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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  
14 J. HERRERA, City Attorney for the CITY  
AND COUNTY OF SAN FRANCISCO,

15 Plaintiff,

16 vs.

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

21 Defendants.

Case No. 464-493

EXPERT DECLARATION OF SAN  
FRANCISCO POLICE DEPARTMENT  
OFFICER REESE BURROWS 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: Dept. 301  
Date Action Filed: 6/21/07  
Trial Date: Not Yet Set

22  
23 **DECLARATION OF OFFICER REESE BURROWS**

24 I, Officer REESE BURROWS, declare as follows:

25 1. I have personal knowledge of the following facts, except those stated on information  
26 and belief. As to those facts, I believe them to be true. If called upon to testify, I could and would  
27 testify competently to the contents of this Declaration.  
28

1           2.     I am a police officer employed by the San Francisco Police Department ("SFPD"). I  
2 have been so employed since June 1999.

3 **Special Knowledge, Skill, Experience And Education Concerning Criminal Street Gangs And**  
4 **Gang Members**

5           3.     From April 2006 to the present time, I have been assigned to the SFPD Gang Task  
6 Force. My primary responsibilities are to investigate gang-related crimes, specifically focusing on  
7 African-American gangs in the Western Addition of the City and County of San Francisco,  
8 including Eddy Rock criminal street gang ("Eddy Rock"). As a result, I have obtained a significant  
9 amount of information about these gangs including the number and names of the members of each  
10 gang, each gang's method of operation and criminal activities, gang terminology and trends, and  
11 each gang's turf, rivalries, alliances, dress, tattoos, philosophy, loyalty, lifestyle, and graffiti.

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

17           5.     As a gang inspector, I come in contact with gang members, including members of  
18 Eddy Rock, through arrests, traffic stops, pedestrian stops, consensual encounters, preliminary  
19 investigations and follow-up investigations involving gang members as victims, witnesses, or  
20 suspects, and through parole and probation compliance investigations. I talk with gang members,  
21 including members of Eddy Rock, frequently, sometimes on a daily basis. I also obtain information  
22 on gangs by conducting custodial and non-custodial interviews with gang members and former gang  
23 members, including members of Eddy Rock. In addition, I frequently discuss gang-involved and  
24 gang-related events, trends and issues with other Gang Task Force officers, narcotics officers, and  
25 officers at SFPD stations, including Park Station and Northern Station. I also obtain information on  
26 gangs, including Eddy Rock, and gang members by reviewing police reports of gang-involved and  
27 gang-related incidents and incidents occurring in gang territories. In addition, I obtain information  
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1 on these gangs and gang members by interviewing victims and witnesses to gang related crimes and  
2 interviewing other members of the community. I also read and review literature on gangs, gang  
3 trends and issues and gang related crimes. In addition, I obtain information on gangs through  
4 conversations with other law enforcement agencies. I have been contacted by law enforcement in  
5 other jurisdictions for information about gangs in the Western Addition.

6 6. During my tenure at Gang Task Force, I have been assigned at least one hundred  
7 gang cases, including cases involving Eddy Rock. I have also assisted other gang investigators on  
8 hundreds of gang cases, including cases involving Eddy Rock.

9 7. I have also received training on criminal street gangs including standard training at  
10 the San Francisco Police Academy and advanced officer training through the San Francisco Police  
11 Department.

12 8. In addition, I train officers at the various San Francisco Police Department District  
13 Stations on the subject of Western Addition African-American criminal street gangs, including  
14 Eddy Rock. I update the officers on the Western Addition gangs, the active members of these gangs  
15 and the gang's practices. I also update officers at the San Francisco Police Department Northern  
16 Station on a weekly basis regarding gang activity, crime and trends within the Western Addition.

17 9. Before my assignment at Gang Task Force, the majority of my eight-year tenure as a  
18 police officer was spent assigned to Northern Station as a beat officer. As a beat officer, I patrolled  
19 the territories of the Western Addition African American gangs, including Eddy Rock, on a daily  
20 basis. I investigated gangs and gang-related crimes including those involving narcotics, burglaries,  
21 robberies, weapons charges, assaults, and shootings in the Western Addition of San Francisco.

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

1           11.     Throughout the last eight years with the San Francisco Police Department I have  
2 investigated hundreds of gang crimes, including crimes involving Eddy Rock, and made hundreds  
3 of arrests in cases involving gangs or gang related activity. These cases have included homicides,  
4 aggravated assaults, weapons charges, burglaries, robberies, narcotics, and other crimes committed  
5 in the Western Addition of San Francisco.

6           12.     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 Eddy Rock and other street gangs includes  
9 my own personal observations, discussions with my fellow law enforcement officers and gang  
10 experts, conversations with gang members, former gang members, rival gang members, victims of  
11 gang crimes, witnesses to gang crimes and members of the community, review of gang graffiti,  
12 writings, and review of gang member convictions, police reports, field contact reports, other law  
13 enforcement records, court records and the declarations of individual officers attached to the  
14 Request for Preliminary Injunction.

15 **San Francisco Western Addition Gangs**

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

24           14.     The gangs in the Western Addition fall into two groups. Those gangs who claim  
25 territory west of Fillmore Street are known as the "Uptown" gangs. The Uptown gangs include  
26 Knock Out Posse (also known as "KOP" or "KO"), and Chopper City (also known as "Choppa  
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1 City").<sup>1</sup> While each gang claims its particular territory, members and identifiers, those gangs within  
2 the Uptown alliance work together to further their gangs. Those gangs who claim territory east of  
3 Fillmore Street are "Downtown" gangs. Eddy Rock is a Downtown gang. The Uptown gangs and  
4 Eddy Rock are archrivals and mortal enemies of each other. I am aware of numerous incidents of  
5 assaults and homicides that the Uptown gangs and Eddy Rock have committed against each other.

### 6 **Eddy Rock Criminal Street Gang**

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

### 19 **History Of Eddy Rock Criminal Street Gang**

20 16. Eddy Rock criminal street gang started in late 2001 with the opening of the Plaza  
21 East Public Housing Complex in the Western Addition neighborhood of San Francisco. Plaza East  
22 Public Housing Complex is bordered to the north by Willow Street, to the east by Laguna Street, to  
23 the south by Turk Street, and to the west by Buchanan Street. Plaza East Public Housing Complex  
24 replaced the old Plaza East Towers. Before its demolition, Plaza East Towers was the territory of a  
25 criminal street gang that went by the name of Outta Control Posse ("OC") or Paypa Bound. When

26 \_\_\_\_\_  
27 <sup>1</sup> There are other gangs in the Uptown alliance. Because this Injunction applies only to KOP, Chopper City  
28 and Turkwood, however, I will only discuss these gangs in this Declaration.

1 the Plaza East Towers were demolished in 1999, OC members left the area. With the opening of  
2 Plaza East Public Housing Complex in 2001, however, several members of the OC criminal street  
3 gang returned to the area. With the opening of the new complex, the gang adopted a new name,  
4 Eddy Rock.

5 17. Following its inception in late 2001, graffiti bearing the name Eddy Rock began to  
6 appear in and around the Plaza East Public Housing Complex, communicating to the community  
7 and to rival gangs that this was Eddy Rock territory. Members of Eddy Rock also began a drug  
8 dealing enterprise in their territory.

9 18. The sale of narcotics and trade in stolen property are two of the primary purposes of  
10 Eddy Rock. After its formation, the gang established operating procedures for drug sales in their  
11 territory, such as lookout posts, collection enforcement, modes of transportation, safe houses within  
12 their territory and outdoor stash locations. The gang also created a hierarchy from shot callers  
13 (leaders who give orders to other members of the gang) to lookouts (persons assigned to watch for  
14 police, enemies and potential buyers.) Also during this time, members of the gang began to  
15 burglarize neighborhood homes and automobiles and sell the stolen property to bring additional  
16 income to the gang.

17 19. With the onset of its drug dealing enterprise, the members of the gang began to  
18 commit more violent crimes such as aggravated assaults, shootings and homicides. The purpose of  
19 these crimes was to protect the gang's territory against rival gang members, to build up the gang's  
20 reputation as a violent gang, and to protect their drug trade within their claimed territory.

#### 21 **How Eddy Rock Is Organized**

22 20. Eddy Rock is made up of African-American men and juveniles. At this time, I  
23 believe there to be over twenty documented adult members of Eddy Rock. Though juvenile  
24 members of this gang are not subject to this injunction, I believe there are over ten documented  
25 juvenile members of Eddy Rock at the present time.

26 21. Eddy Rock has no formal hierarchy like other more organized gangs, and has no  
27 official officers. Nevertheless, the gang does have one leader and other senior members who give  
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1 orders to other members of the gang. At the present time, the leader of Eddy Rock is Paris Moffett.  
2 Similarly, the gang has no business address or mailing address. All the gang members  
3 communicate through word of mouth or by telephone.

4 22. Eddy Rock's roster of members constantly evolves as new members join the gang  
5 and work their way up the ranks. Eddy Rock members will recruit individuals living in the gang's  
6 claimed territory or going to school in the territory. They will also recruit individuals who have  
7 family living in the territory.

8 23. Gang members increase their status within the gang through any act, usually  
9 criminal, that benefits the gang. An act benefits the gang, for example, if it helps to solidify the  
10 gang's turf and the gang's control of the drug trade, increases the gang's profile and reputation for  
11 violence among other gangs, or terrorizes the community. Such crimes include selling narcotics,  
12 tagging the territory with gang graffiti, robberies, burglaries, assaults, and homicides, especially  
13 those involving the murder of rival gang members. If a gang member kills someone, particularly, if  
14 he kills a rival gang member, he will greatly increase his status in the gang. Gang members also  
15 increase their status in the gang by serving time in jail or prison.

16 24. While gang activities are primarily criminal or otherwise unlawful, gang members  
17 also socialize with each other.

#### 18 **Identifying Eddy Rock Criminal Street Gang**

19 25. Members of Eddy Rock criminal street gang primarily identify themselves through  
20 the gang's name, territory, graffiti, hand signs and tattoos.

#### 21 **The Significance Of Eddy Rock's Name**

22 26. The gang's name is very important to the gang's identity. The name is what gang  
23 members "claim" and helps to separate Eddy Rock and its members from other gangs in the area.  
24 Due to its history, members of Eddy Rock also identify themselves by the names "OC" and "Paypa  
25 Bound". Members will also use the term "1200 block" to describe Eddy Rock. "1200 block" is the  
26 1200 block of Eddy Street, an area controlled by Eddy Rock. Members of Eddy Rock often write or  
27 otherwise mark their gang name on clothing and other personal belongings. Members of Eddy  
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1 Rock also include the gang's name in other writings and mark the gang's name in graffiti in their  
2 territory.

3 27. Attached as Exhibit A are photographs of Eddy Rock member Leslie Howard  
4 wearing a sweatshirt decorated with a memorial to murdered Eddy Rock member Jamal Smith and  
5 the following Eddy Rock terms: "Eddy Rock Bitch", "1200", "37", "72", and "Fuck Uptown".  
6 "1200" refers to the 1200 block of Eddy Street, which is in the heart of Eddy Rock territory, and is  
7 another name commonly used for Eddy Rock. "37" is the numerical equivalent for "ER" or "Eddy  
8 Rock" on the telephone pad. "72" is the numerical equivalent for "PB" of "Payba Bound" on the  
9 telephone pad. "Uptown" is the alliance of Western Addition gangs who claim territory west of  
10 Fillmore Street. Eddy Rock has a deadly rivalry with the Uptown alliance of gangs. This  
11 photograph was taken on February 8, 2007, in front of 626 Larch Way.

12 28. Attached as Exhibit B is a photograph of an individual wearing a t-shirt decorated  
13 with Eddy Rock writings and symbols. The t-shirt has the words "Eddy Rock" on the front. The t-  
14 shirt also has drawings of a diamond and the now-demolished OC towers. The "Rock" in Eddy  
15 Rock stands for a diamond, and members will flash a diamond shape with their hands to show they  
16 claim Eddy Rock. This photograph was taken on December 1, 2006 in the area of Eddy and  
17 Buchanan Streets.

### 18 **The Significance Of Eddy Rock's Territory**

19 29. The territory or "turf" claimed by Eddy Rock is the geographic area that the gang  
20 claims as its own. When a criminal street gang claims a territory, it means that the gang intends to  
21 exclusively occupy the area for its drug sales and other gang related activity.

22 30. Eddy Rock's claimed territory is bordered by Ellis Street to the north, Gough Street to  
23 the west, Turk Street to the south, and Webster Street to the west. In Eddy Rock's territory, gang  
24 members and their associates move freely in the area, congregate day and night, brandish weapons  
25 to intimidate citizens and rival gang members, display or "throw" gang signs, commit acts of graffiti  
26 to assert the gang's presence in the territory, routinely sell narcotics to their customers, and  
27 burglarize homes and automobiles. Eddy members do not fear being reported to the police because  
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1 the community lives in fear of them. The gang members routinely threaten and harass residents  
2 who call or cooperate with the police. By instigating this culture of intimidation, the gang members  
3 make the residents fearful of cooperating with the police. I am aware of numerous gang-related  
4 crimes in Eddy Rock's claimed territory where witnesses and victims of violent crime have refused  
5 to cooperate with police investigations out of fear of retaliation by the gang members.

6 31. Even when Eddy Rock gang members themselves are victims of a crime within their  
7 territory and elsewhere, they refuse to cooperate with police. The gang members prefer to go after  
8 the culprit themselves rather than work with the criminal justice system. Consequently, I have  
9 found that once an Eddy Rock member is assaulted or shot, a member of a rival gang is usually  
10 assaulted or shot shortly thereafter. I am aware of numerous incidents where Eddy Rock gang  
11 members were shot or assaulted. The majority of these cases, however, remain unsolved because  
12 the victim gang member refused to cooperate with police and went so far as to sign an Affidavit  
13 requesting that the police investigation into their case be terminated.

14 32. In addition to carrying weapons in their territory, Eddy Rock gang members also  
15 store firearms and other weapons in various places within the territory so that they have easy access  
16 to the weapons to commit crimes. I am aware of numerous incidents where Eddy Rock gang  
17 members were caught in their territory with weapons in their possession. I am also aware of  
18 numerous incidents where weapons were found by officers or members of the community hidden in  
19 areas accessible to the public.

20 33. Eddy Rock gang members also take over homes within their territories to use as a  
21 safe haven to commit their crimes. I am aware of incidents where gang members have taken over  
22 homes, both occupied and unoccupied. Members have used the homes to cook, package, sell and  
23 store drugs, to congregate after committing crimes, to hide from police and rival gang members and  
24 to store weapons.

25 34. Eddy Rock gang members feel safe in their territory. They know that they will find  
26 other Eddy Rock members and associates in their territory and that the area will generally be free of  
27 rival gang members. Eddy Rock members are also assured that other gang members will be nearby  
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1 so that should a rival gang member be seen in the their territory, the gang members will work  
2 together to deal with the rival member. Rival gang members, such as Knock Out Posse, Chopper  
3 City and other Uptown gangs, know that they cannot enter Eddy Rock territory without retribution  
4 for such an act. In fact, rival gang members who enter Eddy Rock territory will often be shot or  
5 otherwise assaulted.

#### 6 **Proposed Safety Zone for Eddy Rock Criminal Street Gang**

7 35. Eddy Rock claims as its territory or turf the geographic area within the Western  
8 Addition of San Francisco that is bordered by and includes Ellis Street to the north, Gough Street to  
9 the east, Turk Street to the south, and Webster Street to the west. The Plaza East Public Housing  
10 Complex is within this territory. A true and correct copy of a map showing the Eddy Rock Safety  
11 Zone is attached as Exhibit U. The Eddy Rock Safety Zone is depicted as the geographic area  
12 contained within the rectangle on the top half of the map. This entire geographic area is the  
13 proposed Eddy Rock Safety Zone for purposes of this Injunction.

#### 14 **The Significance of Eddy Rock's Graffiti**

15 36. Eddy Rock members publicly identify themselves as gang members and demarcate  
16 the gang's territory by committing graffiti vandalism throughout their territory.

17 37. Eddy Rock members use graffiti to literally mark their territory and demonstrate the  
18 gang's claim to it. The graffiti announces to the neighborhood that the gang is staking claim to the  
19 particular area and serves to intimidate members of the community. It announces to rival gangs that  
20 the area is controlled by Eddy Rock. The graffiti is a public nuisance in that it creates visual blight  
21 and diminishes property's values.

22 38. Examples of commonly seen graffiti in the Eddy Rock Safety Zone include the  
23 following: "Eddy Rock", "OC", "Paypa Bound", "ER", "PB", "1200", "37", "72", and "Downtown".  
24 "1200" refers to the 1200 block of Eddy Street, which is in the heart of Eddy Rock territory. Eddy  
25 Rock members will often identify themselves as "1200 Block". "37" is the numerical equivalent for  
26 "ER" on the telephone pad. "72" is the numerical equivalent for "PB" on the telephone pad.  
27 "Downtown" is term claimed by Western Addition gangs that claim territory east of Fillmore Street.  
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1           39.     Eddy Rock gang graffiti in the Safety Zone is also used as a means of  
2 communication. The gang graffiti serves as a newsletter for gang members. The graffiti will often  
3 indicate which rival gangs currently have conflicts with Eddy Rock and which gangs have formed  
4 an alliance with Eddy Rock. The graffiti will also often include memorials to dead gang members.  
5 Consequently, Eddy Rock graffiti is prevalent in the Eddy Rock Safety Zone. Attached as Exhibits  
6 C, D, E, F and G are true and correct copies of photographs of examples of Eddy Rock graffiti  
7 found within the Eddy Rock Safety Zone.

8           40.     The graffiti depicted in the photographs attached as Exhibit C was found on April 2,  
9 2004, in the area of Larch and Buchanan Streets. I personally saw the graffiti and requested that it  
10 be photographed. The graffiti on the sidewalk lists the members of Eddy Rock criminal street gang  
11 by rank. "P-Dog" is ranked as the leader. P-Dog is the street moniker for Eddy Rock member Paris  
12 Moffett. The outside curb of the sidewalk lists the names of the younger members under the section  
13 "LIL Nigga's". On the same sidewalk, there is graffiti with the word "RIP" followed by a list of the  
14 following names: "Sharod", "Keese", "Mike Pen" and "Seany Moe". "Sharod" is Eddy Rock  
15 member Sharod Fleming who was shot and killed on January 17, 2004. "Keese" is Marquis  
16 Moffett, Paris Moffett's brother. Marquis Moffett was murdered in May 2001. "Mike Pen" is Mike  
17 Penn. Mike Penn was murdered in April 2002. "Seany Moe" is Eddy Rock member Sean Williams  
18 who was shot and killed in July 2002.

19           41.     The photographs of the graffiti depicted in Exhibit D were taken on September 12,  
20 2006 inside a residence in the 600 block of Larch Way. It shows "1200", "PB", "Paypa Bound",  
21 "1200 Blk", and "Eddy Rock". The resident of the unit had previously called police on September  
22 2, 2006 after coming home and finding Eddy Rock members Anthony Hunter, Steve Johnson,  
23 Demetrius Smith and two juvenile Eddy Rock members inside her home. The resident had found  
24 drugs, and a gun inside her home. She reported the incident to police, and left the unit that day.  
25 When she returned on September 12, 2006, to collect some of her belongings, she found her unit  
26 ransacked and graffiti scrawled on her living room wall. By ransacking her unit and scrawling their  
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1 graffiti in the unit, members of Eddy Rock sent a message to the community that there would be  
2 consequences for individuals who called the police to report a crime committed by the gang.

3 42. The graffiti depicted in the photographs attached as Exhibit E were taken on October  
4 18, 2006. This graffiti was found in the area of Turk and Buchanan Streets and in the 600 block of  
5 Larch Way. The graffiti contains the following terms: "ER", "Eddy Rock 1200", "ER Life Hoe",  
6 "RIP Weezy, Scharod", "Eddy Rock", "RIP JON", "PB", "ER YNS", "Dre", "Young Eddy".  
7 "Weezy" is deceased Eddy Rock member Wayne Bernard who was killed in November 2005.  
8 "Scharod" is deceased Eddy Rock member Sharod Fleming who was killed in January 2004. "JON"  
9 is deceased Eddy Rock member John Brown who was killed in July 2006. This graffiti is an  
10 example of how Eddy Rock marks and claims its territory.

11 43. The graffiti depicted in the photographs attached as Exhibit F were taken in the  
12 summer of 2005. This graffiti was found in the area of Eddy and Buchanan Streets. They show the  
13 following terms: "ER", "PB", "Eddy Rock", "ER for Life", and "KO Niggs gonna die". "KO"  
14 stands for Knock Out Posse criminal street gang. In this message, Eddy Rock is asserting their  
15 deadly rivalry with Knock Out Posse. This is another example of how Eddy Rock marks its  
16 territory and communicates to the community who their rivals are.

17 44. The graffiti depicted in the photographs attached as Exhibit G were taken in late May  
18 2007. They show the following terms: "Eddy Rock 1200 block", "RIP Ni-Ne", "Fuck Uptown", and  
19 "ER". Ni-Ne is deceased Eddy Rock member Jamal Smith who was killed on January 27, 2007.  
20 "Fuck Uptown" is a message to the community that the Uptown alliance of gangs is Eddy Rock's  
21 rival.

### 22 **The Significance Of Eddy Rock's Hand Signs**

23 45. Members of Eddy Rock use several hand signs to indicate gang membership to other  
24 members of the gang, rival gang members and members of the community. When a gang member  
25 uses hand signs, it is often called "throwing gang signs" or "flashing gang signs."

26 46. Members of Eddy Rock flash the "rock" sign by forming the shape of a diamond  
27 with their hands. The "rock" in Eddy Rock stands for a diamond. Members of Eddy Rock also  
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1 flash the "E" sign by forming the shape of the letter "E" with their fingers. "E" stands for Eddy  
2 Rock. Members of Eddy Rock will also flash the "Downtown" sign by making a thumbs down  
3 gesture with their hands. This signifies that Eddy Rock is a Downtown gang.

4 47. Members of Eddy Rock frequently flash their hand signs to intimidate rival gangs  
5 and members of the community and to make the Eddy Rock's presence known in its territory. For  
6 instance, a member of Eddy Rock will drive by community members within their territory and flash  
7 the gang's hand sign to indicate his membership in Eddy Rock and the gang's presence in the  
8 territory. Eddy Rock members also flash the gang's hand signs to indicate pride in their gang as  
9 well. I have seen numerous photographs of Eddy Rock members, alone or with other gang  
10 members, flashing their hand sign. Frequently these pictures are taken within the gang's territory as  
11 a further indication that the gang is claiming the territory.

12 48. Attached as Exhibit H are two photographs of Eddy Rock gang members flashing  
13 gang signs. Eddy Rock member Hannibal Thompson is depicted in the first photograph flashing a  
14 "rock" sign. The other members in the photograph are seen flashing the "E" sign. In the second  
15 photograph, members of Eddy Rock are seen flashing both the "E" and the "rock" sign. These  
16 photographs were found during a search warrant of 1203 Webster Street on September 22, 2006.  
17 This is the residence of Eddy Rock member Christopher Blueford.

18 49. Attached as Exhibit I are two photographs of Eddy Rock gang members. In the  
19 photograph on the right, murdered Eddy Rock member Jamar Lake is flashing the "E" sign. Lake  
20 was shot and killed on May 24, 2007. The photograph on the left is of murdered Eddy Rock  
21 member John Brown. These photographs were found during a search warrant of Eddy Rock  
22 member Deandre Watson's residence on November 16, 2006.

23 50. Attached as Exhibit J is a photograph of deceased Eddy Rock member Wayne  
24 Bernard flashing a thumbs down sign to signify Eddy Rock's alliance with Downtown. This  
25 photograph was found stored in Eddy Rock member Maurice Bibbs' cell phone during Bibbs' arrest  
26 for burglary and conspiracy on December 26, 2006.

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1           **The Significance Of Eddy Rock's Tattoos**

2           51.     Eddy Rock gang members use tattoos to exhibit a dedication and commitment to the  
3 gang. Tattoos are a permanent marker on one's body and serve as a constant reminder or a display  
4 showing that one is aligned with or belongs to that gang. I have seen members of Eddy Rock tattoo  
5 the terms "Eddy Rock", "Money On Eddy", "OC", "PB", "Paypa Bound", "Bound Out", "37", "72",  
6 "1200 Block", and "Rock Star" on their bodies. In addition, members will also tattoo their  
7 individual gang moniker and memorials to dead gang members on their body. Rival gangs and  
8 community members are familiar with Eddy Rock's monikers and terms. An individual would  
9 never display Eddy Rock tattoos on his or her body unless he or she was a member of Eddy Rock.  
10 If an individual did display an Eddy Rock tattoo and was not a member of the gang, the gang would  
11 retaliate against that individual.

12           52.     Attached as Exhibit K are photographs of Eddy Rock tattoos on member Paris  
13 Moffett's body. These photographs were taken on April 6, 2004. Moffett has "Paypa" and "Bound"  
14 on his forearms, "Money On Eddy" across his chest, "Bound out" on his abdomen", "PB" on his left  
15 inner forearm, and "7" and "2" on his triceps. All of these terms advertise to the viewer that Moffett  
16 is part of Eddy Rock criminal street gang.

17           53.     Attached as Exhibit L are photographs of Eddy Rock tattoos on member Andre  
18 Bernard's body. These photographs were taken on February 20, 2004. Bernard has "1200" and  
19 "Block" on his inner forearms, "Eddy" and "Rock" on his outer forearms, and "Money On Eddy"  
20 across his chest. All of these terms advertise to the viewer that Bernard is part of Eddy Rock  
21 criminal street gang.

22           54.     Attached as Exhibit M are photographs of Eddy Rock tattoos on murdered Eddy  
23 Rock member Anthony Hunter. These photographs were taken on September 8, 2005. Hunter was  
24 gunned down on February 11, 2007. Hunter has "P" and "B" on his shoulders, "Money On Eddy"  
25 across his abdomen, "Rock Star" across his lower abdomen, and "3" and "7" on his outer forearms.  
26 All of these terms advertise to the viewer that Hunter is part of Eddy Rock criminal street gang.

27           ///

1 **Crimes And Other Nuisance Activities Committed By Members of Eddy Rock Within The**  
2 **Eddy Rock Safety Zone**

3 55. Eddy Rock's primary activities are drug dealing, burglaries, graffiti, possession of  
4 firearms, and the commission of violent crime. I have participated in hundreds of arrests and/or  
5 investigations involving Eddy Rock members or associates within the Eddy Rock Safety Zone who  
6 have committed the felonies enumerated in California Penal Code Section 186.22(e), including  
7 burglaries, drug sales, robberies, aggravated assaults (including shootings), and homicides. In  
8 addition, I have reviewed hundreds of police reports and investigations involving Eddy Rock  
9 members or associates in the Safety Zone who have committed the felonies enumerated in  
10 California Penal Code Section 186.22(e), including burglaries, drug sales, robberies, aggravated  
11 assaults (including shootings), and homicides. In addition, I have reviewed all of the individual  
12 officer declarations submitted in support of Plaintiffs' Application For An Order To Show Cause  
13 Re: Preliminary Injunction And Preliminary Injunction in this matter. These declarations document  
14 Eddy Rock's nuisance activity in the Eddy Rock Safety Zone.

15 **Drug Dealing Within The Eddy Rock Safety Zone**

16 56. When Eddy Rock gang members sell drugs within the Eddy Rock Safety Zone, this  
17 creates a public nuisance. The members conduct their illegal drug sales in public spaces which  
18 interferes with vehicle and pedestrian traffic, interferes with lawful activity by community members  
19 in the area, generates complaints to police, exhausts police resources, and diminishes the quality of  
20 life in the Eddy Rock Safety Zone. Eddy Rock's drug trade within the Eddy Rock Safety zone also  
21 leads to loitering, littering, noise, verbal altercations, physical altercations, and public use of illegal  
22 drugs as drug dealers and drug users converge on the area. The street level drug dealing also leads  
23 to the commission of other kinds of crimes, including robbery, burglary, assaults, shootings and  
24 homicides as drug dealers fight for their territory from other criminal street gangs and drug users  
25 struggle to find money to feed their addiction.

26 57. When members of Eddy Rock sell drugs on the street within the Eddy Rock Safety  
27 Zone, they often carry dangerous weapons, including firearms, in case they encounter a rival gang  
28 member or a threatening situation. With members carrying dangerous weapons, this increases the

1 likelihood that a violent act will be committed in the neighborhood, creating, contributing to, and  
2 exacerbating the public nuisance. The mere presence of dangerous weapons is a public nuisance, in  
3 that neighbors or merchants become rightfully intimidated and scared to live in, work in, and enjoy  
4 their own neighborhood.

5       **58. The following are several examples of the drug-related crimes committed by**  
6 **members of Eddy Rock criminal street gang within the Eddy Rock Safety Zone:**

- 7       • On June 11, 2003, officers arrested Eddy Rock member Jonathan Smith on the corner of  
8 Buchanan and Larch Streets for illegal possession of fireworks. When officers searched  
9 Smith, they found 10 rocks of crack cocaine, and \$102 in small bills inside his pants pocket.  
10 The officers arrested Smith for possession for sale of cocaine.
- 11       • On September 1, 2003, officers saw Eddy Rock member Robert Harvey duck behind a car in  
12 front of 1201 Eddy Street. When officers looked in the area behind the car, they found 53  
13 rocks of cocaine in a bag on the ground. Harvey admitted to officers that he was selling the  
14 cocaine.
- 15       • On May 21, 2004, officers saw Eddy Rock member Paris Moffett conduct two separate drug  
16 sales in front of 659 Larch Way. During each sale, Moffett entered a locked garbage area to  
17 retrieve the drugs. Officers arrested Moffett and found a key. Officers used the key to open  
18 the garbage area and found 248 rocks of crack cocaine inside.
- 19       • On October 2, 2005, officers found Eddy Rock members Dontaye Hubbard, Maurice Bibbs,  
20 Burnett Raven, Maurice Carter, and John Brown<sup>2</sup> loitering and drinking in front of 630  
21 Larch Way. Officers searched Brown and found six rocks of crack cocaine in his pocket.
- 22       • On February 28, 2006, Eddy Rock members took over a vacant unit of the Plaza East Public  
23 Housing Complex located at 1270 Eddy Street. Officers saw member Maurice Carter exit  
24 the unit with what appeared to be a gun in his waistband. When Carter saw the officers, he  
25 ran back inside. Two juvenile members of Eddy Rock then ran out of the back of the unit to  
26

27       <sup>2</sup> Brown is now deceased. He was gunned down in front of 600 Larch Way on July 22, 2006.



1 evade officers. Along the way, officers saw one of them throw cocaine on the ground.  
2 Inside the residence, officers found Eddy Rock member Robert Harvey and four other  
3 individuals. Officers found five baggies of marijuana and a scale inside.

- 4 • On November 1, 2006, officers saw Eddy Rock member Demetrius Smith and two juvenile  
5 members standing in the 600 block of Larch Way. On the same block, officers saw Eddy  
6 Rock member Hannibal Thompson standing behind a locked gate. It is common for drug  
7 dealers to sell drugs while behind a locked gate to avoid police. Thompson suddenly ran  
8 away from the officers. Officers chased him and eventually detained him. Officers then re-  
9 traced the path that Thompson had taken during the chase and found a plastic baggie  
10 containing 29 individually wrapped rocks of cocaine.
- 11 • On February 15, 2007, officers executing a search warrant at 1221 Eddy Street found Eddy  
12 Rock members Paris Moffett and Maurice Carter inside. They saw Moffett drop a baggie of  
13 cocaine and a baggie of MDMA. Inside the residence, officers also found 8 baggies of  
14 marijuana, a scale, empty baggies next to the scale, and a computer that had the following  
15 screen saver: "EDDY ROCKIN IT". Officer also found \$253.00 in small bills in Moffett's  
16 pocket, and \$201.00 in small bills in Carter's pocket.

17 59. **The following are examples of other crimes committed by members of Eddy**

18 **Rock Criminal Street Gang within the Eddy Rock Safety Zone:**

- 19 • On February 18, 2004, Eddy Rock members Demetrius Smith and Andre Bernard and other  
20 juvenile members stole three bicycles from a Toys R Us store located at 2675 Geary  
21 Boulevard. During the incident, Bernard assaulted a store manager who had tried to stop  
22 them. Later that same day, one of the bicycles was found in a van parked in front of 640  
23 Larch Way. Smith and Bernard were inside the van.
- 24 • On July 31, 2004, a confidential informant told officers that Eddy Rock member Anthony  
25 Hunter<sup>3</sup> hid guns in and around 1220 Eddy Street and 650 Larch Way. Officers searched the  
26 area and found a Mac 10 machine gun pistol in the backyard of 1220 Eddy Street and a

27 <sup>3</sup> Hunter is now deceased. He was gunned down in front of 1221 Eddy Street on February 11, 2007.

1 bullet in an electrical box in the trash area in the 600 block of Larch Way. During the  
2 search, Hunter was seen loitering in the area.

- 3 • On September 30, 2004, witnesses heard shots fired in the 600 block of Larch Way.  
4 Officers found six parked cars and the front door to 635 Larch Way damaged by bullets.  
5 Officers were unable to locate witnesses. A confidential informant told officers that Eddy  
6 Rock member Burnett Raven<sup>4</sup> had a shootout with Victor Guy. Victor Guy later gave a  
7 statement to officers stating that he was not involved in the shooting. Guy stated that he  
8 avoids this area of town because of the ongoing turf war between Eddy Rock and KOP.
- 9 • On June 4, 2005, officers saw Eddy Rock members Dontae Allen, Andre Bernard and  
10 Demetrius Smith in front of 1240 Eddy Street. Both Allen and Smith began to run when  
11 they saw the officers. As Bernard ran away, he threw a gun onto the ground. Officers  
12 retrieved the gun and arrested Bernard.
- 13 • On September 7, 2005, officers saw Anthony Hunter and Dontaye Hubbard riding bikes in  
14 front of 615 Larch Way. Officers conducted a parole search of Hunter and his car which  
15 was parked nearby. Officers found two handguns inside the trunk.
- 16 • On August 14, 2006, a shootout occurred between Eddy Rock members Jonathan Smith,  
17 Delorian Lee, Jamal Smith<sup>5</sup>, Hannibal Thompson and Dion Martin and unidentified  
18 individuals in the 1100 block of Turk Street. Following the shootout, the five members ran  
19 into 1152 Turk Street. The five then came back outside because Martin had been shot.  
20 Martin was taken to the hospital, and the others were arrested. Officers found crack cocaine  
21 on Lee. Officers also found two handguns and a shotgun in the backyard of 1170 Turk  
22 Street (the backyard abuts the backyard of 1152 Turk Street). Inside 1152 Turk Street,  
23 officers found two boxes of gunshot shells and ammunition. Gunshot residue samples were  
24 taken from all five men. With the exception of Jamal Smith, all of the men's samples tested  
25 positive for gunshot residue, confirming that each had fired a gun during the shootout.

26 <sup>4</sup> Raven is now deceased. He was gunned down in front of 618 Larch Way on October 7, 2006.

27 <sup>5</sup> Smith is now deceased. He was gunned down in front of 1118 Eddy Street on January 27, 2007.

- 1 • On September 2, 2006, the resident of a unit in the 600 block of Larch Way returned home  
2 after being away for two months. The resident found a large baggie of cocaine inside her  
3 mailbox. The resident then saw Eddy Rock member Anthony Hunter walk out of the unit  
4 and take the cocaine with him. Inside the unit, the resident saw Eddy Rock members Steve  
5 Johnson, Demetrius Smith and two juvenile members. The resident kicked everyone out.  
6 After they left, the resident found a handgun in her laundry closet. The resident called  
7 police to report the incident and then left the unit. When the resident returned ten days later  
8 to retrieve some property, the unit had been ransacked. The resident's couch was missing,  
9 and Eddy Rock gang graffiti was scrawled across her living room walls.
- 10 • On October 21, 2006, officers saw a juvenile member of Eddy Rock standing in the 600  
11 block of Larch Way with other individuals. When officers approached them, all but the  
12 juvenile left the area. The juvenile continued to stand by a trash collection bin. Officers  
13 searched the bin and found a loaded semi-automatic rifle.
- 14 • On November 25, 2006, a mother and daughter were shot at as they pulled out of the parking  
15 lot at 639 Willow Street. Their unit had been burglarized a few days before.
- 16 • On November 29, 2006, two separate news vans were burglarized in the 1200 block of Eddy  
17 Street. Ironically, the news crews were in the area to report on the increase in burglaries in  
18 the area. Items stolen from the burglaries were found during a search warrant of 1221 Eddy  
19 Street on December 6, 2006. Eddy Rock members Steve Johnson, Demetrius Smith,  
20 Raymond Davis were inside the residence along with other individuals during the service of  
21 the search warrant.
- 22 • On February 15, 2007, officers executed a search warrant at 1221 Eddy Street and arrested  
23 Eddy Rock members Paris Moffett and Maurice Carter for possession for sale of cocaine,  
24 MDMA, marijuana and for active participation in a criminal street gang. Officers then  
25 searched the backyard of 1221 Eddy Street and the backyards of the units next to it. In the  
26 backyard of 1195 Laguna Street, an officer found a loaded and cocked handgun along with  
27 three boxes of ammunition and a baggie containing additional ammunition under the  
28

1 staircase. In the backyard of 1181 Laguna Street, an officer found a loaded handgun along  
2 with three boxes of ammunition under the stairs. In the backyard of 1234 Eddy Street, an  
3 officer found a loaded handgun under the backyard deck. In the backyard of 1240 Eddy  
4 Street, an officer found a loaded handgun under the backyard deck.

