 19, 2000, two black males robbed Johnny Rockets Restaurant at Pierce and  
26 Chestnut Streets. The men were armed with a gun and struck one of the employees  
27 in the head with the gun during the robbery. The suspects stole cash from the  
28

1 restaurant's safe and placed it inside a red shopping bag. Immediately after the  
2 robbery, an officer near the restaurant saw two African American individuals  
3 walking in a hurried manner on the north side of Chestnut Street, toward Avila  
4 Street. One of the individuals was carrying a red bag. The two turned onto Avila  
5 Street and began to run. The officer saw the rear lights of a vehicle on Avila Street  
6 suddenly turn on and saw the two individuals get into the vehicle. The vehicle then  
7 left the scene. The officer caught up to the vehicle, a white Ford Escort, and saw an  
8 African American woman driving the car and a black man, whom he later identified  
9 in court as Sala Thorn, sitting in the front passenger seat. The officer followed the  
10 Escort as it drove onto the Golden Gate Bridge. Shortly thereafter, the Escort  
11 suddenly stopped in its lane. The officer saw the female driver tumble awkwardly  
12 out of the driver's door and land in the fast lane of southbound traffic. The woman  
13 lay there, crying hysterically. Sala Thorn opened the passenger side door, exited,  
14 and walked around the rear of the Escort. As he did so, the officer pointed his  
15 firearm at him and shouted at him several times to get down on the ground. Thorn  
16 ignored the officer's commands, entered the driver's seat, and drove north on the  
17 Golden Gate Bridge. At this point, the officer saw the headlights of a car headed  
18 southbound in the fast lane of the bridge. He yelled several times at the woman to  
19 get up and get out of the lane. The woman finally began to stand up. As she did so,  
20 a car driving southbound in the fast lane struck the woman, causing her body to be  
21 thrown back in the northbound fast lane. The woman died shortly thereafter from  
22 her injuries. After Thorn drove away, he was pursued by officers from the California  
23 Highway Patrol and the Marin County Sheriff's Office. During a lengthy and  
24 hazardous chase where Thorn was seen driving in excess of 100 miles per hour and  
25 driving in the wrong direction down highway 101, officers were finally able to stop  
26 Thorn. This incident led to Thorn's August 29, 2005 conviction discussed above.  
27  
28

- On June 27, 2006, confidential source working with police purchased crack cocaine from Thorn at Eddy and Divisadero in the Safety Zone.
- On August 17, 2006, a confidential source working with police purchased crack cocaine from Sala Thorn at Eddy and Divisadero in the Safety Zone.

I declare under penalty of perjury that the foregoing is true and correct. Executed in San Francisco, California.

Dated: 07/06/2007

 #53

DAVID Q. DO



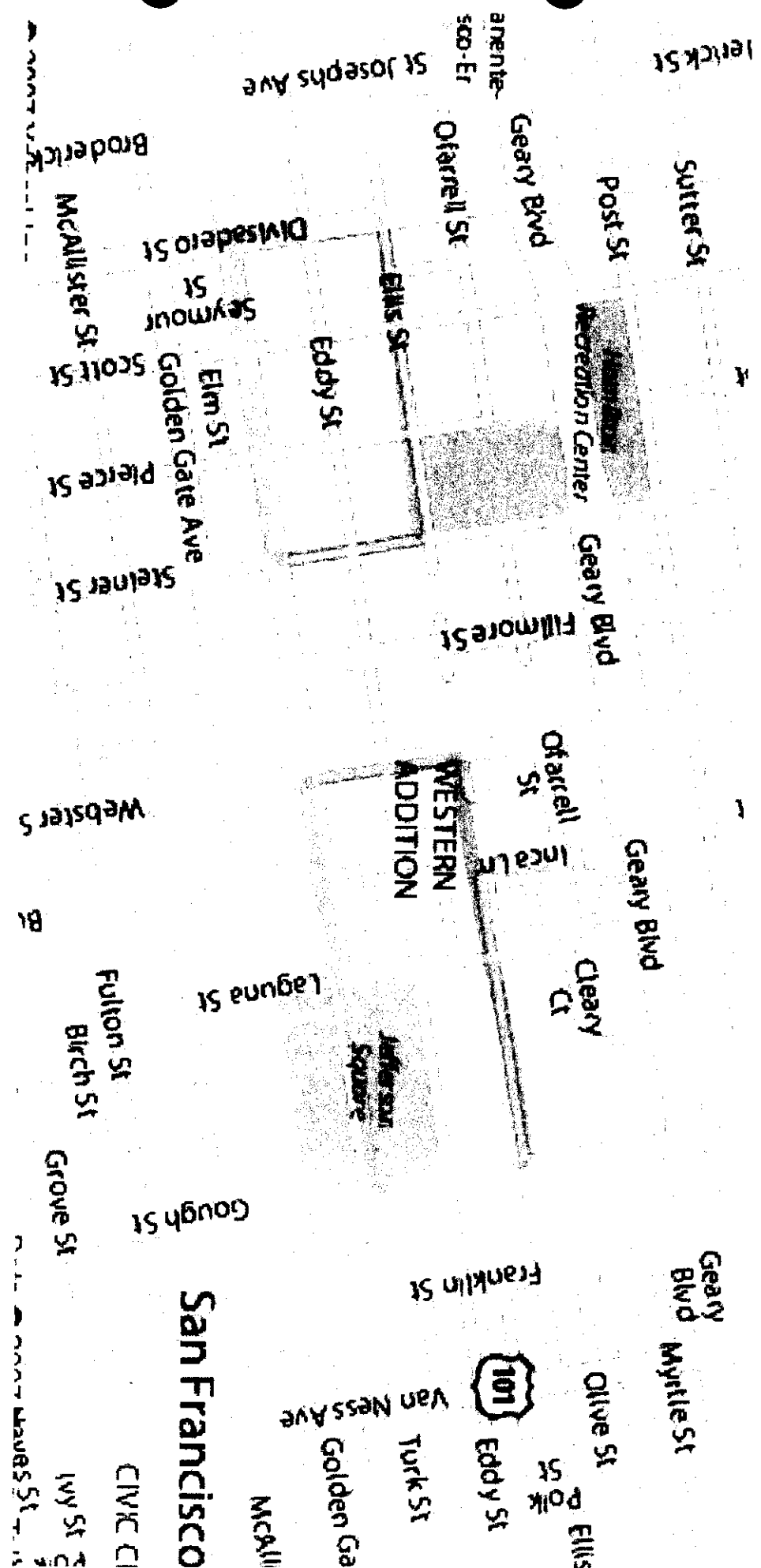
EXHIBIT LIST

A	Map of Proposed Chopper City/Knock Out Posse Safety Zone
B	Photographs of Knock Out Posse graffiti in the Martin Luther King Housing Complex
C	Photographs of Knock Out Posse graffiti in the Martin Luther King Housing Complex
D	Two collages and one drawing related to Chopper City, Knock Out Posse and Turkwood
E	Photographs of Chopper City graffiti in the Pitts Plaza Housing Complex
F	Photographs of Chopper City graffiti in the Pitts Plaza Housing Complex
G	Photographs of Chopper City graffiti in the Pitts Plaza Housing Complex
H	Photograph of Knock Out Posse member Juan Allen flashing his "567" tattoo
I	Photograph of Knock Out Posse gang members flashing hand signs and tattoos
J	Photograph Knock Out Posse member Dana Ball flashing the KOP hand sign
K	Photograph of Knock Out Posse gang members flashing hand signs
L	Photograph of Knock Out Posse gang member Floyd Barrow and Chopper City gang members Dennis Anderson (flashing Chopper City hand sign), Demorea Jacobs and Byron Cheeves
M	Photograph of Knock Out Posse gang members Floyd Barrow, Terry Lockett and Gary Owens in front of KOP trailer
N	Photograph of Knock Out Posse gang members Jelvon Helton (flashing KOP hand sign), Gary Owens (flashing KOP and Uptown hand signs) and Marcus Mays
O	Photograph of Knock Out Posse gang members Jelvon Helton (flashing KOP hand sign), Gary Owens (flashing KOP and Uptown hand signs) and Marcus Mays
P	Photograph of Knock Out Posse and Chopper City gang members flashing hand signs
Q	Photograph of Knock Out Posse gang member Jelvon Helton flashing the KOP hand sign and Chopper City gang member Larry Robinson
R	Photographs of Darrell Lockett and his "1600" tattoo
S	Photograph of Terry Lockett flashing gang hand sign
T	Photograph of Gary Owens flashing KOP hand sign
U	Photographs of Dennis Anderson's gang tattoos

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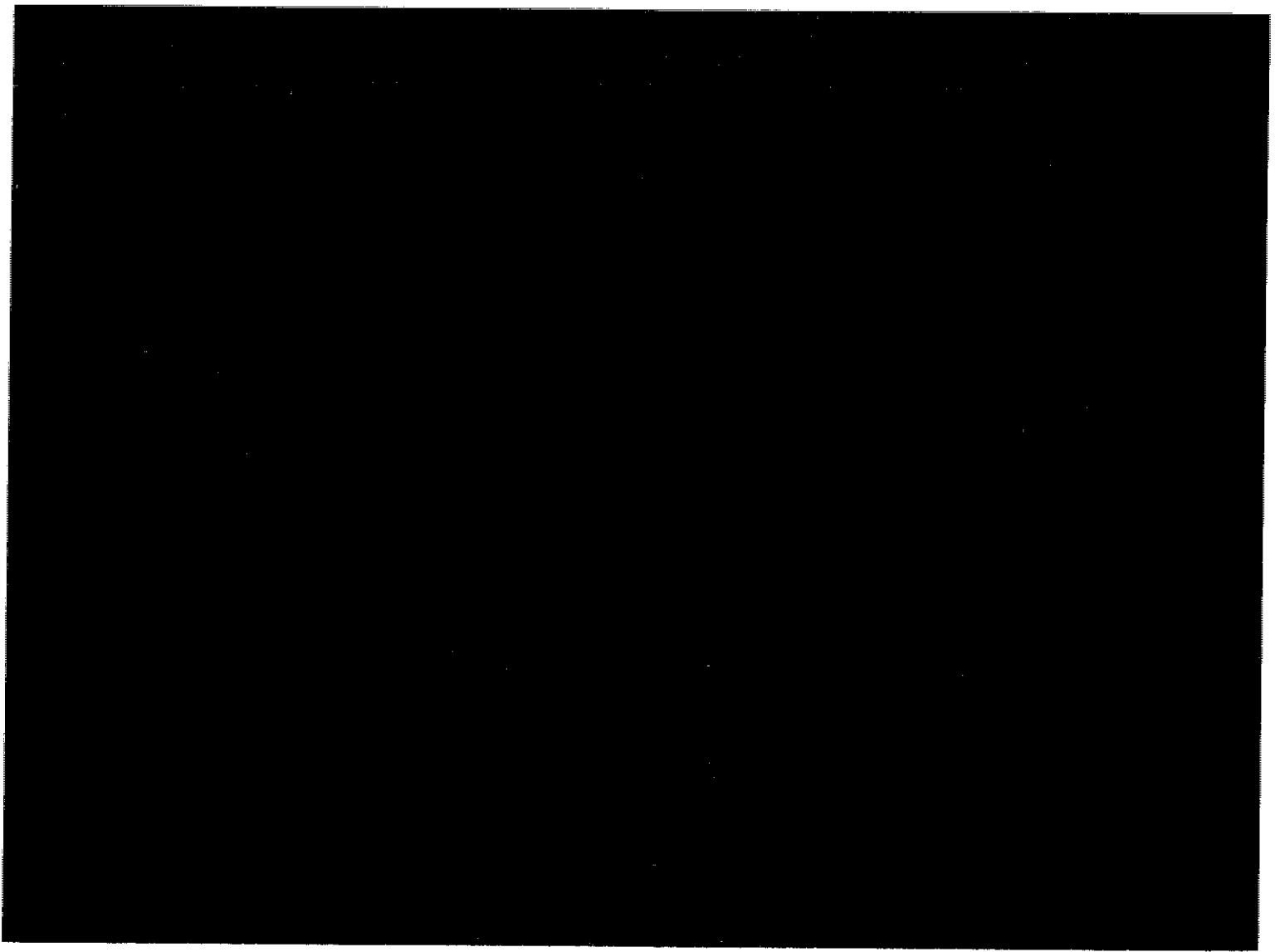
V	Photograph of Dennis Anderson, Bryon Cheeves and Demorea Jacobs (flashing Chopper City hand sign)
W	Photograph of Dennis Anderson flashing Chopper City hand sign
X	Photograph of Dennis Anderson and Harold Gaines in front of Chopper City graffiti
Y	Photograph of Dennis Anderson in front of Chopper City graffiti
Z	Photograph of Dennis Anderson

