

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

The People of the State of California,
Plaintiff,

CASE NO. BA453095

v.

INDICTMENT

SECRET

1. MATTHEW POWELL FLETCHER
2. THADDEUS JULIAN CULPEPPER

COUNT 1

The said MATTHEW POWELL FLETCHER, THADDEUS JULIAN CULPEPPER AND OTHER UNINDICTED CO-CONSPIRATORS are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of CONSPIRACY TO COMMIT A CRIME, in violation of Penal Code Section 182(a)(1), a Felony, committed prior to the finding of this Indictment, and as follows:

A TRUE BILL

Foreperson of the Grand Jury

Presented by the Foreperson of the Grand Jury in the presence of the Grand Jury, in open Superior Court of the State of California, within and for the County of Los Angeles, and filed as a record in said Court this 24th day of January, 2018

SHERRI R. CARTER, Executive Officer/Clerk

By _____ Deputy

JACKIE LACEY, District Attorney

By  Deputy

On or between January 29, 2015 and September 16, 2016, in the County of Los Angeles, the said **MATTHEW POWELL FLETCHER, THADDEUS JULIAN CULPEPPER AND OTHER UNINDICTED CO-CONSPIRATORS** did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **BRIBERY OF WITNESS**, in violation of Section 137(a) of the Penal Code, a felony: that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendants committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On January 29, 2015, at approximately 6:03pm., a few hours after the murder of Terry Carter and the attempted murder of Cle "Bone" Sloan, Mark Blankenship spoke with Marion "Suge" knight on the phone.
2. On January 29, 2015, at approximately 8:15pm, a few hours after the murder of Terry Carter and the attempted murder of Cle "Bone" Sloan, Mark Blankenship sent a text message to Toilin Kelly stating "tell Suge I have spoken to Reggie and have him ready and in check if we need him"
3. On January 29, 2015, at approximately 10:18 p.m., Mark Blankenship sent a text message to "Johnny" stating that he was going to meet with "Suge" and get his side of the story.
4. On January 30, 2015, at approximately 2:38 a.m., Mark Blankenship send a text to Reggie Beamon asking him to meet at 11:30 a.m.
5. On January 30, 2015, at approximately noon, Mark Blankenship sent a text to Toilin Kelly stating "I'm driving with Reggie. HE SAW EVERYTHING AND CAN EXONERATE SUGE".
6. On February 1, 2015, at approximately 1:20 p.m., Mark Blankenship sent a text to Reggie Beamon asking "can you talk?"
7. On February 1, 2015, at approximately 1:30 p.m., Mark Blankenship sent a text to Reggie Beamon identifying the eyewitnesses to the murder of Terry Carter: "Marvin McKenzie- took video that went to TMZ, Dwayne Johnson-Knob, Jimmy-possible attacker, Terry."
8. On February 3, 2015, at approximately 12:30p.m., Mark Blankenship sent a text to Toilin Kelly concerning eyewitness Dwayne "Knob" Johnson. The message read "I am seeing later today for 'other' reasons but we need to get his testimony in a tractor beam, asap."
9. On February 16, 2015, at approximately 1:44 p.m., Mark Blankenship sent a text to Reggie Beamon stating "please remember you are my highest priority and that I value and appreciate you."
10. On February 16, 2015, at approximately 1:47 p.m., Reggie Beamon sent Mark Blankenship text stating "...I shld be. Show it. I'm from Missouri the show me state. Reg."
11. On February 17, 2015, at approximately 3:41 p.m., Mark Blankenship sent Reggie Beamon a MoneyGram in the amount of \$250.00.
12. On March 9, 2015, at approximately 3:21 p.m., Mark Blankenship sent a text message to target Matthew Powell Fletcher stating "I know how to get Sloan."
13. On March 13, 2015, Marion "Suge" Knight spoke to Toilin Kelly on the telephone. He told her that there is a witness who will do whatever is needed and say that they saw a gun at the murder scene.
14. On March 13, 2015, Toilin Kelly told Marion "Suge" Knight that Mark Blankenship put Reggie Beamon on the payroll.
15. On March 13, 2015, Marion "Suge" Knight told an unidentified male that he had a "little project for him coming up" and that "in a week or so, something would be coming your way."
16. On March 13, 2015, at approximately 11:00 a.m., target Matthew Powell Fletcher send a text message to Mark Blankenship stating "I have found a eyewitness...he says there were multiple guns...trying to get him to go public...he's scared...we are working him hard."