- 5 • On April 20, 2007, members of Eddy Rock shot into the bedroom window of a unit in the  
6 1100 block of Turk Street. The occupant of the room, who was not present during the  
7 shooting, is pregnant with KOP gang member Dana Ball's baby. On April 21, 2007,  
8 members of Eddy Rock returned to the unit and were involved in a shoot out with the  
9 occupant's father and brother in law. On April 22, 2007, the brother in law was involved in  
10 another shoot out with Eddy Rock members in front of the same unit.
- 11 • On April 23, 2007, a unit in the 600 block of Larch Way was burglarized. The resident  
12 called police to report the incident. The resident then left the unit in fear. When the resident  
13 returned on April 27, 2007, the resident found that someone had scrawled the following on  
14 the plywood that was used to board up a window that had been smashed during the burglary:  
15 "U R dead white bitch cop caller." Attached as Exhibit N is a true and correct copy of a  
16 photo depicting the plywood.

### 17 **Crimes Related To Eddy Rock's Rivalry With Uptown Gangs**

18 60. As stated previously, Eddy Rock has a deadly rivalry with all the gangs within the  
19 Uptown alliance, including Knock Out Posse and Chopper City. Members of Eddy Rock will  
20 assault any rival member found in the Eddy Rock Safety Zone. Likewise, members of Eddy Rock  
21 who are seen in the territory claimed by members of the Uptown alliance will be assaulted.  
22 Conversely, if members of Eddy Rock seek to assault a rival gang member, they will travel to the  
23 rival member's territory because they know that they will find rival gang members in that area. As a  
24 result, the majority of rivalry-related shootings and homicides against Eddy Rock members have  
25 occurred within the Eddy Rock Safety Zone, and vice versa for KOP and Chopper City.

26 61. This rivalry between the Uptown gangs and Eddy Rock has created a public nuisance  
27 within the two proposed Safety Zones. Members of the community within the two proposed Safety  
28

1 Zone are frequently innocent victims of the violence created by the rivalry. I am aware of  
2 numerous incidents where cars, businesses and homes of community members in the two Safety  
3 Zones have been damaged by stray bullets or otherwise as a result of this rivalry violence. I am also  
4 aware of numerous incidents within the two proposed Safety Zones where innocent bystanders have  
5 been forced to seek cover or shelter from stray bullets as a result of the rivalry violence within the  
6 two proposed Safety Zones.

7 62. I have found that rivalry related crimes between Eddy Rock and the Uptown alliance  
8 often follow each other in rapid sequence. For instance, if a member of Eddy Rock is assaulted by  
9 Uptown gang members, then Eddy Rock gang members will quickly retaliate with an assault on an  
10 Uptown gang member. Since 2002, I am aware of numerous shootings and homicides that have  
11 occurred as a result of the deadly rivalry between Eddy Rock and the Uptown alliance.

12 63. **The following are examples of crimes related to the deadly rivalry between**  
13 **Eddy Rock and the Uptown alliance.**<sup>67</sup>:

- 14 • On April 27, 2002, a shootout occurred at Eddy and Fillmore Street between members of  
15 KOP and Eddy Rock. Knock Out Posse member Robert Chatman and Eddy Rock members  
16 Leslie Howard and Edward Leslie were injured during the shootout.
- 17 • In July 2002, Sean Williams, a documented member of Eddy Rock, was shot and killed in  
18 the Bayview neighborhood of San Francisco.
- 19 • On January 5, 2004, Ivory Collins, a documented member of Knock Out Posse, was shot and  
20 wounded in the 1600 block of Eddy Street. The suspects in the case are Eddy Rock gang  
21 members.

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

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

- 1 • On January 12, 2004, Demarea Corgile, a documented member of Knock Out Posse, was  
2 shot and wounded in the parking lot at 1625 Eddy Street. Corgile told officers that a black  
3 male wearing all dark clothing shot him but he did not know the suspect. Corgile was  
4 otherwise uncooperative with the officers.
- 5 • On January 17, 2004, Sharod Fleming, a documented member of Eddy Rock, was murdered  
6 in front of the YMCA, located at 220 Golden Gate Avenue.
- 7 • On July 2, 2004, Quelacy Hubbard, a documented member of Eddy Rock was shot and  
8 wounded in front of the Third World Market, located at Fillmore and Turk Streets. The  
9 suspects in the case are Knock Out Posse members.
- 10 • On August 21, 2004, Demorea Jacobs (also known as "Spank"), a documented member of  
11 Chopper City was murdered in front of 1234 Divisadero Street. The suspects in the case are  
12 Eddy Rock members.
- 13 • On September 3, 2004, Cedrick Rucker, a documented member of Eddy Rock, was  
14 murdered in front of 695 Larch Way.
- 15 • On September 8, 2004, Raheshi Horace, a documented member of Chopper City, was shot  
16 and wounded while walking on Eddy Street between Divisadero and Scott Streets.
- 17 • On September 24, 2004, Christopher Kelly, Demetrius Smith and Jason Thomas, all  
18 documented members of Eddy Rock, and associate Justin Hernandez were driving in a  
19 vehicle in the area of McAllister and Webster Streets when the vehicle was shot at by  
20 unknown suspects. Christopher Kelly was wounded in the assault.
- 21 • On October 31, 2004, Charlie Chatman, a documented member of Knock Out Posse, was  
22 shot inside the courtyard of the Martin Luther King housing complex. The suspects in the  
23 case are Eddy Rock members.
- 24 • On February 24, 2005, Gaylon Smith, a documented member of Eddy Rock, was shot and  
25 killed on Golden Gate Avenue at Lyon. The suspects in the case are Knock Out Posse  
26 members.
- 27
- 28

- 1 • On June 11, 2005, John Brown, a documented member of Eddy Rock and Jason Robinson, a  
2 documented member of the Thomas Paine gang, were shot and wounded near the  
3 intersection of Turk and Laguna Streets. Thomas Paine is a Downtown gang.
- 4 • On August 3, 2005 at 2:00 a.m., Fred Ayatch was murdered in front of 1867 Eddy. Ayatch's  
5 family was from the territory claimed by the Eddy Rock criminal street gang. By 8:00 a.m.  
6 the next day, San Francisco police officers observed fresh graffiti in the immediate area of  
7 the murder. The graffiti included, "Choppa City," "Uptown", "RIP Spank", "223", and  
8 "Fuck ER." "ER" refers to the Eddy Rock criminal street gang. Dennis Anderson, a known  
9 Chopper City gang member, is the suspect in Ayatch's murder.
- 10 • On November 17, 2005, Wayne Bernard, a documented member of Eddy Rock, was shot  
11 and killed on the corner of Eddy and Webster Streets. The suspect in the crime, Dwight  
12 Hart, is a documented member of Chopper City. Hart was booked and released for the  
13 murder.
- 14 • On November 17, 2005, Jason Thomas, a documented member of Eddy Rock, was shot and  
15 wounded in front of 4799 3<sup>rd</sup> Street. The suspects in the case are Chopper City gang  
16 members and Central Divisadero Players gang members. Central Divisadero Players (also  
17 known as "CDP") is an Uptown gang and is allied with Chopper City and Knock Out Posse.
- 18 • On November 22, 2005, Skylar Stewart, a documented member of Chopper City, and  
19 Antonio Gilton, a documented member of Central Divisadero Players, were shot while  
20 sitting in a vehicle in front of 1231 Silver Avenue. Stewart died from his injuries. The  
21 suspects in the case are Eddy Rock gang members.
- 22 • On March 6, 2006, Robert Mays, Marcus Mays and a juvenile member of Knock Out Posse  
23 were inside 1349 Steiner Street #2 with two other juveniles when an unknown suspect began  
24 to shoot into the residence. Officers recovered seven bullet casings outside the apartment  
25 and three bullet fragments inside the apartment.

- 1 • On April 1, 2006, Robert Chatman, a documented member of Knock Out Posse, was  
2 murdered in front of 285 Herman Street. The suspects in the case are Eddy Rock gang  
3 members.
- 4 • On June 3, 2006, Hannibal Thompson, a documented member of Eddy Rock, was shot and  
5 wounded on the corner of Bush and Fillmore Streets. The suspects in the case are Knock  
6 Out Posse members.
- 7 • On June 25, 2006, John Brown, a documented member of Eddy Rock, was shot and  
8 wounded in the 600 block of Larch Way.
- 9 • On July 22, 2006, John Brown was shot and killed in front of 600 Larch Way. The suspects  
10 in the case are 800 Block gang members. 800 Block is an Uptown gang and is allied with  
11 Chopper City and Knock Out Posse.
- 12 • On August 5, 2006, a juvenile documented member of Eddy Rock and another juvenile were  
13 shot while attending a funeral reception for deceased member John Brown in the 600 block  
14 of Larch Way. The suspects in the case are Knock Out Posse gang members.
- 15 • On August 14, 2006, Aubrey Abrakasa, a documented member of the Central Divisadero  
16 Players, was murdered on Grove Street at Lyon Street. The suspects in the case are Eddy  
17 Rock gang members.
- 18 • On October 1, 2006, Paul Tanner, a documented member of Eddy Rock, was murdered in  
19 front of 1619 Polk Street.
- 20 • On October 7, 2006, documented Eddy Rock members Burnett Raven and Steven Johnson  
21 were shot in front of 618 Larch Way. Raven died, and Johnson survived.
- 22 • On November 24, 2006, Dwight Hart, a documented member of Chopper City, was shot and  
23 wounded near 1600 Turk Street.
- 24 • On January 27, 2007, Jamal Smith, a documented member of Eddy Rock, was shot and  
25 killed in front of 1118 Eddy Street. The suspects in the case are Chopper City gang  
26 members.



- 1 • On February 3, 2007, Leon Parker, a documented member of Central Divisadero Players,  
2 and Floyd Barrow, a documented member of Knock Out Posse, were shot in front of 2855  
3 Geary Street. The suspects in the case are Eddy Rock members.
- 4 • On February 11, 2007, Anthony Hunter, a documented member of Eddy Rock, was shot and  
5 killed in front of 1221 Eddy Street. The suspects in the case are documented members of  
6 Central Divisadero Players and Chopper City.
- 7 • On February 11, 2007, a thirteen year old girl was shot while walking in the 600 block of  
8 Grove Street with two documented members of the 800 Block gang. Deshawn Campbell  
9 and two juveniles, all documented members of Eddy Rock, were arrested for the crime.
- 10 • On February 12, 2007, Tony McDougal, a documented member of the Central Divisadero  
11 Players, was murdered in his car at Hayes and Baker Streets. The suspects in the case are  
12 Eddy Rock gang members.
- 13 • On February 12, 2007, Eric Sailor was shot at the corner of Haight and Fillmore Streets.  
14 Sailors is related to Leon Parker, a documented member of the Central Divisadero Players.
- 15 • On April 16, 2007, Leslie Howard, a documented member of Eddy Rock, was shot and  
16 wounded near 146 Westpoint Road.
- 17 • On April 20 2007, Deon Anderson, a documented member of Chopper City, was shot at  
18 Divisadero and Golden Gate Streets. The suspects in the case are Eddy Rock gang  
19 members.
- 20 • On May 18, 2007, Dontaye Hubbard and Carnell Taylor, Jr., both documented members of  
21 Eddy Rock, were shot in the area of McAllister and Buchanan Streets. It is suspected that  
22 both Taylor and Hubbard had handguns and were trying to attack 800 Block members.  
23 Three guns were recovered at the scene. The suspects in the shooting of Taylor and  
24 Hubbard are 800 Block members.

25 ///

26 ///

27 ///

- 1 • On May 19, 2007, Antoine Mackey, a documented member of the 800 Block gang, was shot  
2 while standing on the 800 block of Buchanan Street. The suspects in the case are Eddy  
3 Rock gang members.
- 4 • On May 22, 2007, Deon Anderson, a documented member of Chopper City, was shot and  
5 wounded while at Pearl Market, located at 1201 Divisadero. The suspects in the case are  
6 Eddy Rock gang members.
- 7 • On May 24, 2007, Jamar Lake, a documented member of Eddy Rock, was shot and killed at  
8 the corner of Eddy and Laguna Streets.
- 9 • On June 12, 2007, Larue Shaw, a documented member of Eddy Rock, was shot at Eddy and  
10 Buchanan Streets.
- 11 • On June 13, 2007, three juvenile associates of 800 Block and a bystander were shot in the  
12 1100 block of McAllister Street. The suspects in the case are Eddy Rock gang members.
- 13 • On June 14, 2007, three juvenile associates of 800 Block were shot on Friendship Court  
14 between McAllister and Fulton Streets. The suspects in the case are Eddy Rock gang  
15 members.

#### 16 **Eddy Rock Members' Criminal Convictions**

17 64. To qualify as a criminal street gang under California Penal Code section 186.22, a  
18 gang, through its members, must commit, attempt to commit, conspire to commit, or be convicted  
19 of two or more "predicate crimes". In the prededing paragraphs, I have listed numerous predicate  
20 crimes that members of Eddy Rock have committed, attempted to commit or conspired to commit.  
21 Many of these incidents resulted in criminal convictions. The following are examples of the felony  
22 convictions suffered by members of Eddy Rock.<sup>8</sup>

- 23 • On February 6, 2002, Eddy Rock member Demetrius Smith was convicted in San Francisco  
24 Superior Court of one count of Health and Safety Code section 11359 (possession for sale of  
25 marijuana), a felony, Case No. 2024826.

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27 <sup>8</sup> This list is not exhaustive and does not include all of the criminal convictions of Eddy Rock members.

- 1 • On April 16, 2002, Eddy Rock member Paris Moffett was convicted in San Francisco  
2 Superior Court of one count of Penal Code section 245(a)(1) (assault with a deadly weapon  
3 or with force likely to cause great bodily injury), a felony, Case No. 1981911.
- 4 • On February 11, 2003, Eddy Rock member Robert Harvey was convicted in San Francisco  
5 Superior Court of one count of Health and Safety Code section 11350 (possession of  
6 cocaine), a felony, Case No. 2085365.
- 7 • On March 5, 2003, Eddy Rock member Dontae Allen was convicted in United States  
8 District Court of one count of felon in possession of a firearm, U.S. District Court Case No.  
9 3:02 CR00230 WHA.
- 10 • On August 1, 2003, Eddy Rock member Kethan Hubbard was convicted in San Francisco  
11 Superior court of one count of Penal Code section 459 (burglary), a felony, Case No.  
12 2111166.
- 13 • On August 19, 2003, Eddy Rock member Dontaye Hubbard was convicted in San Francisco  
14 Superior Court of one count of Health and Safety Code section 11351.5 (possession for sale  
15 of cocaine), a felony, Case No. 2118725.
- 16 • On September 29, 2003, Eddy Rock member Lovell Bronson-Davis was convicted in San  
17 Francisco Superior Court of one count of Penal Code section 459 (burglary), a felony, Case  
18 No. 2122643.
- 19 • On December 15, 2004, Eddy Rock member Andre Bernard was convicted in San Francisco  
20 Superior Court of one count of Health and Safety Code section 11351.5 (possession for sale  
21 of cocaine), a felony, Case No. 2072816.
- 22 • On May 24, 2005, Eddy Rock member Jonathan Brown was convicted in San Mateo County  
23 Superior Court of one count of Penal Code section 212.5(a) (first degree burglary), a felony,  
24 Case No. SC58522A.
- 25 • On July 21, 2005, Eddy Rock member Robert Harvey was convicted in San Francisco  
26 Superior Court of one count of Health and Safety Code section 11351 (possession for sale of  
27 cocaine), a felony, Case No. 2170672.
- 28

- 1 • On October 11, 2005, Eddy Rock member Dontae Allen was convicted in United States  
2 District Court of one count of felon in possession of a firearm, U.S. District Court Case No.  
3 3:05 CR0363 WHA.
- 4 • On February 27, 2006, Eddy Rock member Jonathan Brown was convicted in San Francisco  
5 Superior Court of one count of Health and Safety Code section 11351.5 (possession for sale  
6 of cocaine), a felony, Case No. 2194029.
- 7 • On June 15, 2006, Eddy Rock member Delshawnte Smith was convicted in San Francisco  
8 Superior Court of one count of Penal Code section 12021(a) (felon in possession of a  
9 firearm), a felony, Case No. 2256979.
- 10 • On July 7, 2006, Eddy Rock member Andre Bernard was convicted of one count of felon in  
11 possession of a firearm, a felony, in United States District Court, Case No. 3:05 CR 0400 SI.
- 12 • On October 11, 2006, Eddy Rock member Deshawn Campbell was convicted in San  
13 Francisco Superior Court of four felony counts of Penal Code section 459 (burglary), Case  
14 Nos. 2273053, 2273054, 2268973.
- 15 • On November 7, 2006, Eddy Rock member Delorian Lee was convicted in San Francisco  
16 Superior Court of one count of Health and Safety Code section 11351.5 (possession for sale  
17 of cocaine), a felony, Case No. 2285313.

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1 **The Individual Documented Members Of Eddy Rock**

2 65. When determining whether an individual is a member of the Eddy Rock criminal  
3 street gang, I look at several factors, including self-admission, criminal history, association with  
4 known members of the gang, gang symbols, gang tattoos, photographs and letters. This criteria is  
5 also used by law enforcement agencies throughout the state of California.

6 66. I consider admissions of membership by individuals to law enforcement to be  
7 reliable evidence of their membership in the gang. Within the gang culture, only members are  
8 permitted to claim their membership within the gang. If a non-member were to claim membership,  
9 members would retaliate against the non-member. As a result, if an individual claims membership  
10 in a gang, it is because the individual is a member of the gang. Gang members will make  
11 admissions to law enforcement officers during consensual encounters, when they are victims or a  
12 suspect in a crime or when they are being admitted to a jail. Admissions in jail are particularly  
13 reliable because the member knows that if he fails to tell the jail about his gang membership, he  
14 could be housed with a member of a rival gang and potentially beaten or killed. As gang members  
15 have come to realize that their admissions can be used against them in court, however, fewer  
16 members are now willing to admit membership to law enforcement, even when they are gang  
17 members.

18 67. An individual member's criminal history is also important in determining an  
19 individual's membership status in a gang. I review an individual's history to see what crimes he has  
20 committed, where the crimes were committed, and who, if any, committed the crimes with the  
21 individual. I also review an individual's criminal convictions to see what criminal convictions he  
22 has suffered. If the individual committed the crime in the gang's turf or with other gang members,  
23 and/or the crime promoted the gang's reputation, I consider this to be evidence of the individual's  
24 membership in the gang.

25 68. The individual's association with other known gang members is another important  
26 factor in my analysis. Gang members will generally associate with only other members of their  
27 own gang and gangs with which their gang has an alliance because they trust them. Gang members  
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1 will also generally associate with each other in their claimed territory because they feel safe there.  
2 Therefore, if an individual is seen associating with other known members of Eddy Rock, in Eddy  
3 Rock territory, I consider this to be evidence of the individual's membership in the gang.

4 69. Gang tattoos are another factor I consider when determining whether an individual is  
5 a gang member. A tattoo is permanent and signifies a permanent commitment to the gang.  
6 Moreover, within the gang culture, non-members are not permitted to sport tattoos of gangs on their  
7 bodies. For instance, if an Eddy Rock member saw a non-member sporting an Eddy Rock tattoo,  
8 the member would retaliate against the non-member. Consequently, if an individual sports a gang  
9 tattoo, I consider this to be very strong evidence of that individual's membership status within the  
10 gang.

11 70. I also consider whether the person is depicted in any gang photos, with other known  
12 members of the gang, flashing gang signs, showing gang tattoos, and/or brandishing weapons. It is  
13 very common for members of Eddy Rock to pose for, keep, and display photos, evidencing pride in  
14 their gang membership.

15 71. I also consider any writings made by a person. In addition, I consider personal  
16 belongings of persons, such as photo albums, wall hangings and clothing that have been marked  
17 with gang names, signs and symbols as evidence of the individual's membership.

18 72. **The following are the documented adult members of Eddy Rock Criminal**  
19 **Street Gang:**

- 20 • DONTAE ALLEN
- 21 • ANDRE BERNARD
- 22 • MAURICE BIBBS
- 23 • DESHAWN CAMPBELL
- 24 • MAURICE CARTER
- 25 • RAYMOND DAVIS
- 26 • ROBERT HARVEY
- 27 • LESLIE HOWARD

- 1 • DONTAYE HUBBARD
- 2 • KETHAN HUBBARD
- 3 • STEVE JOHNSON
- 4 • DELORIAN LEE
- 5 • DION MARTIN
- 6 • PARIS MOFFETT
- 7 • DELSHAWNTE SMITH
- 8 • DEMETRIUS SMITH
- 9 • JONATHAN SMITH
- 10 • HANNIBAL THOMPSON
- 11 • DEANDRE WATSON

12 73. DONTAE ALLEN: I know Dontae Allen through previous contacts and arrests.  
13 His street moniker is "Lump". In my opinion, Dontae Allen is a member of Eddy Rock Criminal  
14 Street Gang.

15 Allen's Convictions:

- 16 • On March 5, 2003, Allen was convicted in United States District Court of one count  
17 of felon in possession of a firearm, a felony, Case Number 3:02 CR00230 WHA.
- 18 • On October 11, 2005, Allen was convicted in United States District Court of one  
19 count of felon in possession of a firearm, a felony, Case Number 3:05 CR0363  
20 WHA. Allen was sentenced to 37 months in federal prison. Following his release,  
21 Allen will be on three years supervised probation. One of the terms of his probation  
22 is that Allen cannot associate with, or participate in, Eddy Rock criminal street gang.

23 Allen's Tattoos:

- 24 • Allen has "Eddy" tattooed on his right forearm, "Rock" tattooed on his left forearm  
25 and "OC" tattooed on his stomach.

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- 1           • On December 15, 2004, Bernard was convicted of Penal Code section 11351.5  
2           (possession for sale of cocaine), a felony, in San Francisco Superior Court, Case No.  
3           2072816.
- 4           • On July 7, 2006, Bernard was convicted of one count of felon in possession of a  
5           firearm, a felony, in United States District Court, Case No. 3:05 CR 0400 SI.  
6           Bernard was sentenced to 39 months in prison. Upon his release, Bernard will be  
7           placed on 3 years supervised probation. One of the terms of his probation is that  
8           Bernard cannot associate with, or participate in, Eddy Rock criminal street gang.

9           Bernard's Admissions:

- 10          • On February 20, 2004, when he was admitted into San Francisco County Jail, Sheriff  
11          Deputies asked Bernard whether he was a member of a gang. Bernard replied, "I'm  
12          from Eddy."  
13          • On June 4, 2005, when he was admitted into the San Francisco County Jail, Sheriff  
14          Deputies classified him as a gang member.

15          Bernard's Tattoos:

- 16          • Bernard has "1200" tattooed on his inner right forearm and "Block" tattooed on his  
17          inner left forearm. Bernard has "Eddy" tattooed on his right forearm and "Rock"  
18          tattooed on his left forearm. Bernard has "Money On Eddy" tattooed across his  
19          chest. True and correct copies of photographs of Bernard's tattoos are attached as  
20          Exhibit L. These photographs were taken on February 20, 2004 by the San  
21          Francisco Sheriff's Department.

22          Crimes And Other Nuisance Activities Committed By Bernard:

- 23          • On January 4, 2002, Bernard, Eddy Rock member Dontaye Hubbard, and Lavaughn  
24          Kelly burglarized a home in the 1800 block of Ellis Street. The resident of the home  
25          came home while the three were still inside. Bernard and Kelly fled the scene in  
26          Eddy Rock member Raymond Davis' Camaro, and Hubbard fled on foot. All three  
27          met up at Davis' residence at 717 Hayes Street and divided the property stolen during  
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1 the burglary. Officers later pulled the Camaro over. Eddy Rock member Demetrius  
2 Smith was driving the Camaro. Officers searched the Camaro and found two loaded  
3 handguns, jewelry and burglary tools.

- 4 • On February 18, 2004, Bernard, Eddy Rock member Demetrius Smith, and several  
5 juveniles stole three bikes from Toys R Us. During the incident, Bernard punched a  
6 store manager who was trying to stop them. Bernard was later found in a van with  
7 Smith, parked in front of 640 Larch Street, with one of the bicycles. Bernard was  
8 arrested for robbery and assault and ultimately pled guilty to battery and grand theft.
- 9 • On July 13, 2004, Bernard was in custody at the San Francisco County Jail. Before a  
10 court appearance, he and Eddy Rock members Steve Johnson and Dontaye Hubbard  
11 were involved in a fight with Latino inmates in the holding cell
- 12 • On February 16, 2005, officers approached Bernard in front of 1240 Eddy Street.  
13 When Bernard saw the officers, he dropped two rocks of cocaine on the ground.  
14 Bernard was arrested for possession for sale of cocaine.
- 15 • On June 4, 2005, Bernard was seen standing in front of 1240 Eddy Street with fellow  
16 Eddy Rock members Demetrius Smith and Dontae Allen. When officers approached  
17 them to arrest Allen on a warrant, Bernard ran away. As officers chased him,  
18 Bernard dropped a gun to the ground. Bernard was arrested for possession of a  
19 firearm. Bernard was ultimated convicted in federal court for this offense and is  
20 presently serving a 39 month prison sentence. Attached as Exhibit O are  
21 photographs taken of Bernard, the gun, and one of Bernard's Eddy Rock tatoos on  
22 June 4, 2005. Bernard was prosecuted by federal authorities for this offense and was  
23 sentenced to federal prison in July 2006.

24 75. **MAURICE BIBBS:** I know Maurice Bibbs from previous contacts. In my opinion,  
25 Maurice Bibbs is a member of Eddy Rock Criminal Street Gang.

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1        Bibbs' Admissions:

- 2            • On January 6, 2006, as he was being admitted to the San Francisco County Jail,  
3            Sheriff Deputies asked Bibbs whether he was a member of a gang. Bibbs replied,  
4            "I'm from Eddy Rock."

5        Crimes and Other Nuisance Activities Committed by Bibbs:

- 6            • On October 5, 2005, Bibbs was seen loitering in front of 630 Larch Way with Eddy  
7            Rock members John Brown, Dontaye Hubbard, Burnett Raven, and Maurice Carter.  
8            Bibbs was ultimately arrested after he gave a false name to police officers who  
9            approached them. At the time, Bibbs had an outstanding warrant for his arrest on a  
10           firearms case. Brown was arrested for possession for sale of cocaine after six rocks  
11           of crack cocaine were found in his pants pocket.
- 12           • On October 18, 2006, Bibbs was seen loitering in the area of Eddy and Laguna with  
13           Eddy Rock members Paris Moffett, Demetrius Smith, Maurice Carter, and Deandre  
14           Watson. A wake for murdered Eddy Rock member Burnett Raven had occurred  
15           earlier in the day.
- 16           • On November 21, 2006, Bibbs was seen loitering in front of 626 Larch Way with  
17           Eddy Rock members Delorian Lee, Dion Martin and Deandre Watson.
- 18           • On December 26, 2006, I saw Bibbs at Northern Police Station being booked on  
19           case. I saw a cell phone on his lap. When I inspected the phone, I saw "7PB2" and  
20           "3ER7" on the screen. I also saw photographs saved on the phone's hard drive. I  
21           printed the photographs. The photographs consist of memorials to deceased Eddy  
22           Rock members, photographs of members flashing Eddy Rock gang signs, and  
23           photographs of Eddy Rock gang terms. Attached as Exhibit P are copies of the  
24           photographs.
- 25           • On January 10, 2007, Bibbs was found inside 1221 Eddy Street during the execution  
26           of a search warrant at the residence. Bibbs was with Eddy Rock members Demetrius  
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- 1 Smith, Maurice Carter, Hannibal Thompson and Steve Johnson. Cocaine was found  
2 in the residence, and the resident was arrested for possession for sale of cocaine.
- 3 • On February 8, 2007, Bibbs was seen inside a car with two juvenile members of  
4 Eddy Rock in the area of Eddy and Buchanan Streets. This car was used on  
5 February 11, 2007 by Eddy Rock members Deshawn Campbell and a juvenile to  
6 commit a drive-by shooting of Uptown gang members.
  - 7 • On March 3, 2007, Bibbs was seen loitering near Eddy and Laguna Streets with  
8 Eddy Rock members Demetrius Smith, Hannibal Thompson, and Leslie Howard.
  - 9 • On March 14, 2007, Bibbs and Eddy Rock member Deandre Watson carjacked a  
10 pregnant woman as she exited her car on 11 Dakota Street. Bibbs then pointed a  
11 loaded gun at the victim and pulled the trigger. The gun, however, jammed. After  
12 his arrest for carjacking, Bibbs called the victim from jail and tried to dissuade her  
13 from testifying in court. On May 29, 2007, Bibbs and Watson were indicted by a  
14 federal grand jury for carjacking and tampering with a witness and are now awaiting  
15 trial in United States District Court.
  - 16 • On March 21, 2007, a search warrant was served at Bibb's residence at 1195 Laguna  
17 Street. Officers found a box of ammunition, a photograph of Bibbs with other Eddy  
18 Rock members and a photograph of a memorial to deceased Eddy Rock members.  
19 Attached as Exhibit Q are copies of these photographs.

20 76. **DESHAWN CAMPBELL:** I know Deshawn Campbell from previous contacts. In  
21 my opinion, Deshawn Campbell is a member of Eddy Rock Criminal Street Gang.

22 Campbell's Convictions:

- 23 • On October 11, 2006, Campbell was convicted of four felony counts of Penal Code  
24 section 459, in San Francisco Superior Court, Case Nos. 2268973, 2273053,  
25 2273054.

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1 Crimes And Other Nuisance Activities Committed by Campbell:

- 2 • On June 1, 2006, an officer saw Campbell burglarize a car parked in front of 1925  
3 Polk Street by smashing the rear passenger window. Campbell took a laptop from  
4 the car, jumped into a getaway car, and fled the scene. The getaway car was pulled  
5 over a short time later, and Campbell was in the front passenger seat. Officers found  
6 a laptop computer in the backseat. The owner of the burglarized car identified the  
7 laptop as the one taken from his car.
- 8 • On July 1, 2006, Campbell burglarized a car parked in front of 1388 Sutter Street by  
9 smashing the rear passenger window. Later that same morning, Campbell  
10 burglarized another car, parked in front of 1503 North Point, by smashing the  
11 passenger window. Officers saw Campbell shortly after the second burglary walking  
12 one block away. Officers brought a witness to the scene, and the witness positively  
13 identified Campbell as the burglar of the car at 1503 North Point. A witness to the  
14 Sutter Street burglary was brought to the scene, and the witness positively identified  
15 Campbell as the burglar of the the car at 1388 Sutter Street. Campbell was arrested  
16 for these two burglaries.
- 17 • On February 11, 2007, Campbell and a juvenile member of Eddy Rock drove by 634  
18 Grove Street and shot a thirteen year-old girl who was standing on the street with  
19 Uptown gang members. The shooting was in retaliation for the murder of Eddy  
20 Rock member Anthony Hunter that had occurred earlier that same day. Campbell is  
21 currently in custody awaiting trial on this case.

22 77. MAURICE CARTER: I know Maurice Carter from previous contacts. Carter's  
23 street moniker is "Pie". In my opinion, Maurice Carter is a member of Eddy Rock Criminal Street  
24 Gang.

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1           Carter's Convictions:

- 2           • On April 16, 2002, Carter was convicted of one count of Health and Safety Code  
3           section 11351.5 (possession for sale of cocaine), a felony, in San Mateo County  
4           Superior Court, Case No. 050877A.
- 5           • San Francisco Superior Court Case No. 1618162
- 6           • San Francisco Superior Court Case No. 1646493

7           Carter's Admissions:

- 8           • When Carter was admitted to the San Francisco County Jail on February 15, 2007,  
9           Sheriff Deputies identified him as a gang member. Carter also initially told deputies  
10          that he associates with 1200 Block, but later denied any association.

11          Crimes And Other Nuisance Activities Committed By Carter:

- 12          • On October 2, 2005, Carter was seen with Eddy Rock members John Brown,  
13          Dontaye Hubbard, Maurice Bibbs and Burnett Raven in front of 630 Larch Way.  
14          Brown was arrested for possessing cocaine for sale.
- 15          • On February 28, 2006, Carter was seen walking out of 1270 Eddy Street with what  
16          appeared to be a gun in his waistband. The unit was listed as vacant, but had been  
17          taken over by Eddy Rock members for their drug enterprise. When Carter saw  
18          officers, Carter ran back inside. Two juvenile members of Eddy Rock then fled  
19          through the unit's back door. Officers saw the juveniles throw crack cocaine on the  
20          ground as they fled. When officers entered the unit, they found Eddy Rock member  
21          Robert Harvey inside with five baggies of marijuana and a scale.
- 22          • On October 18, 2006, Carter was seen loitering in the area of Eddy and Laguna  
23          Streets with Eddy Rock members Paris Moffett, Demetrius Smith, Maurice Bibbs,  
24          Deandre Watson and juvenile members of Eddy Rock. A wake for murdered Eddy  
25          Rock member Burnett Raven had taken place earlier in the day.
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- 1 • On November 9, 2006, Carter was seen loitering in front of 600 Larch Way with  
2 Eddy Rock members Steve Johnson, Demetrius Smith, Paris Moffett, Hannibal  
3 Thompson and juvenile members of Eddy Rock.
- 4 • On November 17, 2006, Carter was seen loitering in front of 620 Larch Way with  
5 Eddy Rock members Demetrius Smith, Leslie Howard, Anthony Hunter, Hannibal  
6 Thompson, and juvenile members of Eddy Rock.
- 7 • On December 6, 2006, Carter was inside 1221 Eddy Street when officers served a  
8 search warrant on the unit. Carter was with Eddy Rock members Demetrius Smith,  
9 Raymond Davis, Steve Johnson and other individuals. Officers found stolen checks,  
10 stolen credit cards, bullets and a pistol magazine inside the residence.
- 11 • On January 10, 2007, Carter was inside 1221 Eddy Street when officers served a  
12 search warrant on the unit. With Carter were Eddy Rock members Demetrius Smith,  
13 Maurice Bibbs, Hannibal Thompson, Steve Johnson and a female. Officers found  
14 cocaine inside the unit.
- 15 • On February 15, 2007, Carter was inside 1221 Eddy Street when officers served a  
16 search warrant on the unit. Carter was with Eddy Rock member Paris Moffett.  
17 Baggies of cocaine, MDMA and marijuana were found inside the unit, as well as a  
18 computer with the term "EDDY ROCKIN IT" on the screen saver. Carter and  
19 Moffett were arrested for possession for sale of cocaine, MDMA, and marijuana as  
20 well as active participation in a criminal street gang.
- 21 • On February 23, 2007, officers arrested Carter for a parole violation as he was  
22 attempting to retrieve property seized during the February 15, 2007 search warrant.  
23 During the arrest, Carter physically resisted, and he was also booked for resisting  
24 arrest.

25 78. RAYMOND DAVIS: I know Raymond Davis through previous contacts and  
26 arrests. His street moniker is "Ray". In my opinion, Raymond Davis is a member of Eddy Rock  
27 Criminal Street Gang.

1           Davis' Tattoos:

- 2           • Davis has "Eddy" and "Rock" tattooed on his forearms.

3           Crimes And Other Nuisance Activities Committed by Davis:

- 4           • On January 4, 2002, Davis lent his Camaro to Eddy Rock member Dontaye Hubbard.  
5           Hubbard, Eddy Rock member Andre Bernard and Lavaughn Kelly then drove the  
6           Camaro to Ellis Street and burglarized a home there. The resident returned home  
7           during the burglary, and Bernard and Kelly fled the scene in Davis' Camaro.  
8           Hubbard fled on foot. All three met up at Davis' residence at 717 Hayes Street and  
9           divided up the property stolen from the burglary. Davis then lent the Camaro to  
10          Eddy Rock member Demetrius Smith. Smith was pulled over by officers. Two  
11          loaded handguns, jewelry, clothing, and burglary tools were found in the Camaro.  
12          Officers searched Davis' residence. They found 22 bags of marijuana, \$450 cash, a  
13          loaded handgun, jewelry and photos of Davis holding an assault rifle and handguns.  
14          Davis admitted he owned the gun found inside his residence. Smith admitted that the  
15          marijuana inside Davis' residence belonged to him. He was intending on selling the  
16          marijuana.
- 17          • On July 19, 2003, following a traffic stop of Davis and Eddy Rock member Dontaye  
18          Hubbard, officers found marijuana inside the car. Both were arrested and  
19          transported to the police station. At the station, officers searched Davis and found  
20          ten rocks of crack cocaine wedged between his buttocks. Officers search Hubbard  
21          and found a baggie of marijuana, an ecstasy pill and \$447.50 in cash inside  
22          Hubbard's pants. Officers also found a baggie with 30 rocks of crack cocaine  
23          attached to Hubbard's underwear.



- On January 14, 2004, Eddy Rock member Burnett Raven<sup>9</sup> was shot in front of 1335 Steiner Street. Officers saw Eddy Rock member Leslie Howard and Davis visit Raven at the hospital.
- On March 16, 2004, a drive-by shooting occurred at Turk and Seymore. Witnesses saw a green Caprice with four black men inside flee the scene. Officers saw the Caprice drive to the 600 block of Larch Way and stop. Officers saw Eddy Rock members Steve Johnson, Paris Moffett, Clinton Simms and Davis exit the car.
- On December 6, 2006, Davis was inside 1221 Eddy Street when officers served a search warrant on the unit. Davis was with Eddy Rock members Demetrius Smith, Maurice Carter, Steve Johnson and other individuals. Officers found stolen checks, stolen credit cards, bullets and a pistol magazine inside the residence.
- On May 16, 2007, officers conducted a search warrant of Davis' residence at 717 Hayes Street. Inside Davis' room in the converted garage, officers found a Kel Tec 9mm assault rifle with a laser sight in a duffel bag. The duffel bag also contained 28 loose 9mm rounds. Officers also found a tote bag containing a 9mm magazine and 26 9mm loose rounds. A true and correct photograph of the assault rifle is attached as Exhibit R.