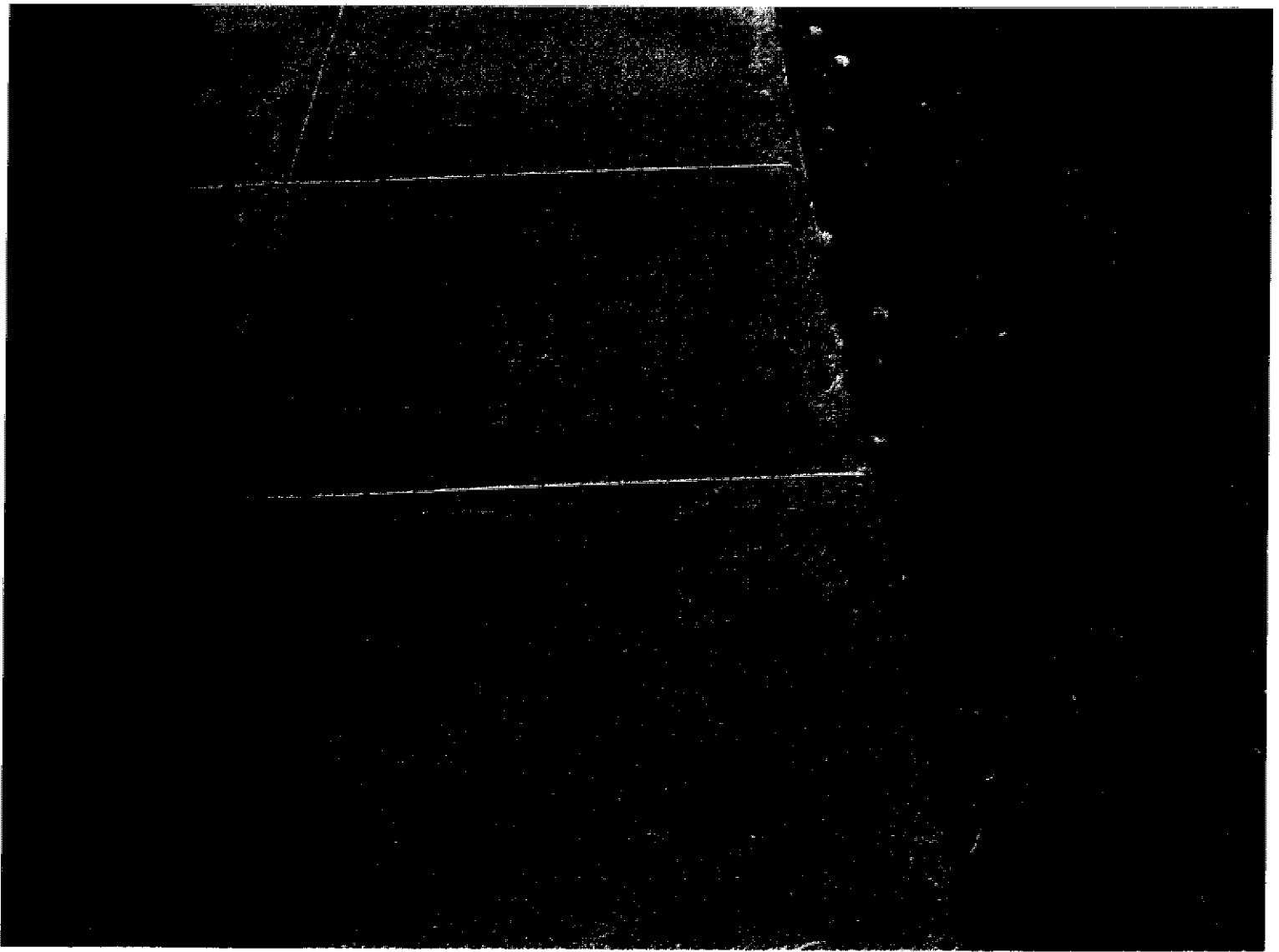
**EXHIBIT A**

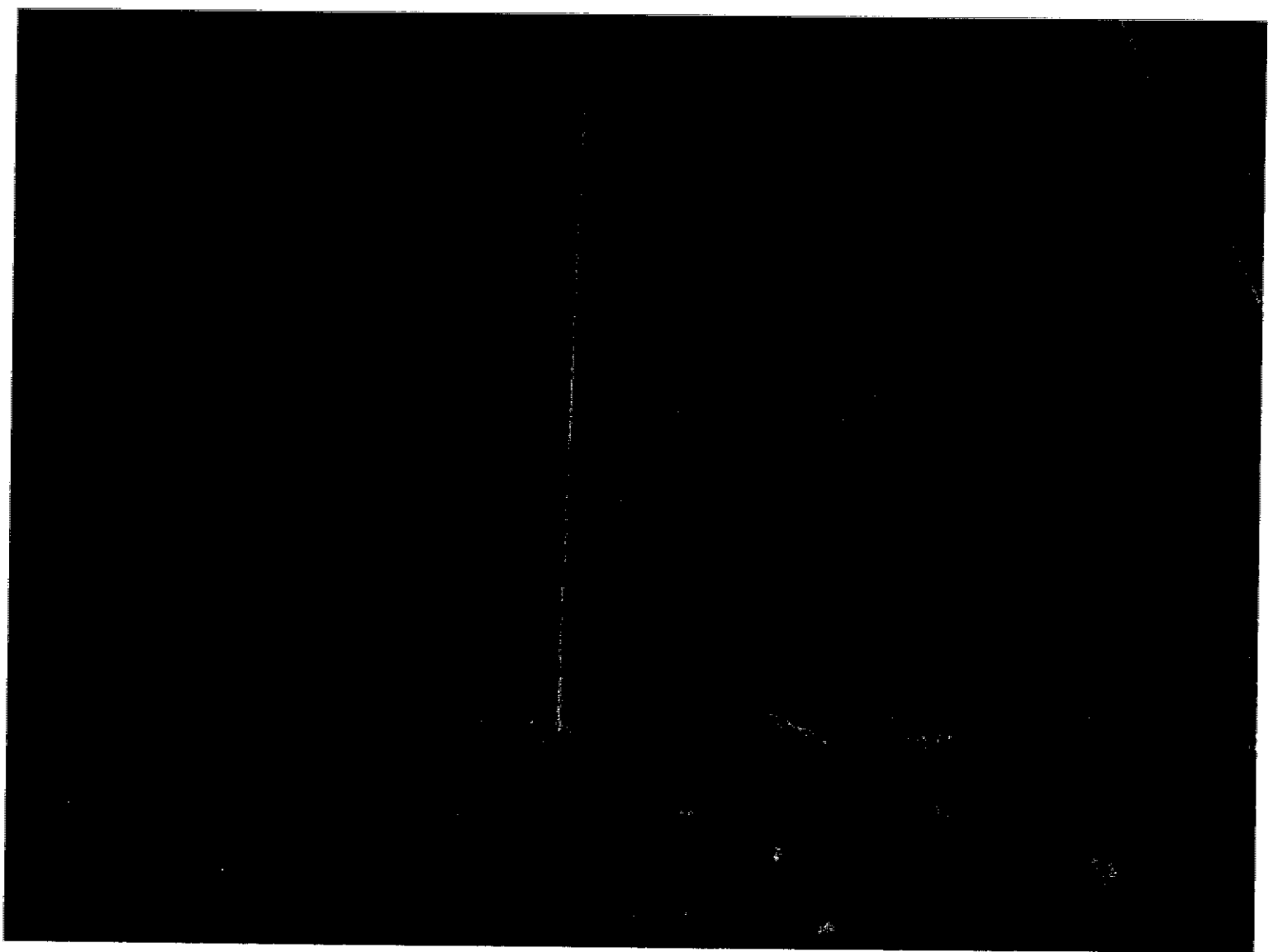


**San Francisco**

EXHIBIT B









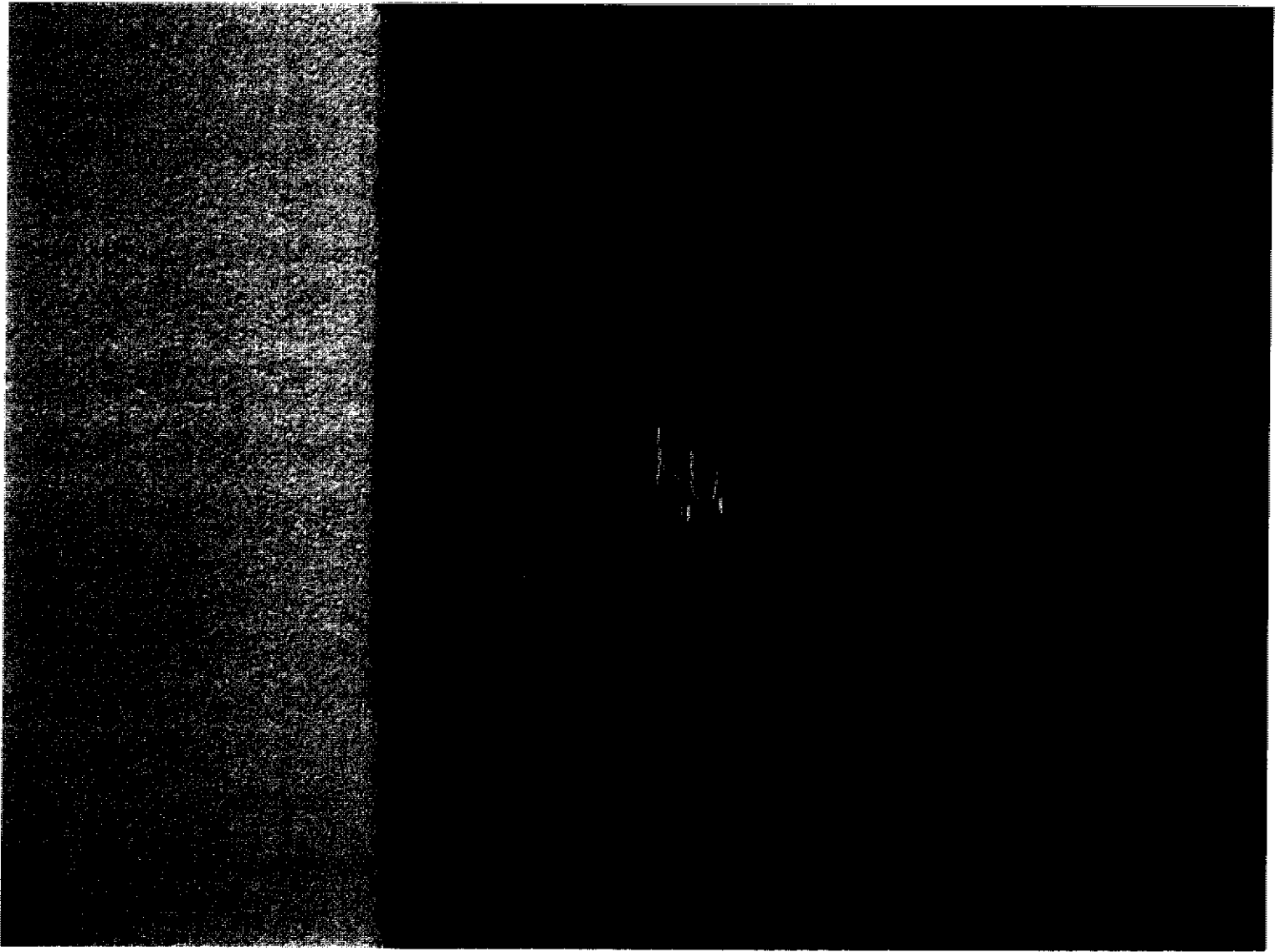




T-6  
KEEP OUT

NOTICE

EMERGENCY





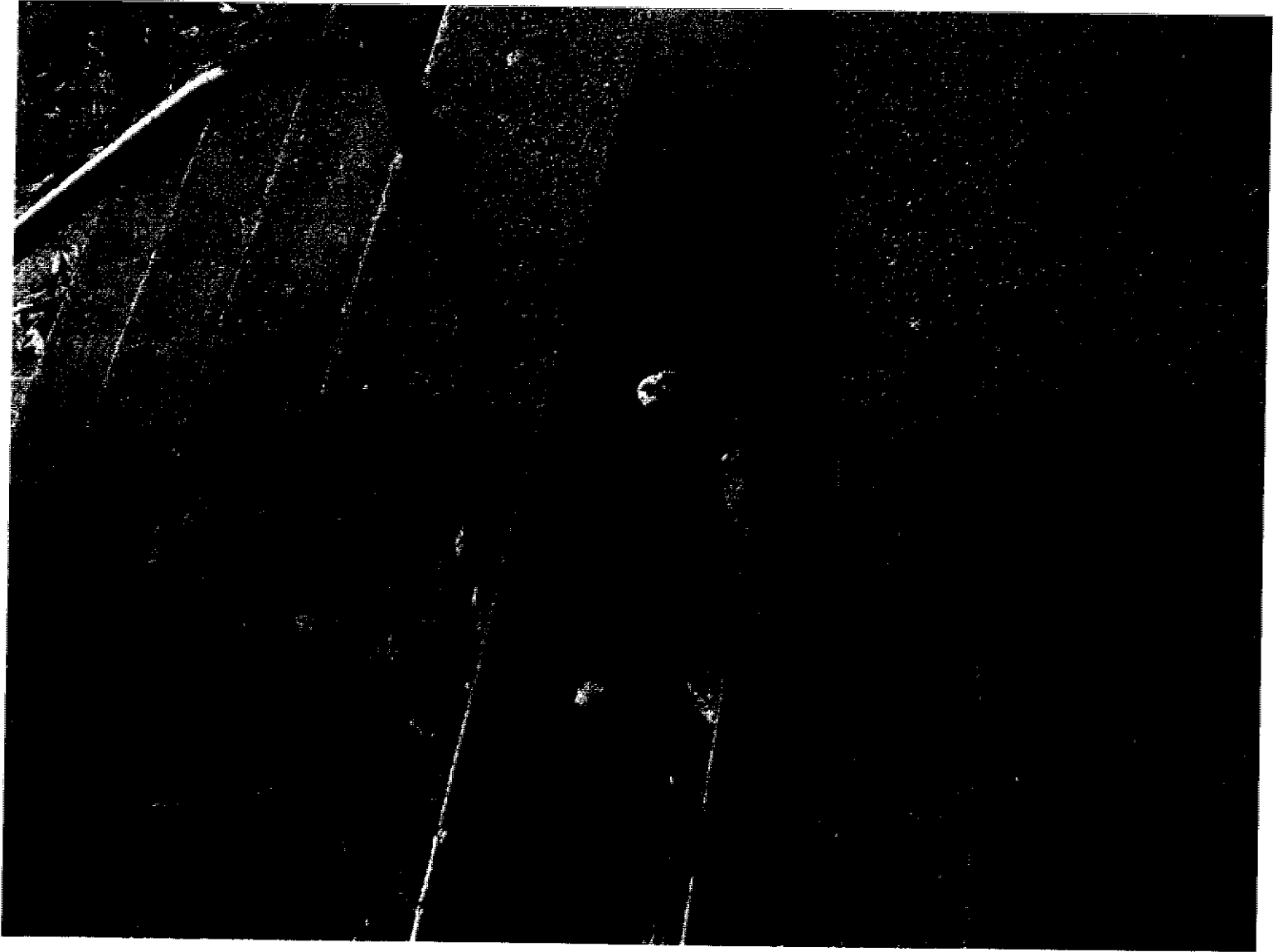
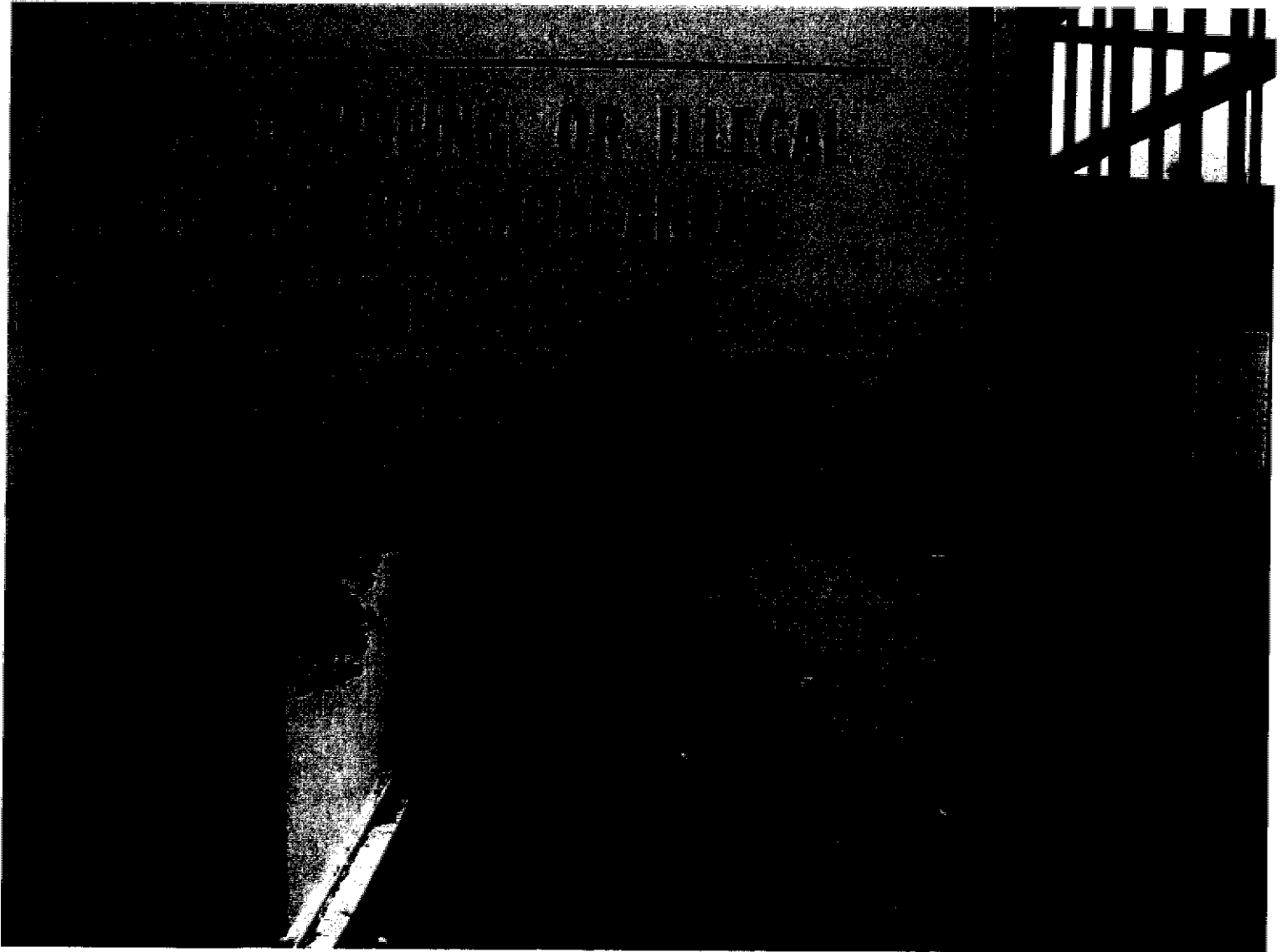
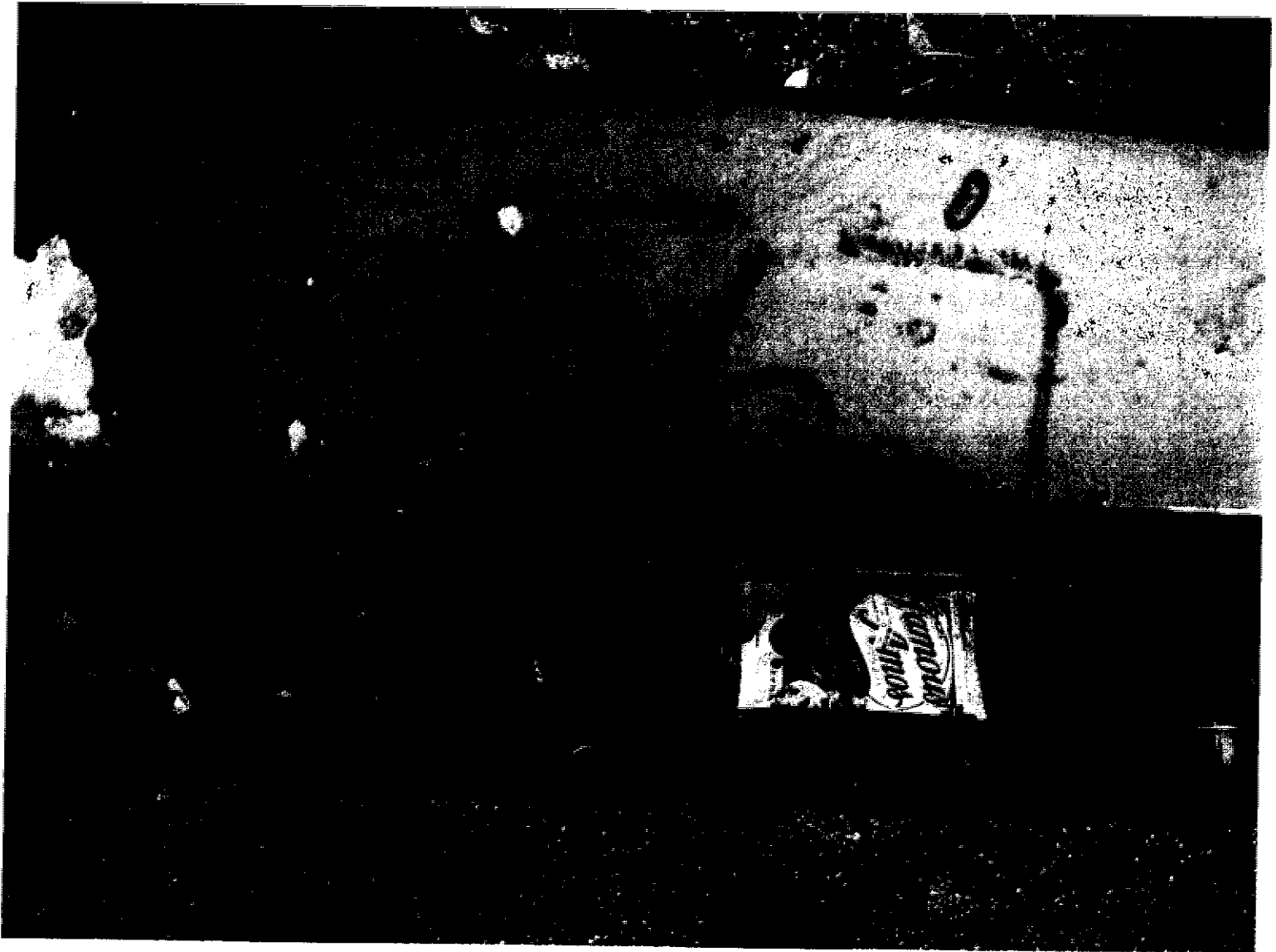
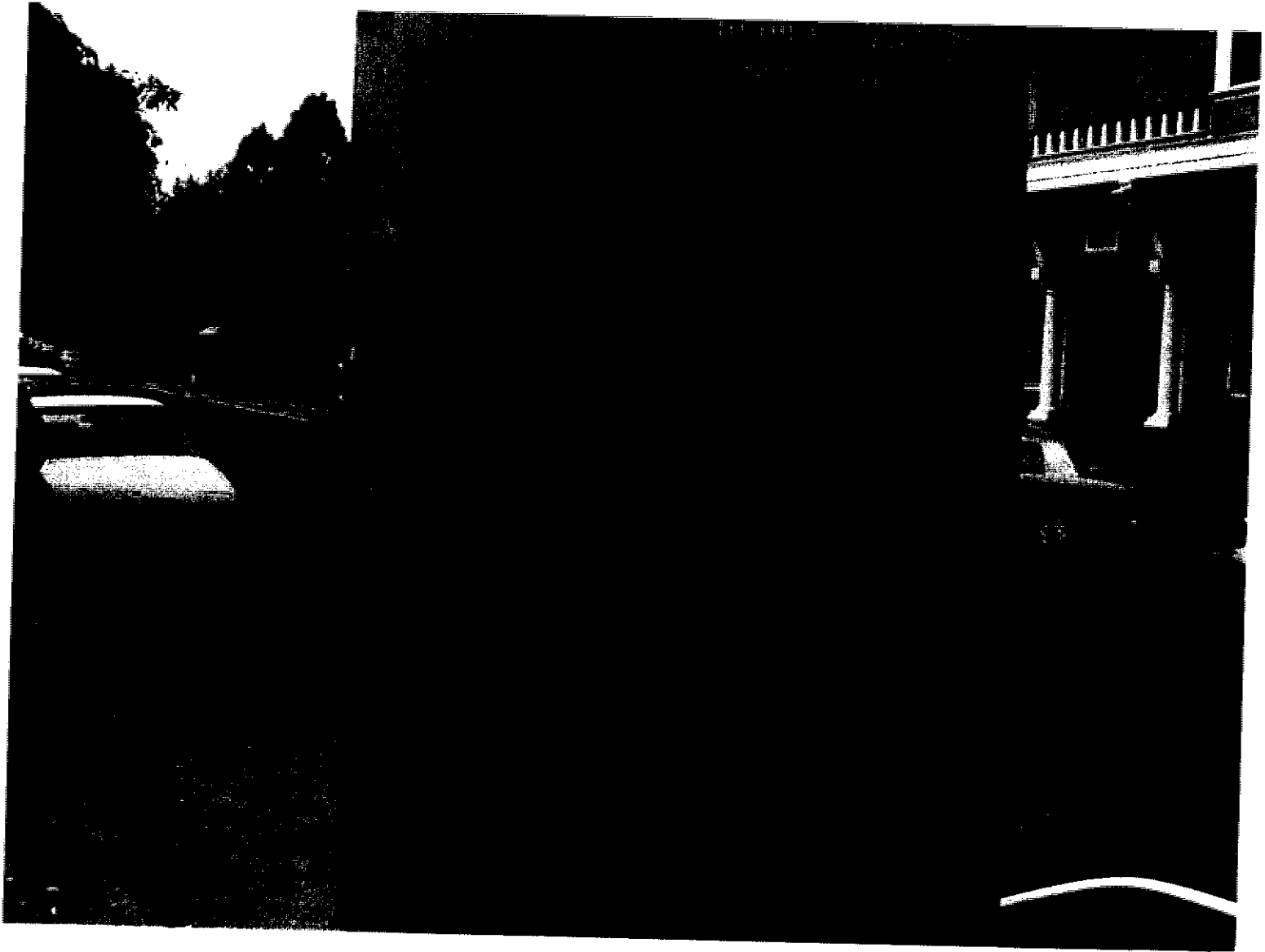


EXHIBIT C









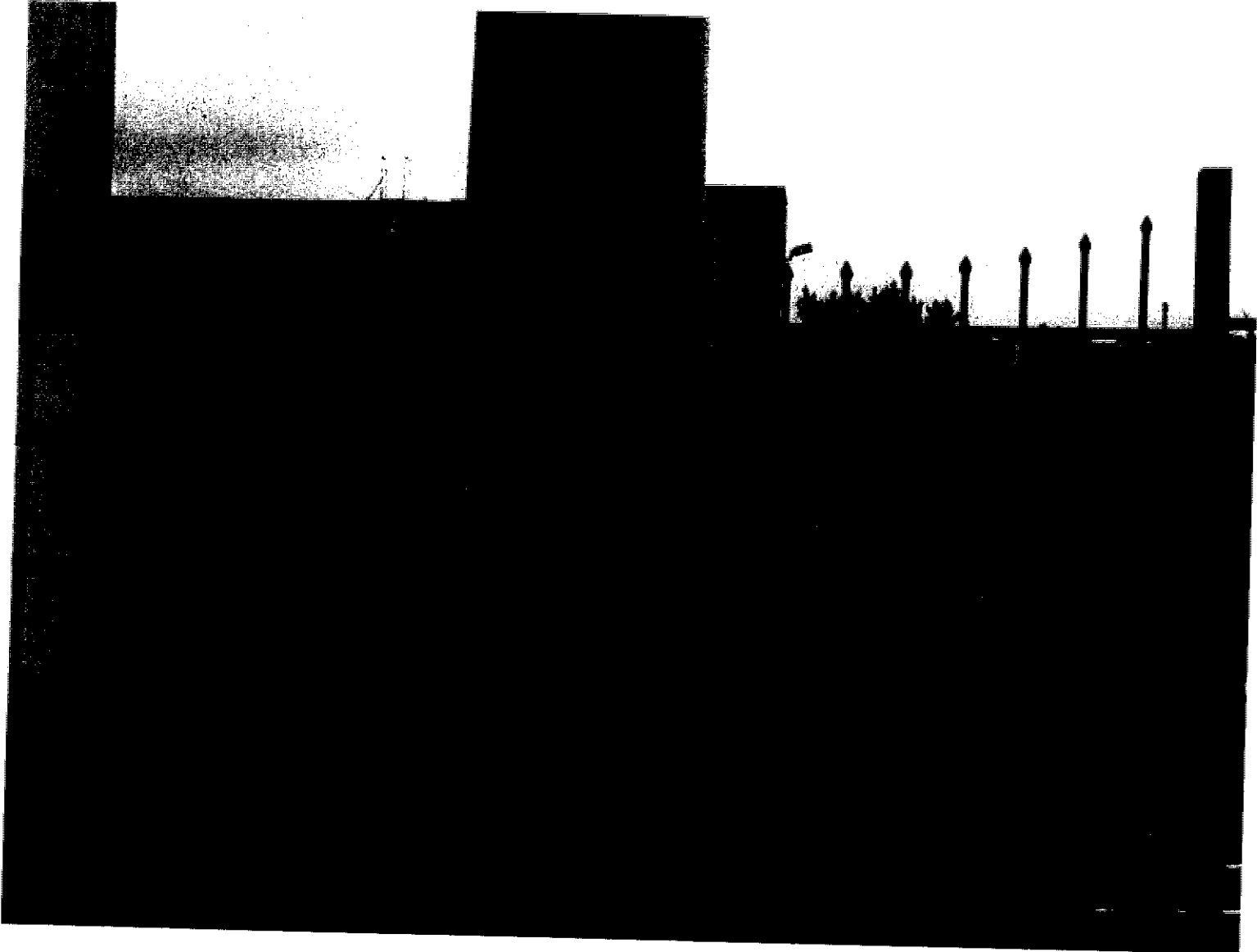


EXHIBIT D

3 LAST REAL HARLEM  
NIGGAZ

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# Crime Bulletin

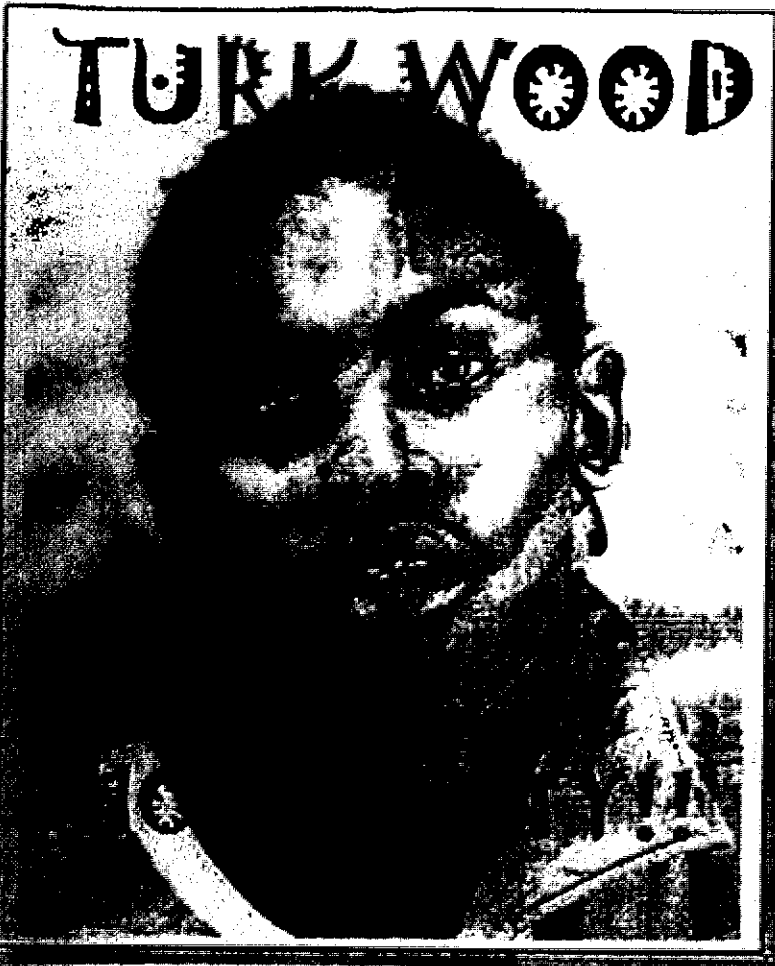


## REWARD \$ 10,000.00

05-021

02/11/05

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**HOMICIDE VICTIM DEMOREA JACOBS**

The Sheriff has authorized a \$ 10,000.00 reward for information leading to the arrest and conviction of the subjects responsible for the killing of Demoreea Jacobs. On 02/11/05 at 11:09 PM, Demoreea Jacobs was killed while crossing the street with a vehicle on the intersection of Divisadero Street and 18th Street. Mr. Jacobs and one fired a shot at the vehicle. The vehicle fled on the scene on foot and were heading towards 18th Street.