17. On March 16, 2015, Toilin Kelly told Marion Hugh "Suge" Knight that "Matt found other witnesses" and that "Matt put some bread out there" to get witnesses to "come around.
18. On March 16, 2015, Mark Blankenship connected Marion Hugh "Suge" Knight to target Matthew Powell Fletcher via a three-way telephone call.
19. On March 16, 2015, Matthew Powell Fletcher told Marion Hugh "Suge" Knight that witness Marvin Kincy would say that there were guns at the murder scene and they would give Marvin money for his testimony.
20. On March 16, 2015, Mathew Powell Fletcher told Marion Hugh "Suge" Knight that 20-25 thousand dollars was a fair investment to secure his freedom.
21. On May 9, 2016, Marion Hugh "Suge" Knight had a conversation with a Los Angeles County Sheriff's Department informant named "KB."
22. On May 9, 2016, after "KB" implied that he could assist in Marion Hugh "Suge" Knight's defense, Knight said "I'm gonna fuck with you."
23. On May 10, 2016, target Matthew Powell Fletcher called "KB."
24. On May 10, 2016, target Matthew Powell Fletcher told "KB" that the witnesses in Marion Hugh "Suge" Knight's murder case needed to be paid for their testimony.
25. On May 10, 2016, target Matthew Powell Fletcher told "KB" that he would discuss with Marion Hugh "Suge" Knight possibly using "KB" as a witness in the murder case.
26. On or between May 10, 2016, and May 18, 2016, target Matthew Powell Fletcher provided "KB"'s phone number to target Thaddeus Julian Culpepper.
27. On May 18, 2016, target Thaddeus Julian Culpepper called "KB" and Culpepper agreed that "KB" could call him back.
28. On June 10, 2016, target Thaddeus Julian Culpepper spoke with "KB." Target Culpepper told "KB" that he received his phone number from target Matthew Powell Fletcher.
29. On June 10, 2016, "KB" told target Thaddeus Julian Culpepper that "he wasn't there but whatever you need me to do I'll do it." Target Culpepper replied "so you weren't there but you know what's going on?"
30. On June 10, 2016, target Thaddeus Julian Culpepper told "KB" to call him when he ("KB") returned to California.
31. On June 22, 2016, target Thaddeus Julian Culpepper called "KB". "KB" told Target Culpepper "I'll do whatever...but you know what, I'm gonna need a few dollars...maybe later down the line." Target Culpepper responded "of course, or course."
32. On June 28, 2016, target Thaddeus Julian Culpepper met with "KB" at a restaurant in Los Angeles. Target Culpepper offered to draft a declaration for "KB" to sign and "KB" agreed.
33. On June 28, 2016, target Thaddeus Julian Culpepper met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Culpepper told Knight that "KB" was willing to testify that he saw guns at the murder scene.
34. On June 29, 2016, "KB" met with target Thaddeus Julian Culpepper in Encino California. Target Culpepper told "KB" that he intended to prepare a declaration for "KB" to sign. In addition, he wanted "KB" to watch the surveillance video from the murder. Target Culpepper provided "KB" with a handwritten note containing a Los Angeles address; he told "KB" to "tuck that away."
35. On June 29, 2016, target Thaddeus Julian Culpepper met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Culpepper and Knight agreed to use "KB" as a witness but to withhold his identity until the commencement of the trial.
36. On June 29, 2016, during the same meeting at Men's Central Jail, Marion Hugh "Suge" Knight asked target Thaddeus Julian Culpepper if "KB" was in custody at the time of the murder. Target Culpepper responded that he had already checked and that he (KB) was not in custody.
37. On August 21, 2016, target Matthew Powell Fletcher met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Fletcher told Knight that witness Marvin Kincy had to be paid for his testimony; Knight agreed.

38. On September 16, 2016, target Matthew Powell Fletcher met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Fletcher told Knight that the surviving victim in the attempted murder, Cle "Bone" Sloan, needed to be paid money for his testimony." And Knight agreed.