79. **ROBERT HARVEY:** I know Robert Harvey through previous contacts and arrests. His street moniker is "Harv". In my opinion, Robert Harvey is a member of Eddy Rock Criminal Street Gang.

Harvey's Convictions:

- On February 11, 2003, Harvey was convicted of one county of Health and Safety Code section 11350 (possession of cocaine), a felony, in San Francisco Superior Court, Case No. 2085365.

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<sup>9</sup> Raven survived this shooting. Raven, however, was shot and killed on October 7, 2006 in front of 618 Larch Way.

- 1           • On July 21, 2005, Harvey was convicted of one count of Health and Safety Code  
2           section 11351 (possession for sale of cocaine), a felony, in San Francisco County  
3           Superior Court, Case No. 2170672. One of the terms of his probation is that he stay  
4           at least 25 yards away from Larch and Buchanan Streets. Due to multiple probation  
5           violations, Harvey's probation has been extended to August 31, 2008.

6           Harvey's Admissions:

- 7           • When Harvey was admitted to the San Francisco County Jail on April 5, 2006,  
8           Sheriff Deputies identified him as a gang member. Harvey also told deputies that he  
9           has problems with KOP criminal street gang.  
10          • During previous contacts, Harvey has admitted to me on more than one occasion that  
11          he claims Eddy Rock.

12          Harvey's Tattoos:

- 13          • Harvey has "Eddy" and "Rock" tattooed on his forearms. Attached as Exhibit S are  
14          true and correct copies of the tattoos. These photographs were taken on August 18,  
15          2006.

16          Crimes And Other Nuisance Activities Committed By Harvey:

- 17          • On September 1, 2003, Harvey was found in front of 1201 Eddy Street with a baggie  
18          containing 53 rocks of crack cocaine. Harvey admitted that he sold cocaine. Harvey  
19          was arrested for possession for sale of cocaine.  
20          • On June 29, 2004, undercover officers saw Harvey sell cocaine in the 600 block of  
21          Larch Way. They searched him and found 15 rocks of cocaine in his pants. Harvey  
22          was arrested for sale and possession for sale of cocaine.  
23          • On February 28, 2006, Harvey was found inside 1270 Eddy Street, a vacant unit that  
24          had been taken over by Eddy Rock members for their drug enterprise. Officers  
25          found five baggies of marijuana and a scale inside.

- On April 5, 2006, Harvey was stopped and arrested near Eddy and Laguna Streets for driving with a suspended license. Inside his car, officers found a baggie of marijuana.
- On June 13, 2006, Harvey was inside 626 Larch Way when a search warrant was served on the residence. Eddy Rock member Burnett Raven, Harvey's girlfriend, and another individual were inside with Harvey. Harvey and his girlfriend live at 626 Larch Way. Officers found a bullets, a scale, and a cell phone with the words "Eddy Rock" on the screen. Officers also found numerous rocks of crack cocaine and pills of ecstasy inside Harvey's girlfriend's purse. Harvey's girlfriend stated that someone, whom she refused to name, gave her the drugs to hold. Harvey admitted that the cell phone belonged to him.
- On August 18, 2006, officers saw Harvey sell drugs to a woman in the 600 block of Larch Way. When officers approached him, Harvey dropped a rock of cocaine on the ground. Harvey was arrested for possession for sale of cocaine.

80. **LESLIE HOWARD:** I know Leslie Howard through previous contacts and arrests. His street moniker is "Les". In my opinion, Leslie Howard is a member of Eddy Rock Criminal Street Gang.

Howard's Convictions:

- San Francisco Superior Court Case No. 2293484

Crimes And Other Nuisance Activities Committed By Howard:

- On April 27, 2002, Howard was shot and injured during a shootout between members of Eddy Rock and KOP near Eddy and Fillmore Streets.
- On January 14, 2004, Eddy Rock member Burnett Raven was shot in front of 1335 Steiner Street. Howard and Eddy Rock member Raymond Davis visited Raven at the hospital.

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- On February 16, 2005, officers arrested Eddy Rock member Andre Bernard in front of 1240 Eddy Street for possession for sale of cocaine. During the arrest, officers saw Howard nearby, wearing a bullet proof vest.
  - On March 14, 2006, officers saw Howard hand a baggie of cocaine to a juvenile member of Eddy Rock in front of 1201 Eddy Street. Officers arrested Howard for furnishing drugs.
  - On November 17, 2006, Howard was seen loitering in front of 620 Larch Way with Eddy Rock members Demetrius Smith, Maurice Carter, Anthony Hunter, Hannibal Thompson and juvenile members of Eddy Rock.
  - On February 8, 2007, Howard was seen wearing a hooded sweatshirt with a photo of deceased Eddy Rock member Jamal Smith on the front, and the following Eddy Rock writings applied all over the sweatshirt: "Eddy Rock Bitch", "1200", "37", "72", "Fuck Uptown", and "Me Me Rock in Peace". True and correct copies of photographs of Howard in the sweatshirt are attached as Exhibit A.
  - On March 3, 2007, Howard was seen loitering near Eddy and Laguna Streets with Eddy Rock members Demetrius Smith, Maurice Bibbs, and Hannibal Thompson.
  - On March 23, 2007, Howard was seen loitering in front of 1238 Eddy Street with Eddy Rock members Paris Moffett and Demetrius Smith.
  - On April 16, 2007, Howard was shot in the face at 146 Westpoint Road.

21 81. **DONTAYE HUBBARD**: I know Dontaye Hubbard through previous contacts and  
22 arrests. His street moniker is "D-Tay". In my opinion, Dontaye Hubbard is a member of Eddy  
23 Rock Criminal Street Gang.

24 Hubbard's Convictions:

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- On August 19, 2003, Hubbard was convicted of one count of Health and Safety Code section 11351.5 (possession for sale of cocaine), a felony, in San Francisco Superior Court, Case No. 2118725.
  - San Francisco Superior Court Case No. 2251577

1        Hubbard's Tattoos:

- 2            • Hubbard has "Eddy Street Mob" tattooed on his right upper arm.

3        Crimes And Other Nuisance Activities Committed By Hubbard:

- 4            • On January 4, 2002, Hubbard borrowed Eddy Rock member Raymond Davis'
- 5            Camaro. Hubbard, Eddy Rock member Andre Bernard and Lavaughn Kelly then
- 6            drove the Camaro to Ellis Street and burglarized a home there. Midway through the
- 7            burglary, the resident of the home returned. Bernard and Kelly fled the scene in
- 8            Davis' Camaro, and Hubbard fled on foot. All three met up at Davis' residence at
- 9            717 Hayes street and divided the property stolen during the burglary. Davis then lent
- 10           the Camaro to Eddy Rock member Demetrius Smith. Smith was pulled over by
- 11           officers. Two loaded handguns, jewelry, clothing, and burglary tools were found in
- 12           the car. Officers searched Davis' residence. They found 22 bags of marijuana, \$450
- 13           cash, a loaded handgun, jewelry and photos of Davis holding an assault rifle and
- 14           handguns. Davis admitted he owned the gun found inside his residence. Smith
- 15           admitted that the marijuana inside Davis' residence belonged to him. He was
- 16           intending on selling the marijuana.
- 17           • On July 19, 2003, following a traffic stop of Hubbard and Eddy Rock member
- 18           Raymond Davis, officers found marijuana inside the car. Both were arrested and
- 19           transported to the police station. At the station, officers search Hubbard and found a
- 20           baggie of marijuana, an ecstasy pill and \$447.50 in cash inside Hubbard's pants.
- 21           Officers also found a baggie with 30 rocks of crack cocaine attached to Hubbard's
- 22           underwear. Officers searched Davis and found ten rocks of crack cocaine wedged
- 23           between his buttocks.
- 24           • On May 12, 2004, Hubbard and Eddy Rock member Steve Johnson attempted to rob
- 25           a woman who had come to 950 Fillmore Street, a residence, to get her hair done by
- 26           the resident. They held the woman at knifepoint and slapped her when she claimed
- 27           to have no money. Johnson digitally penetrated the woman looking for cash on her
- 28

1 body. Hubbard then showed the victim a gun in his waistband and told her, "I'll kill  
2 you if you tell anyone." Two weeks later, Johnson saw the victim on the street and  
3 asked her if she had told anyone. When the victim said no, Johnson showed her a  
4 gun in his waistband and stated "You'd better not or I'll bust you right now!"

- 5 • On July 13, 2004, Hubbard was in custody at the San Francisco County Jail. Before  
6 a court appearance, he and Eddy Rock members Andre Bernard and Steve Johnson  
7 were involved in a fight with Latino inmates in the holding cell.
- 8 • On September 7, 2005, officers saw Hubbard riding bikes with Eddy Rock member  
9 Anthony Hunter in front of 615 Larch Way. Officers searched Hunter's car and  
10 found two guns in the trunk.
- 11 • On October 2, 2005, officers saw Hubbard loitering in front of 630 Larch Way with  
12 Eddy Rock members John Brown, Maurice Bibbs, Burnett Raven and Maurice  
13 Carter. Officers arrested Brown for possession for sale of cocaine after finding six  
14 rocks of cocaine in his pocket. Bibbs was wanted on a firearms case, so he lied to  
15 officers about his identity. Hubbard also lied about Bibbs' identity and was arrested  
16 for harboring a fugitive when officers discovered Bibbs' true identity. During the  
17 booking search at the police station, officers saw the terms "RIP D and YG" on  
18 Hubbard's cell phone. "D" is deceased Eddy Rock member Cedric Rucker who was  
19 killed on September 7, 2004. "YG" is deceased Eddy Rock member Gaylon Smith  
20 who was killed February 25, 2005.
- 21 • On May 18, 2007, Hubbard was shot in the area of Laguna and Fulton Streets. A  
22 loaded pistol with a high-capacity magazine was found within arms reach of  
23 Hubbard. Hubbard was subsequently booked on a parole violation for the incident.  
24 Eddy Rock member Carnell Taylor was also shot that same day near Eddy and  
25 Buchanan Streets.

26 82. **KETHAN HUBBARD:** I know Kethan Hubbard through previous contacts. In my  
27 opinion, Kethan Hubbard is a member of Eddy Rock Criminal Street Gang.  
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1           Crimes And Other Nuisance Activities Committed By Johnson:

- 2           • On March 16, 2004, a drive-by shooting occurred at Turk and Seymore. Witnesses  
3           saw a green Caprice with four black men inside flee the scene. Officers saw the  
4           Caprice drive to the 600 block of Larch Way and stop. Officers saw Johnson exit the  
5           Caprice with Eddy Rock members Raymond Davis, Paris Moffett, and Clinton  
6           Simms.
- 7           • On May 12, 2004, Johnson and Eddy Rock member Dontaye Hubbard attempted to  
8           rob a woman who had come to 950 Fillmore Street, a residence, to get her hair done  
9           by the resident. They held the woman at knifepoint and slapped her when she  
10          claimed to have no money. Johnson digitally penetrated the woman looking for cash  
11          on her body. Hubbard then showed the victim a gun in his waistband and told her,  
12          "I'll kill you if you tell anyone." Two weeks later, Johnson saw the victim on the  
13          street and asked her if she had told anyone. When the victim said no, Johnson  
14          showed her a gun in his waistband and stated "You'd better not or I'll bust you right  
15          now!"
- 16          • On July 13, 2004, Johnson was in custody at the San Francisco County Jail. Before a  
17          court appearance, he and Eddy Rock members Andre Bernard and Dontaye Hubbard  
18          were involved in a fight with Latino inmates in the holding cell. When deputies  
19          attempted to handcuff Johnson following the fight, Johnson fought with the deputies.
- 20          • On September 2, 2006, a resident of a unit in the 600 block of Larch Way returned  
21          home after an extended time away to find her unit taken over by Eddy Rock  
22          members. The resident saw Anthony Hunter grab a large baggie of rock cocaine  
23          from her mailbox and leave the residence. Inside the residence, the resident found  
24          Johnson, Eddy Rock member Demetrius Smith, and two juvenile members of Eddy  
25          Rock along with Johnson's girlfriend. After the resident told everyone to leave, the  
26          resident found a gun in her laundry closet. The resident left the unit in fear. On  
27          September 12, 2006, the resident returned to the unit to retrieve her belongings and  
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1 found the unit ransacked. She found her couch missing and Eddy Rock graffiti  
2 scrawled on the walls inside her unit. Photographs of the graffiti are attached as  
3 Exhibit D.

- 4 • On October 7, 2006, Johnson and Eddy Rock member Burnett Raven were standing  
5 in front of 618 Larch Way with a group of people. Someone in the group suddenly  
6 drew a gun and shot Raven and Johnson. Raven died, but Johnson survived.
- 7 • On November 9, 2006, officers saw Johnson loitering in front of 600 Larch Way  
8 with Eddy Rock members Demetrius Smith, Paris Moffett, Hannibal Thompson,  
9 Maurice Carter and a juvenile member of Eddy Rock.
- 10 • On December 6, 2006, Johnson was inside 1221 Eddy Street when a search warrant  
11 was served on the residence. Johnson was with Eddy Rock members Maurice  
12 Carter, Demetrius Smith, Raymond Davis, and other individuals. Officers found  
13 stolen checks, stolen credit cards, bullets and a pistol magazine inside the residence.
- 14 • On January 10, 2007, Johnson was inside 1221 Eddy Street when a search warrant  
15 was served on the residence. Johnson was with Eddy Rock members Demetrius  
16 Smith, Maurice Carter, Maurice Bibbs, Hannibal Thompson and a female. Officers  
17 found cocaine inside the unit.
- 18 • On February 3, 2007, Johnson and Eddy Rock member Demetrius Smith are  
19 suspected of shooting KOP member Floyd Barrow and Central Divisadero Players  
20 member Leon Parker in front of Kragen Auto Parts on Geary Boulevard. Witnesses  
21 saw a man exit a brown van, argue with Barrow, Parker and other individuals, and  
22 then engage in a shootout with them.
- 23 • On February 15, 2007, officers served a search warrant at 1221 Eddy Street. During  
24 the search, they found a fake California driver's license with Johnson's photograph,  
25 but with identification information for another individual.
- 26 • On February 16, 2007, officers saw Johnson in front of 625 Larch Way and  
27 admonished him about trespassing on Housing Authority property.

1           84.     **DELORIAN LEE:** I know Delorian Lee through previous contacts and arrests. In  
2 my opinion, Delorian Lee is a member of Eddy Rock Criminal Street Gang.

3           Lee's Convictions:

- 4           • On November 7, 2006, Lee was convicted of one count of Health and Safety Code  
5 section 11351.5 (possession for sale of cocaine), a felony, in San Francisco County  
6 Superior Court, Case No. 2285313.
- 7           • On November 7, 2006, Lee was convicted of one count of Penal Code section 459  
8 (burglary), a misdemeanor, in San Francisco County Superior Court, Case No.  
9 2286842.

10          Lee's Admissions:

- 11          • When Lee was admitted to the San Francisco County Jail on August 15, 2006, he  
12 told Sheriff Deputies, "I'm with Eddy Rock".
- 13          • When Lee was admitted to the San Francisco County Jail on October 11, 2006, he  
14 was asked by Sheriff Deputies whether he was a member of a gang. Lee replied,  
15 "I'm with Eddy Rock."

16          Crimes And Other Nuisance Activities Committed By Lee:

- 17          • On August 14, 2006, officers saw Lee, Eddy Rock members Jonathan Smith, Jamal  
18 Smith, Hannibal Thompson, and Dion Martin involved in a shoot out in the 1100  
19 block of Turk Street. Lee and the rest of the members then ran into 1152 Turk  
20 Street. Shortly thereafter, they all came back outside to report to officers that Martin  
21 had been shot. All five were arrested. Officers conducted gunshot residue tests on  
22 the five men's hands. With the exception of Jamal Smith, the tests came back  
23 positive for gunshot residue, confirming that the men had shot a gun during the  
24 shootout. During the search incident to arrest, officers found crack cocaine on Lee.  
25 Officers searched the backyards of the units that abut the backyard of 1152 Turk  
26 Street and found two hand guns and one shotgun in the backyard of 1170 Turk  
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1 Street. Inside 1152 Turk Street, officers found two boxes of shotgun shells and live  
2 ammunition.

- 3 • On November 21, 2006, Lee was seen loitering in front of 626 Larch Way with Eddy  
4 Rock members Maurice Bibbs, Dion Martin, Deandre Watson, and juvenile members  
5 of Eddy Rock.
- 6 • On February 11, 2007, a thirteen year-old girl was shot in front of 634 Grove Street  
7 by Eddy Rock member Deshawn Campbell as the girl stood with two members of  
8 800 Block criminal street gang (part of the Uptown alliance). The shooting was in  
9 retaliation for the shooting and murder of Eddy Rock member Anthony Hunter  
10 earlier that same day. Witnesses described seeing three black men in a car flee the  
11 scene. Shortly thereafter, Lee was seen with two juvenile members of Eddy Rock  
12 walking on Larch Way near a car that was later positively identified as the one  
13 involved in the shooting. Lee and the others changed their clothing two separate  
14 times upon seeing officers. The victim was unable to identify Lee, however, and Lee  
15 was not arrested.

16 85. **DION MARTIN**: I know Dion Martin through previous contacts and arrests. In my  
17 opinion, Dion Martin is a member of Eddy Rock Criminal Street Gang.

18 **Crimes And Other Nuisance Activities Committed By Martin:**

- 19 • On August 14, 2006, Martin and Eddy Rock members Jonathan Smith, Delorian Lee,  
20 Jamal Smith, and Hannibal Thompson were involved in a shootout with another  
21 group of men in the 1100 block of Turk Street. Following the shootout, all five men  
22 ran into 1152 Turk Street. A short time later, all five came back outside to tell police  
23 officers that Martin had been shot and injured. Officers arrested all five men.  
24 Officers conducted gunshot residue tests on the five men's hands. With the  
25 exception of Jamal Smith, the tests came back positive for gunshot residue,  
26 confirming that the men had shot a gun during the shootout. Officers searched the  
27 interior of 1152 as well as the backyard and adjoining backyards of other units.  
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1 Officers found a shotgun and two handguns in the backyard of 1170 Turk Street.  
2 Officers also found two boxes of shotgun shells and other ammunition inside 1152  
3 Turk Street.

- 4 • On November 21, 2006, Martin and Eddy Rock members Maurice Bibbs, Joseph  
5 Morales, Delorian Lee, and two juvenile Eddy Rock members were seen loitering in  
6 front of 626 Larch Way. The men dispersed when police approached them, but  
7 returned to the same location when police left the area.
- 8 • On January 22, 2007, Martin robbed and assaulted a man with a group of men in the  
9 parking lot of the Department of Motor Vehicles. The men took the victim's laptop  
10 computer. Martin was later seen running with the victim's laptop computer.
- 11 • On March 14, 2007, Eddy Rock members Maurice Bibbs and Deandre Watson  
12 carjacked a pregnant woman at gunpoint. A short time later, police pulled Bibbs and  
13 Watson over in the victim's car. In the backseat of the victim's car were Martin and  
14 a juvenile member of Eddy Rock.

15 86. **PARIS MOFFETT**: I know Paris Moffett through previous contacts and arrests.

16 His street moniker is "P-Dog" and "Playa – P". In my opinion, not only is Moffett a member of  
17 Eddy Rock Criminal Street Gang, he is the current leader of Eddy Rock Criminal Street Gang.

18 Moffett's Convictions:

- 19 • On April 16, 2002, Moffett was convicted of one count of Penal Code section  
20 245(a)(1) (assault with a deadly weapon or with force likely to cause great bodily  
21 injury), a felony, in San Francisco Superior Court, Case No. 1981911.

22 Moffett's Tattoos:

- 23 • Moffett has "Paypa" tattooed on his right forearm, and "Bound" tattooed on his left  
24 forearm. Paypa Bound is another name for Eddy Rock.
- 25 • Moffett has "Money On Eddy" tattooed across his chest.
- 26 • Moffett has "PB" tattooed on his left inside forearm.

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1 Crimes And Other Nuisance Activities Committed By Moffett:

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- On January 5, 2004, Moffett is suspected of shooting KOP member Ivory Collins in the 1100 block of Pierce Street.
  - On January 14, 2004, Leonard Colvin shot Eddy Rock member Burnett Raven in front of 1335 Steiner Street. Colvin admitted to the shooting and told police that he had shot Raven because two years before, Raven and Moffett had raped his girlfriend.
  - On February 2, 2004, officers saw graffiti in the area of Larch and Buchanan Streets, listing a roster of Eddy Rock members. Paris Moffett was listed as the leader.
  - On March 16, 2004, a drive-by shooting occurred at Turk and Seymore. Witnesses saw a green Caprice with four black men inside flee the scene. Officers saw the Caprice drive to the 600 block of Larch Way and stop. Officers saw Moffett exit the Caprice with Eddy Rock members Raymond Davis, Steve Johnson, and Clinton Simms.
  - On April 5, 2004, officers saw Moffett conduct a hand to hand drug sale of cocaine in front of 659 Larch Way.
  - On May 21, 2004, officers saw Moffett conduct drug sales by storing the drugs inside a locked, gated garbage area near 659 Larch Way. When officers looked inside the garbage area, they found 248 rocks of cocaine.
  - On February 25, 2005, Moffett was moved to another cell in the San Francisco County Jail due to “suspected gang activity”, “running the tank”, and bringing narcotics into the jail.
  - On October 17, 2006, Moffett was seen loitering in front of 1226 Eddy Street with Eddy Rock members Demetrius Smith, Jason Thomas, and Marquez Shaw.
  - On October 18, 2006, Moffett was seen loitering with Eddy Rock members Demetrius Smith, Maurice Carter, Maurice Bibbs, Damien Brooks, Deandre Watson, and two juvenile Eddy Rock members in the area of Eddy and Laguna Streets. A

1 wake for murdered Eddy Rock member Burnett Raven had taken place earlier in the  
2 day.

- 3 • On October 24, 2006, Moffett and Eddy Rock members Demetrius Smith, Hannibal  
4 Thompson, Anthony Hunter and juvenile Eddy Rock members were seen loitering  
5 and gambling in the area of Larch and Laguna Streets.
- 6 • On February 15, 2007, Moffett and Eddy Rock member Maurice Carter were inside  
7 1221 Eddy Street when officers served a search warrant on the residence. As  
8 officers entered the residence, Moffett threw down baggies of cocaine and MDMA  
9 as he ran from them. A computer inside the house had "EDDY ROCKIN IT" as a  
10 screen saver.
- 11 • On March 23, 2007, Moffett was seen loitering in front of 1238 Eddy Street with  
12 Eddy Rock members Leslie Howard, Demetrius Smith and Gerald Wilkins.
- 13 • On June 16, 2007, Moffett and numerous Eddy Rock members, including Demetrius  
14 Smith, Hannibal Thompson and Marquez Shaw were seen flashing gang signs and  
15 yelling fighting words to numerous members of Uptown gangs on Fillmore Street, in  
16 two separate incidents during Juneteenth festivities.

17 87. **DELSHAWNTE SMITH:** I know Delshawnte Smith through previous contacts and  
18 arrests. His street moniker is "ST". In my opinion, Delshawnte Smith is a member of Eddy Rock  
19 Criminal Street Gang.

20 Smith's Convictions:

- 21 • On June 15, 2006, Smith was convicted of one count of Penal Code section 12021(a)  
22 (felon in possession of a firearm), a felony, in San Francisco Superior Court, Case  
23 No. 2256979. Smith is currently serving a 16 month prison sentence for this  
24 conviction.

25 Smith's Admissions:

- 26 • On February 10, 2005, while being admitted to the San Francisco County Jail, Smith  
27 told Sheriff Deputies that he was affiliated with Paypa Bound/Eddy Rock.



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- On February 18, 2004, Smith and Eddy Rock member Andre Bernard and several juvenile Eddy Rock members stole three bikes from Toys R Us. During the incident, Bernard punched a store manager who was trying to stop them. Bernard was later found in a van with Smith, parked in front of 640 Larch Street, with one of the bicycles.
  - On May 21, 2004, officers saw Eddy Rock member Paris Moffett conduct drug sales in front of 659 Larch Way by storing the drugs in a locked garbage area. During the surveillance of Moffett, officers also saw Smith use a key to enter the locked garbage area. Officers eventually searched the garbage area and found 248 rocks of crack cocaine inside.
  - On September 24, 2004, Eddy Rock member Christopher Kelly was shot and wounded. Kelly fled the scene of the shooting in a car. Officers chased the car to the hospital. Smith and Eddy Rock member Jason Thomas were in the car with Kelly.
  - On May 28, 2005, Smith was with Eddy Rock member Dontae Allen walking on Larch Way. When officers approached them, Allen grabbed his waistband and fled from officers on foot.
  - On June 4, 2005, Smith was with Eddy Rock members Dontae Allen and Andre Bernard in front of 1240 Eddy Street. When officers approached them, Bernard fled from officers on foot. During the chase, Bernard threw a gun to the ground.
  - On September 2, 2006, a resident of a unit in the 600 block of Larch Way returned home after an extended time away to find her unit taken over by Eddy Rock members. The resident saw Anthony Hunter grab a large baggie of rock cocaine from her mailbox and leave the residence. Inside the residence, the resident found Johnson, Eddy Rock member Demetrius Smith, and two juvenile members of Eddy Rock along with Johnson's girlfriend. After the resident told everyone to leave, the resident found a gun in her laundry closet. The resident left the unit in fear. On



1           September 12, 2006, the resident returned to the unit to retrieve her belongings and  
2           found the unit ransacked. She found her couch missing and Eddy Rock graffiti  
3           scrawled on the walls inside her unit.

- 4           • On October 17, 2006, Smith was seen loitering with Eddy Rock members Paris  
5           Moffett, Jason Thomas, and Marquez Shaw in the 1200 block of Eddy Street.
- 6           • On October 18, 2006, Smith was seen loitering in the area of Eddy and Laguna with  
7           Eddy Rock members Paris Moffett, Maurice Bibbs, Maurice Carter, and Deandre  
8           Watson. A wake for murdered Eddy Rock member Burnett Raven had occurred  
9           earlier in the day.
- 10          • On October 24, 2006, Smith was seen loitering and gambling in the area of Larch  
11          and Laguna with Eddy Rock members Paris Moffett, Hannibal Thompson, Anthony  
12          Hunter and juvenile Eddy Rock members.
- 13          • On November 1, 2006, Smith was seen loitering in the 600 block of Larch Way with  
14          Hannibal Thompson and two juvenile Eddy Rock members. When officers  
15          approached them, Thompson fled. During the chase, Thompson dropped a baggie  
16          containing 29 rocks of crack cocaine.
- 17          • On November 9, 2006, Smith was seen loitering in the 600 block of Larch Way with  
18          Eddy Rock members Steve Johnson, Paris Moffett, Hannibal Thompson, Maurice  
19          Carter and two juvenile Eddy Rock members.
- 20          • On November 17, 2006, Smith was seen loitering in the 600 block of Larch Way  
21          with Eddy Rock members Maurice Carter, Leslie Howard, Anthony Hunter,  
22          Hannibal Thompson, Marquez Shaw, and juvenile Eddy Rock members.
- 23          • On December 6, 2006, Smith was inside 1221 Eddy Street with Eddy Rock members  
24          Maurice Carter, Raymond Davis, Chris Blueford, and two females when officers  
25          served a search warrant on the residence. Officers found stolen checks, stolen credit  
26          cards, bullets and a pistol magazine inside the residence.

- 1 • On January 10, 2007, Smith was inside 1221 Eddy Street with Eddy Rock members  
2 Hannibal Thompson, Maurice Carter, Maurice Bibbs, Steve Johnson and a female  
3 when officers served a search warrant on the residence. Cocaine was found in the  
4 bathroom of the residence.
- 5 • On February 3, 2007, Smith and Eddy Rock member Steve Johnson are suspected of  
6 shooting KOP member Floyd Barrow and Central Divisadero Players member Leon  
7 Parker in front of Kragen Auto Parts on Geary Boulevard. Witnesses saw a man exit  
8 a brown van, argue with Barrow, Parker and other individuals, and then engage in a  
9 shootout with them.
- 10 • On March 3, 2007, Smith was seen loitering on the corner of Eddy and Laguna  
11 Streets with Eddy Rock members Maurice Bibbs, Hannibal Thompson, Marcus  
12 Blueford and Leslie Howard.
- 13 • On March 6, 2007, Smith was seen loitering with Eddy Rock members Hannibal  
14 Thompson and Deandre Watson in front of 1212 Eddy Street. Officers arrested  
15 Thompson for trespassing.
- 16 • On March 23, 2007, Smith was seen loitering in front of 1238 Eddy Street with Eddy  
17 Rock members Paris Moffett, Leslie Howard, and Gerald Wilkins.

18 89. JONATHAN SMITH: I know Jonathan Smith through previous contacts and  
19 arrests. Smith's street moniker is "Dollar". In my opinion, Jonathan Smith is a member of Eddy  
20 Rock Criminal Street Gang.

21 Smith's Convictions:

- 22 • San Francisco Superior Court Case No. 2234145

23 Smith's Admissions:

- 24 • On August 15, 2006, as he was being admitted to the San Francisco County Jail,  
25 Smith told Sheriff Deputies that he is with "PB" and has problems with KOP. Smith  
26 told deputies that he did not want to be housed with KOP.

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1        Thompson's Admissions:

- 2            • On August 15, 2006, as he was being admitted to the San Francisco County Jail,  
3            Thompson admitted that he was with Eddy Rock/Paypa Bound and asked to be  
4            housed with them.

5        Crimes And Other Nuisance Activities Committed By Thompson:

- 6            • On February 3, 2006, Thompson and Eddy Rock member Jonathan Smith broke into  
7            a parked car and stole several items from the car. Smith and Thompson were  
8            arrested a short time later, walking nearby. Two witnesses identified them as the  
9            burglars. Officers found broken glass and a sparkplug on a string inside Thompson's  
10           jacket.
- 11           • On June 3, 2006, Thompson was shot in the area of Bush and Fillmore Streets. The  
12           shooter was seen fleeing the area in a car registered to the girlfriend of Antoine  
13           Johnson, a member of Chopper City Criminal Street Gang. Thompson was  
14           uncooperative with officers and signed an affidavit asking that the investigation into  
15           his case be terminated.
- 16           • On August 14, 2006, Thompson and Eddy Rock members Dion Martin, Delorian  
17           Lee, Jamal Smith, and Jonathan Smith were involved in a shootout with another  
18           group of men in the 1100 block of Turk Street. Following the shootout, all five men  
19           ran into 1152 Turk Street. A short time later, all five came back outside to tell police  
20           officers that Martin had been shot and injured. Officers arrested all five men.  
21           Officers conducted gunshot residue tests on the five men's hands. With the  
22           exception of Jamal Smith, the tests came back positive for gunshot residue,  
23           confirming that the men had shot a gun during the shootout. Officers searched the  
24           interior of 1152 as well as the backyard and adjoining backyards of other units.  
25           Officers found a shotgun and two handguns in the backyard of 1170 Turk Street.  
26           Officers also found two boxes of shotgun shells and other ammunition inside 1152  
27           Turk Street.
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- 1 • On September 22, 2006, during a search of 1203 Webster Street, the residence of  
2 Eddy Rock member Christopher Blueford, officers found a photograph of Thompson  
3 throwing an Eddy Rock gang sign with other members of Eddy Rock. A true and  
4 correct copy of this photograph is attached as Exhibit H.
- 5 • On October 24, 2006, Thompson was seen loitering and gambling in the area of  
6 Larch and Laguna with Eddy Rock members Demetrius Smith, Paris Moffett,  
7 Anthony Hunter and juvenile Eddy Rock members.
- 8 • On November 1, 2006, officers saw Thompson standing behind a locked gate in front  
9 of 650 Larch Street. This is a common tactic used by drug dealers to avoid having  
10 officers interfere with their drug sales. When officers approached Thompson, he fled  
11 on foot. After a foot chase, officers caught up with Thompson. Officers then re-  
12 traced Thompson's path and found a baggie containing 29 individually wrapped  
13 rocks of crack cocaine in the back fence of 650 Larch Street.
- 14 • On November 9, 2006, Thompson was seen loitering in front of 600 Larch Way with  
15 Eddy Rock members Steve Johnson, Demetrius Smith, Paris Moffett, Maurice Carter  
16 and two juvenile Eddy Rock members.
- 17 • On November 17, 2006, Thompson was seen loitering in front of 620 Larch Way  
18 with Eddy Rock members Demetrius Smith, Maurice Carter, Leslie Howard,  
19 Anthony Hunter, and four juvenile Eddy Rock members.
- 20 • On January 10, 2007, Thompson was inside 1221 Eddy Street with Eddy Rock  
21 members Demetrius Smith, Maurice Bibbs, Steve Johnson and a female when a  
22 search warrant was served on the residence. Officers found cocaine in the bathroom.
- 23 • On March 3, 2007, Thompson was seen loitering at the corner of Eddy and Laguna  
24 Streets with Eddy Rock members Demetrius Smith, Maurice Bibbs, Marcus Blueford  
25 and Leslie Howard.
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- 1 • On March 4, 2007, Thompson was seen loitering in front of 1151 Laguna Street  
2 which is part of the Plaza East Public Housing Complex. Officers admonished  
3 Thompson about trespassing on Housing Authority property.
- 4 • On March 6, 2007, Thompson was seen in front of 1212 Eddy Street with Eddy Rock  
5 members Demetrius Smith and Deandre Watson. 1212 Eddy Street is part of the  
6 Plaza East Public Housing Complex. Officers arrested Thompson for trespassing on  
7 Housing Authority property.
- 8 • On March 11, 2007, Thompson was seen loitering in front of 600 Larch Way. 600  
9 Larch Way is part of the Plaza East Public Housing Complex. Officers arrested  
10 Thompson for trespassing.
- 11 • On June 16, 2007, Thompson and numerous Eddy Rock members, including  
12 Demetrius Smith, Paris Moffett and Marquez Shaw were seen flashing gang signs  
13 and yelling fighting words to numerous members of Uptown gangs on Fillmore  
14 Street, in two separate incidents during Juneteenth festivities.

15 91. **DEANDRE WATSON:** I know Deandre Watson through previous contacts and  
16 arrests. Deandre Watson's street moniker is "Lil D". In my opinion, Deandre Watson is a member  
17 of Eddy Rock Criminal Street Gang.

18 Watson's Convictions:

- 19 • San Francisco Superior Court Case No. 2318769

20 Crimes And Other Nuisance Activities Committed By Watson:

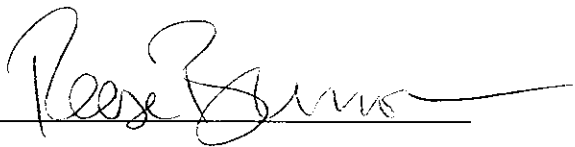
- 21 • On October 18, 2006, Watson was seen loitering in the area of Eddy and Laguna  
22 Streets with Eddy Rock members Paris Moffett, Demetrius Smith, Maurice Carter,  
23 Maurice Bibbs, Damien Brooks and two juvenile Eddy Rock members. A wake for  
24 murdered Eddy Rock member Burnett Raven had occurred earlier in the day.
- 25 • On November 16, 2006, officers found a handgun, Eddy Rock gang indicia and  
26 photographs of gang members flashing gang signs in Watson's room when they  
27 served a search warrant at his residence at 1212 Eddy Street. True and correct copies  
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1 of the photographs are attached as Exhibit I. A true and correct copy of a photograph  
2 of the gang indicia is attached as Exhibit T.

- 3 • On December 2, 2006, officers approached Watson and a group of men after officers  
4 smelled marijuana smoke coming from them. Watson fled on foot. When Watson  
5 was caught, officers searched him and found a loaded handgun in his back pocket.
- 6 • On March 14, 2007, Watson and Eddy Rock member Maurice Bibbs carjacked a  
7 pregnant woman as she exited her car on 11 Dakota Street. During the incident,  
8 Bibbs pointed a loaded gun at the victim and pulled the trigger. The gun, however,  
9 jammed. Watson and Bibbs then fled the scene in the victim's car. A short time  
10 later, officers pulled over Watson and Bibbs as they drove the victim's car. Under  
11 the front passenger seat, where Watson was seated, officers found a loaded handgun.  
12 Following their arrest, Bibbs called the victim from jail and tried to dissuade her  
13 from testifying in court. On May 29, 2007, Bibbs and Watson were indicted by a  
14 federal grand jury for carjacking and tampering with a witness and are now awaiting  
15 trial in United States District Court.