# UPT

Persons with information are urged to contact Inspector Karen Lynch or Inspector [Name] Homicide Detail at (415) 553-1145 during business hours. Persons who wish to remain anonymous may call the Anonymous Tip line at (415) 575 4444.



EXHIBIT E

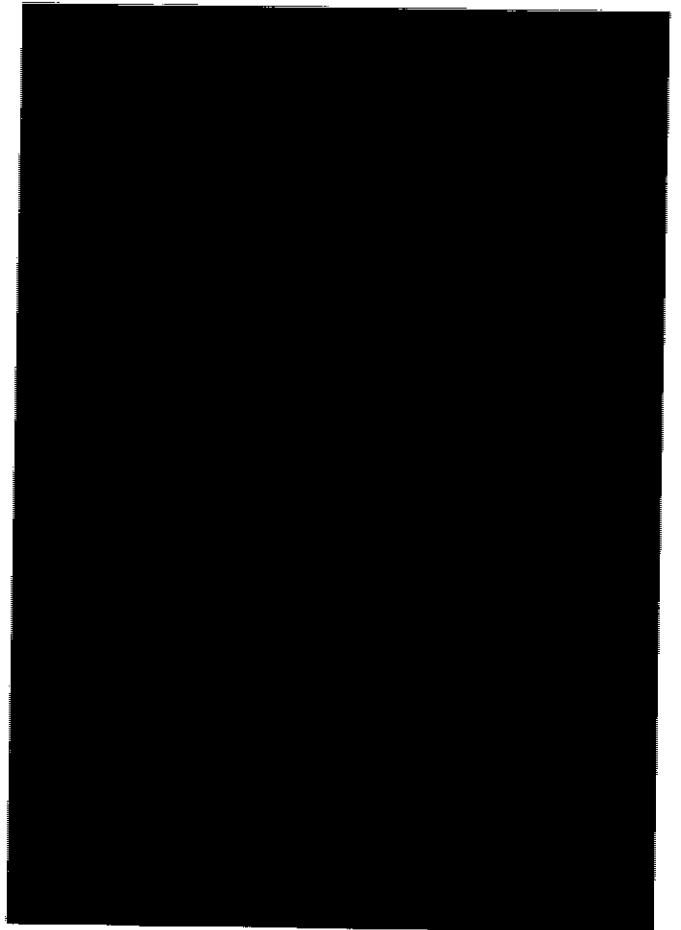
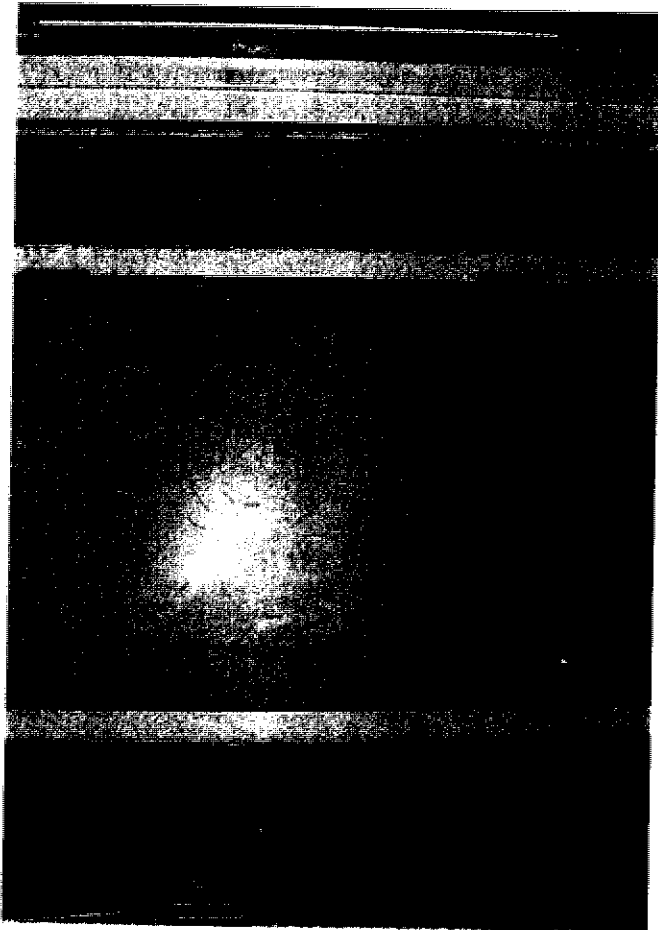
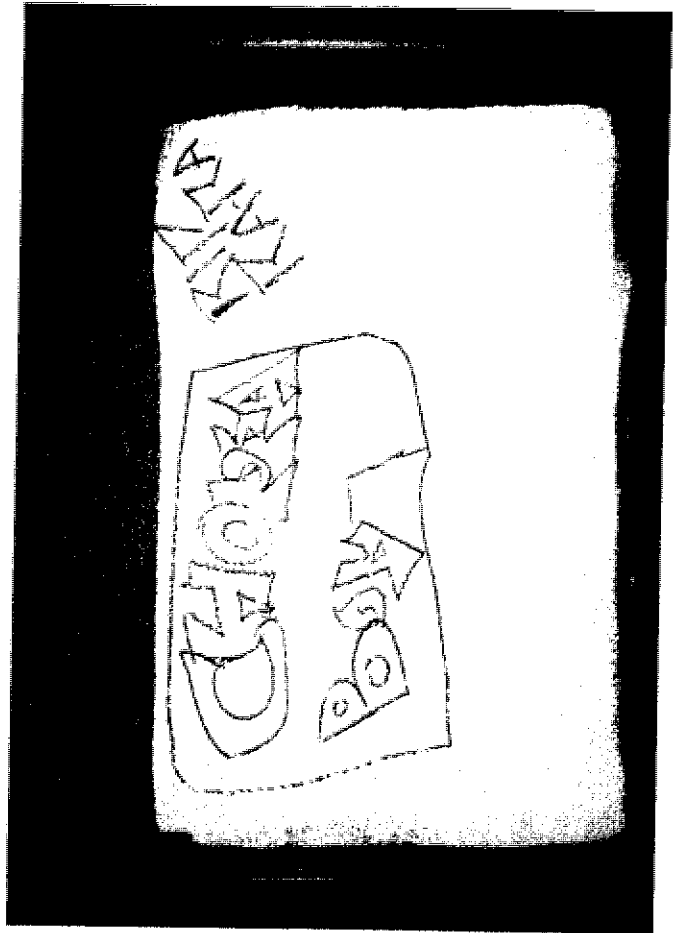
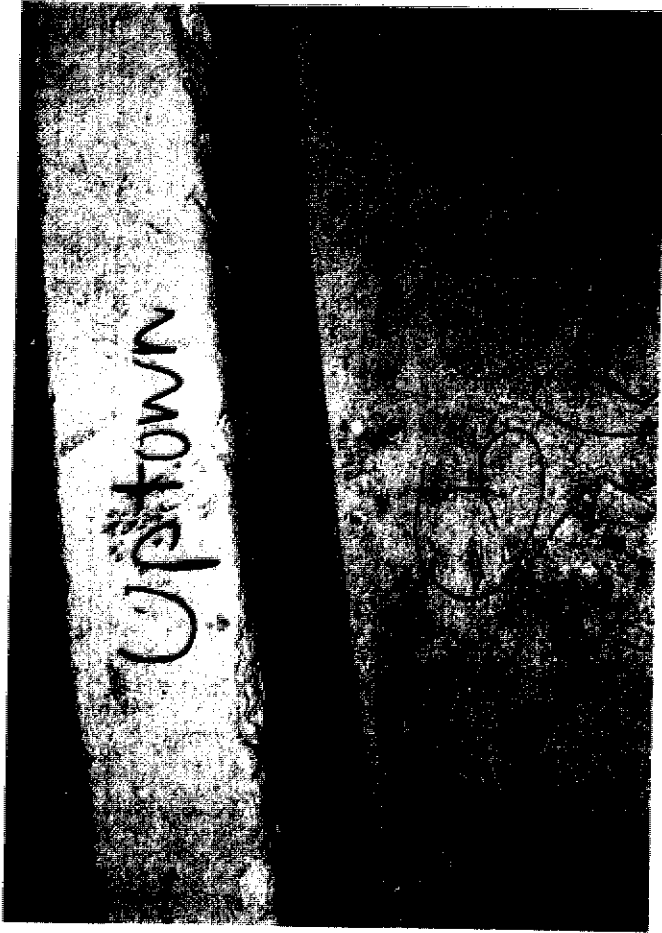
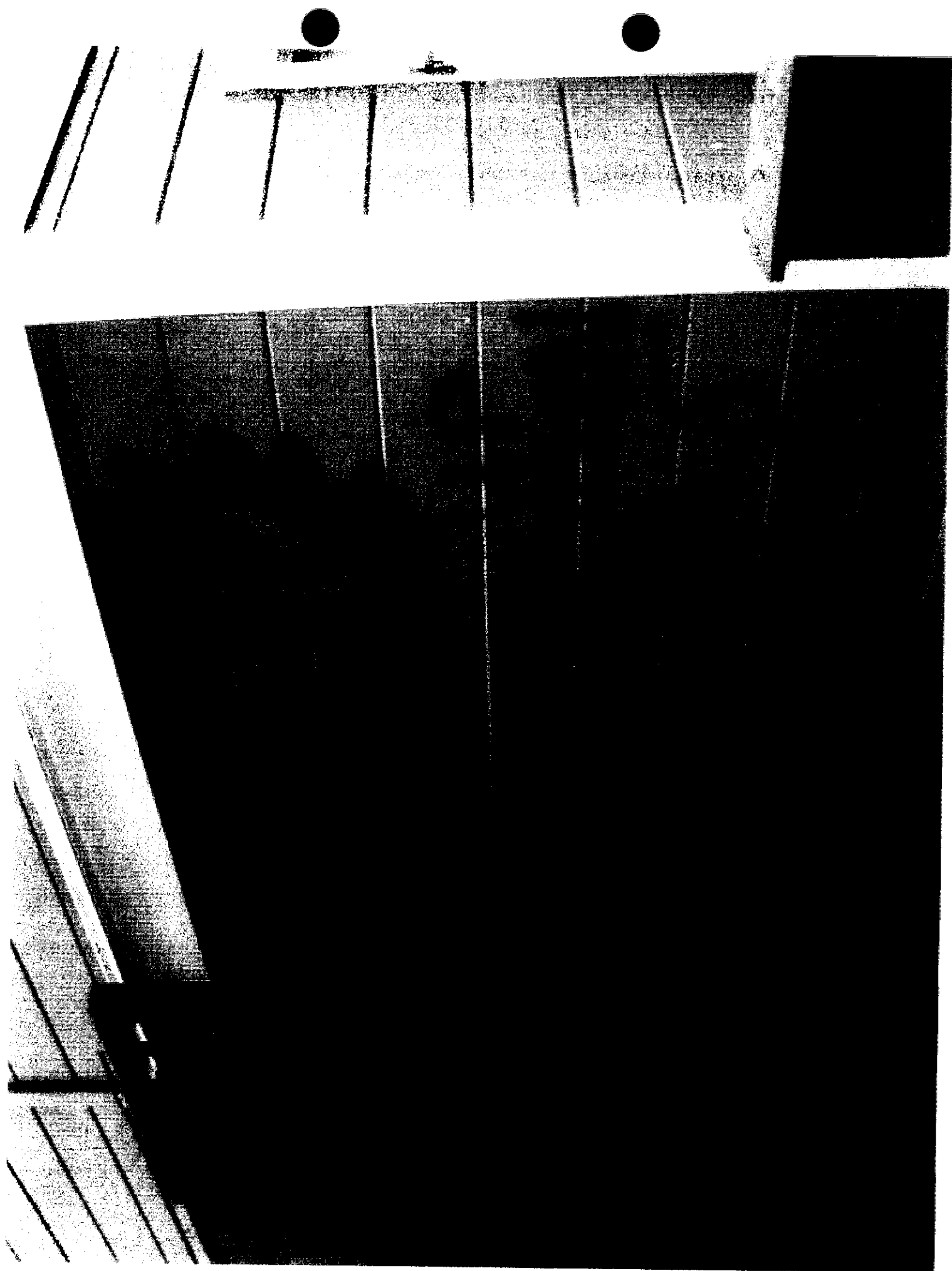
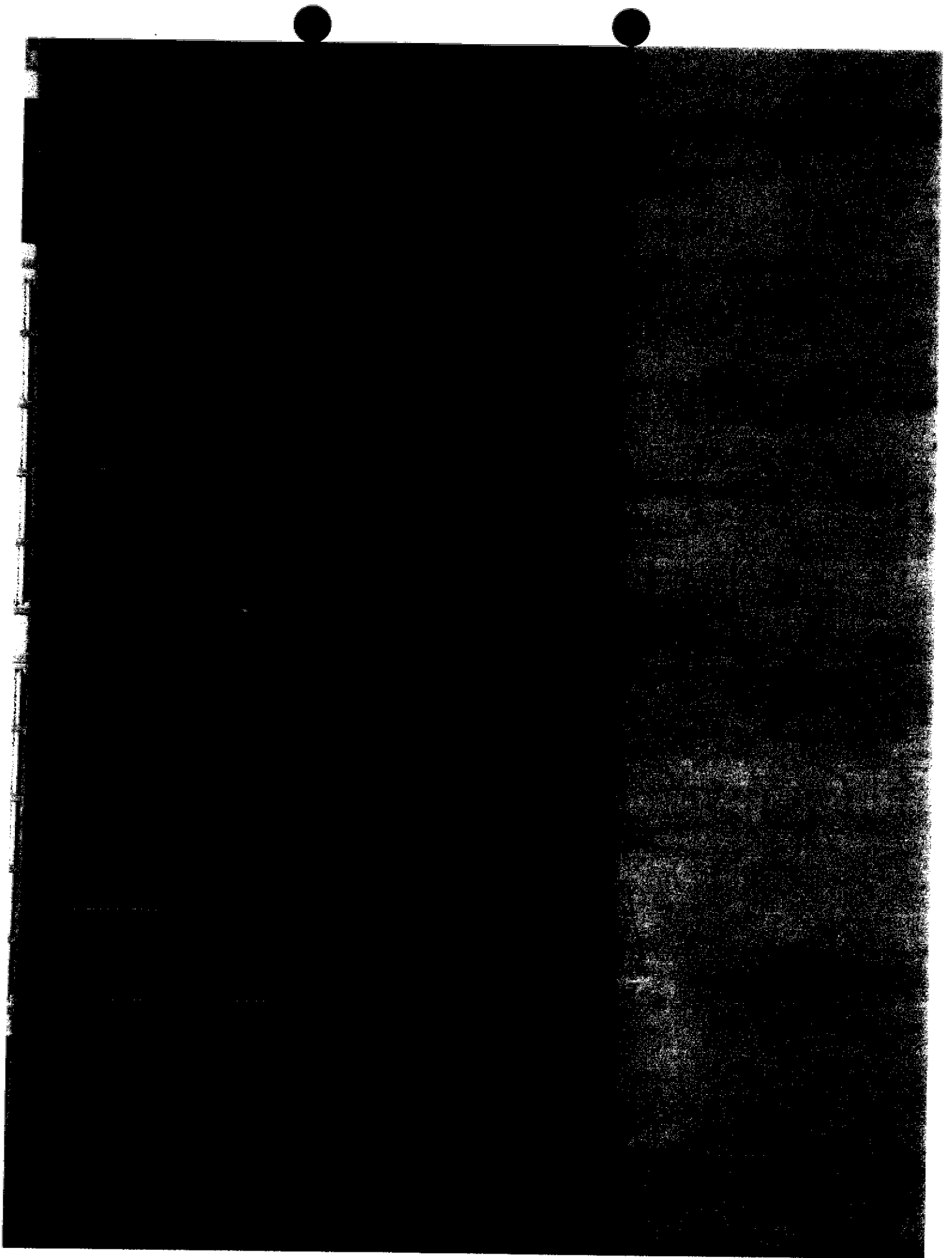