* * * * *

COUNT 2

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **MATTHEW POWELL FLETCHER, THADDEUS JULIAN CULPEPPER AND OTHER UNINDICTED CO-CONSPIRATORS** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT A CRIME**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between January 29, 2015 and September 16, 2016 in the County of Los Angeles, the said **MATTHEW POWELL FLETCHER, THADDEUS JULIAN CULPEPPER AND OTHER UNINDICTED CO-CONSPIRATORS** did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **SUBORNATION OF PERJURY UNDER OATH**, in violation of Section 127 of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On January 29, 2015, at approximately 6:03pm., a few hours after the murder of Terry Carter and the attempted murder of Cle "Bone" Sloan, Mark Blankenship spoke with Marion "Suge" knight on the phone.
2. On January 29, 2015, at approximately 8:15pm, a few hours after the murder of Terry Carter and the attempted murder of Cle "Bone" Sloan, Mark Blankenship sent a text message to Toilin Kelly stating "tell Suge I have spoken to Reggie and have him ready and in check if we need him"
3. On January 29, 2015, at approximately 10:18 p.m., Mark Blankenship sent a text message to "Johnny" stating that he was going to meet with "Suge" and get his side of the story.
4. On January 30, 2015, at approximately 2:38 a.m., Mark Blankenship send a text to Reggie Beamon asking him to meet at 11:30 a.m.
5. On January 30, 2015, at approximately noon, Mark Blankenship sent a text to Toilin Kelly stating "I'm driving with Reggie. HE SAW EVERYTHING AND CAN EXONERATE SUGE".
6. On February 1, 2015, at approximately 1:20 p.m., Mark Blankenship sent a text to Reggie Beamon asking "can you talk?"
7. On February 1, 2015, at approximately 1:30 p.m., Mark Blankenship sent a text to Reggie Beamon identifying the eyewitnesses to the murder of Terry Carter: "Marvin McKenzie- took video that went to TMZ, Dwayne Johnson-Knob, Jimmy-possible attacker, Terry."
8. On February 3, 2015, at approximately 12:30p.m., Mark Blankenship sent a text to Toilin Kelly concerning eyewitness Dwayne "Knob" Johnson. The message read "I am seeing later today for 'other' reasons but we need to get his testimony in a tractor beam, asap."
9. On February 16, 2015, at approximately 1:44 p.m., Mark Blankenship sent a text to Reggie Beamon stating "please remember you are my highest priority and that I value and appreciate you."

10. On February 16, 2015, at approximately 1:47 p.m., Reggie Beamon sent Mark Blankenship text stating "...I shld be. Show it. Im from Missouri the show me state. Reg."
11. On February 17, 2015, at approximately 3:41 p.m., Mark Blankenship sent Reggie Beamon a MoneyGram in the amount of \$250.00.
12. On March 9, 2015, at approximately 3:21 p.m., Mark Blankenship sent a text message to target Matthew Powell Fletcher stating "I know how to get Sloan."
13. On March 13, 2015, Marion "Suge" Knight spoke to Toilin Kelly on the telephone. He told her that there is a witness who will do whatever is needed and say that they saw a gun at the murder scene.
14. On March 13, 2015, Toilin Kelly told Marion "Suge" Knight that Mark Blankenship put Reggie Beamon on the payroll.
15. On March 13, 2015, Marion "Suge" Knight told an unidentified male that he had a "little project for him coming up" and that "in a week or so, something would be coming your way."
16. On March 13, 2015, at approximately 11:00 a.m., target Matthew Powell Fletcher send a text message to Mark Blankenship stating "I have found a eyewitness...he says there were multiple guns...trying to get him to go public...he's scared...we are working him hard."
17. On March 16, 2015, Toilin Kelly told Marion Hugh "Suge" Knight that "Matt found other witnesses" and that "Matt put some bread out there" to get witnesses to "come around.
18. On March 16, 2015, Mark Blankenship connected Marion Hugh "Suge" Knight to target Matthew Powell Fletcher via a three-way telephone call.
19. On March 16, 2015, Matthew Powell Fletcher told Marion Hugh "Suge" Knight that witness Marvin Kincy would say that there were guns at the murder scene and they would give Marvin money for his testimony.
20. On March 16, 2015, Mathew Powell Fletcher told Marion Hugh "Suge" Knight that 20-25 thousand dollars was a fair investment to secure his freedom.
21. On May 9, 2016, Marion Hugh "Suge" Knight had a conversation with a Los Angeles County Sheriff's Department informant named "KB."
22. On May 9, 2016, after "KB" implied that he could assist in Marion Hugh "Suge" Knight's defense, Knight said "I'm gonna fuck with you."
23. On May 10, 2016, target Matthew Powell Fletcher called "KB."
24. On May 10, 2016, target Matthew Powell Fletcher told "KB" that the witnesses in Marion Hugh "Suge" Knight's murder case needed to be paid for their testimony.
25. On May 10, 2016, target Matthew Powell Fletcher told "KB" that he would discuss with Marion Hugh "Suge" Knight possibly using "KB" as a witness in the murder case.
26. On or between May 10, 2016, and May 18, 2016, target Matthew Powell Fletcher provided "KB"'s phone number to target Thaddeus Julian Culpepper.
27. On May 18, 2016, target Thaddeus Julian Culpepper called "KB" and Culpepper agreed that "KB" could call him back.
28. On June 10, 2016, target Thaddeus Julian Culpepper spoke with "KB." Target Culpepper told "KB" that he received his phone number from target Matthew Powell Fletcher.
29. On June 10, 2016, "KB" told target Thaddeus Julian Culpepper that "he wasn't there but whatever you need me to do I'll do it." Target Culpepper replied "so you weren't there but you know what's going on?"
30. On June 10, 2016, target Thaddeus Julian Culpepper told "KB" to call him when he ("KB") returned to California.
31. On June 22, 2016, target Thaddeus Julian Culpepper called "KB". "KB" told Target Culpepper "I'll do whatever...but you know what, I'm gonna need a few dollars...maybe later down the line." Target Culpepper responded "of course, or course."
32. On June 28, 2016, target Thaddeus Julian Culpepper met with "KB" at a restaurant in Los Angeles. Target Culpepper offered to draft a declaration for "KB" to sign and "KB" agreed.