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

18  
19 Dated: 6-28-07



20 REESE BURROWS  
21  
22  
23  
24  
25  
26  
27  
28

**EXHIBIT LIST**

|   |   |
|---|---|
| A | Photographs of Eddy Rock member Leslie Howard wearing sweatshirt emblazoned with Eddy Rock terms              |
| B | Photograph of individual wearing a t-shirt emblazoned with Eddy Rock terms and symbols                        |
| C | Photographs of Eddy Rock graffiti at Larch and Buchanan Streets   |
| D | Photographs of Eddy Rock graffiti in the 600 block of Larch Way   |
| E | Photographs of Eddy Rock graffiti at Turk and Buchanan Streets  |
| F | Photographs of Eddy Rock graffiti at Eddy and Buchanan Streets  |
| G | Photographs of Eddy Rock graffiti at Willow Road  |
| H | Photographs of Eddy Rock members flashing Eddy Rock hand signs  |
| I | Photograph of deceased Eddy Rock member Jamar Lake flashing Eddy Rock hand sign                               |
| J | Photograph of deceased Eddy Rock member Wayne Bernard flashing "Downtown" hand sign                           |
| K | Photographs of Eddy Rock member Paris Moffett's tattoos   |
| L | Photographs of Eddy Rock member Andre Bernard's tattoos   |
| M | Photographs of deceased Eddy Rock member Anthony Hunter's tattoos   |
| N | Photographs of vandalized plywood at burglarized home   |
| O | Photographs of gun dropped by Eddy Rock member Andre Bernard in the 1200 block of Eddy Street                 |
| P | Photographs saved on hard drive of Eddy Rock member Maurice Bibbs' cell phone                                 |
| Q | Photographs of memorial to deceased Eddy Rock member Wayne Bernard and collage of photographs of gang members |
| R | Photograph of assault rifle found inside Eddy Rock member Raymond Davis' residence                            |
| S | Photographs of Eddy Rock member Robert Harvey's tattoos   |
| T | Clipboard with Eddy Rock indicia found in Eddy Rock member Deandre Watson's room                              |
| U | Map of Proposed Eddy Rock Safety Zone   |



EXHIBIT A



Glen Rock  
1954

1954  
Glen Rock  
1954



Did You Know

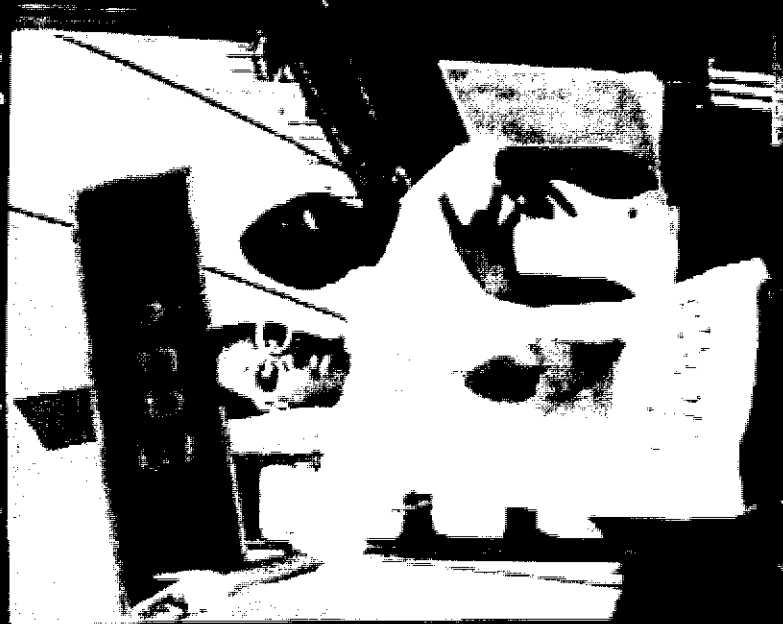


The Master

Frank Matrone

NEW YORK  
R231

FILE FILE



George M. Hays

VER

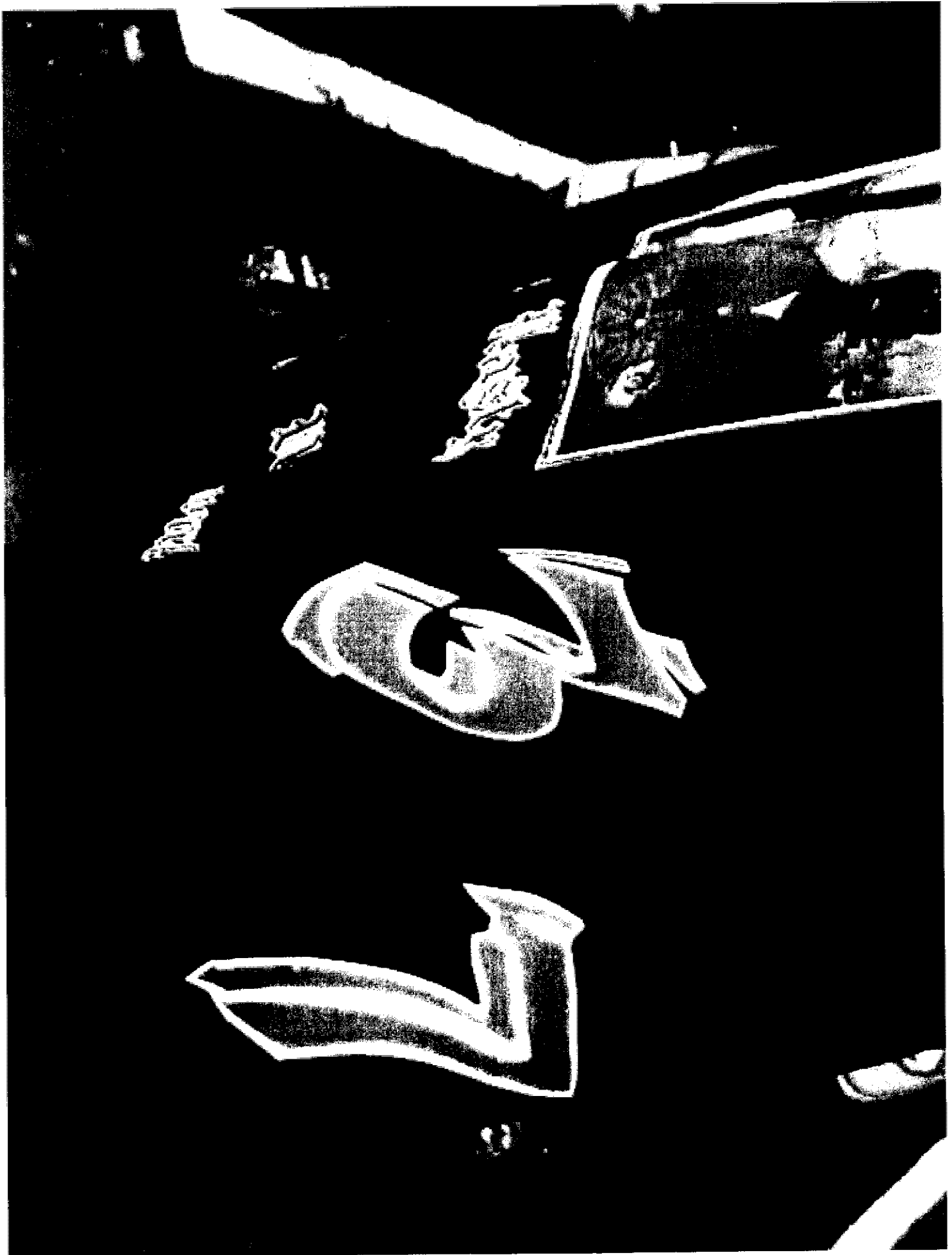


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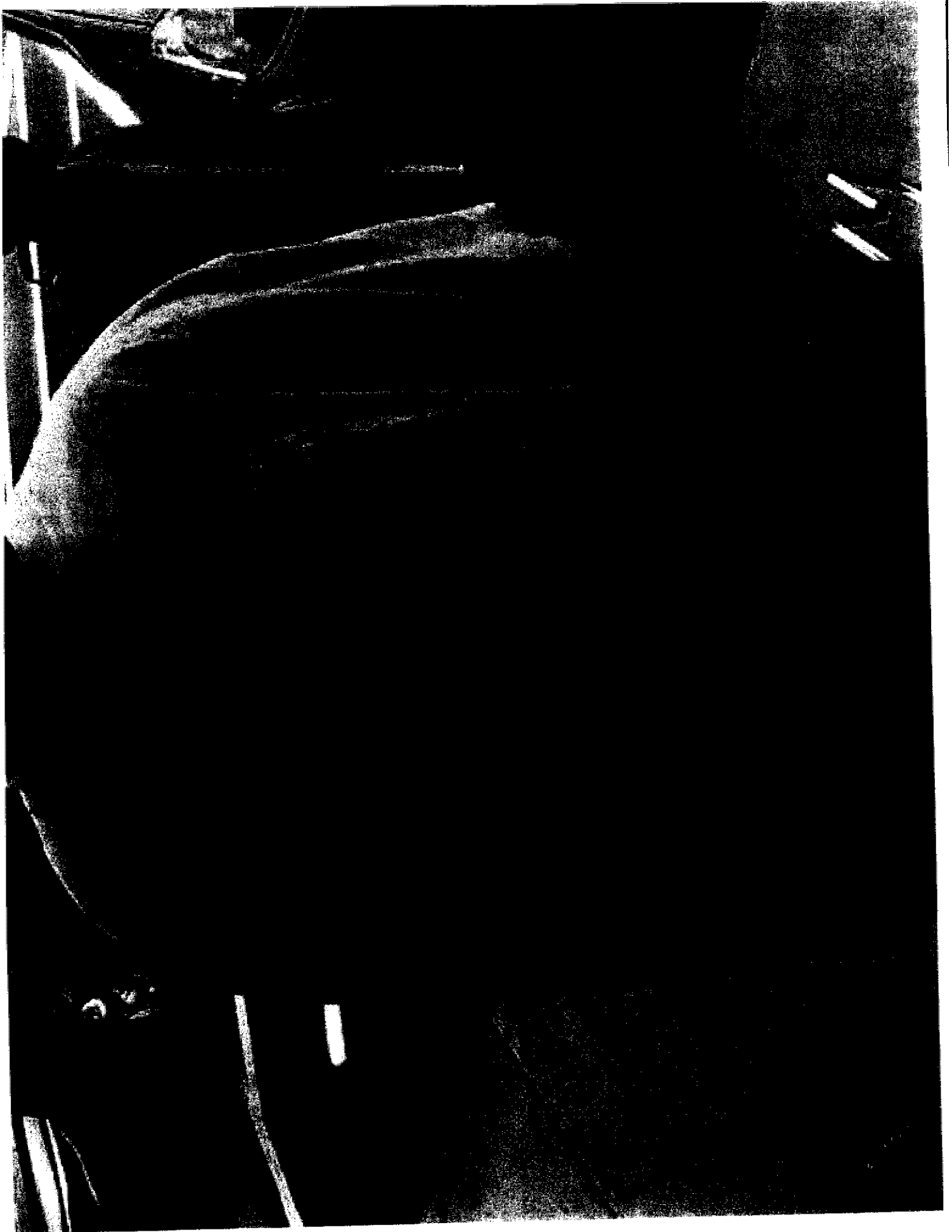
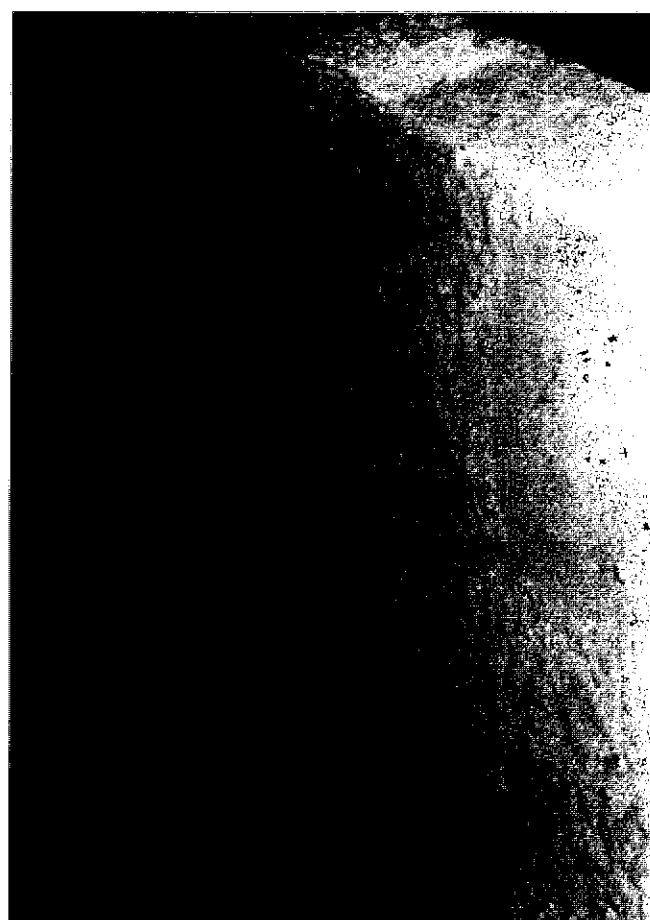
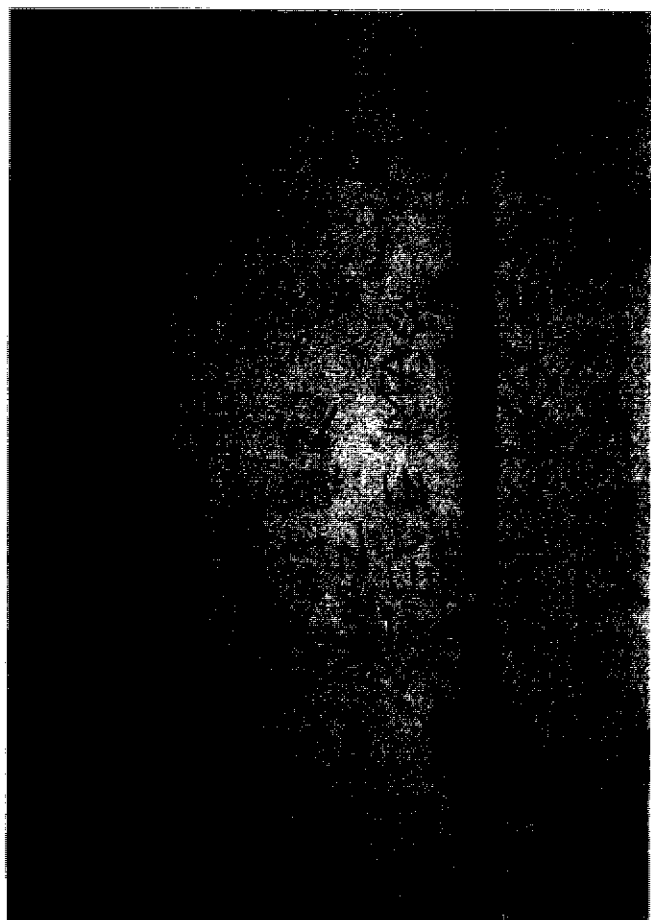
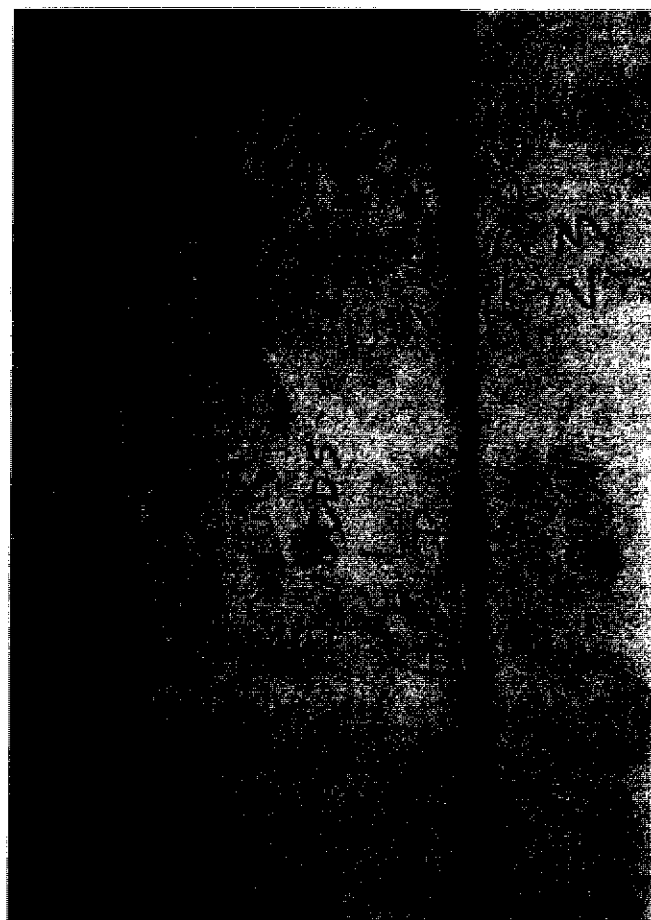
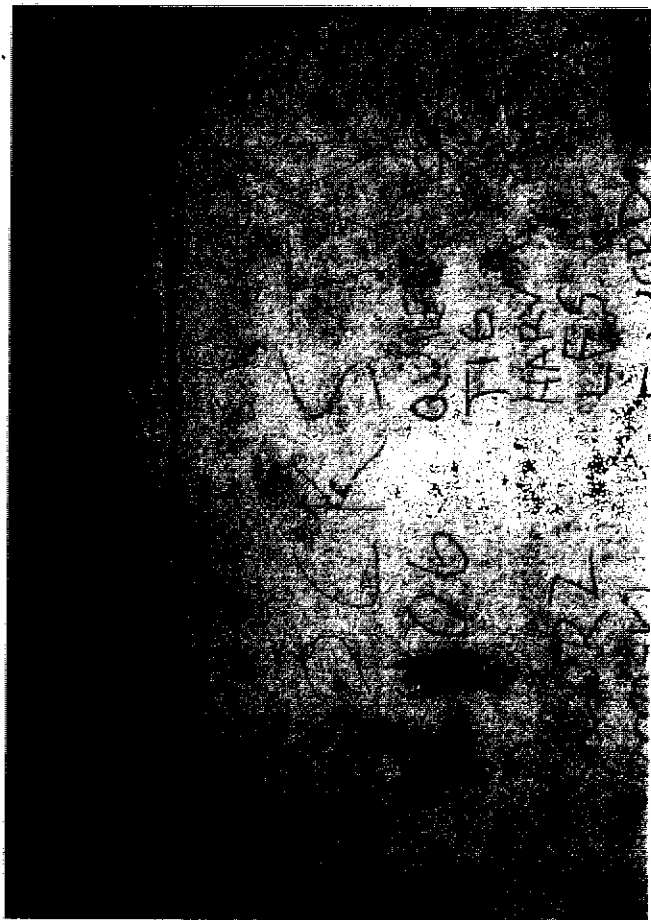
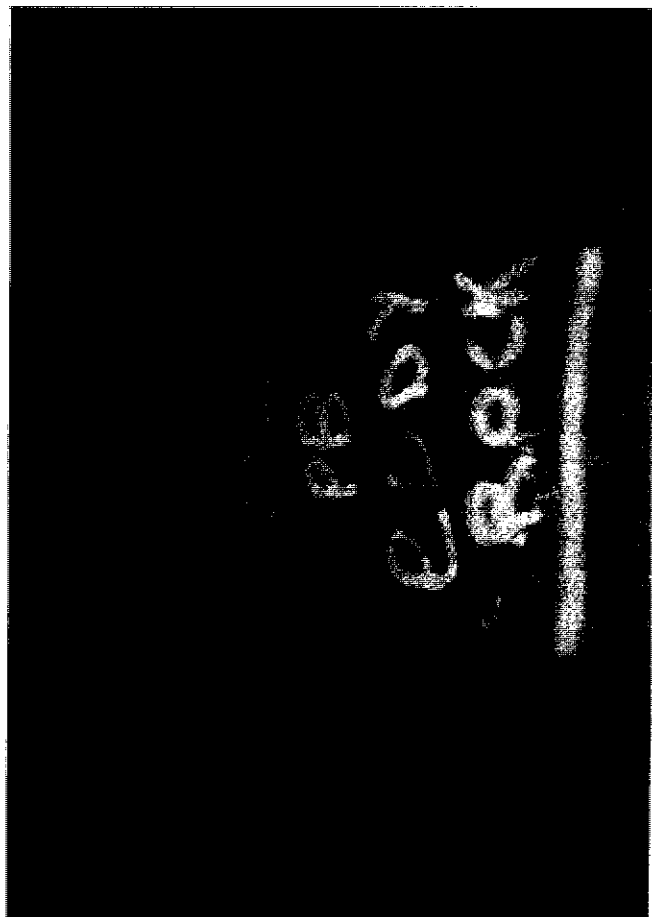
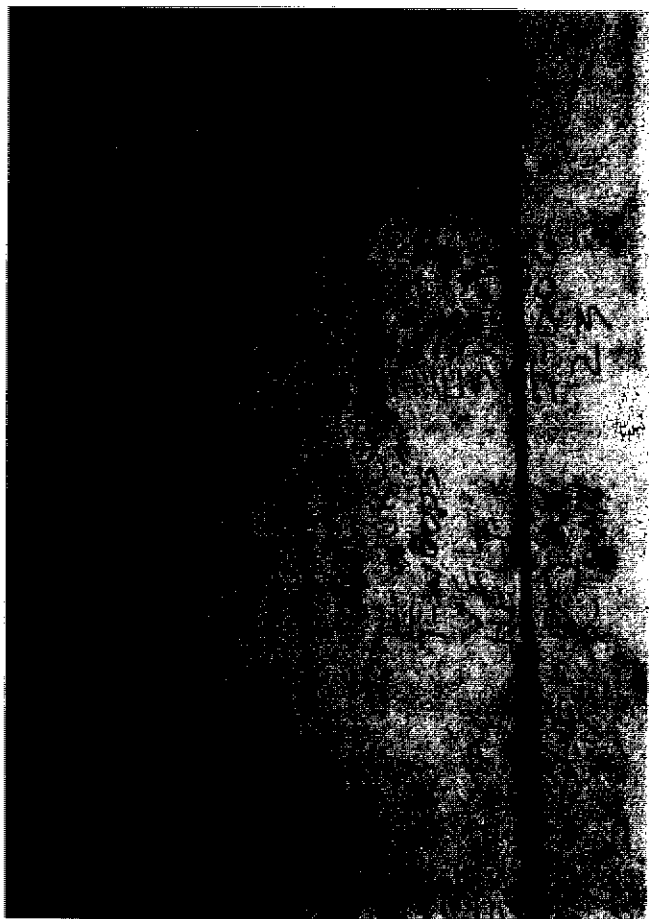
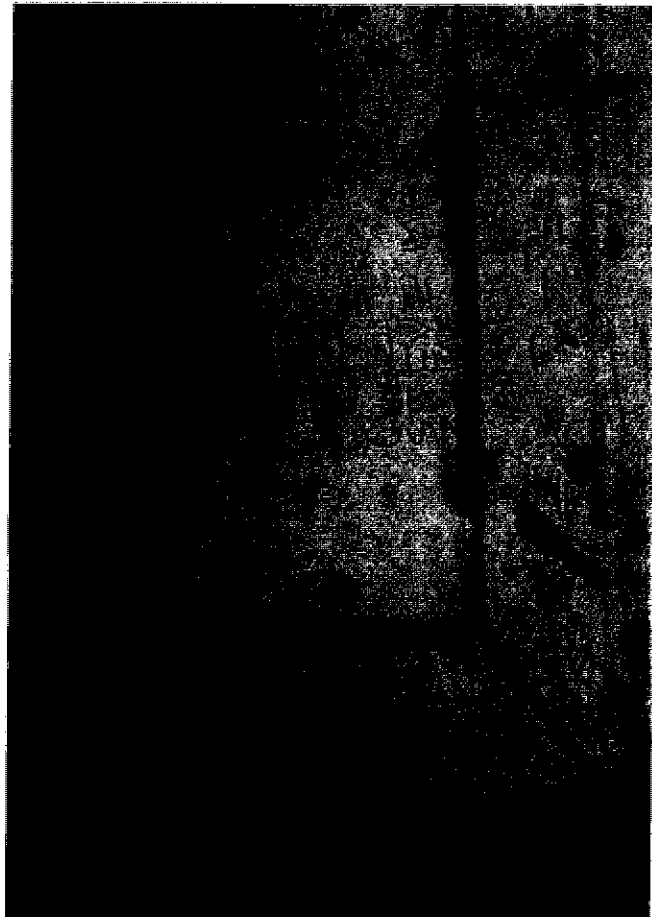
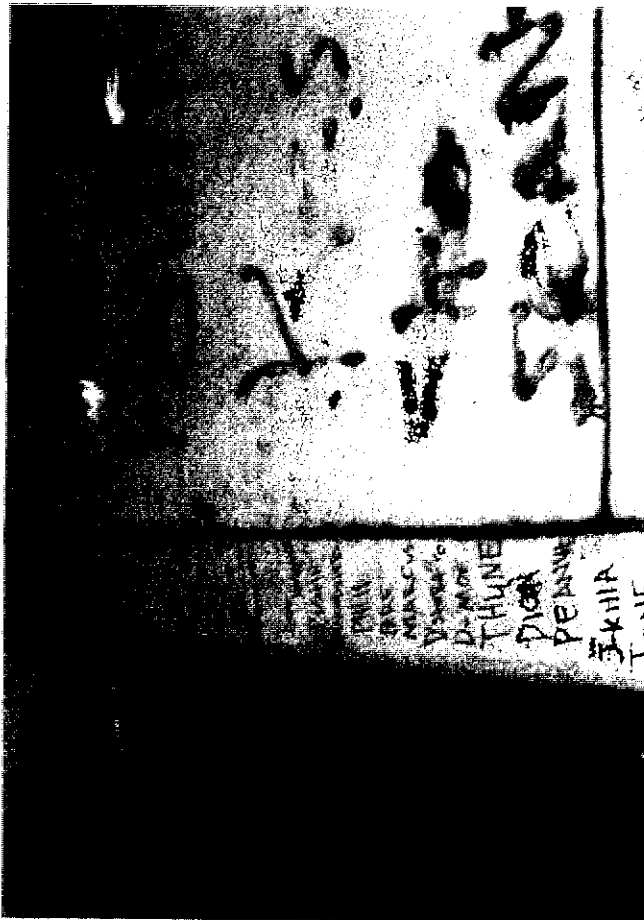
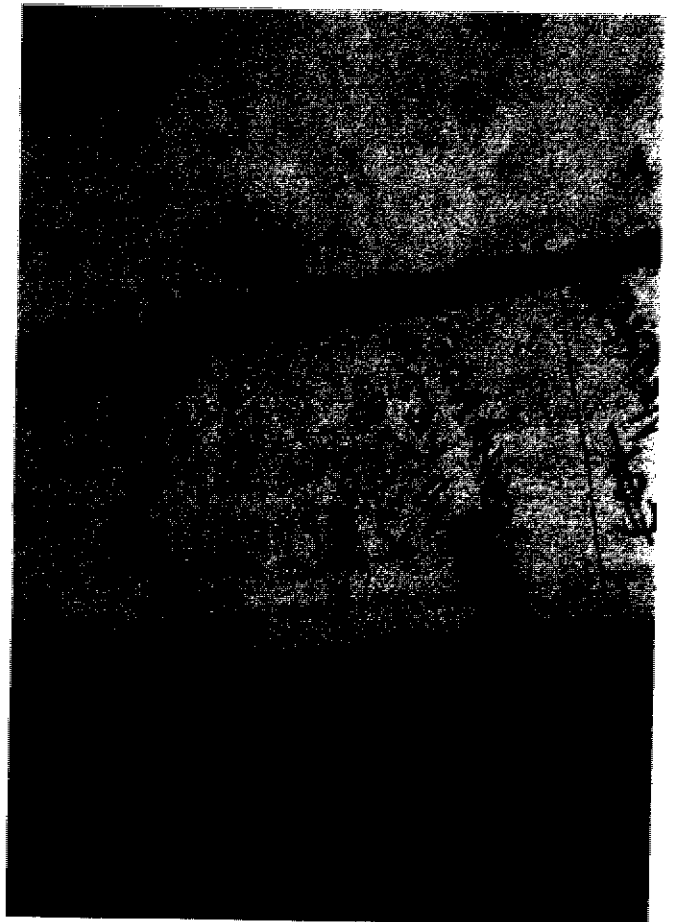
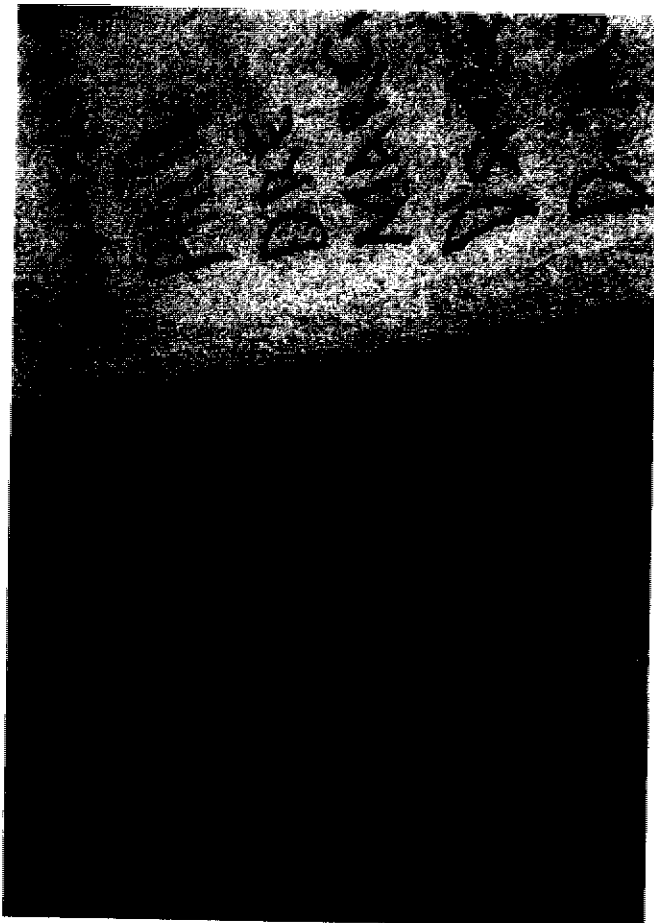
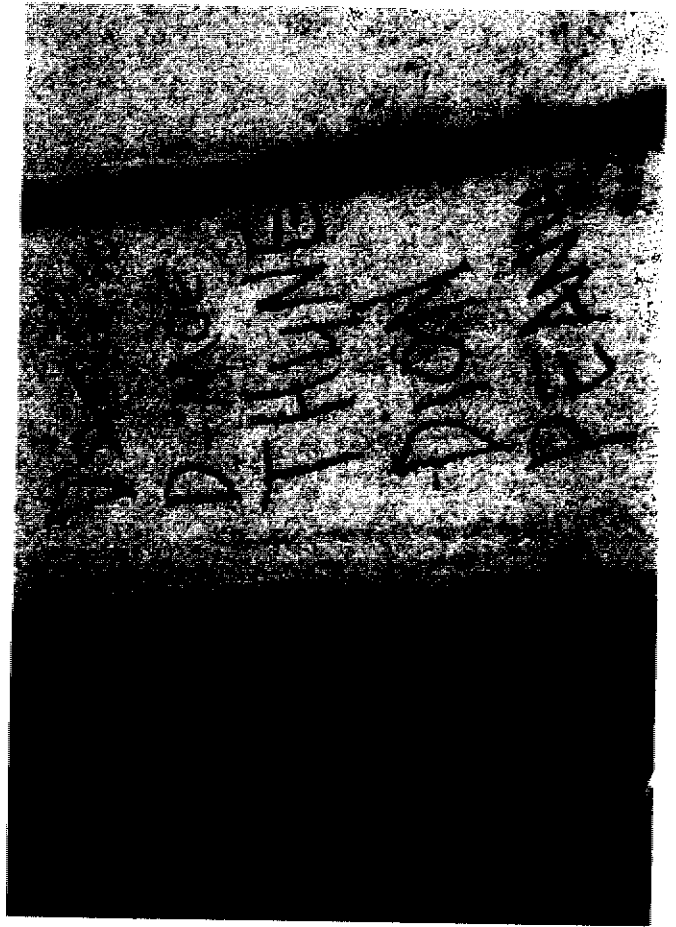
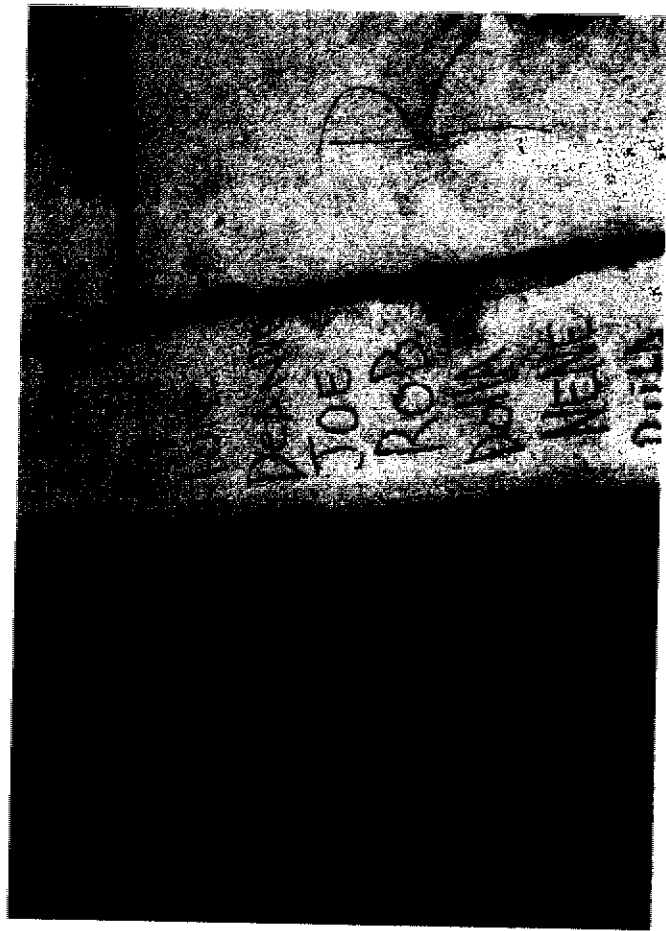