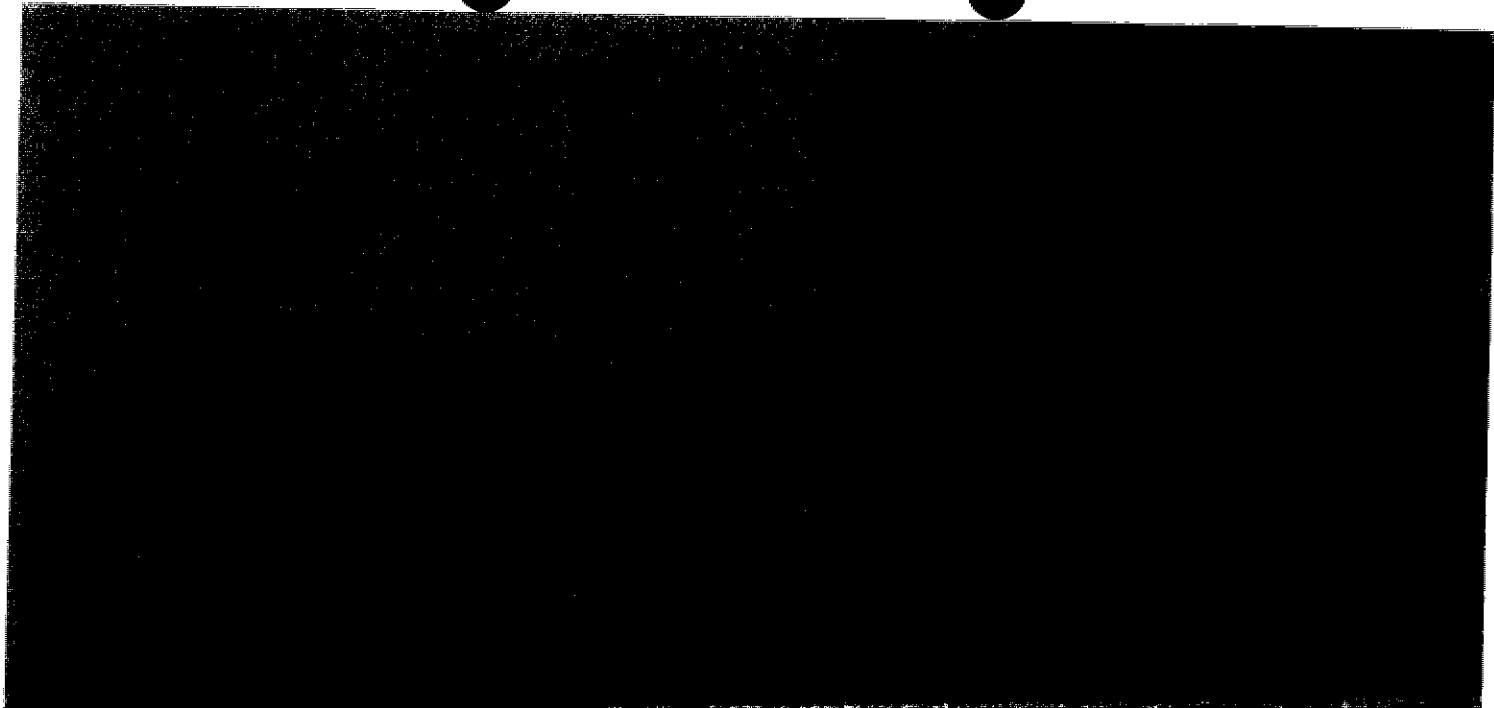


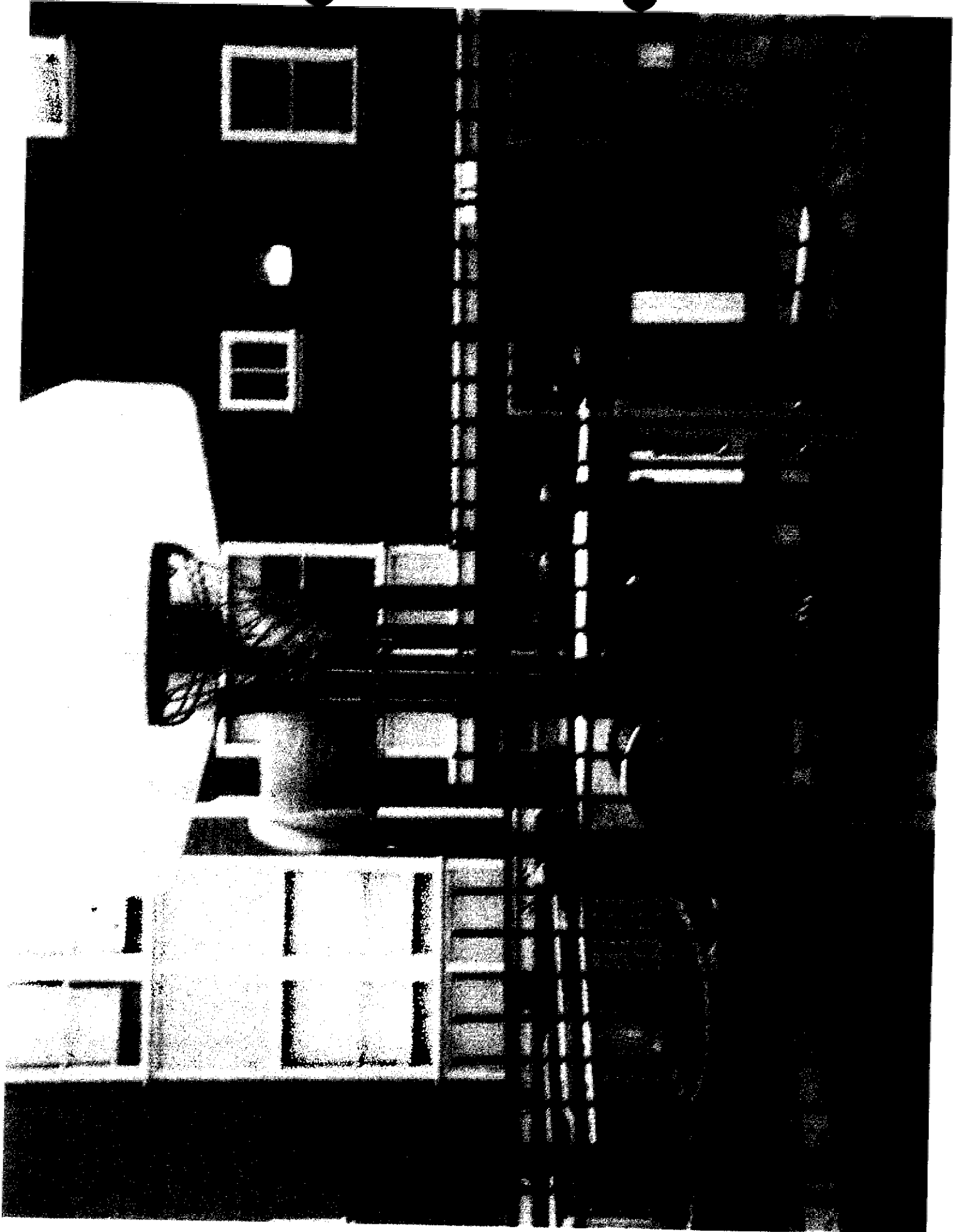
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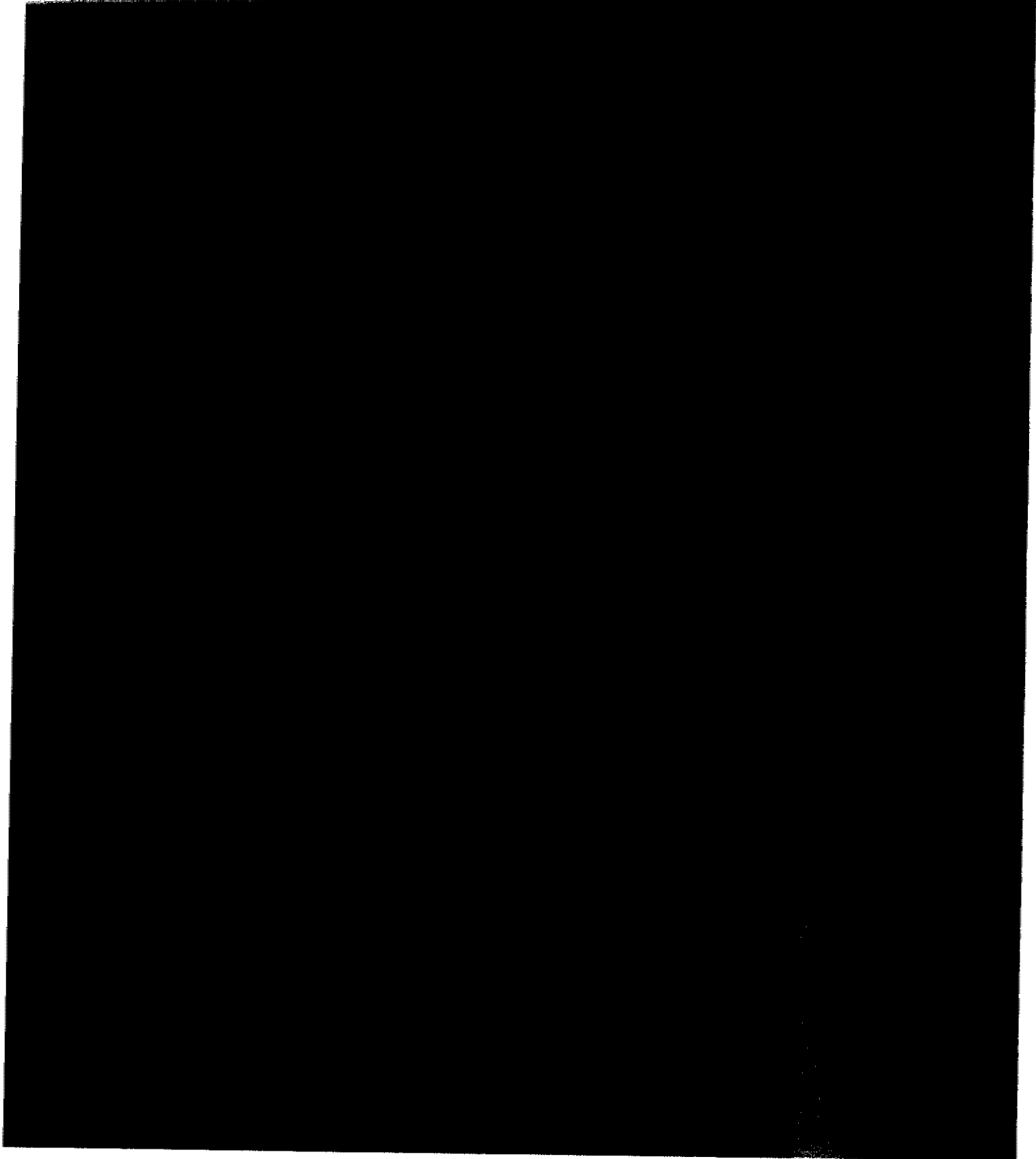
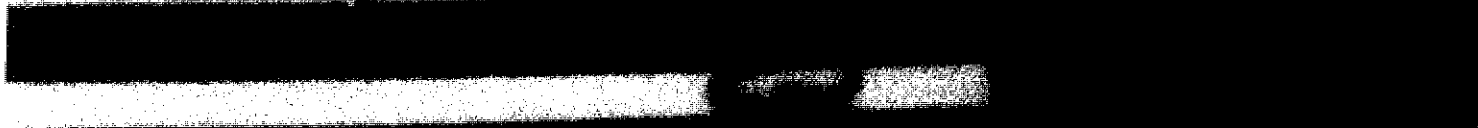
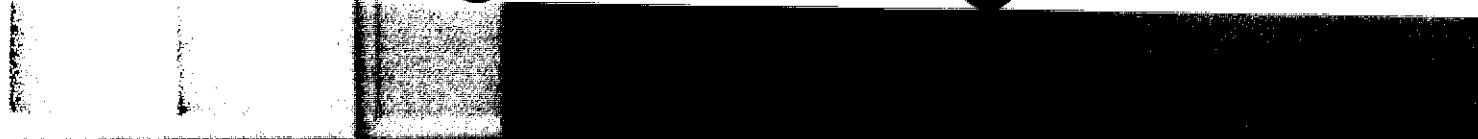