33. On June 28, 2016, target Thaddeus Julian Culpepper met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Culpepper told Knight that "KB" was willing to testify that he saw guns at the murder scene.
34. On June 29, 2016, "KB" met with target Thaddeus Julian Culpepper in Encino California. Target Culpepper told "KB" that he intended to prepare a declaration for "KB" to sign. In addition, he wanted "KB" to watch the surveillance video from the murder. Target Culpepper provided "KB" with a handwritten note containing a Los Angeles address; he told "KB" to "tuck that away."
35. On June 29, 2016, target Thaddeus Julian Culpepper met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Culpepper and Knight agreed to use "KB" as a witness but to withhold his identity until the commencement of the trial.
36. On June 29, 2016, during the same meeting at Men's Central Jail, Marion Hugh "Suge" Knight asked target Thaddeus Julian Culpepper if "KB" was in custody at the time of the murder. Target Culpepper responded that he had already checked and that he (KB) was not in custody.
37. On August 21, 2016, target Matthew Powell Fletcher met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Fletcher told Knight that witness Marvin Kincy had to be paid for his testimony; Knight agreed.
38. On September 16, 2016, target Matthew Powell Fletcher met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Fletcher told Knight that the surviving victim in the attempted murder, Cle "Bone" Sloan, needed to be paid money for his testimony." And Knight agreed.

* * * * *

COUNT 3

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MATTHEW POWELL FLETCHER, THADDEUS JULIAN CULPEPPER AND OTHER UNINDICTED CO-CONSPIRATORS** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT AN ACT INJURIOUS TO PUBLIC**, in violation of **Penal Code Section 182(a)(5)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between January 29, 2015 and September 16, 2016 in the County of Los Angeles, the said **MATTHEW POWELL FLETCHER, THADDEUS JULIAN CULPEPPER** did unlawfully conspire together and with another person and persons whose identity is unknown to commit and act injurious to the public health, to public morals, and pervert and obstruct justice, and the due administration of laws; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy the said defendants committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On January 29, 2015, at approximately 6:03pm., a few hours after the murder of Terry Carter and the attempted murder of Cle "Bone" Sloan, Mark Blankenship spoke with Marion "Suge" knight on the phone.
2. On January 29, 2015, at approximately 8:15pm, a few hours after the murder of Terry Carter and the attempted murder of Cle "Bone" Sloan, Mark Blankenship sent a text message to Toilin Kelly stating "tell Suge I have spoken to Reggie and have him ready and in check if we need him"