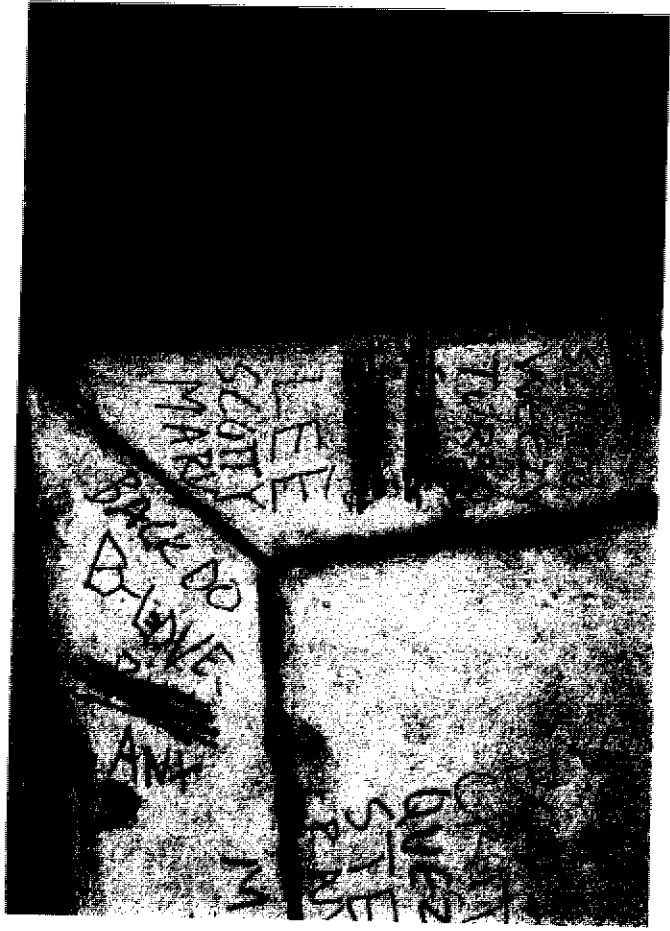


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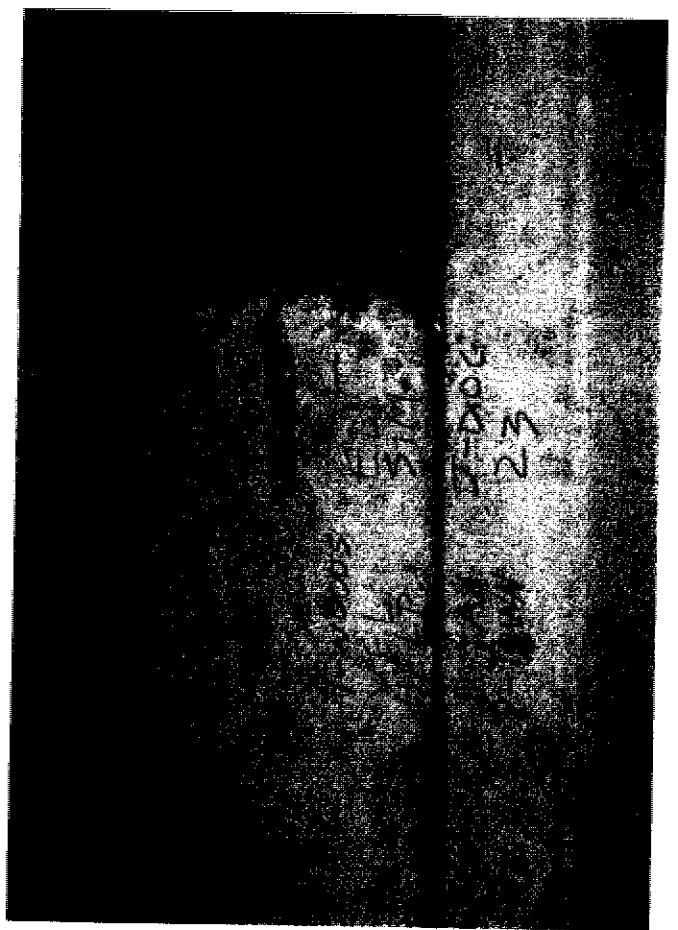
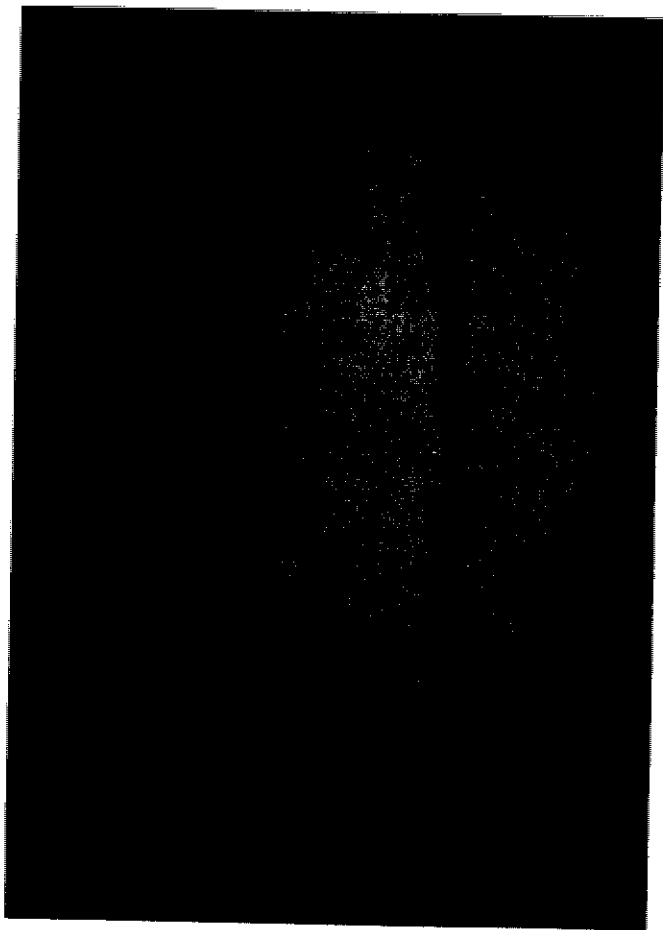
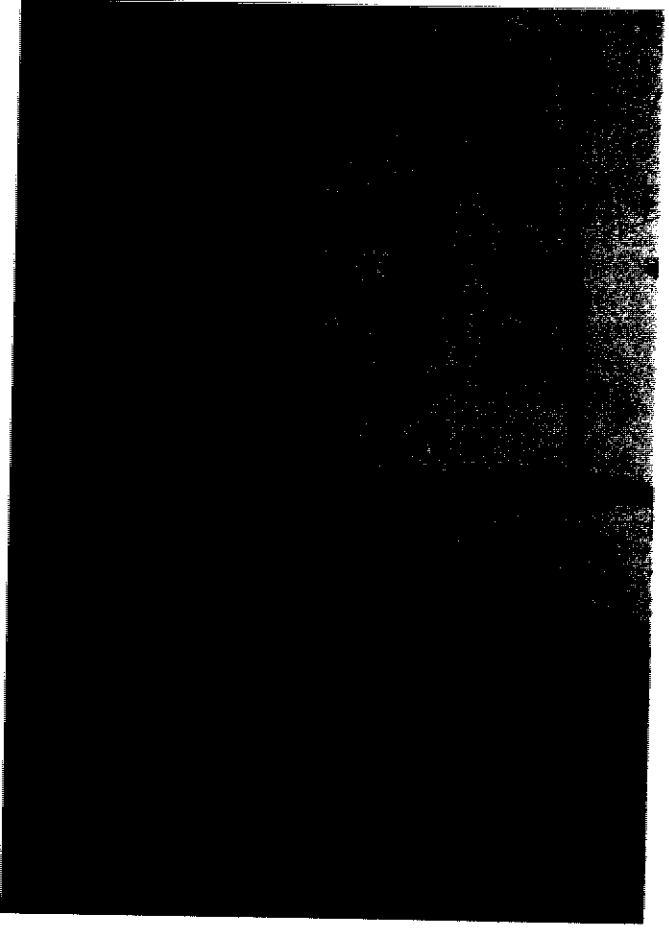
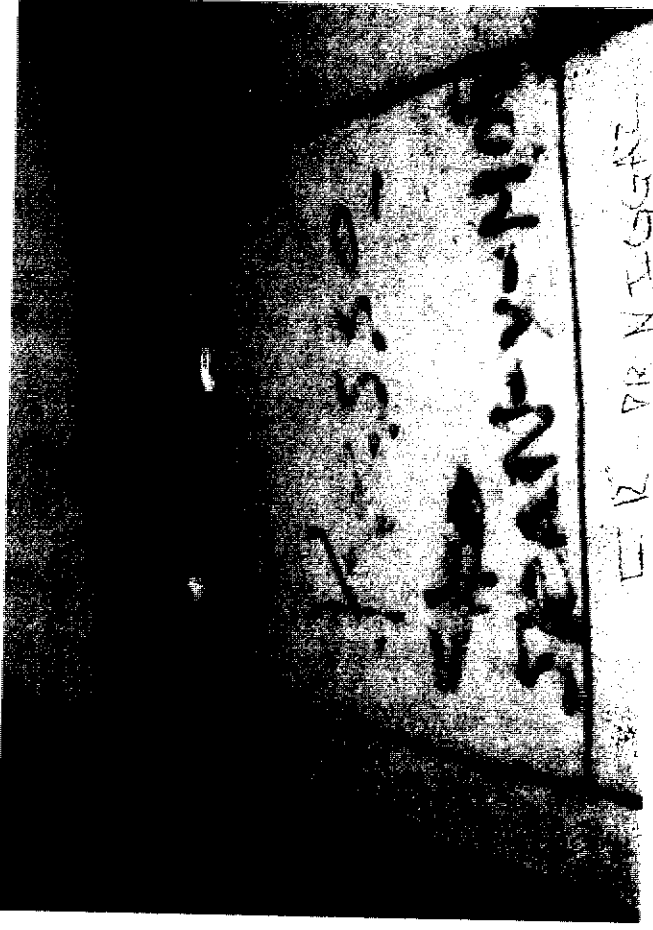


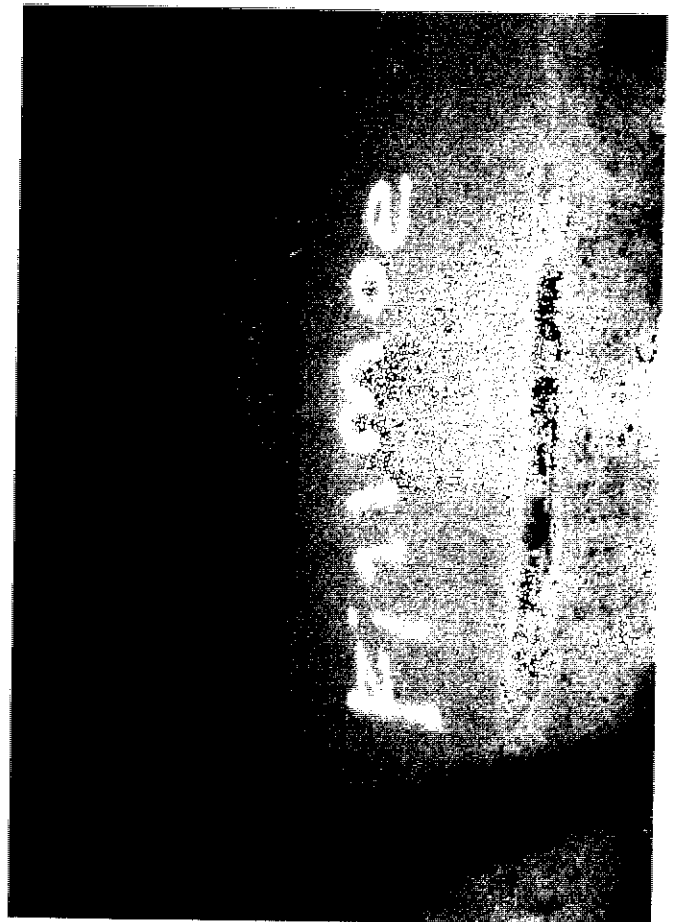
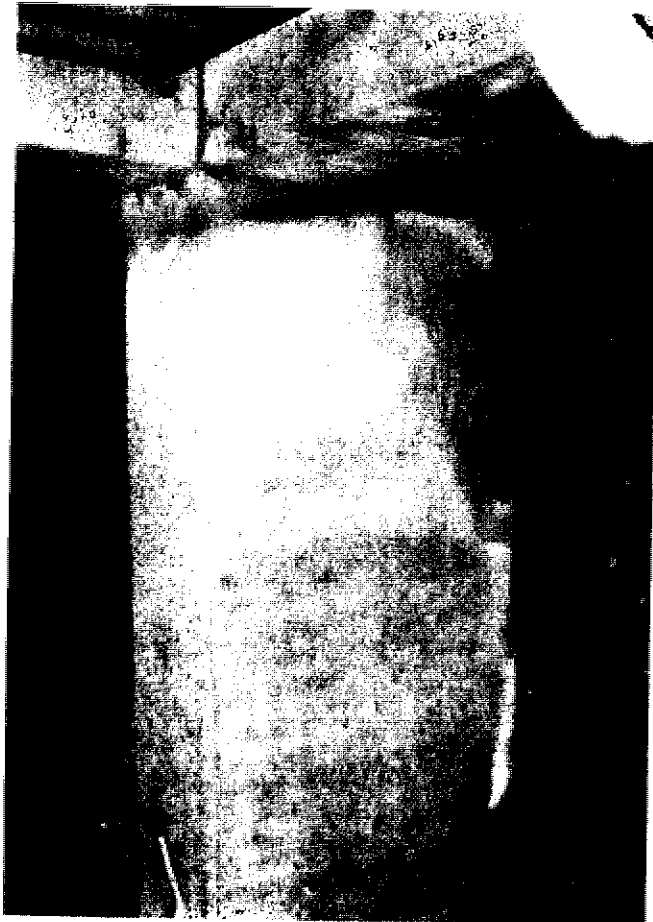
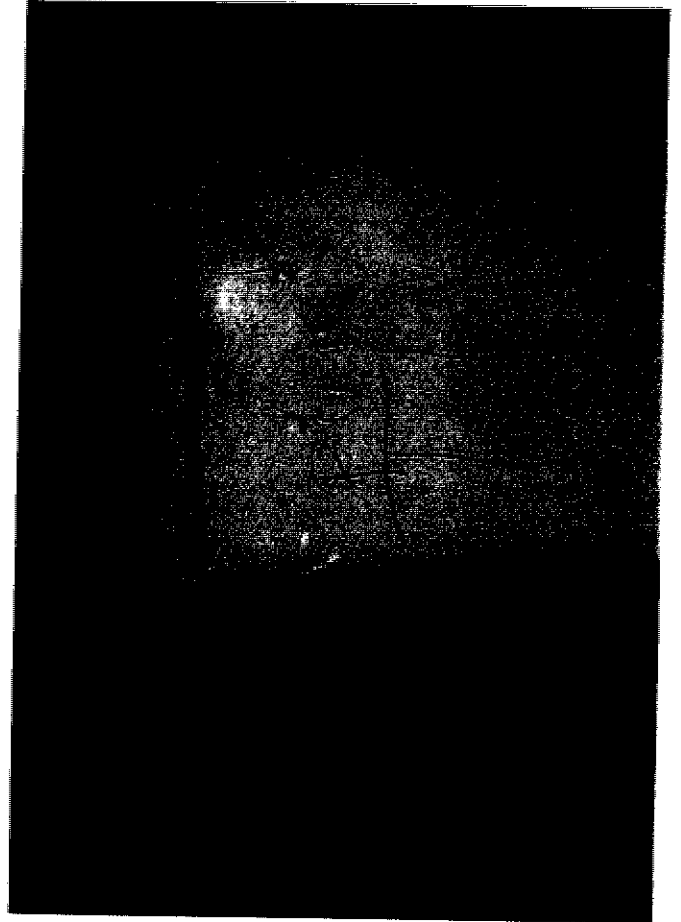
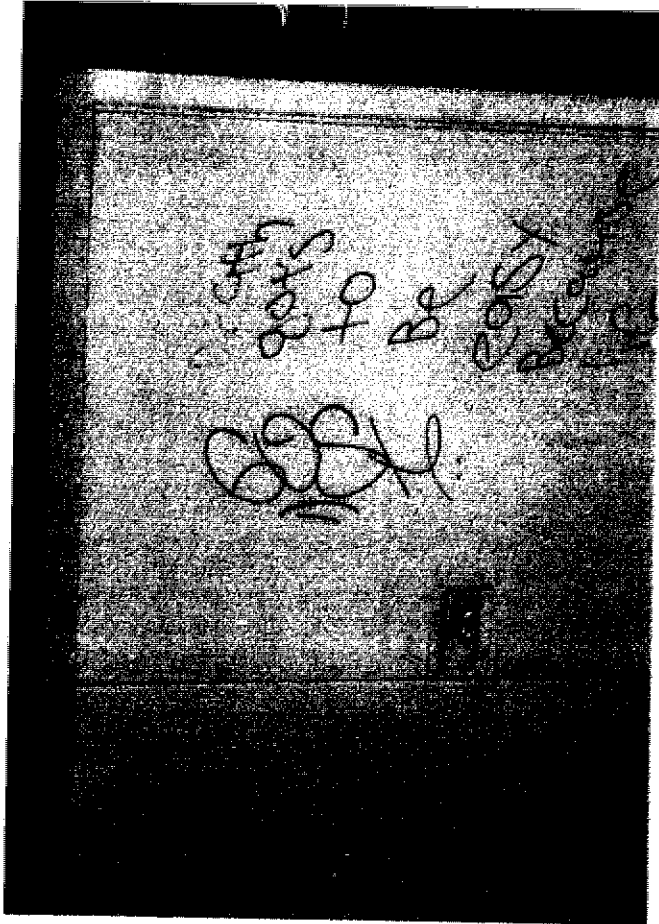


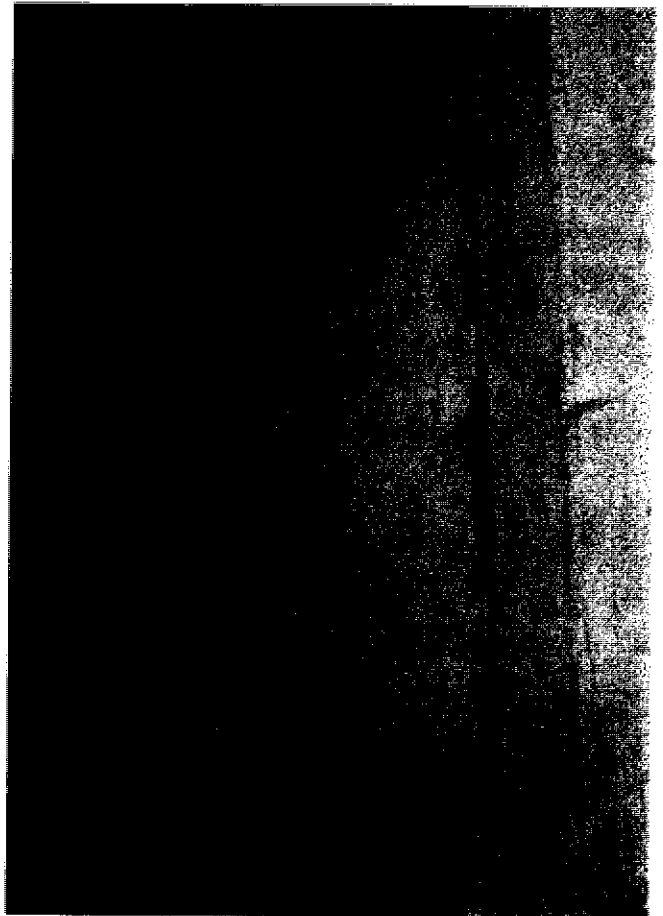
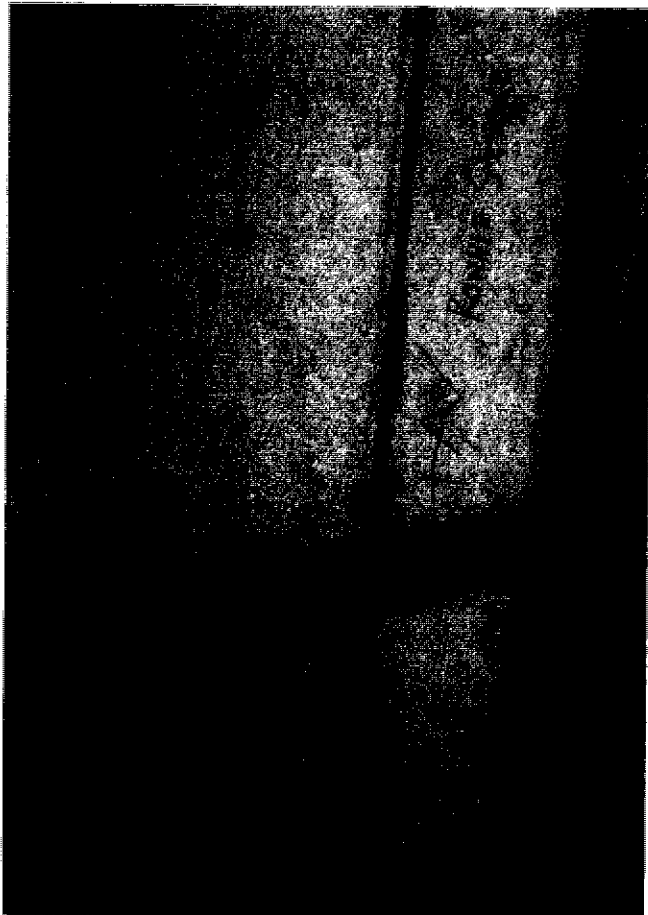
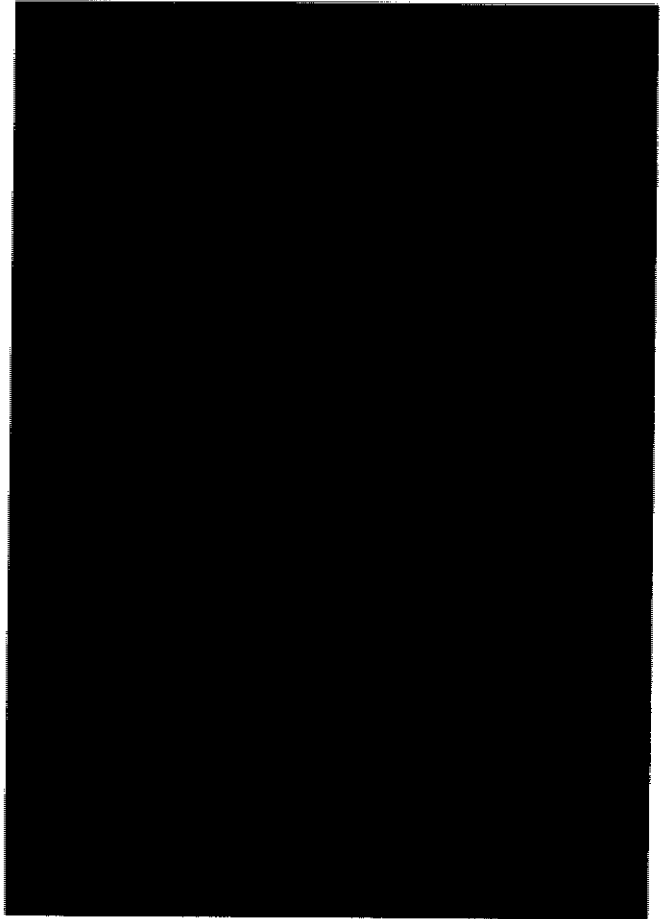
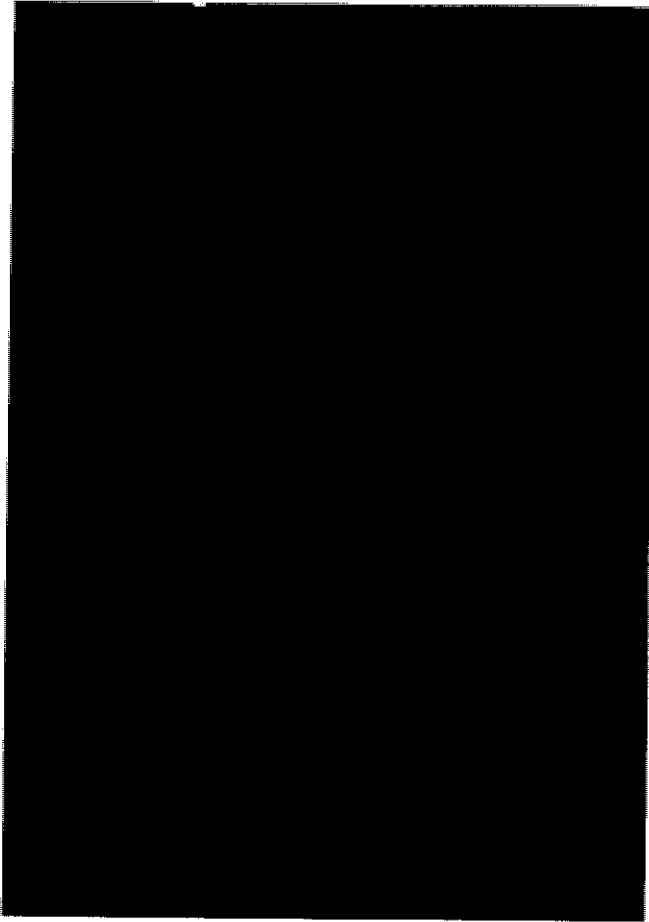




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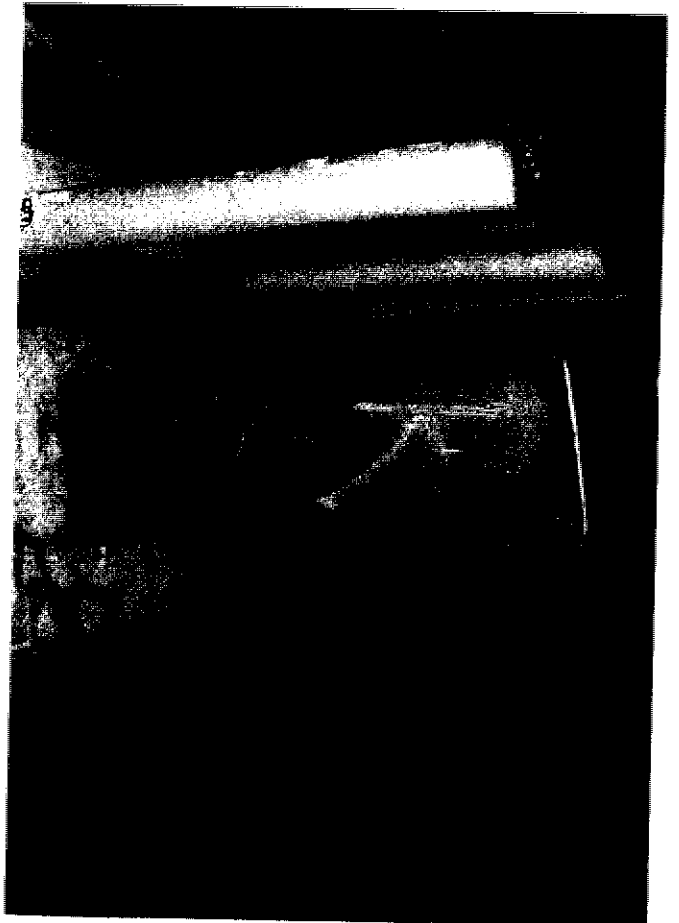
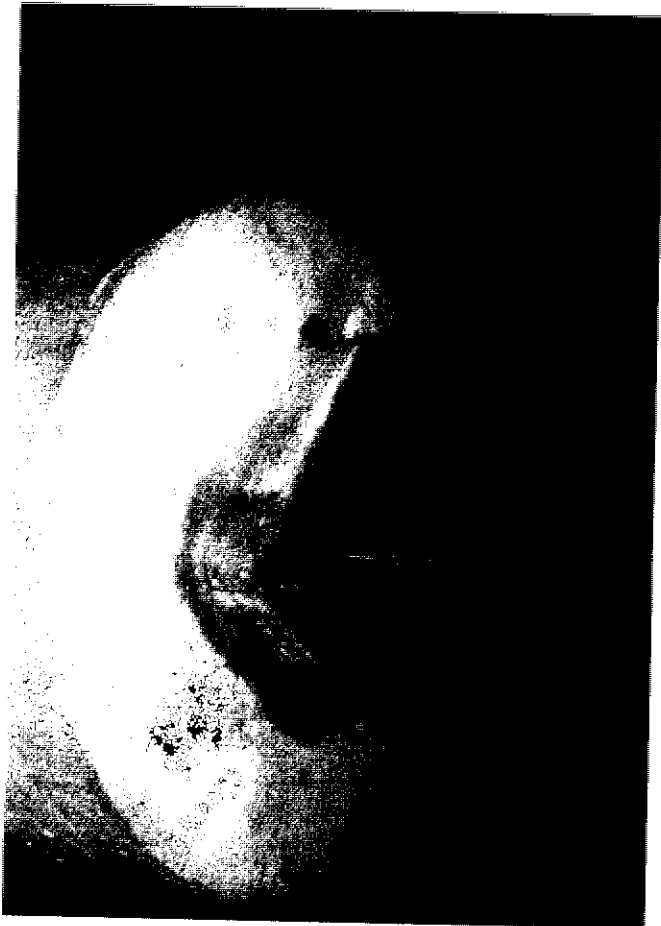
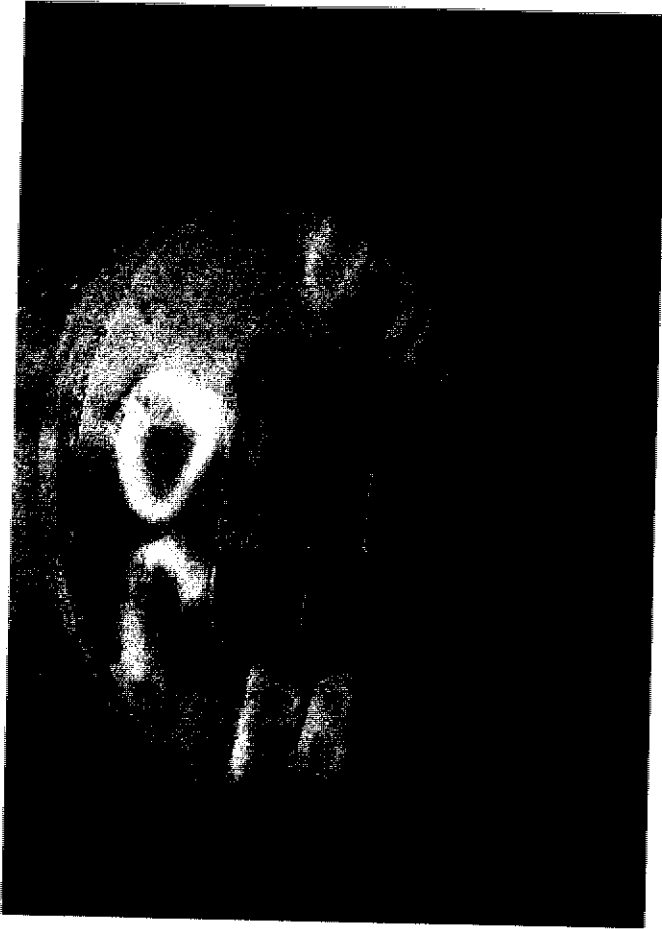
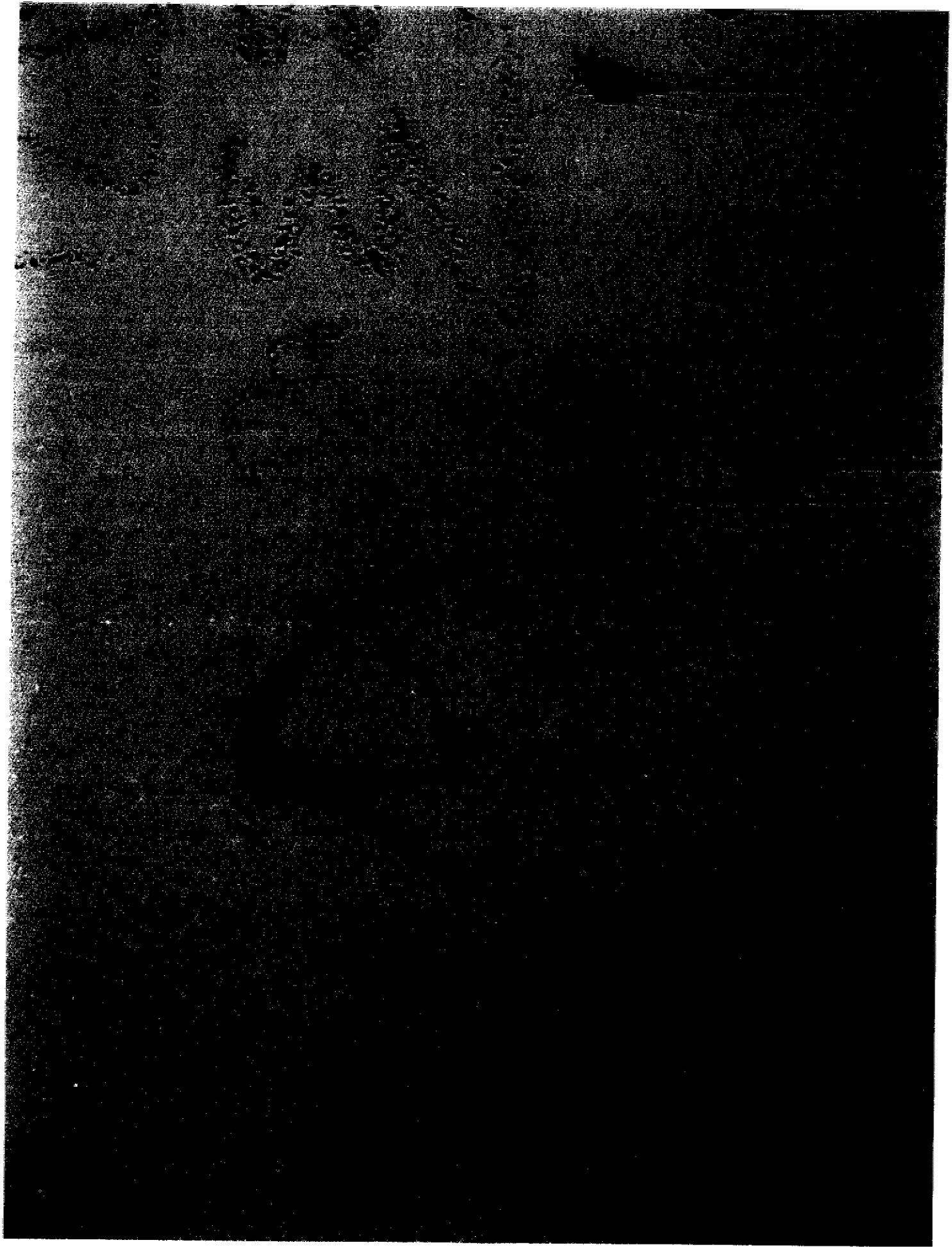
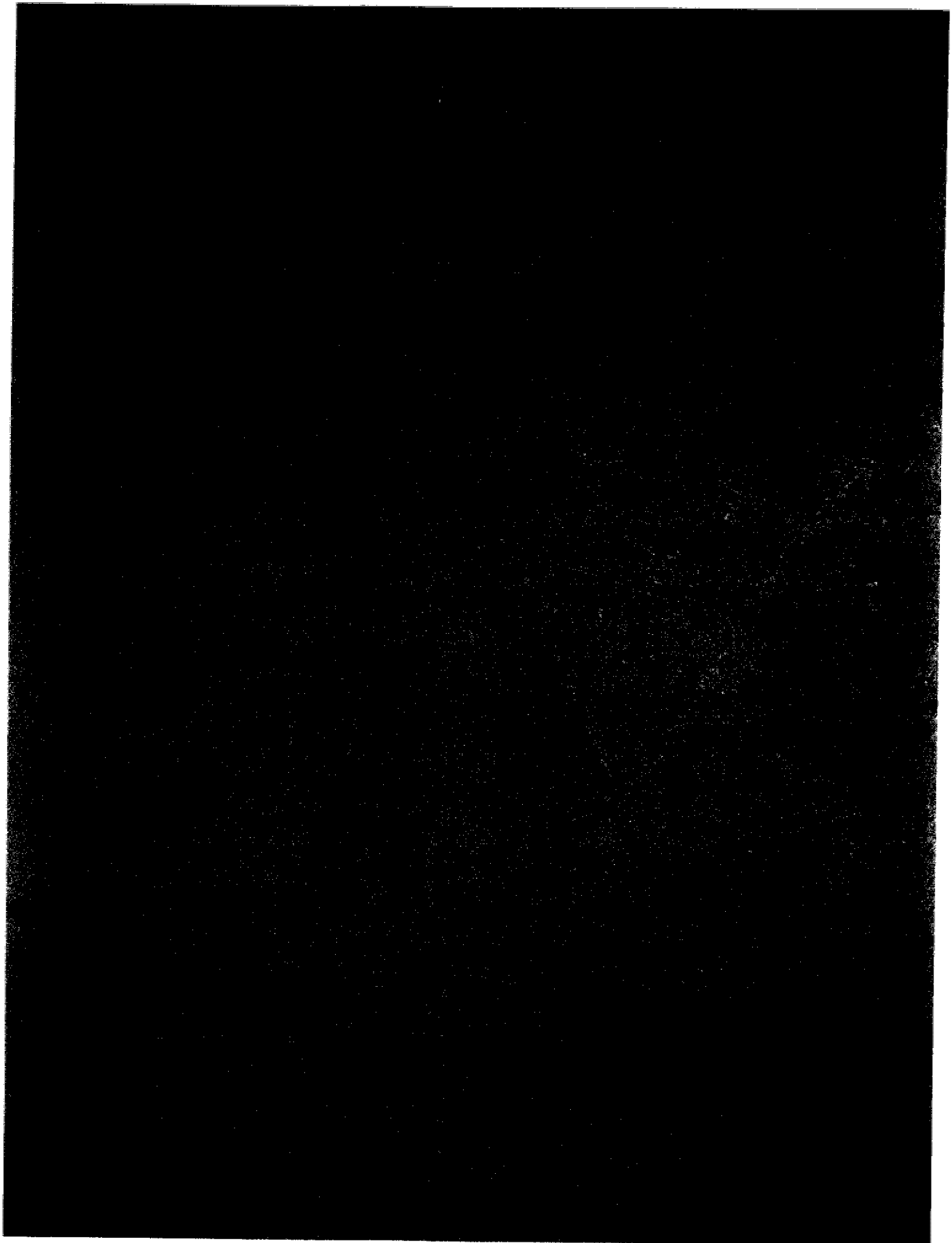


EXHIBIT D





Handwritten text, possibly a signature or code, consisting of several vertical columns of characters. The characters are highly stylized and difficult to decipher, but appear to include letters and numbers.