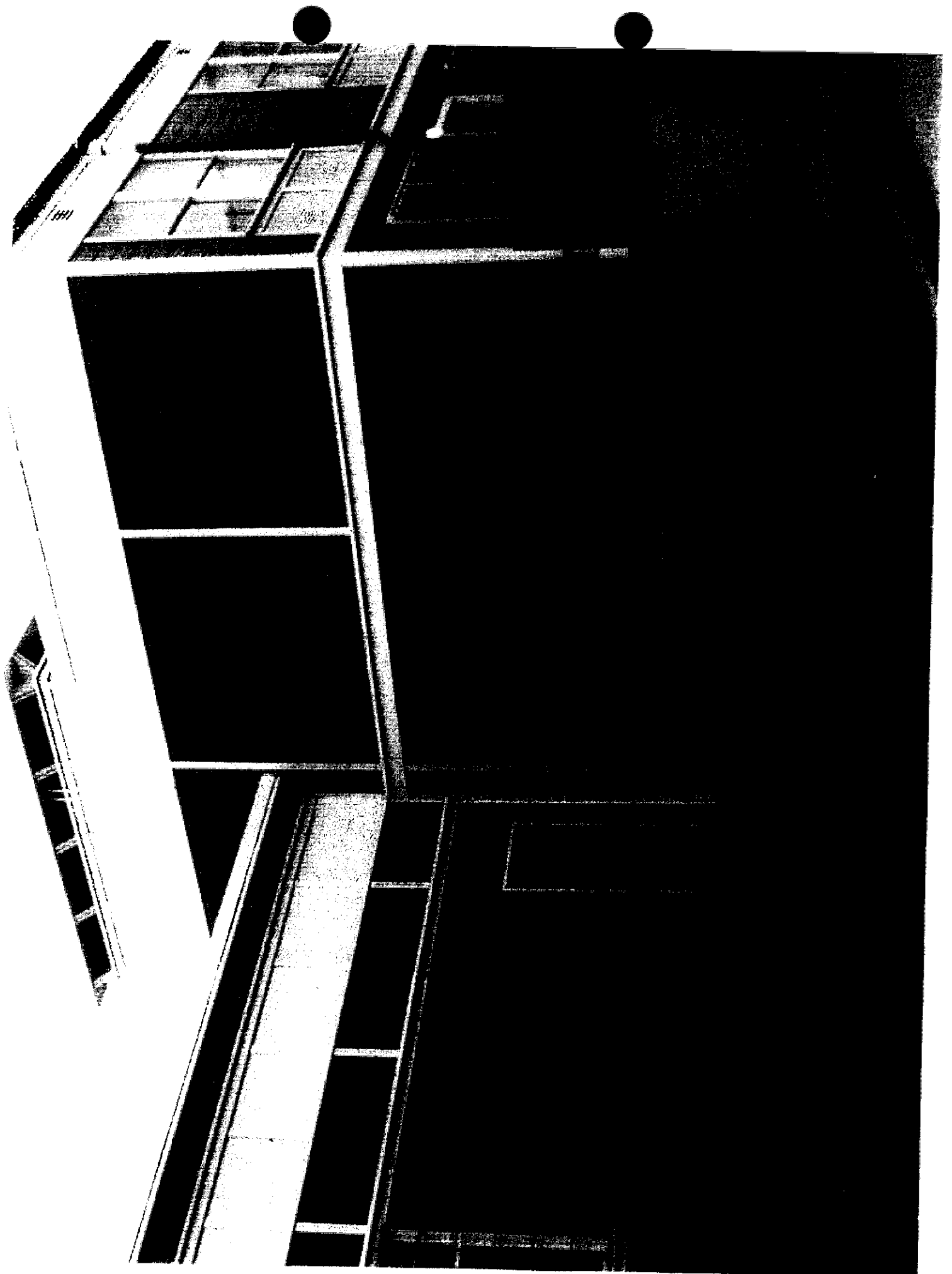




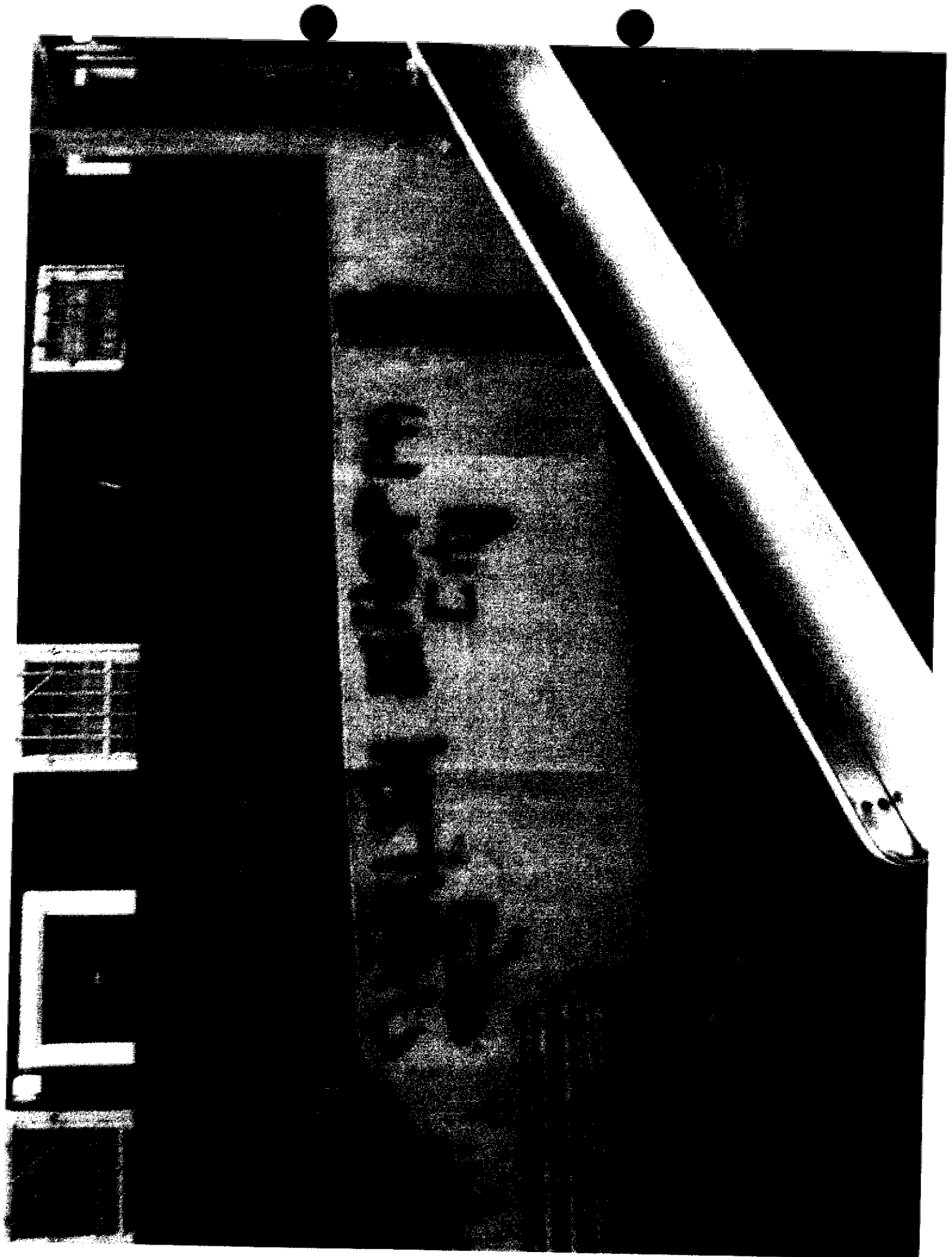






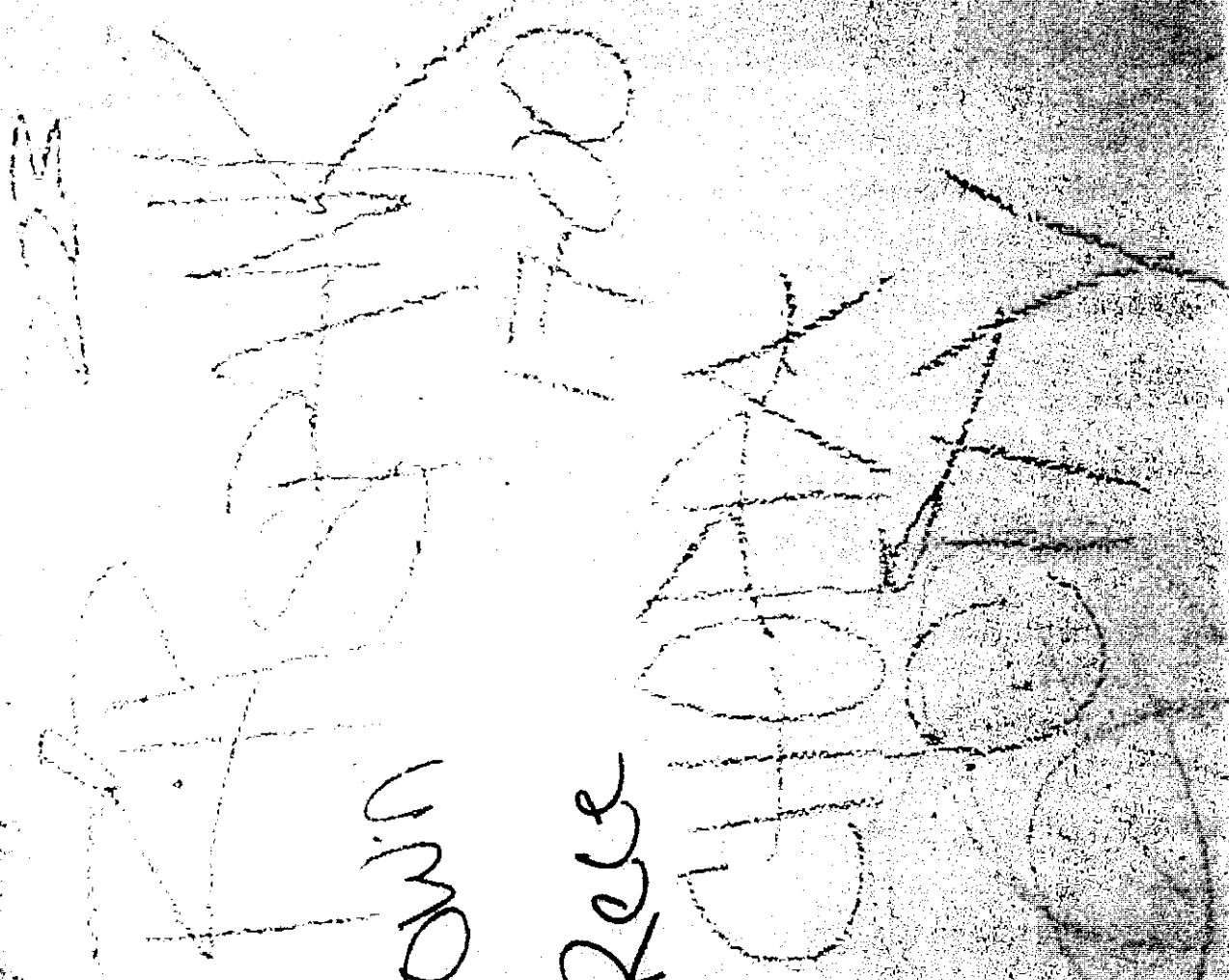






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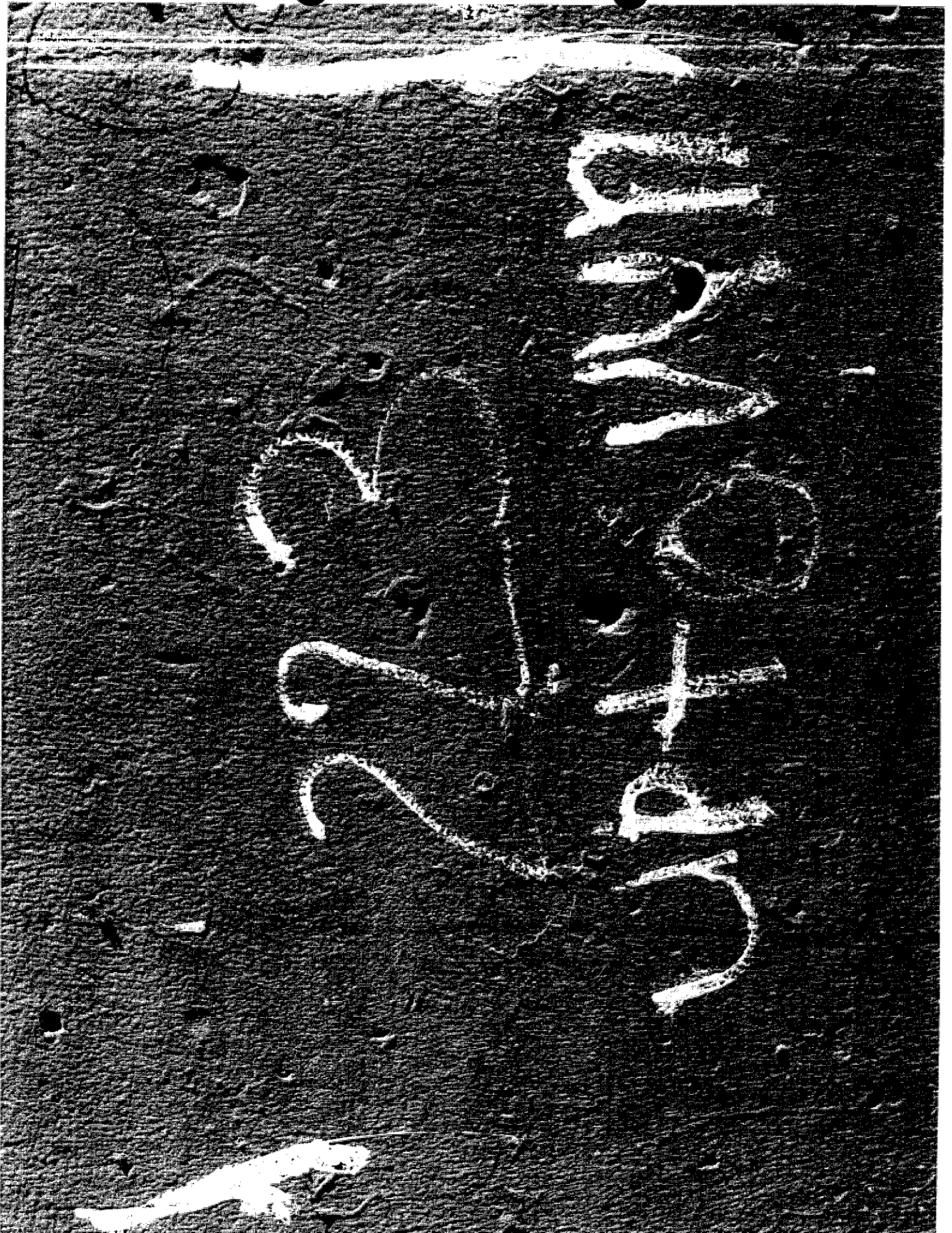
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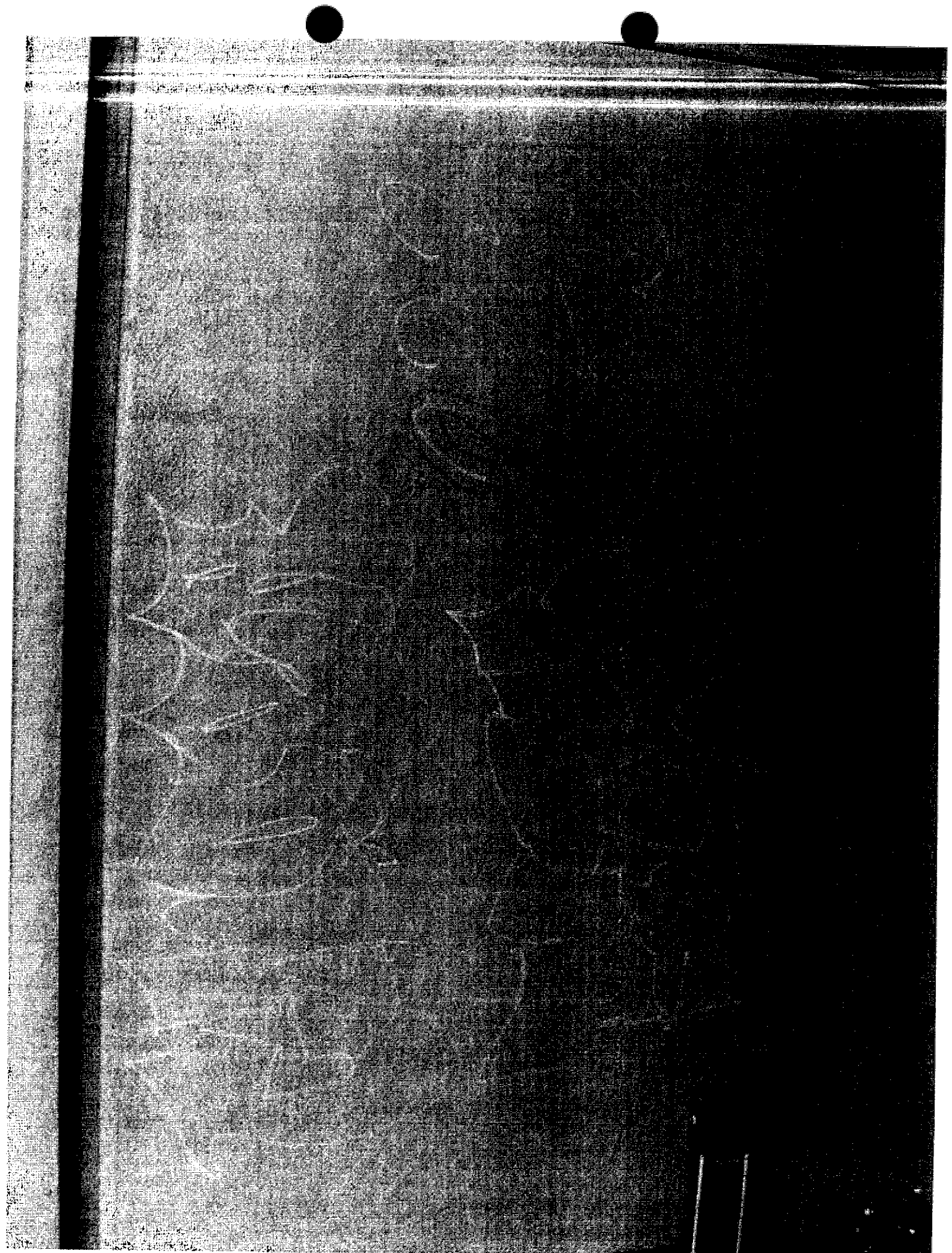