EXHIBIT E



SIGN POLE @ TURK / BUCHANAN

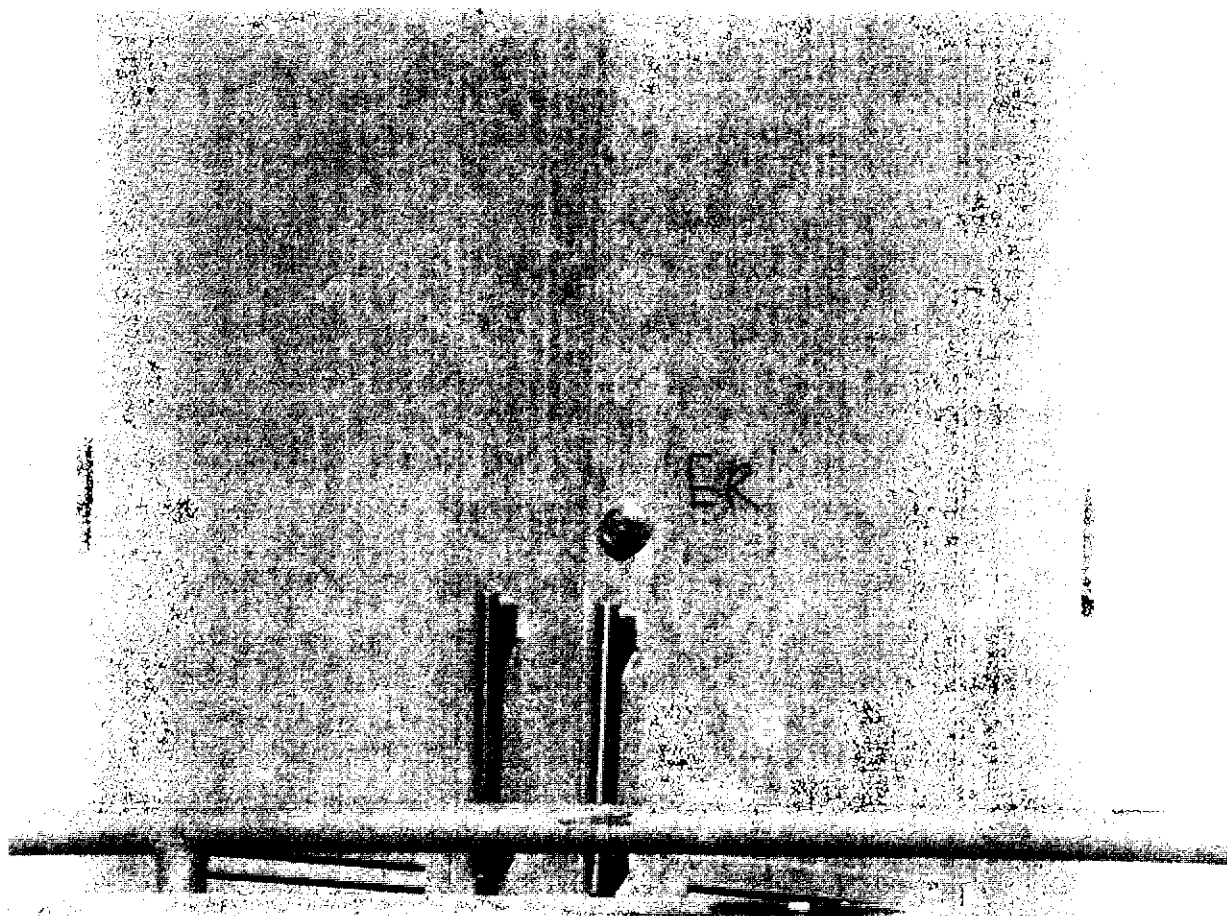


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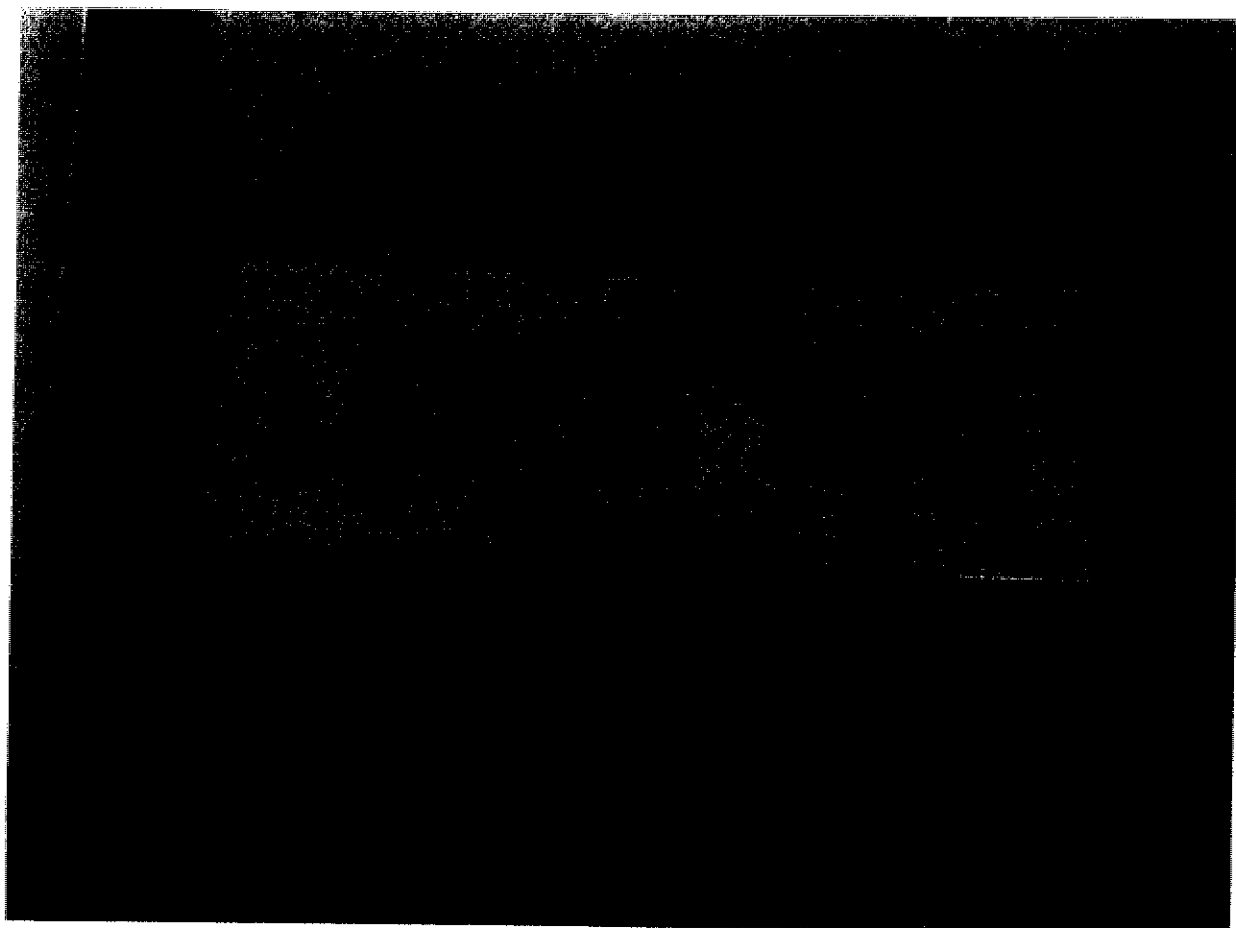




"ER LIFE HOE" @ TURK SI / BUCHANAN

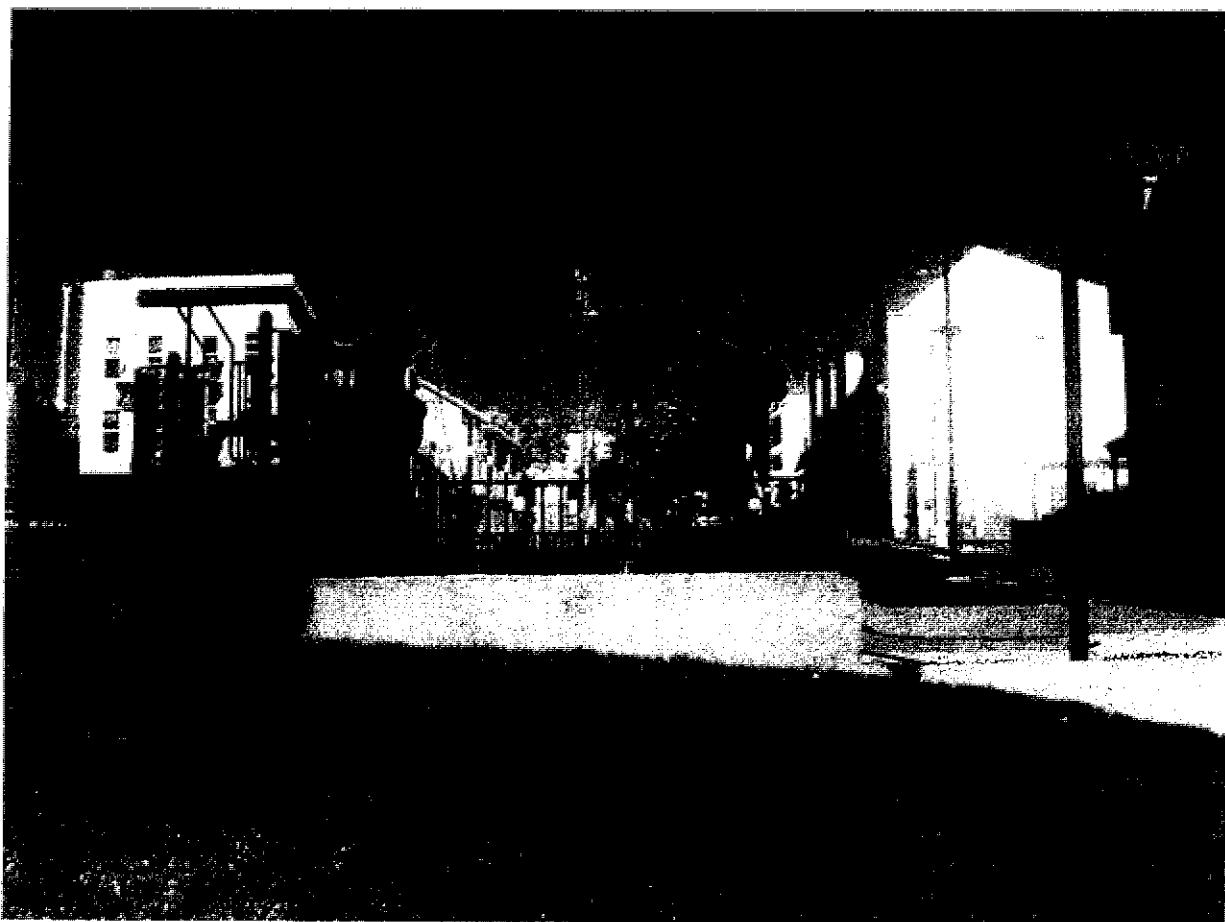


UTILITY ACCESS DOORS @ LARCH / RACINA



2007-02-23  
LARCH WAY

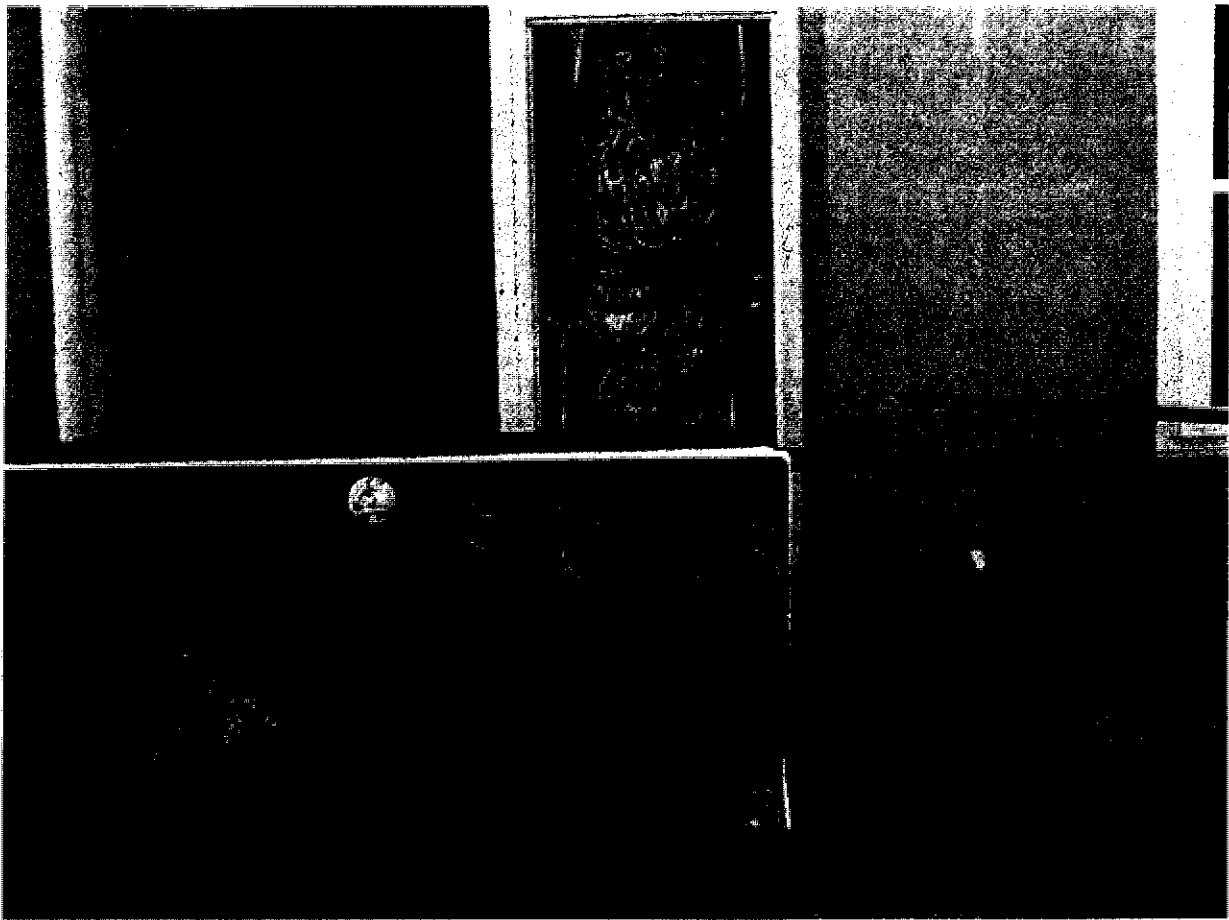
DOOR  
BOOK



BUCHANAN ST, FROM TURK ST









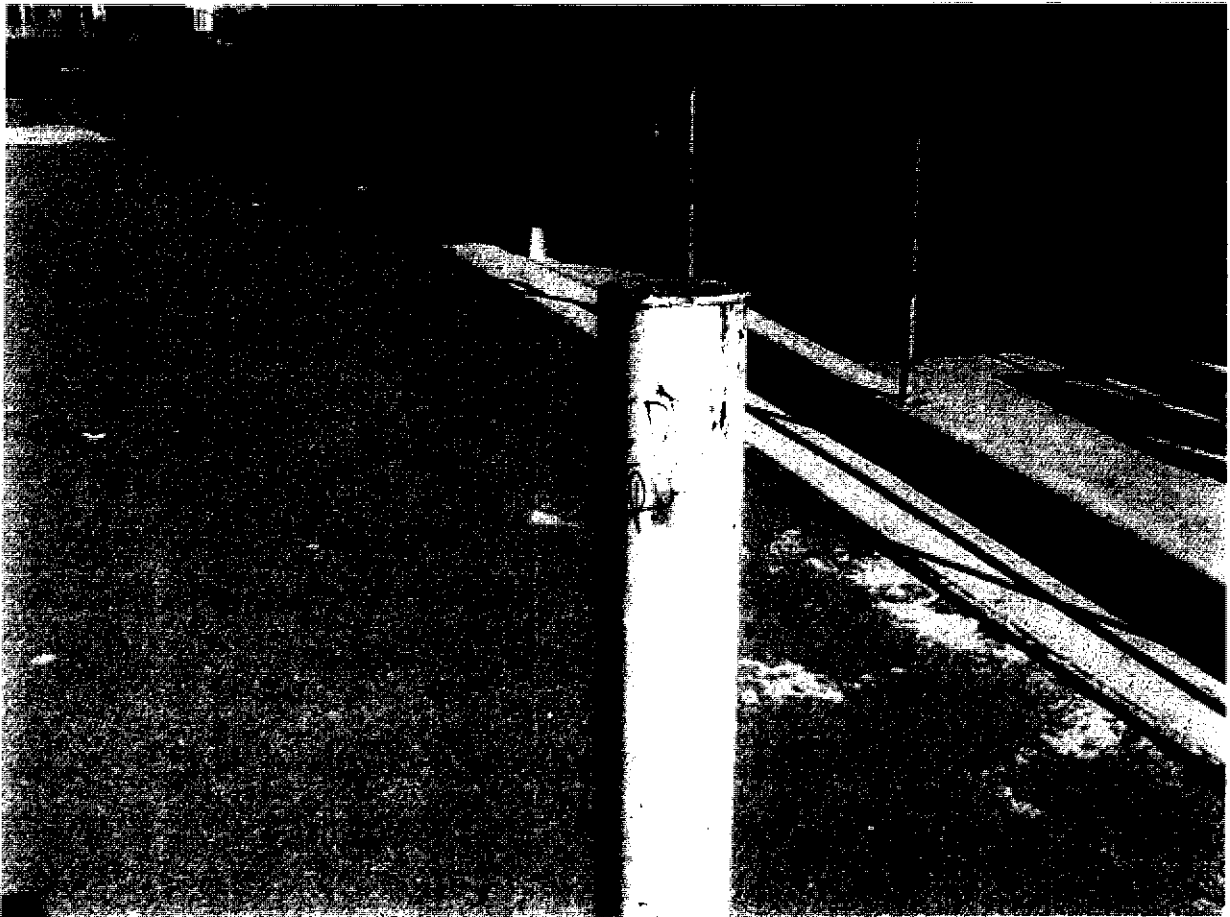
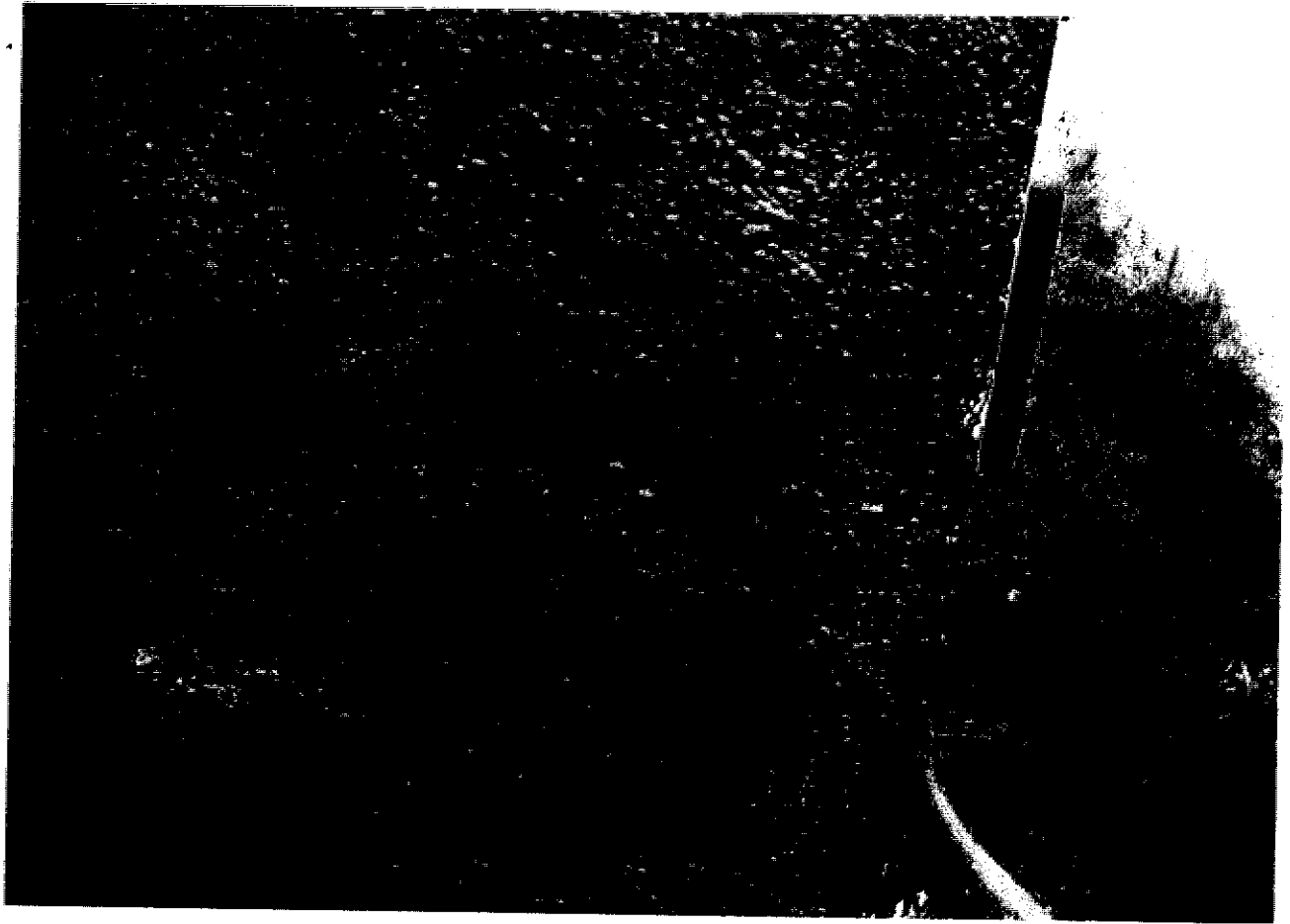


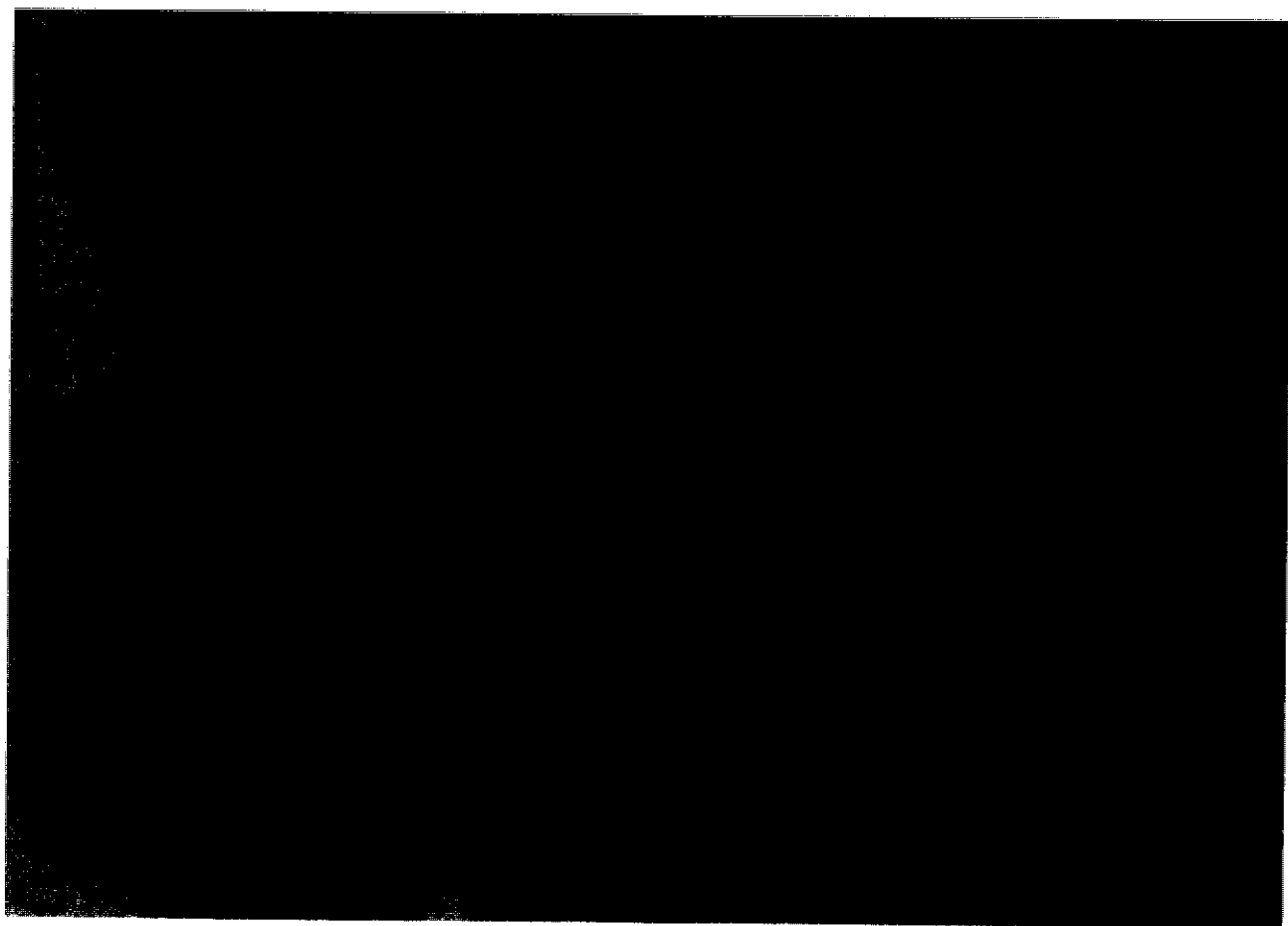


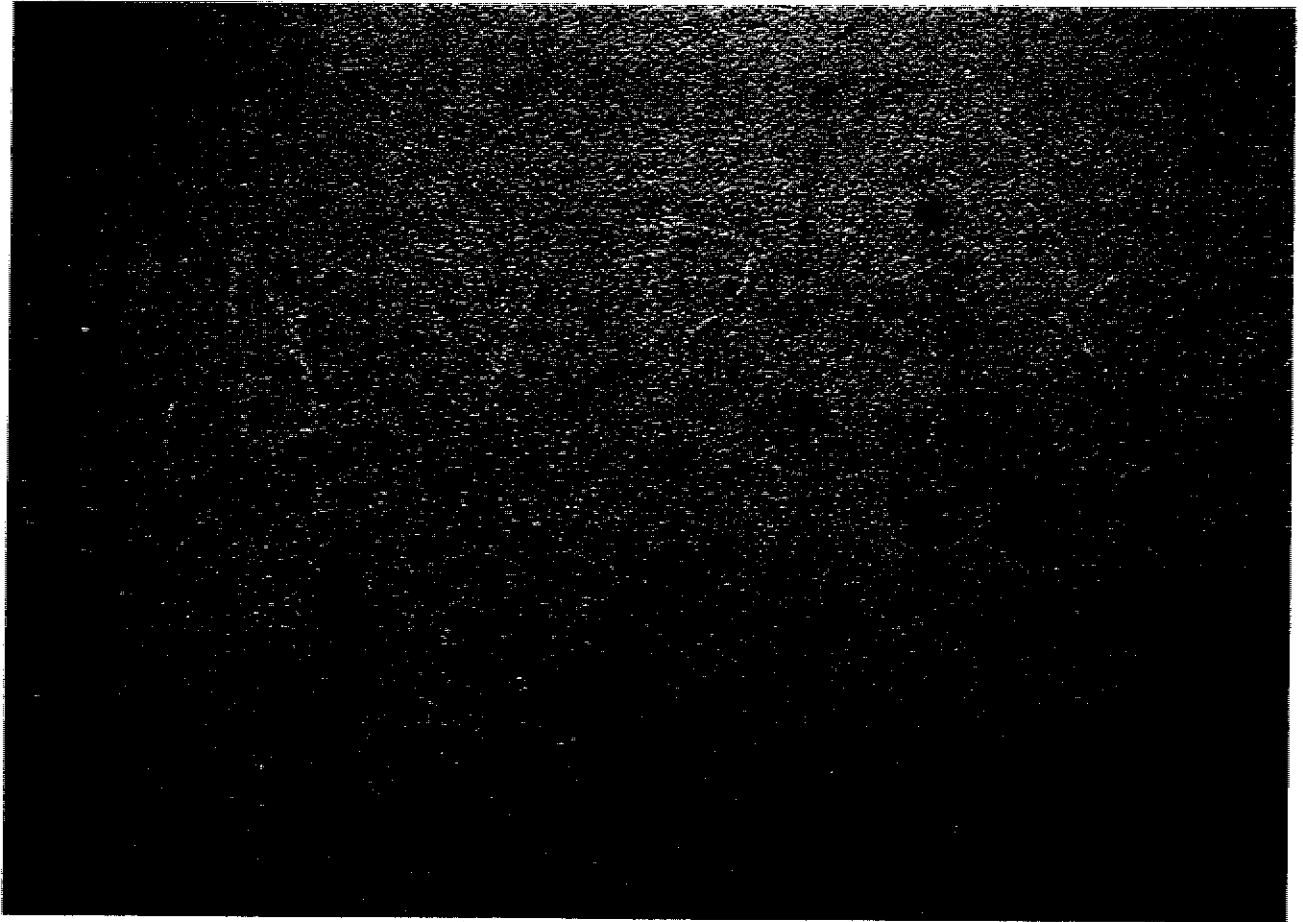




EXHIBIT F









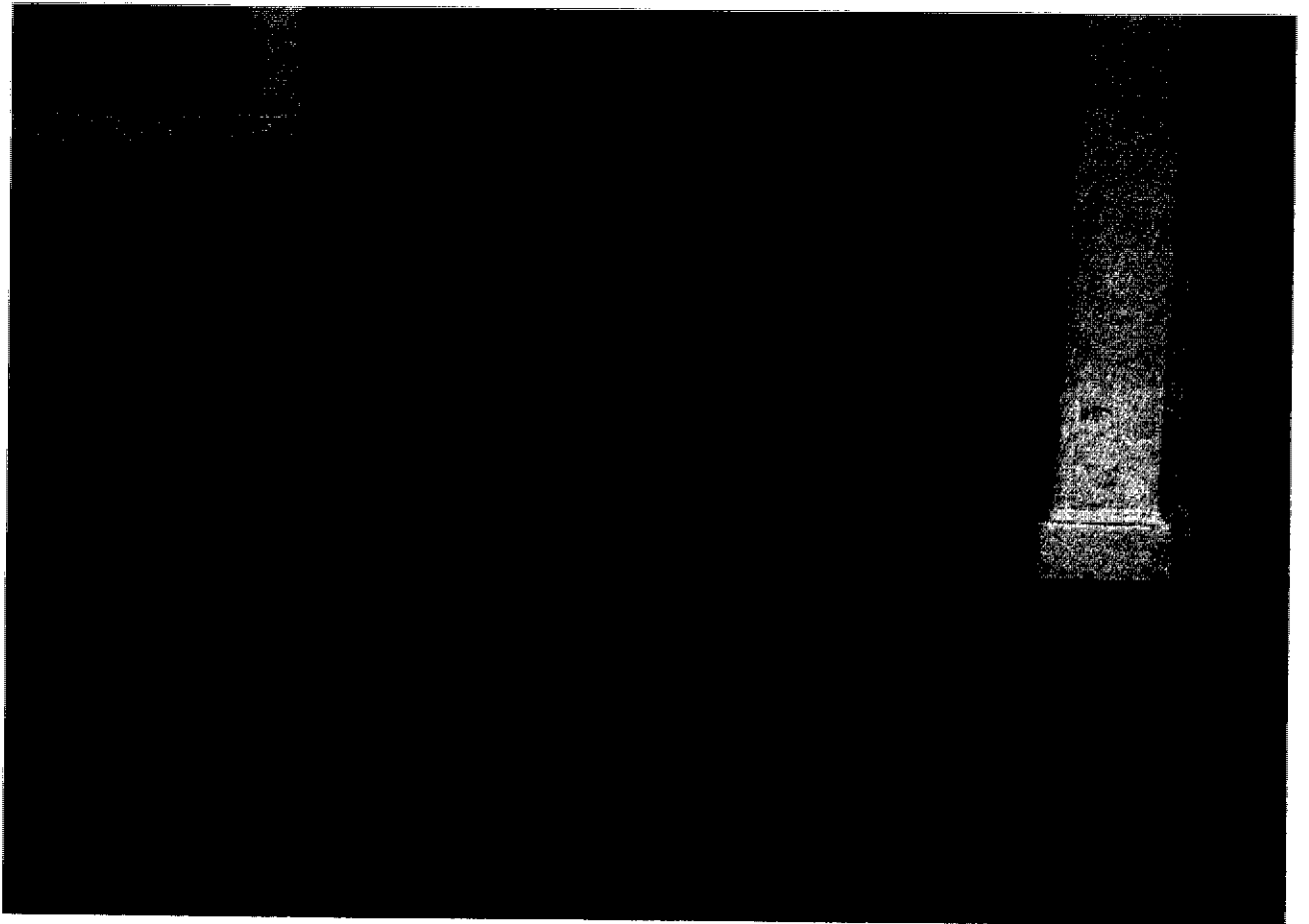
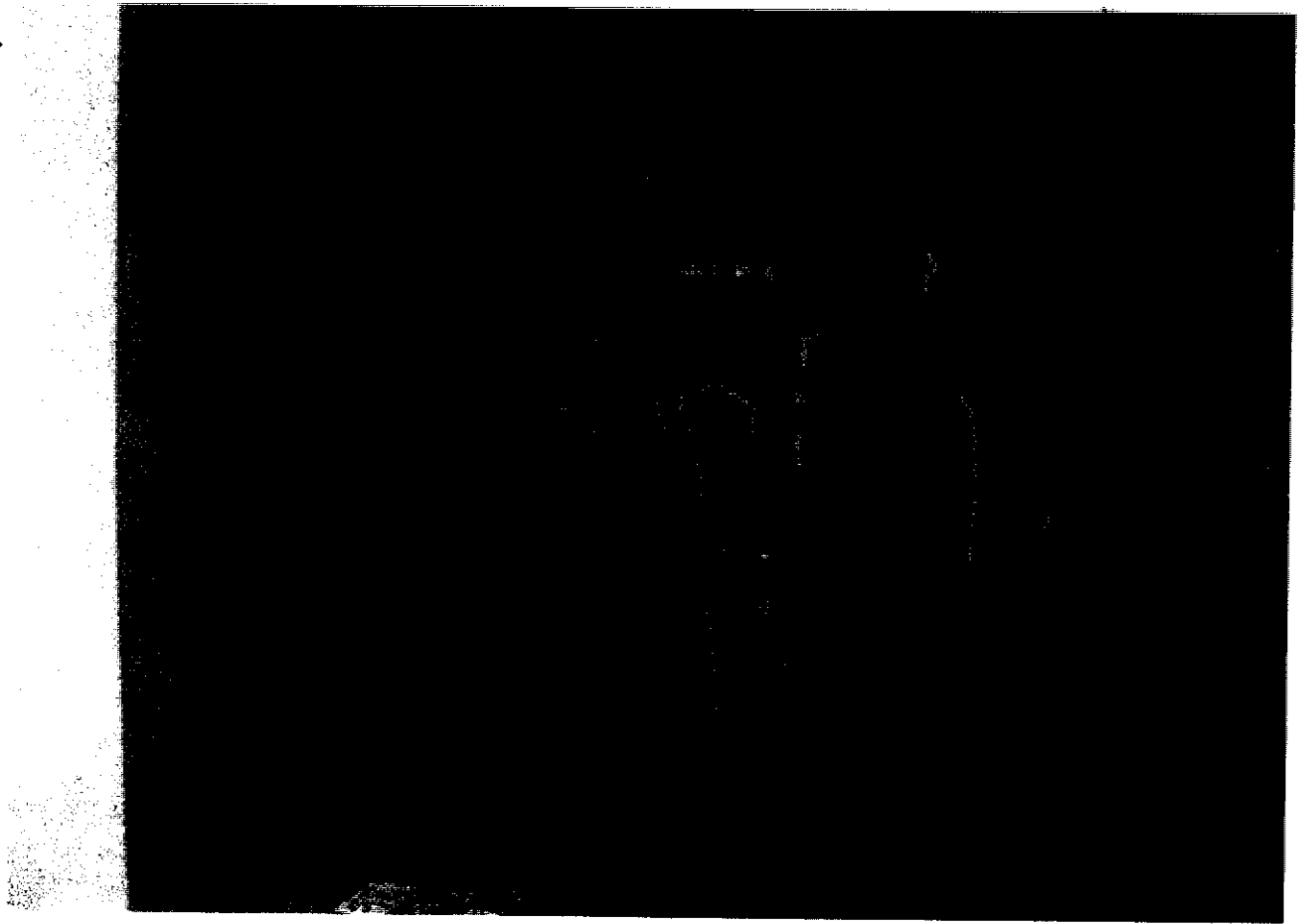
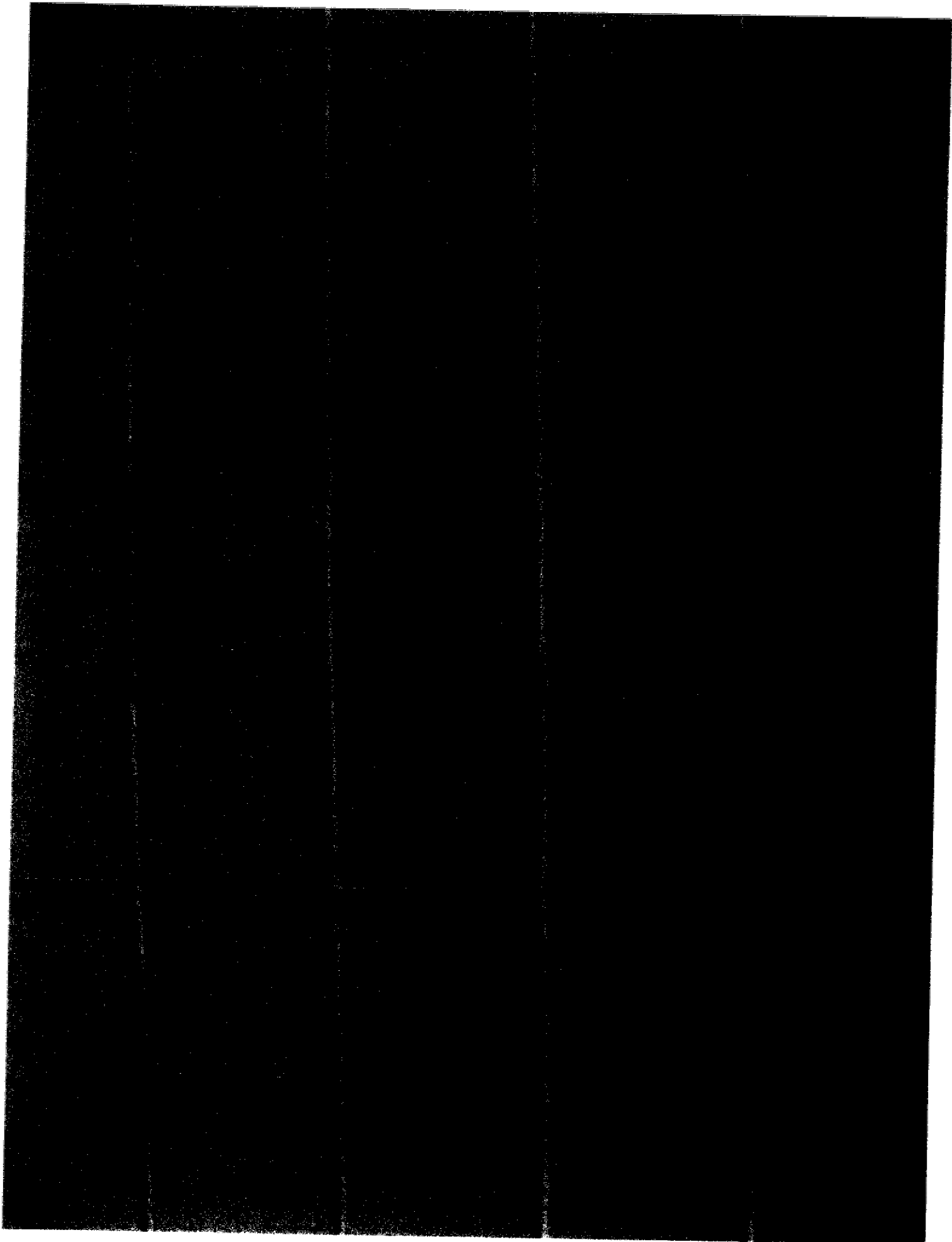
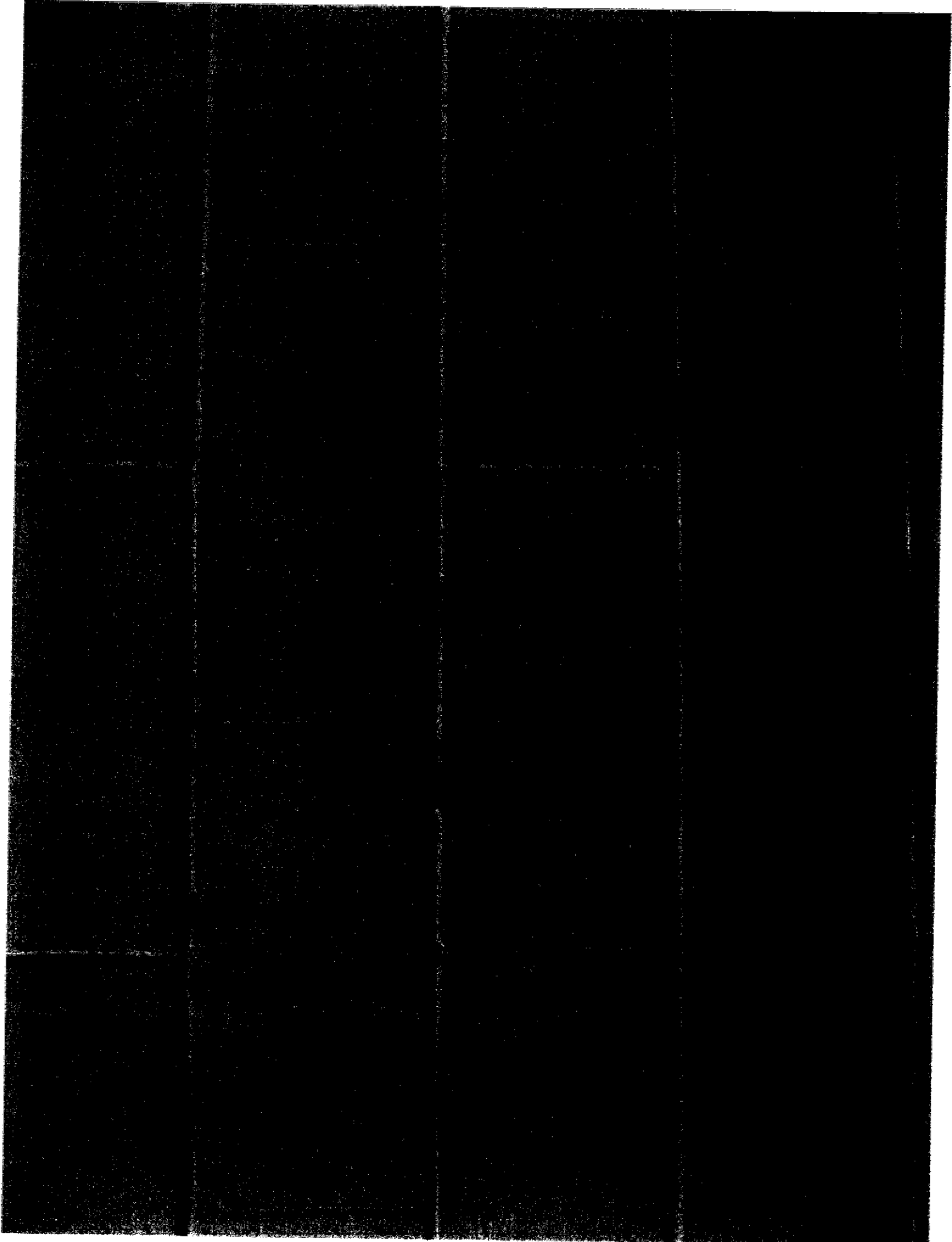


EXHIBIT G





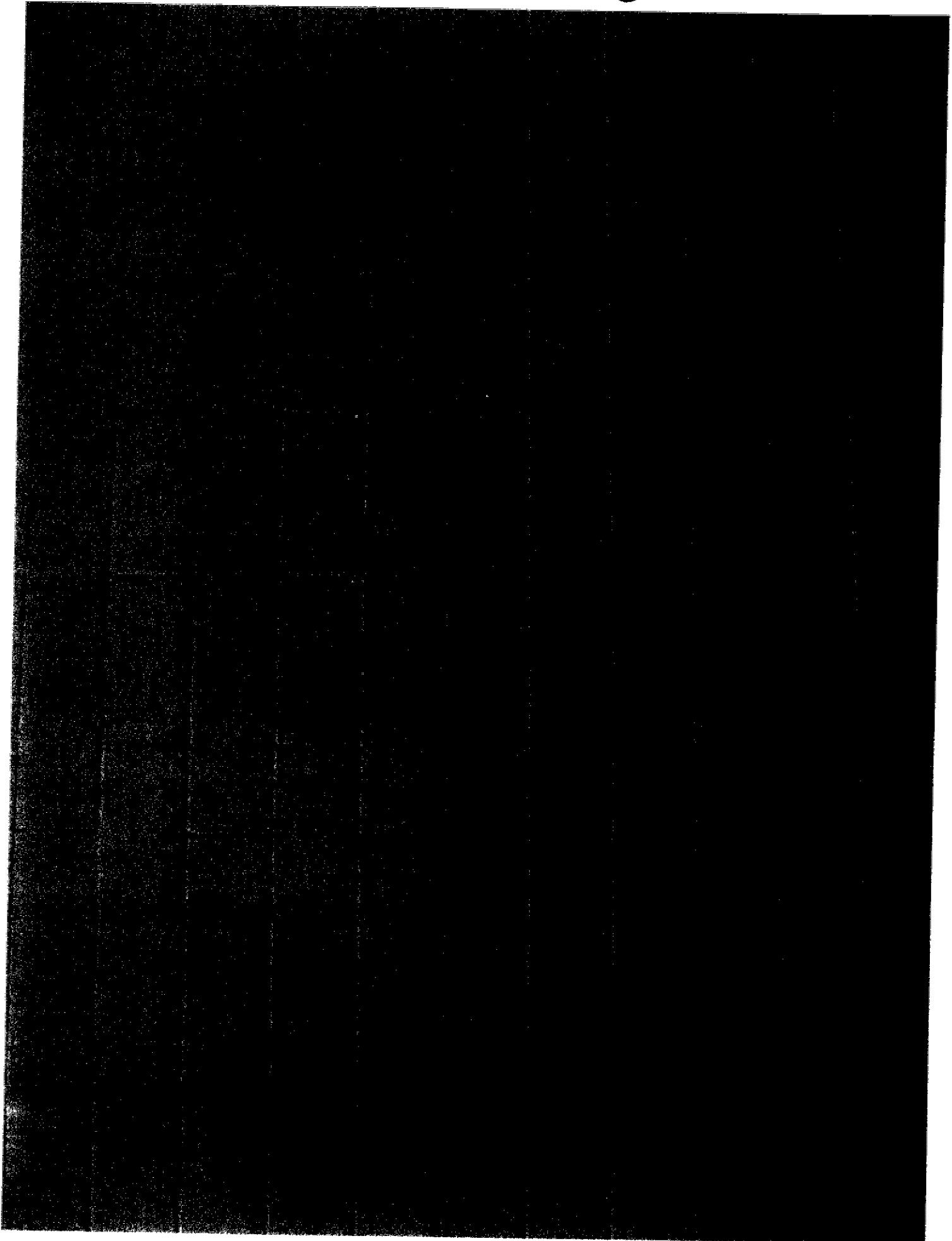
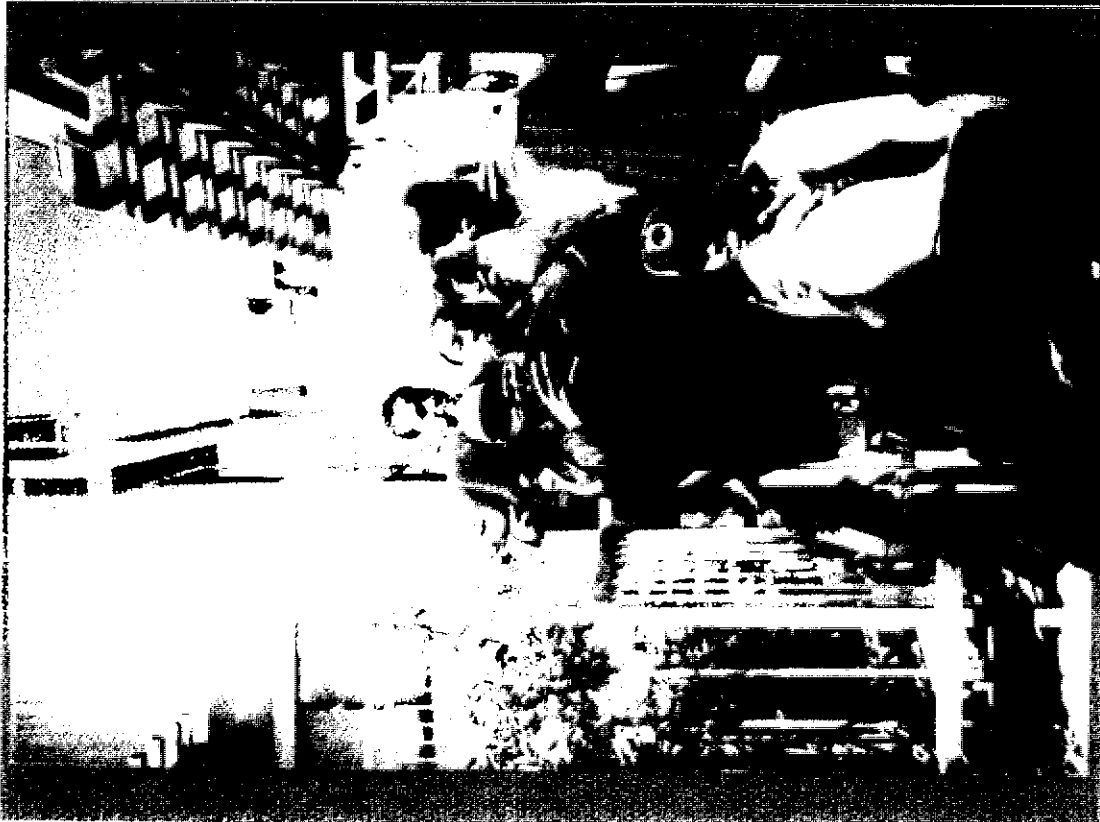


EXHIBIT H



Page 1 of 1

EXHIBIT I





EXHIBIT J



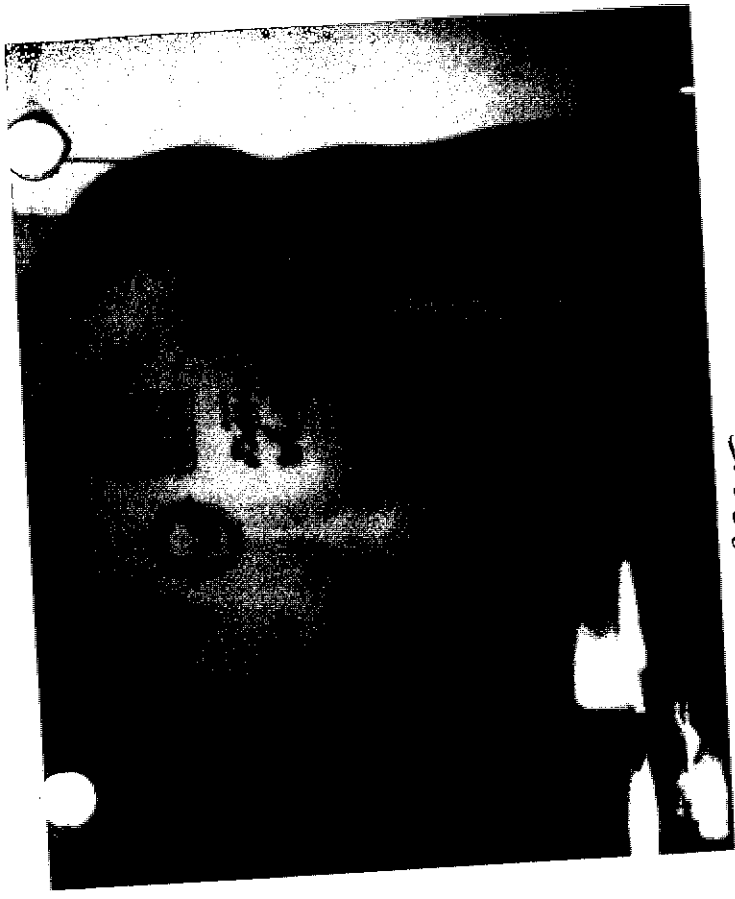
EXHIBIT K

6-20-58



MURPHY, PAUL  
317 523 297  
12700 1300 20  
0-1-06-08

5-24-04



MOE PETT, PACT  
SEP 23 2007  
A 44 PM 10:00  
04-06-04



MOFFETT, PARIS

523297

PAYPA BOUND

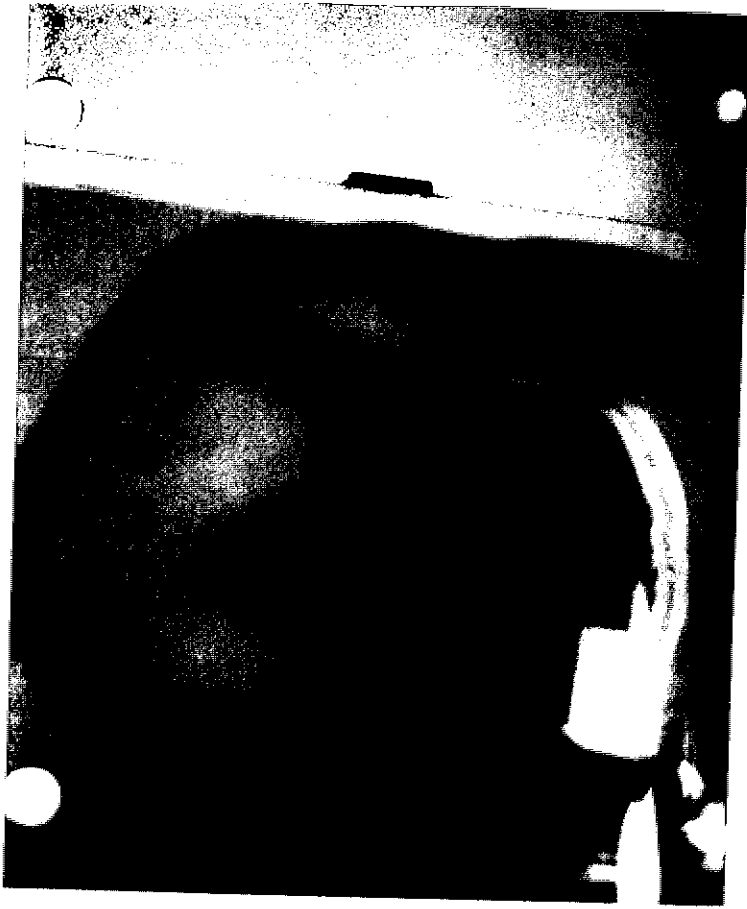


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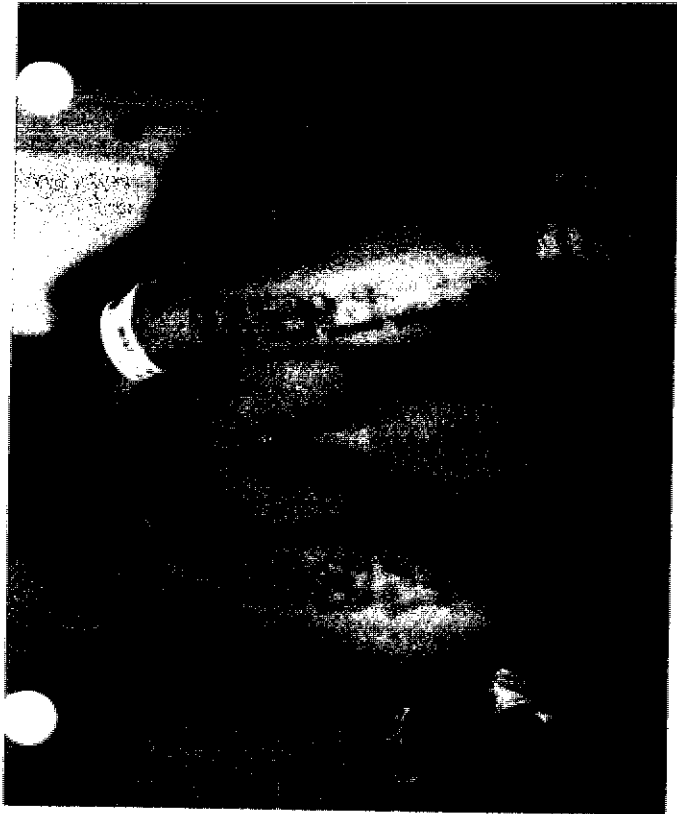


SP-5000



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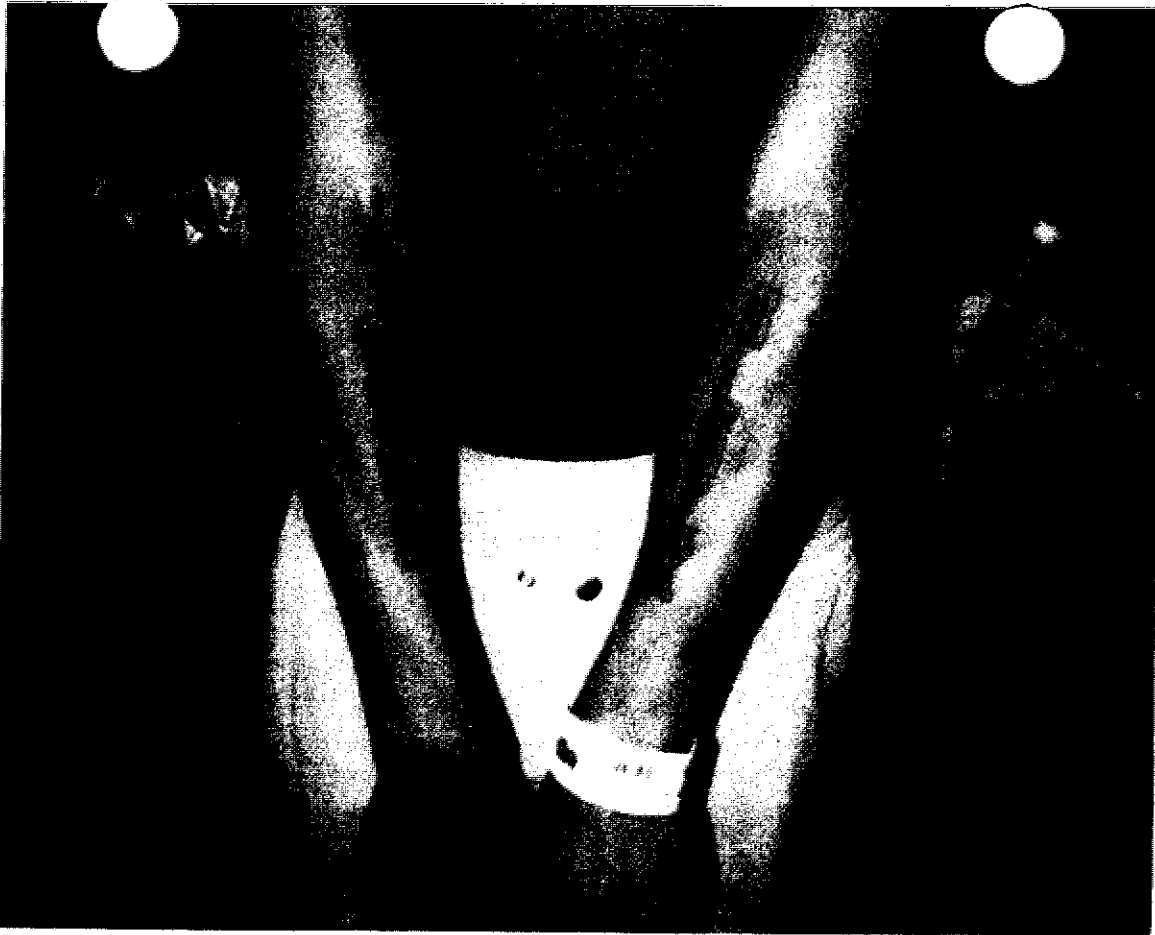




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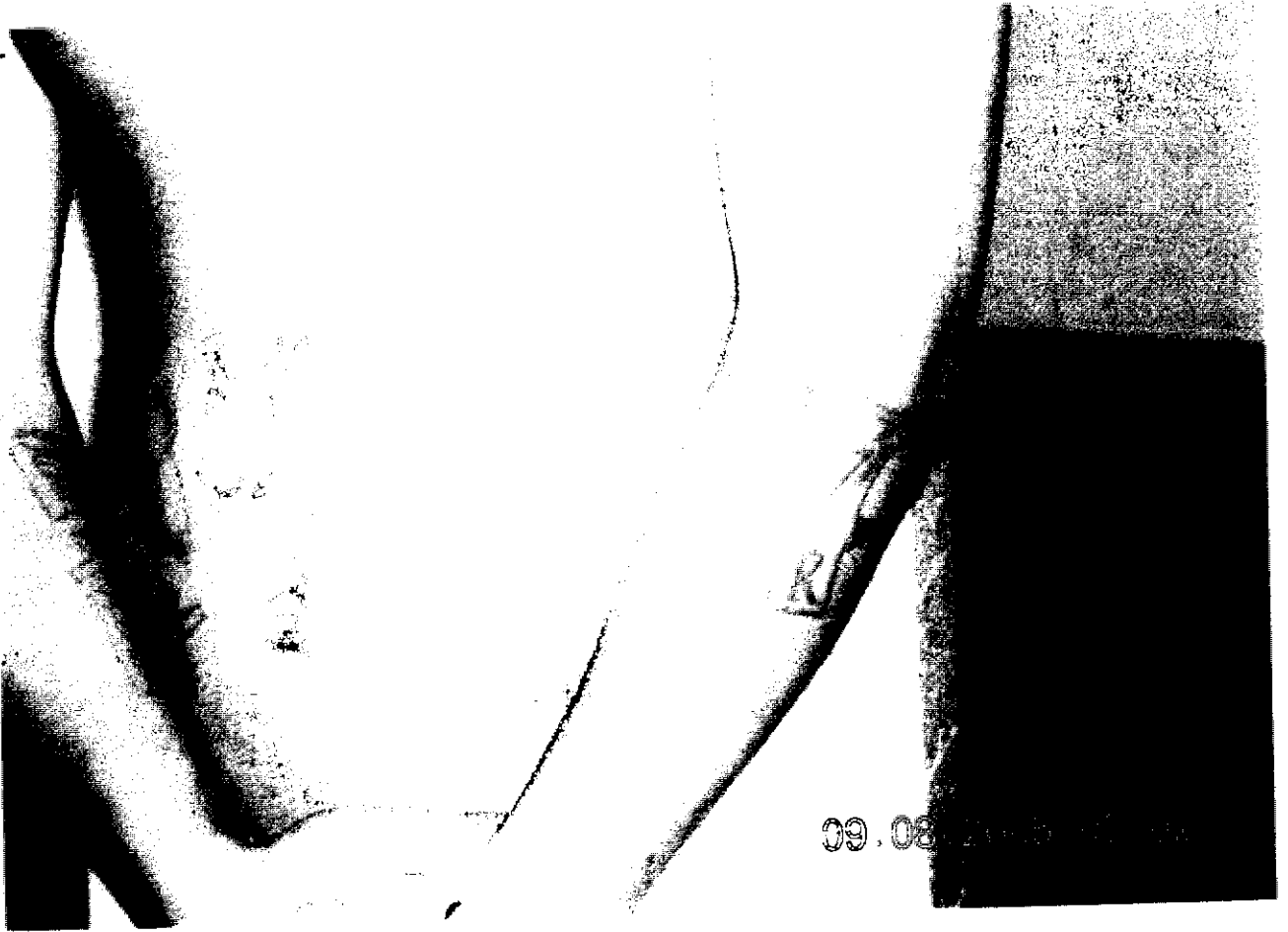
ANTHONY HUNTER

SF# 563971 PAIPA BOUND

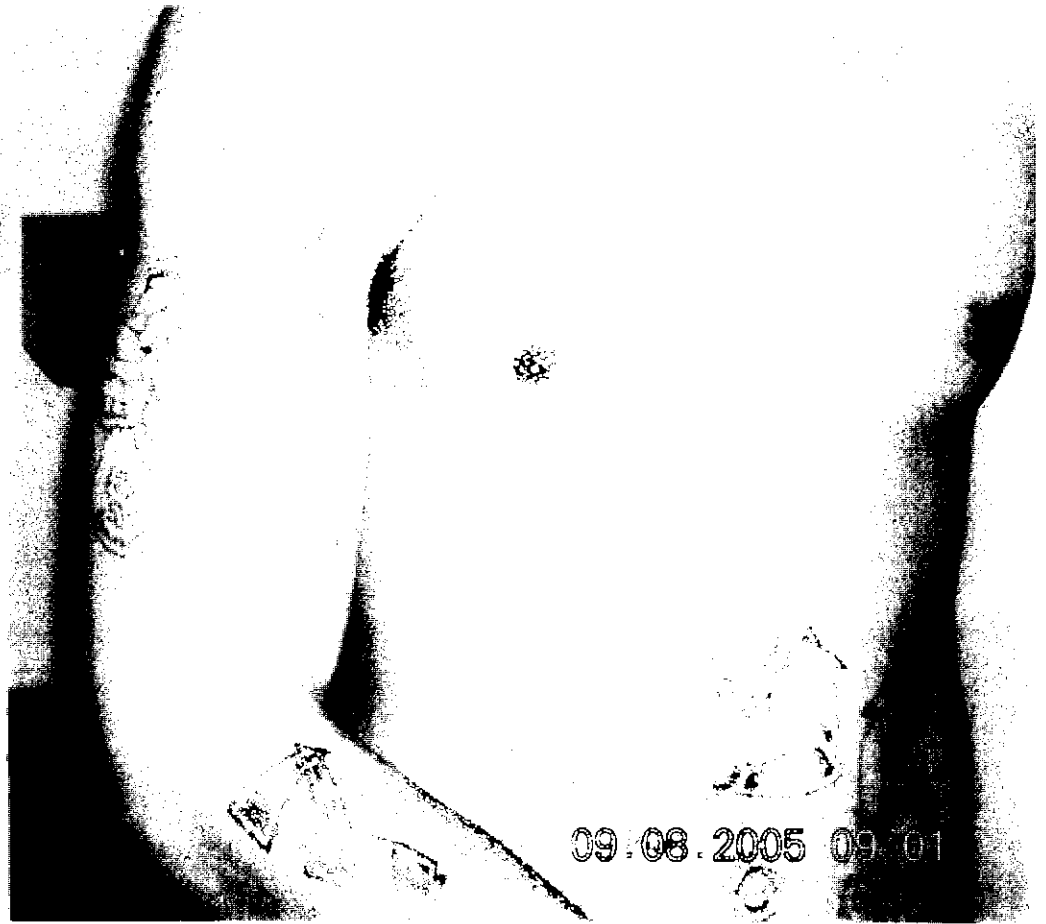
AKA "TONE"



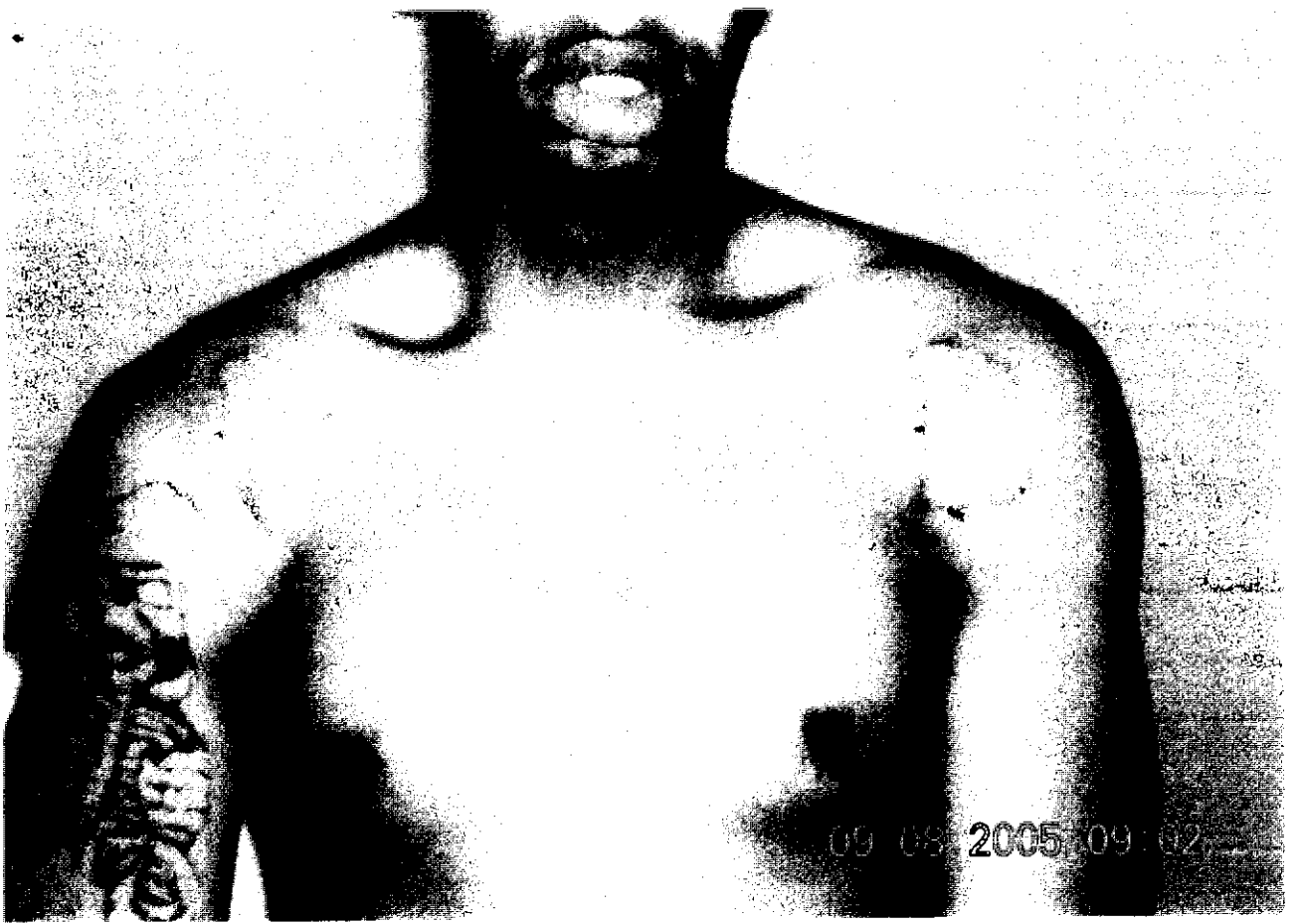


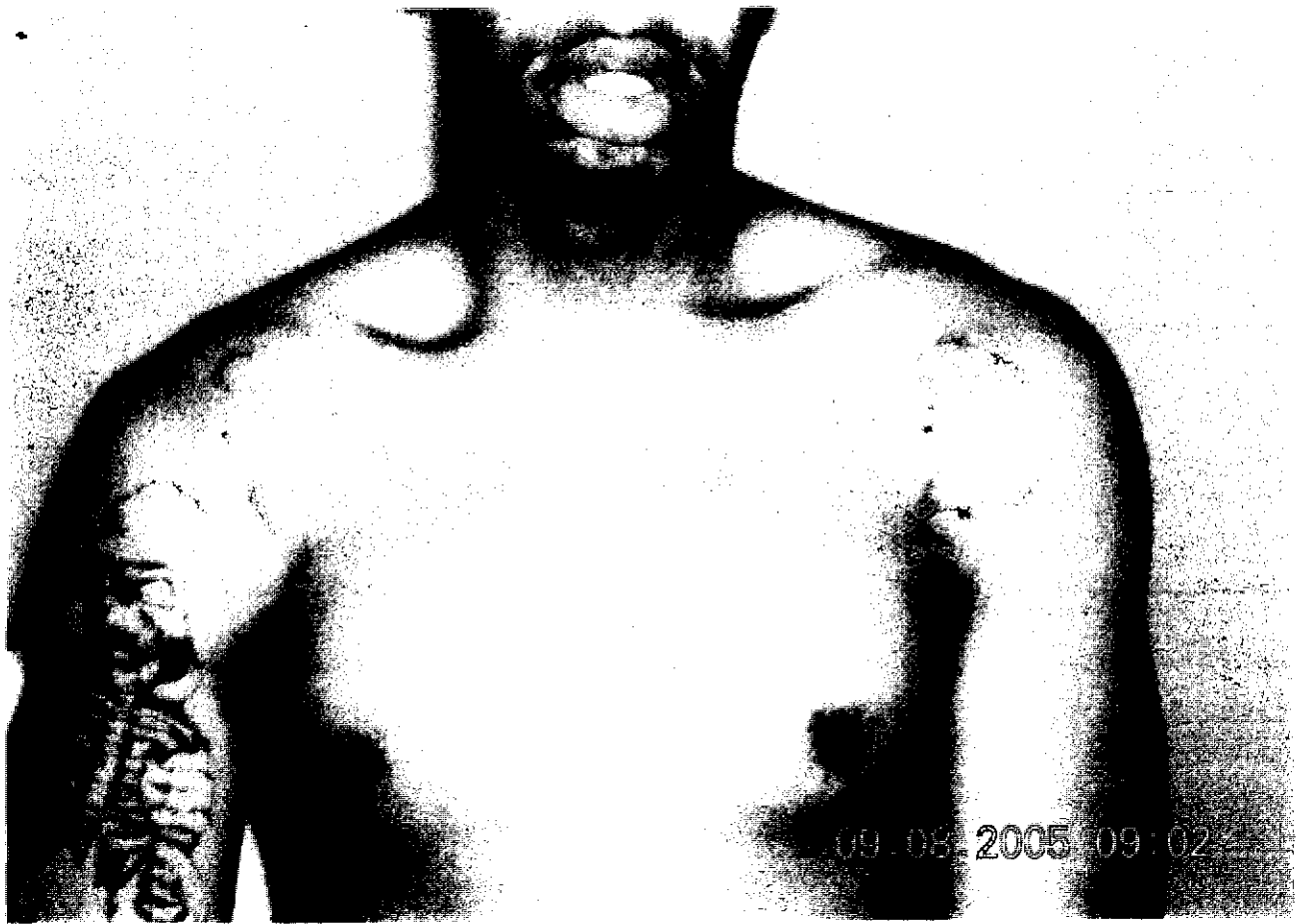


09.02



09.08.2005 09:01





09-08-2005 09:02

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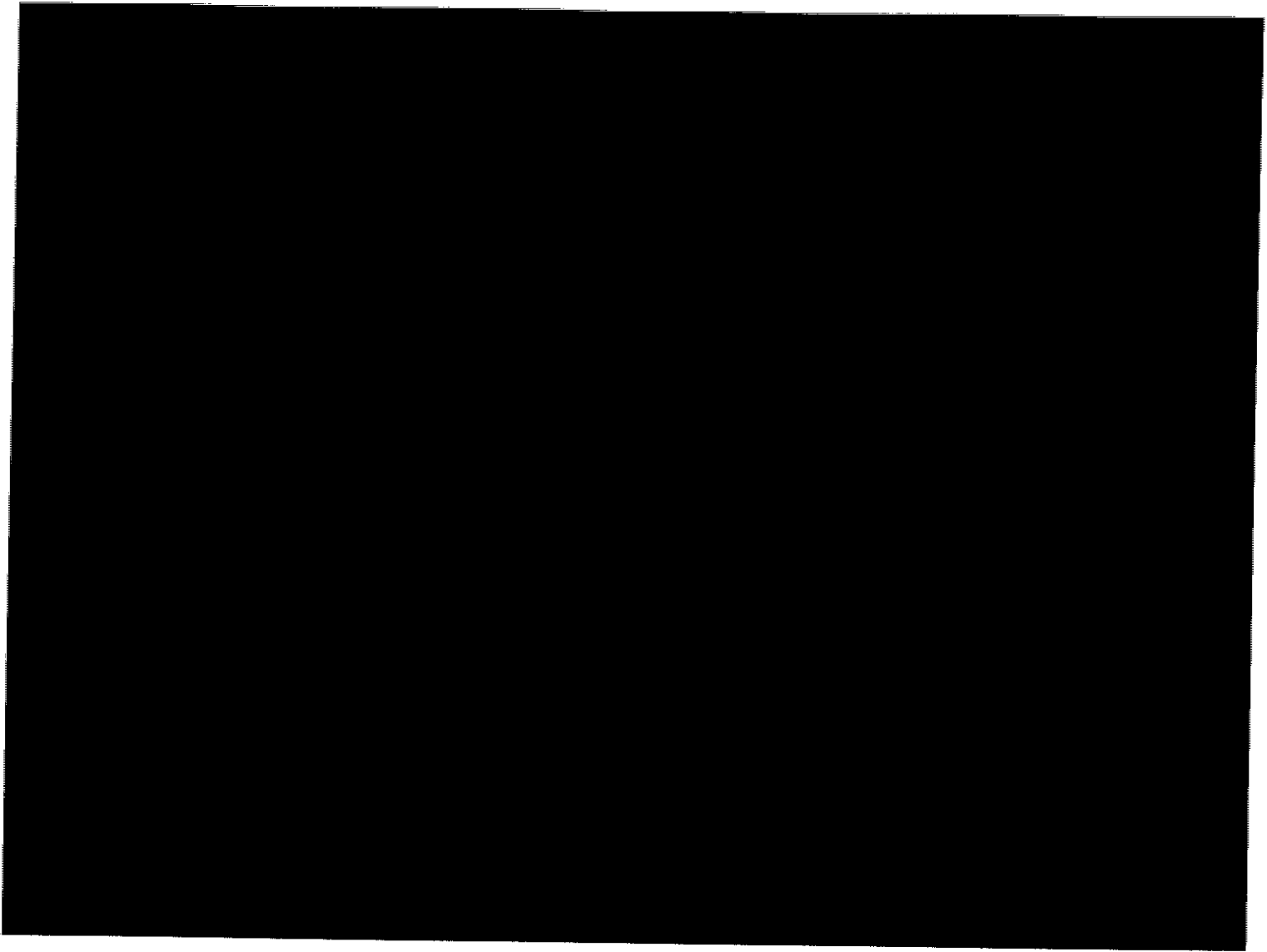