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EXHIBIT G

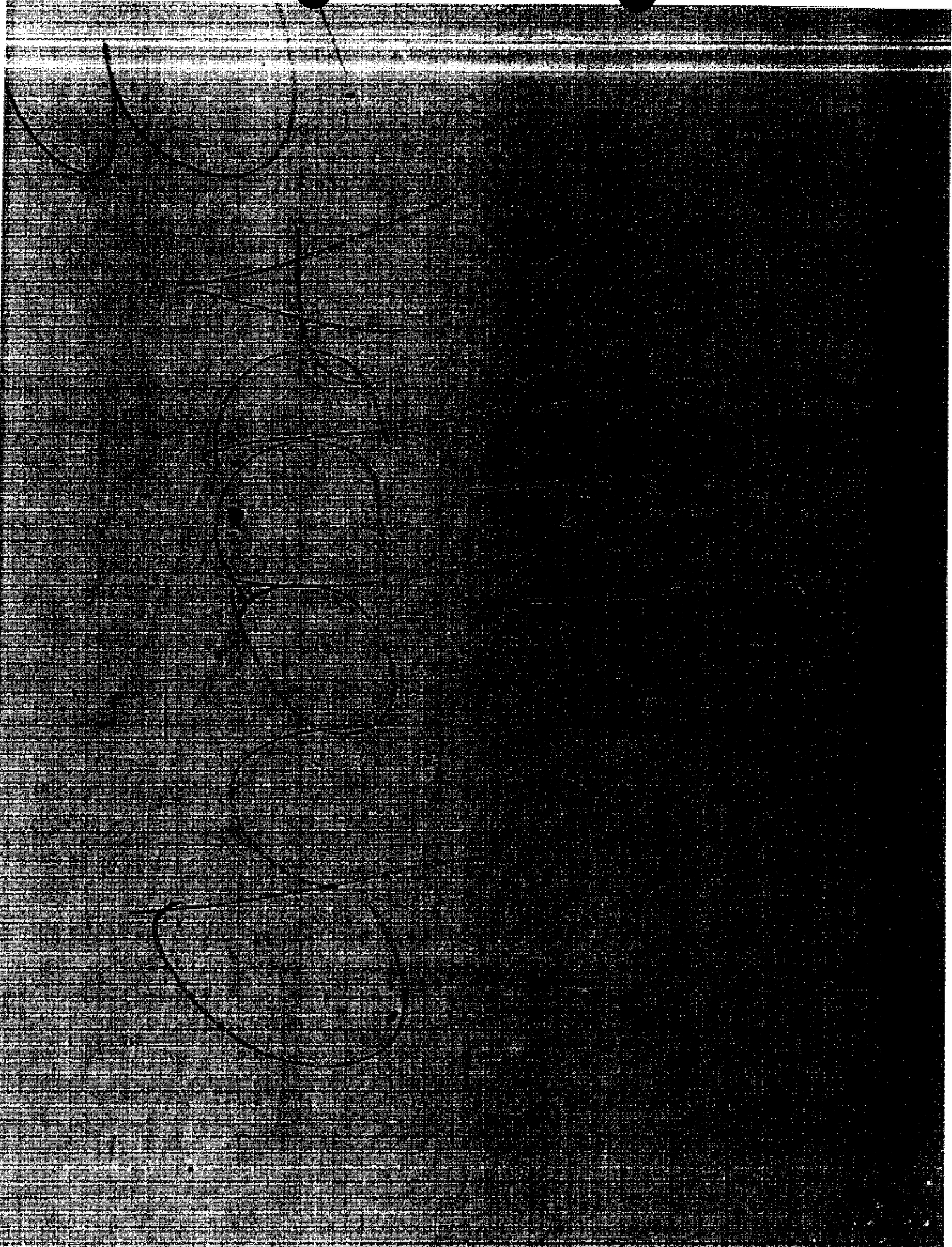






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EXHIBIT H

1 OF 3 \* ONLY TATTOO



JUAN PUEN SFA 557465  
# 223 7286 DOB: 03/12/80  
567 = KNAK OUT PASSE

EXHIBIT I



EXHIBIT J





EXHIBIT K

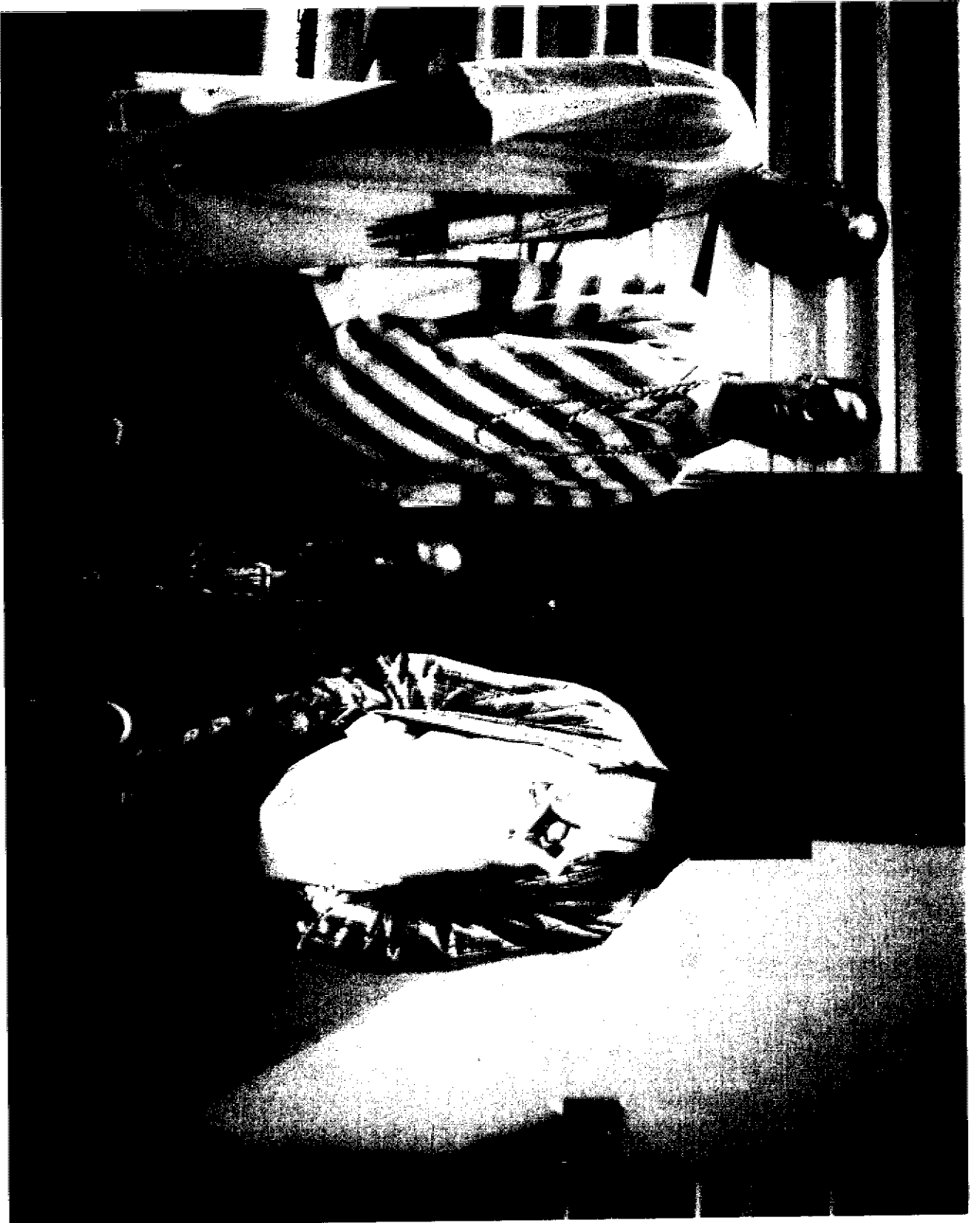


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EXHIBIT L



EXHIBIT M



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EXHIBIT N



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EXHIBIT O

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doin it blg on da day of da funeral

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EXHIBIT P



EXHIBIT Q



EXHIBIT R







EXHIBIT S

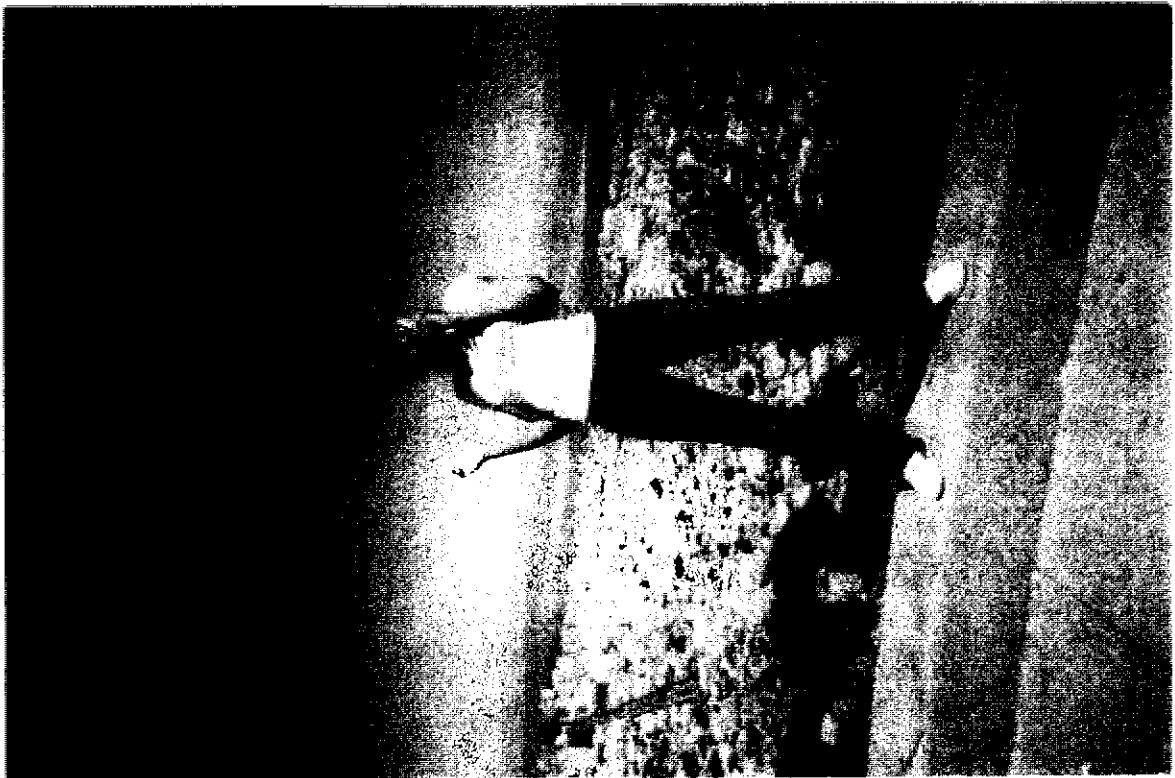
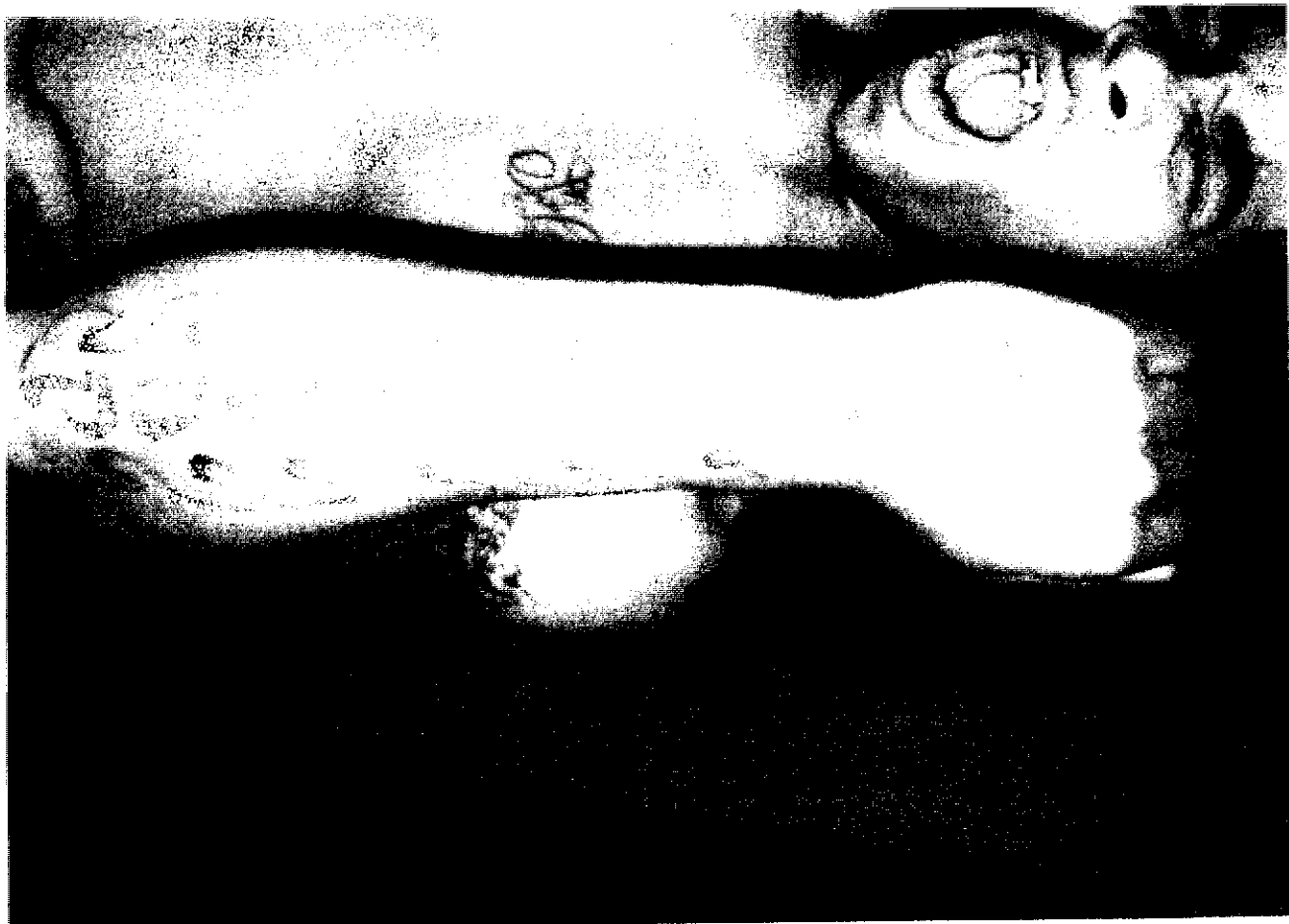