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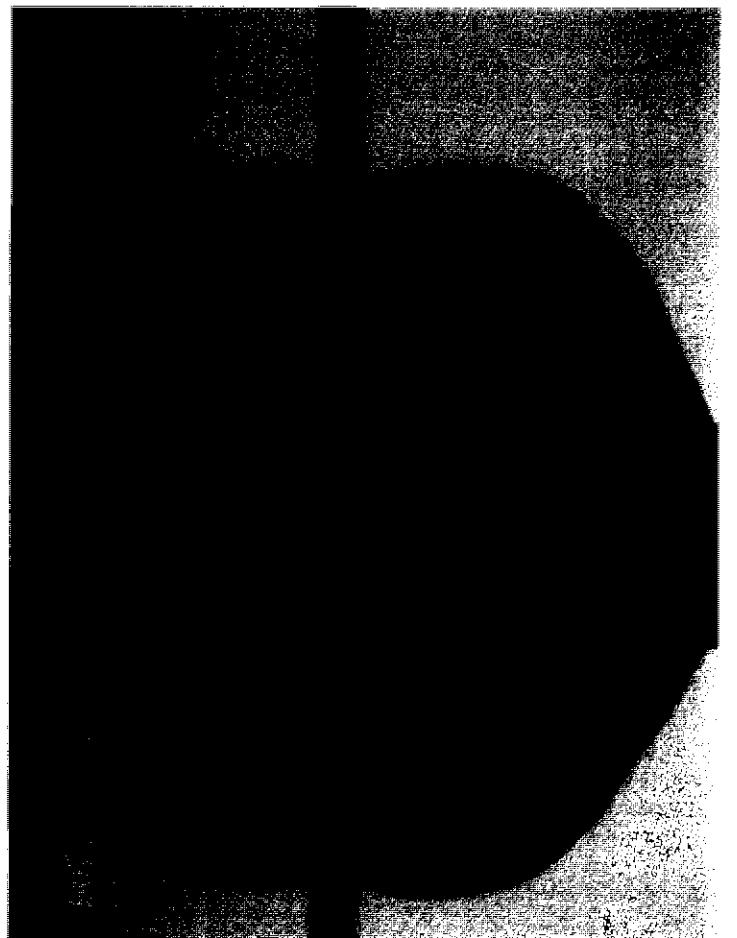




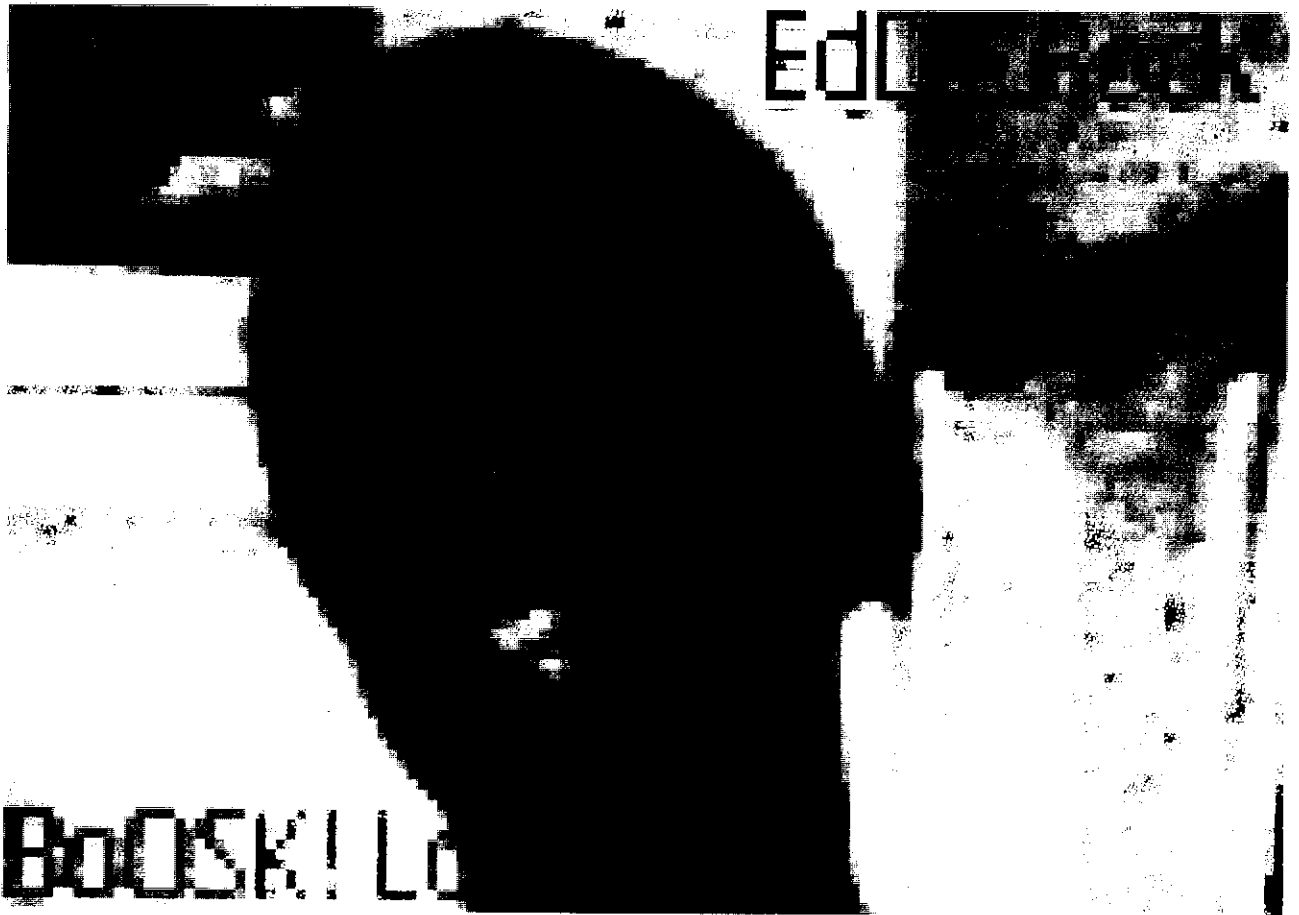
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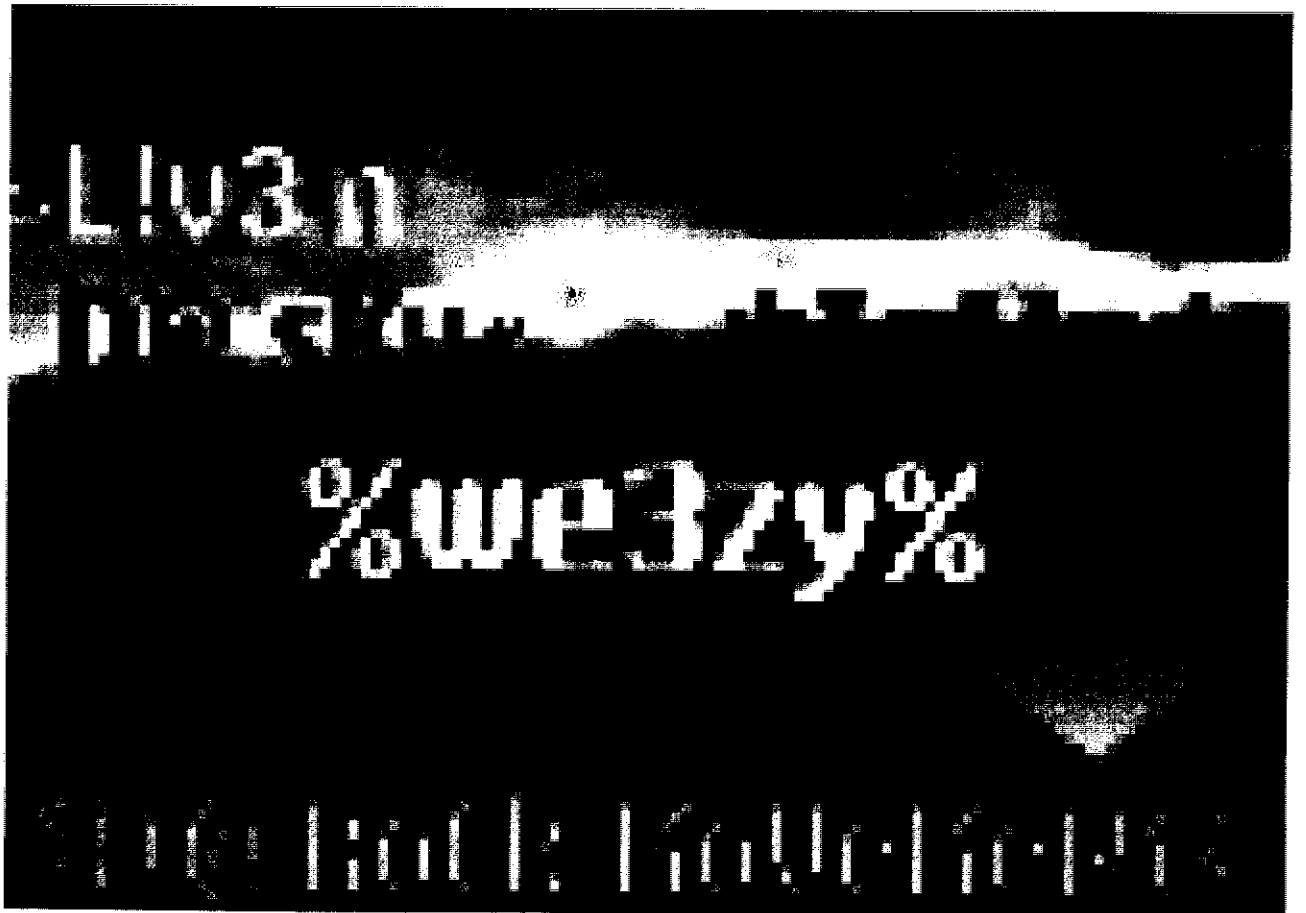


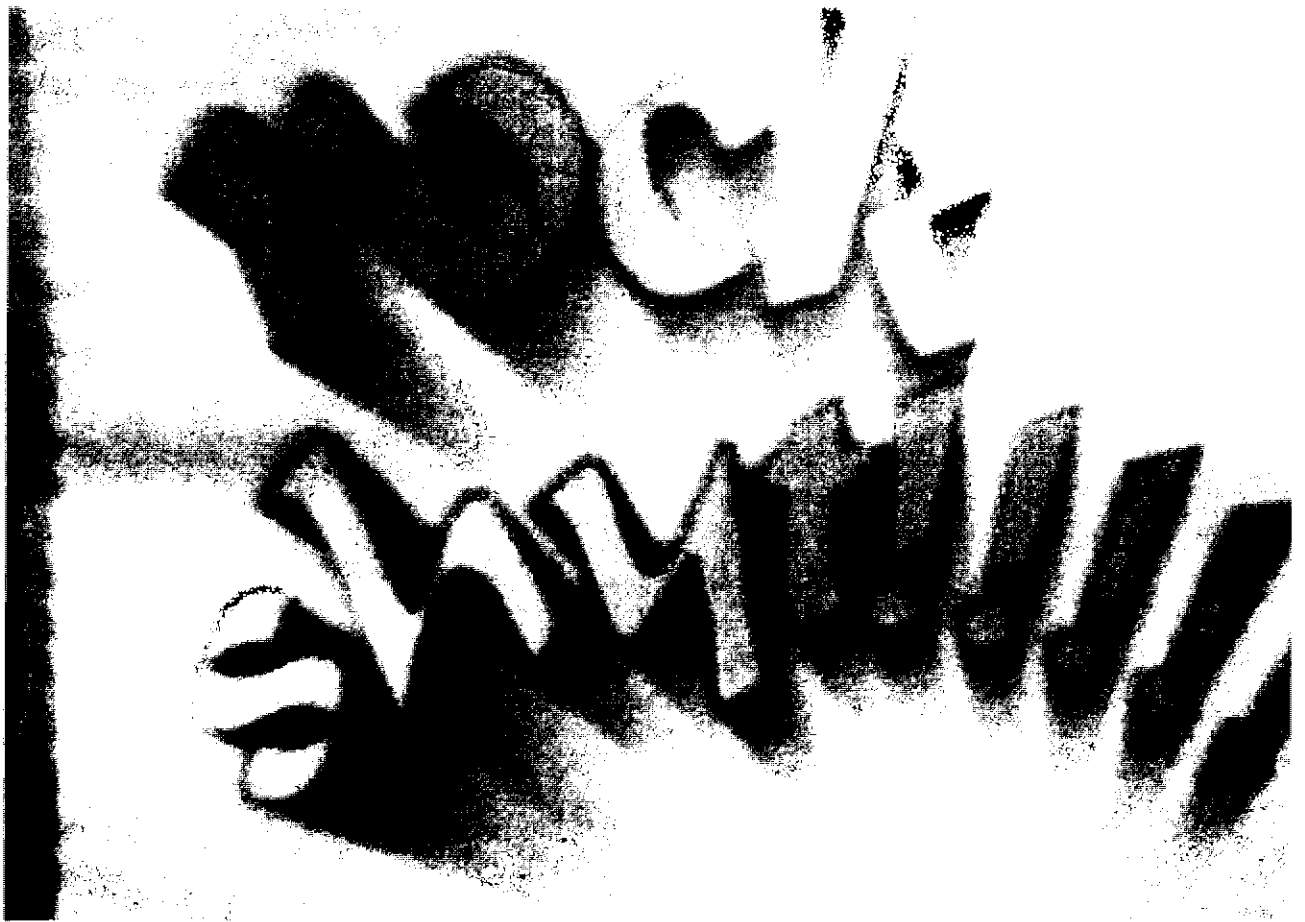
SECRET  
CONFIDENTIAL  
TOP SECRET

Old Rock  
MAMMANT

1948 W. J. SODSKI K. J. J.



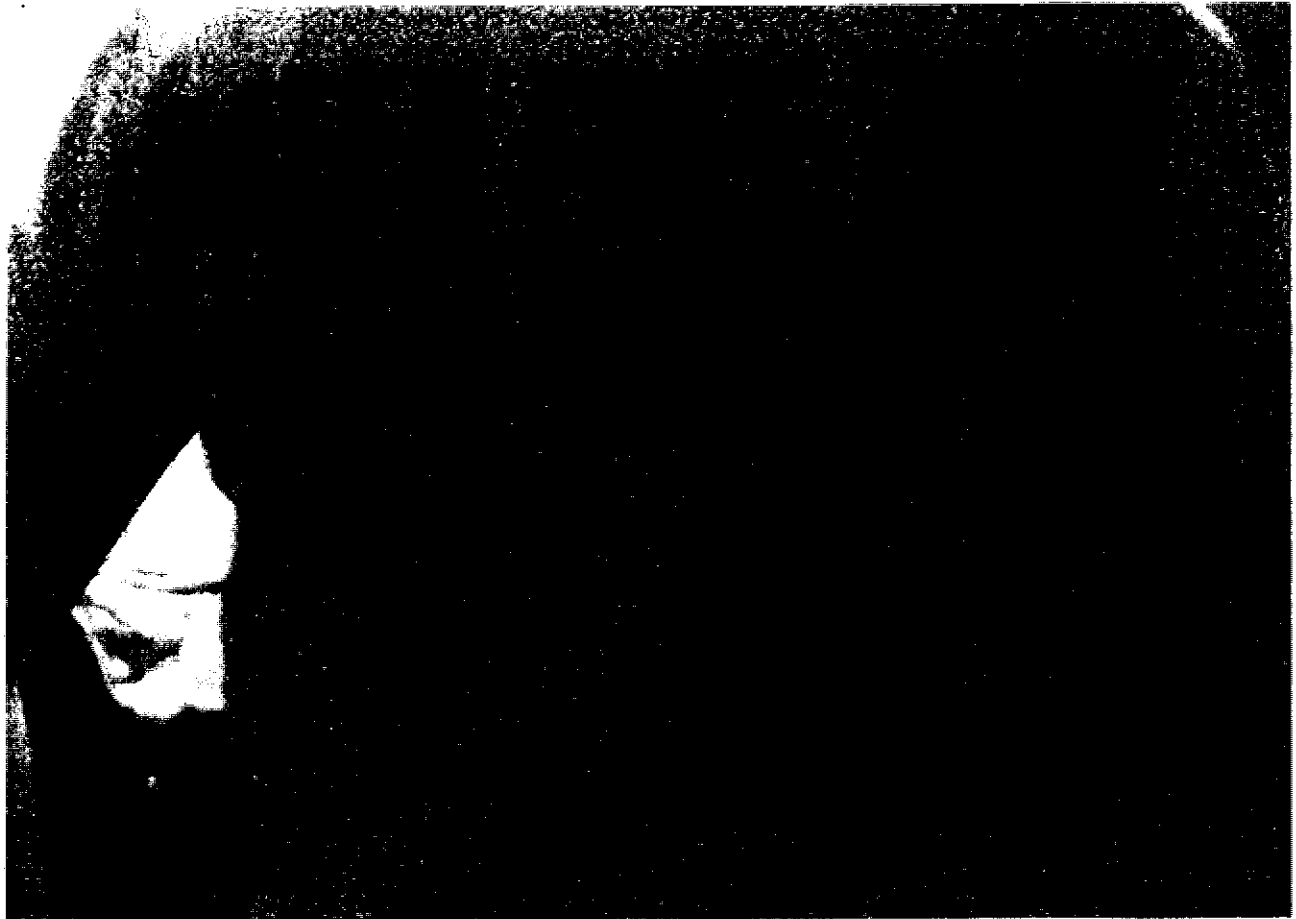






Side ROCK  
MOVEMENT

F.I.P.  
JANUARY  
- 1982



♥ \*K!J!\*  
I miss y@w  
John  
e3zy  
BOWSKI





Black

3 7  
AAHHHH





EXHIBIT Q



EXHIBIT R

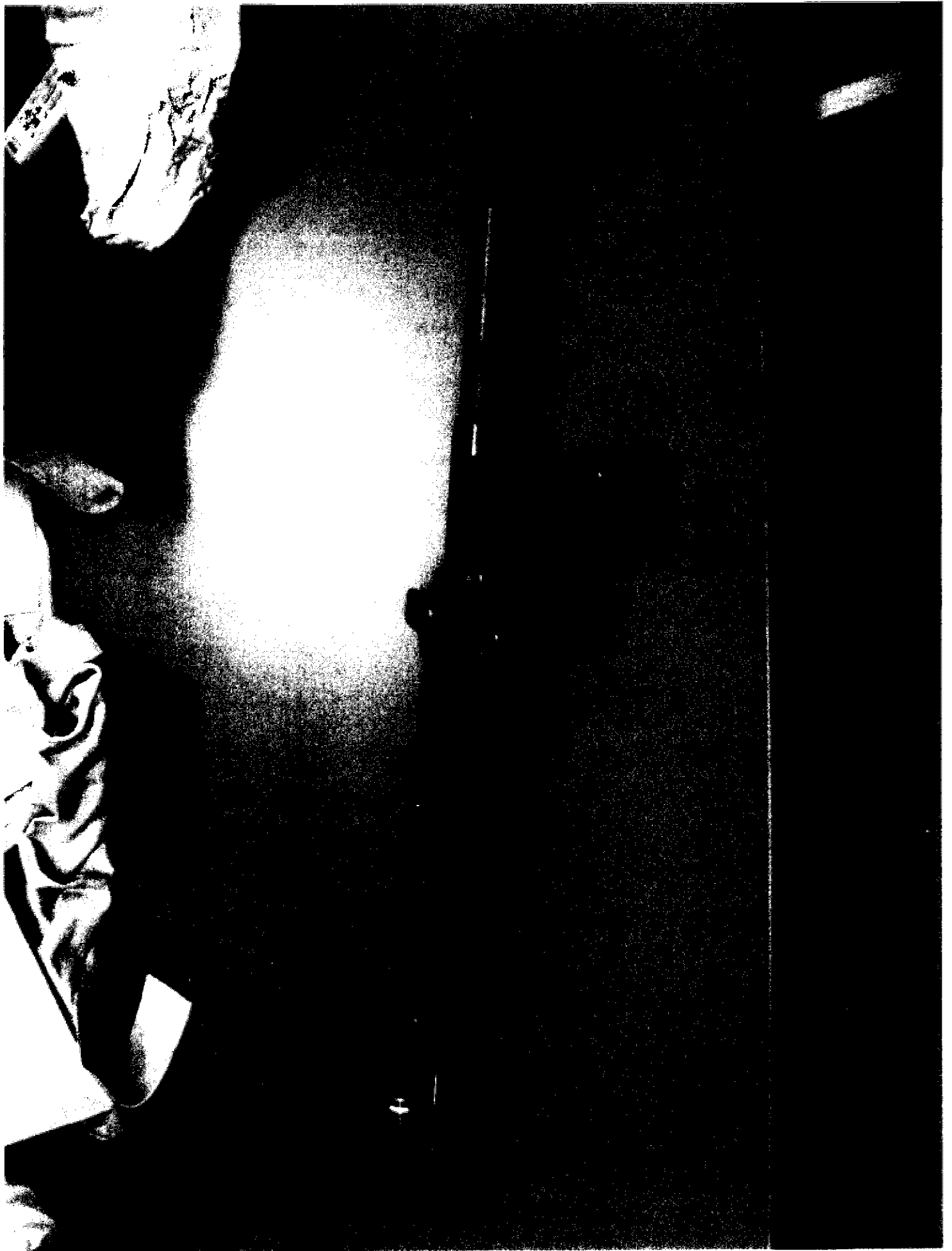
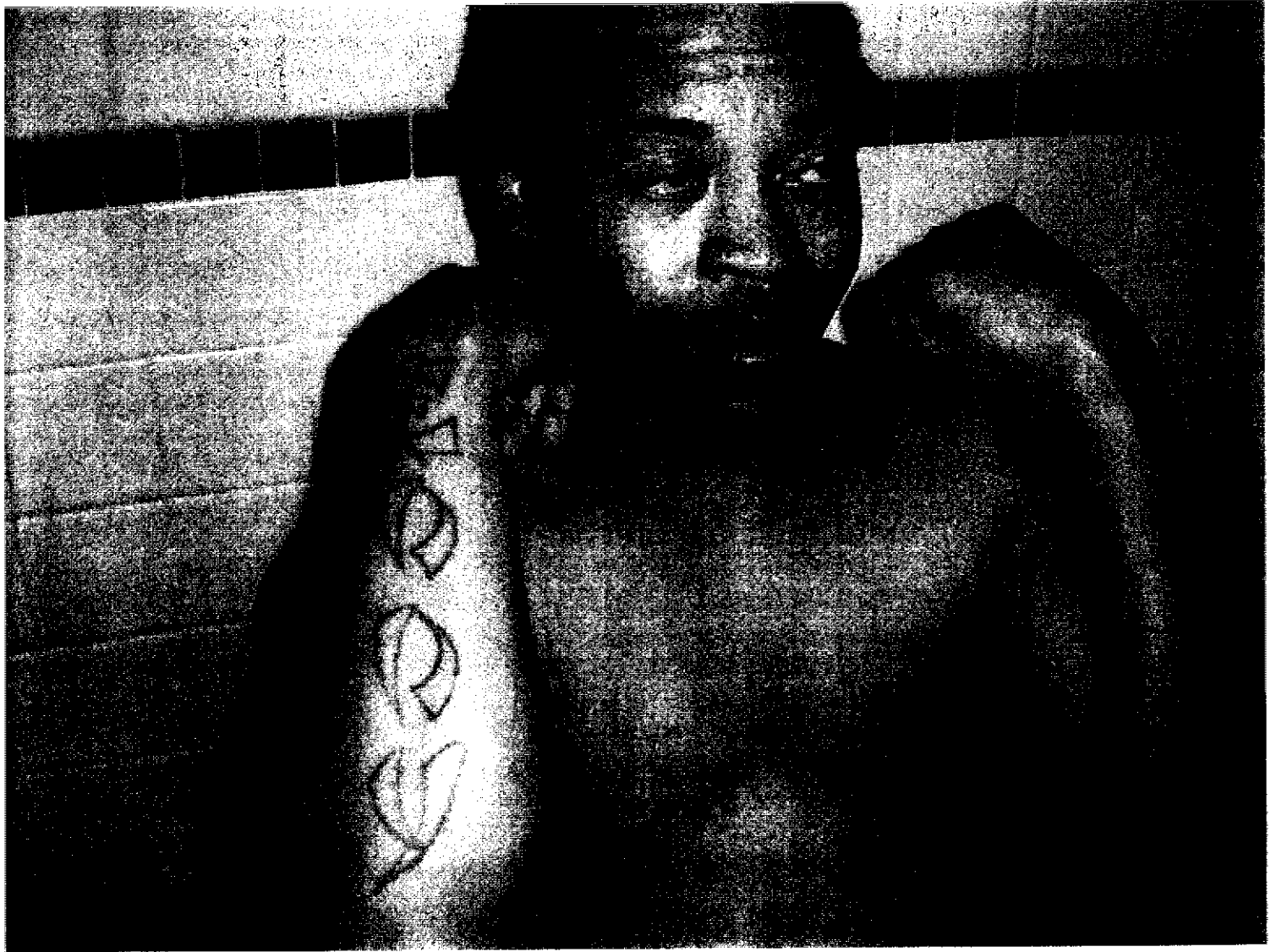


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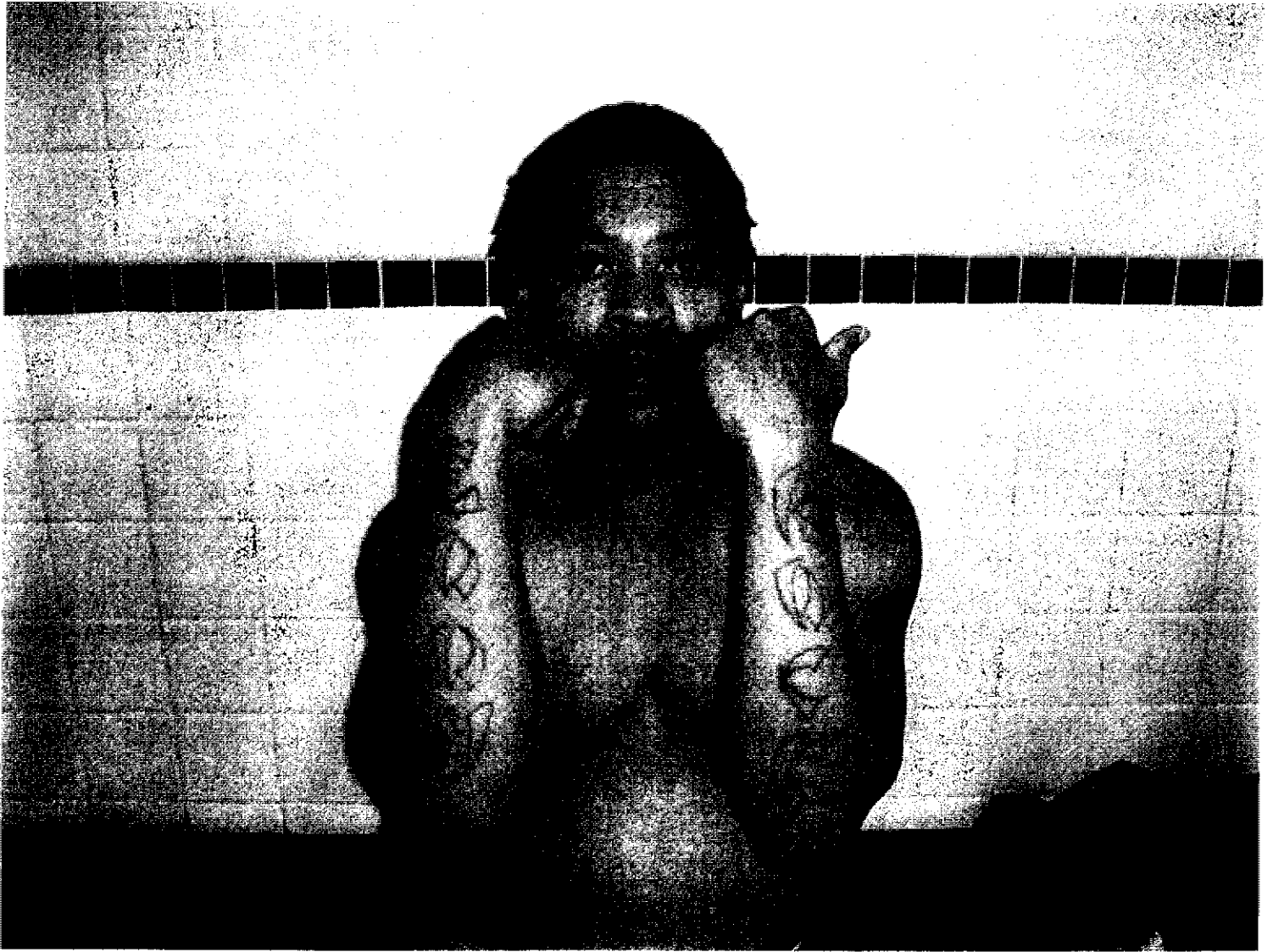


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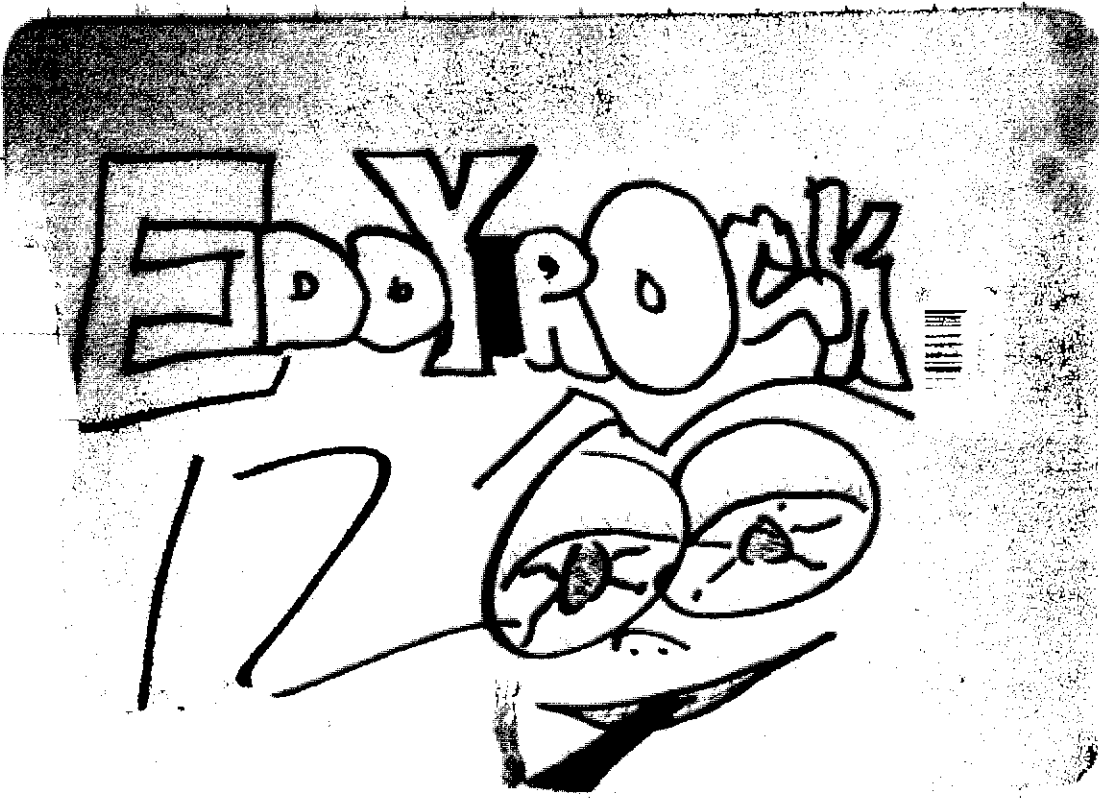
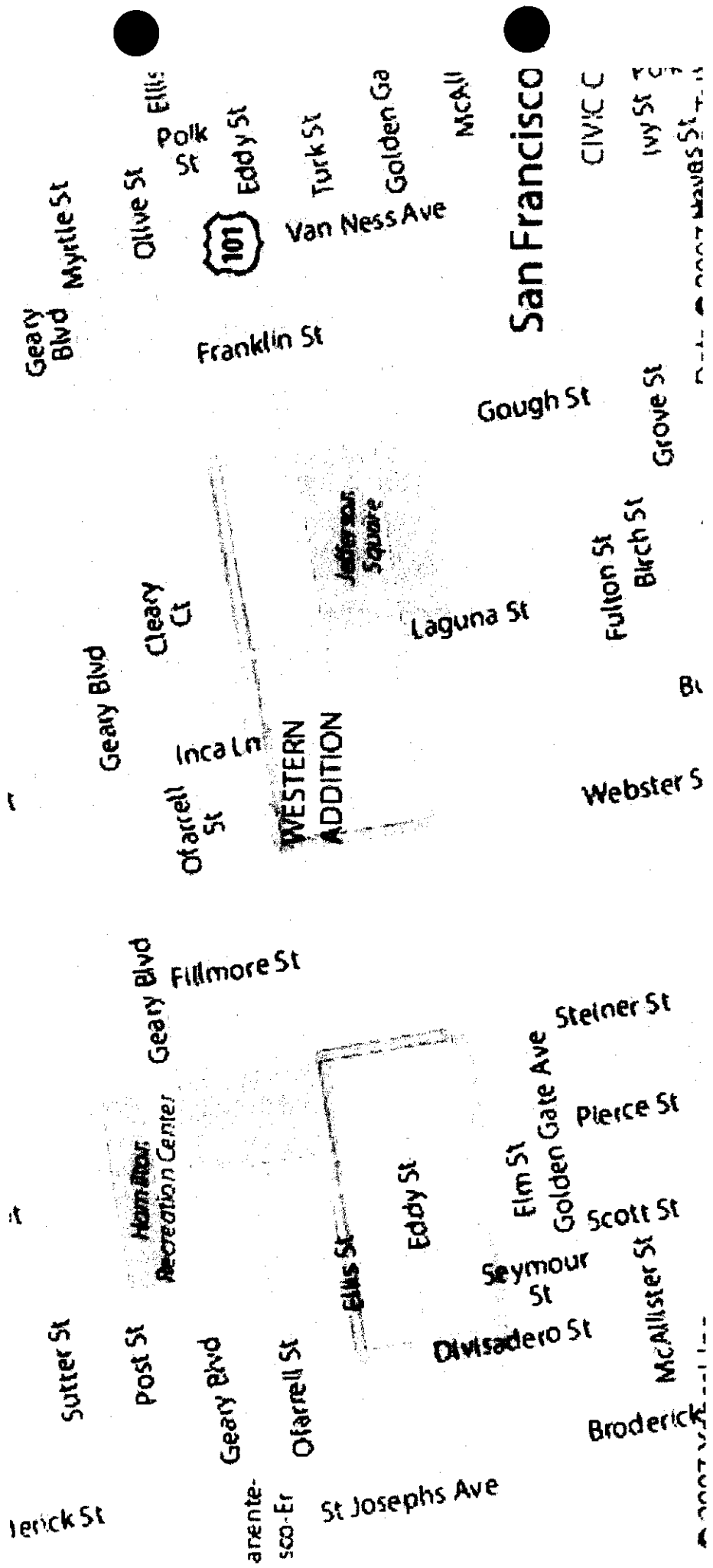


EXHIBIT U



Geary Blvd

Myrtle St

Olive St

Polk St

101

Eddy St

Van Ness Ave

Turk St

Golden Ga

McAll

San Francisco

CIVIC C

Ivy St

Waverly St

Franklin St

Gough St

Grove St

Geary Blvd

Cleary Ct

Jefferson Square

Laguna St

Fulton St

Birch St

Ofarrell St

WESTERN ADDITION

Webster S

Geary Blvd

Fillmore St

Sutter St

Post St

Hampton Recreation Center

Geary Blvd

Ofarrell St

St Josephs Ave

Ellis St

Eddy St

Divisadero St

Seymour St

Elm St

Golden Gate Ave

Scott St

Pierce St

Steiner St

Broderick

McAllister St