EXHIBIT T



EXHIBIT U



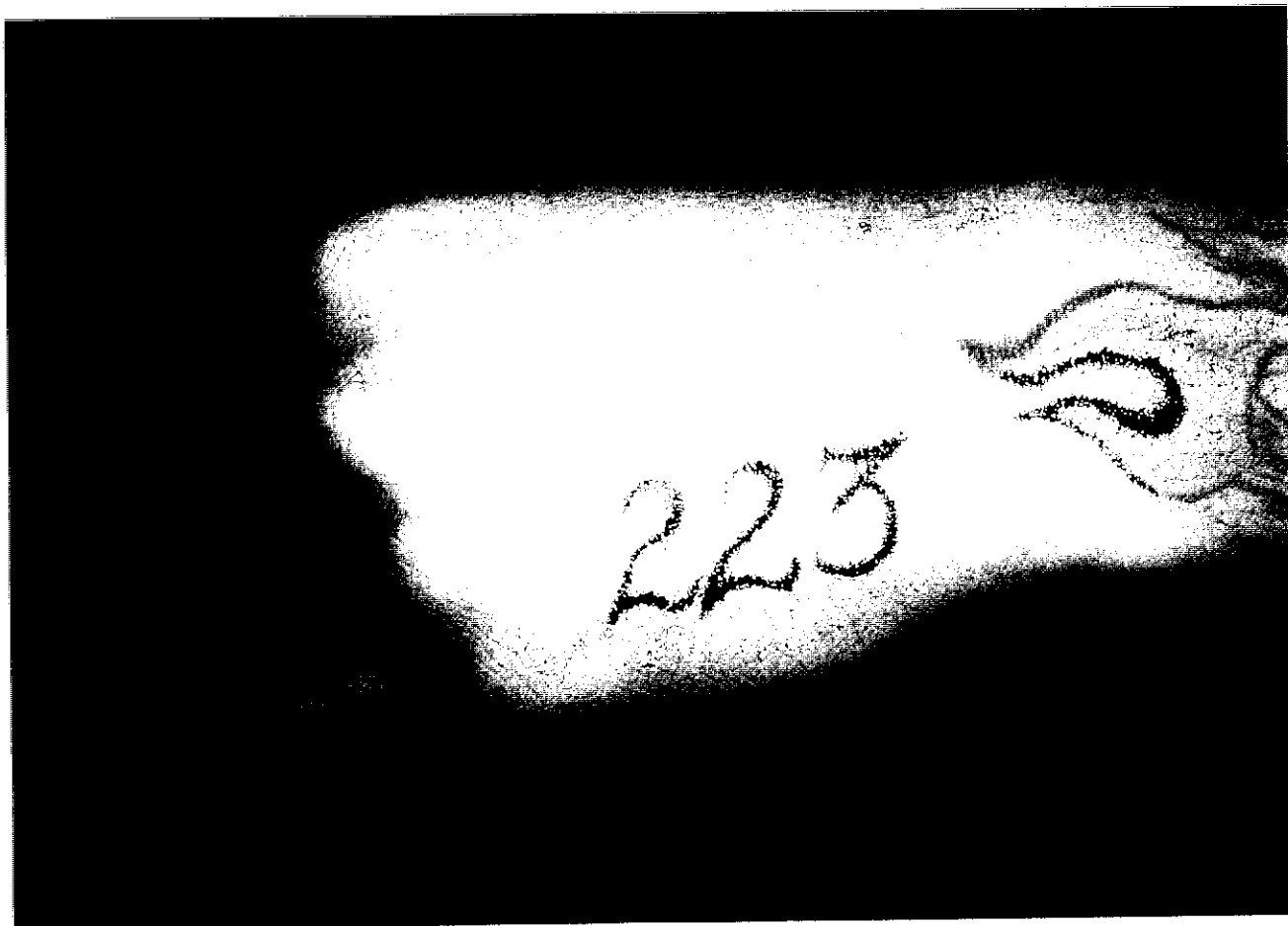
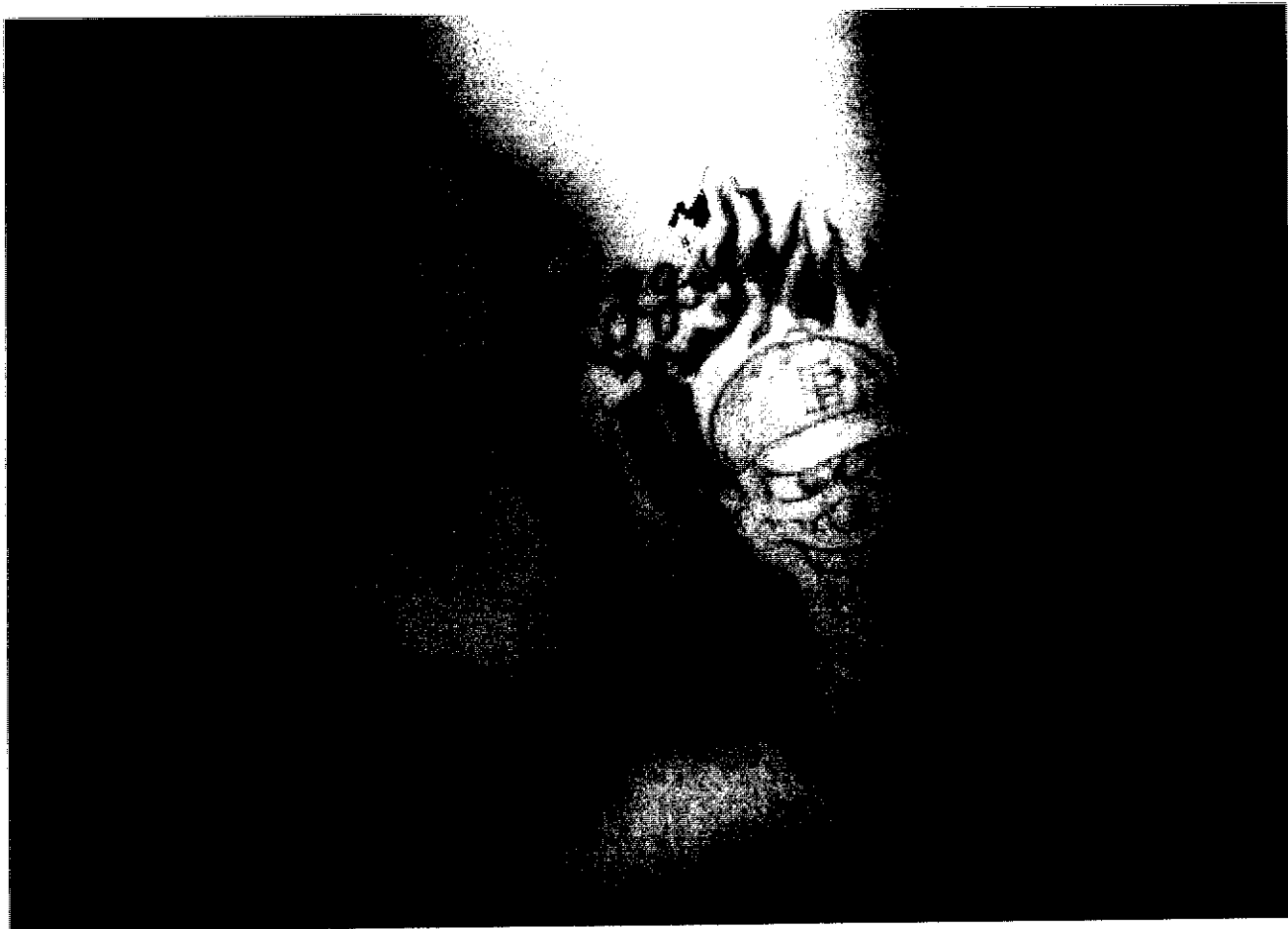




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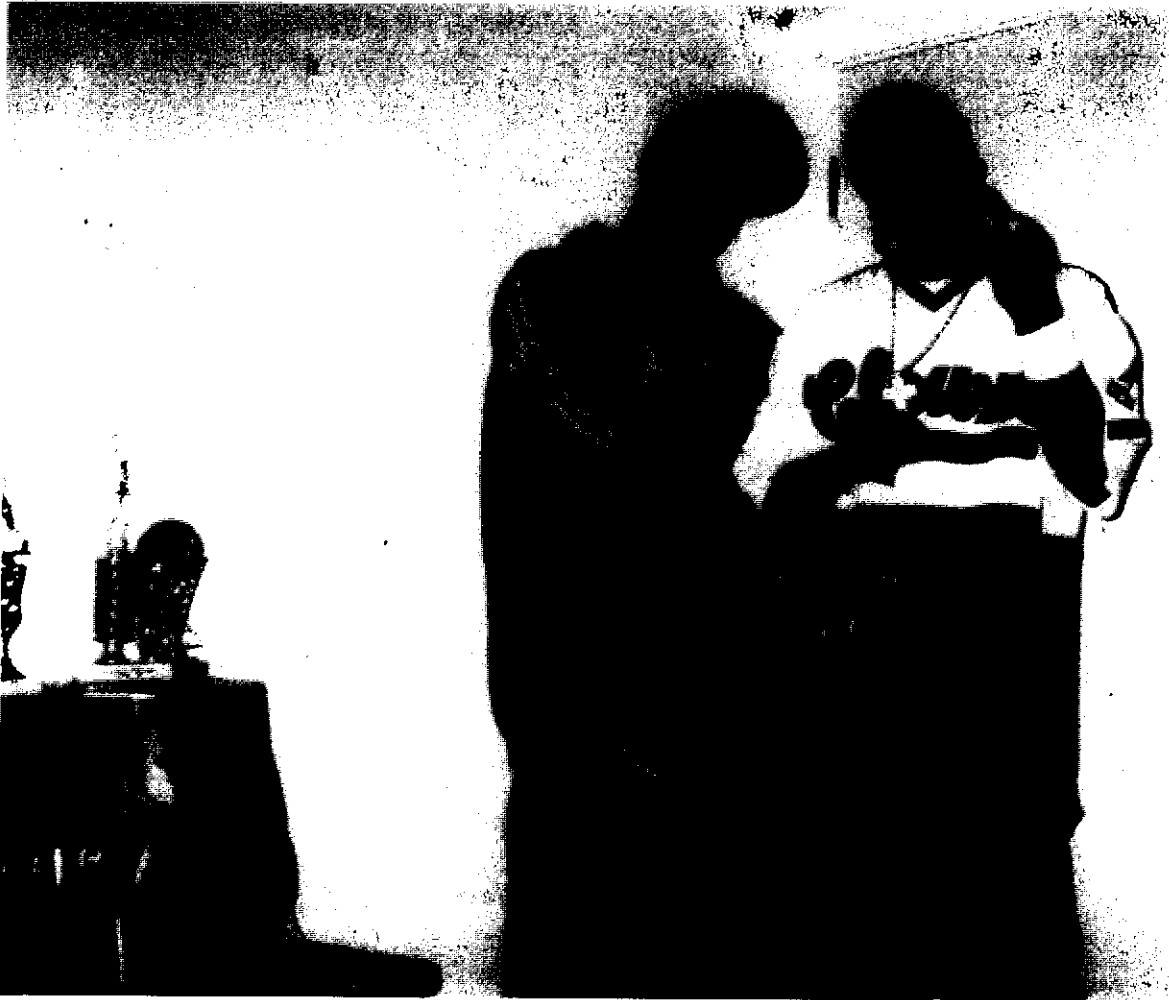


EXHIBIT W



EXHIBIT X

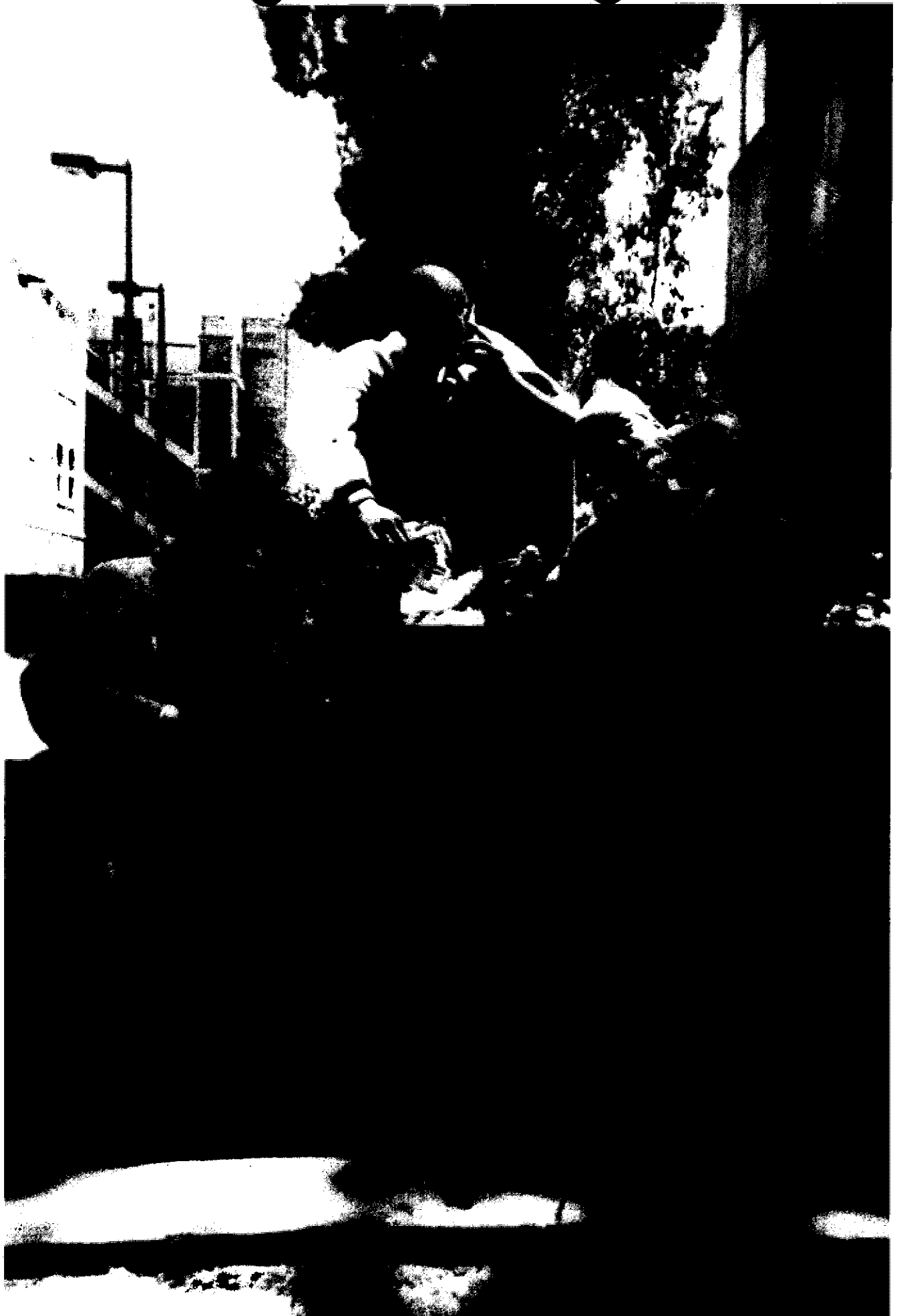


EXHIBIT Y





**EXHIBIT Z**