3. On January 29, 2015, at approximately 10:18 p.m., Mark Blankenship sent a text message to "Johnny" stating that he was going to meet with "Suge" and get his side of the story.
4. On January 30, 2015, at approximately 2:38 a.m., Mark Blankenship send a text to Reggie Beamon asking him to meet at 11:30 a.m.
5. On January 30, 2015, at approximately noon, Mark Blankenship sent a text to Toilin Kelly stating "I'm driving with Reggie. HE SAW EVERYTHING AND CAN EXONERATE SUGE".
6. On February 1, 2015, at approximately 1:20 p.m., Mark Blankenship sent a text to Reggie Beamon asking "can you talk?"
7. On February 1, 2015, at approximately 1:30 p.m., Mark Blankenship sent a text to Reggie Beamon identifying the eyewitnesses to the murder of Terry Carter: "Marvin McKenzie- took video that went to TMZ, Dwayne Johnson-Knob, Jimmy-possible attacker, Terry."
8. On February 3, 2015, at approximately 12:30p.m., Mark Blankenship sent a text to Toilin Kelly concerning eyewitness Dwayne "Knob" Johnson. The message read "I am seeing later today for 'other' reasons but we need to get his testimony in a tractor beam, asap."
9. On February 16, 2015, at approximately 1:44 p.m., Mark Blankenship sent a text to Reggie Beamon stating "please remember you are my highest priority and that I value and appreciate you."
10. On February 16, 2015, at approximately 1:47 p.m., Reggie Beamon sent Mark Blankenship text stating "...I shld be. Show it. I'm from Missouri the show me state. Reg."
11. On February 17, 2015, at approximately 3:41 p.m., Mark Blankenship sent Reggie Beamon a MoneyGram in the amount of \$250.00.
12. On March 9, 2015, at approximately 3:21 p.m., Mark Blankenship sent a text message to target Matthew Powell Fletcher stating "I know how to get Sloan."
13. On March 13, 2015, Marion "Suge" Knight spoke to Toilin Kelly on the telephone. He told her that there is a witness who will do whatever is needed and say that they saw a gun at the murder scene.
14. On March 13, 2015, Toilin Kelly told Marion "Suge" Knight that Mark Blankenship put Reggie Beamon on the payroll.
15. On March 13, 2015, Marion "Suge" Knight told an unidentified male that he had a "little project for him coming up" and that "in a week or so, something would be coming your way."
16. On March 13, 2015, at approximately 11:00 a.m., target Matthew Powell Fletcher send a text message to Mark Blankenship stating "I have found a eyewitness...he says there were multiple guns...trying to get him to go public...he's scared...we are working him hard."
17. On March 16, 2015, Toilin Kelly told Marion Hugh "Suge" Knight that "Matt found other witnesses" and that "Matt put some bread out there" to get witnesses to "come around.
18. On March 16, 2015, Mark Blankenship connected Marion Hugh "Suge" Knight to target Matthew Powell Fletcher via a three-way telephone call.
19. On March 16, 2015, Matthew Powell Fletcher told Marion Hugh "Suge" Knight that witness Marvin Kincy would say that there were guns at the murder scene and they would give Marvin money for his testimony.
20. On March 16, 2015, Mathew Powell Fletcher told Marion Hugh "Suge" Knight that 20-25 thousand dollars was a fair investment to secure his freedom.
21. On May 9, 2016, Marion Hugh "Suge" Knight had a conversation with a Los Angeles County Sheriff's Department informant named "KB."
22. On May 9, 2016, after "KB" implied that he could assist in Marion Hugh "Suge" Knight's defense, Knight said "I'm gonna fuck with you."
23. On May 10, 2016, target Matthew Powell Fletcher called "KB."
24. On May 10, 2016, target Matthew Powell Fletcher told "KB" that the witnesses in Marion Hugh "Suge" Knight's murder case needed to be paid for their testimony.
25. On May 10, 2016, target Matthew Powell Fletcher told "KB" that he would discuss with Marion Hugh "Suge" Knight possibly using "KB" as a witness in the murder case.
26. On or between May 10, 2016, and May 18, 2016, target Matthew Powell Fletcher provided "KB"'s phone number to target Thaddeus Julian Culpepper.

27. On May 18, 2016, target Thaddeus Julian Culpepper called "KB" and Culpepper agreed that "KB" could call him back.
28. On June 10, 2016, target Thaddeus Julian Culpepper spoke with "KB." Target Culpepper told "KB" that he received his phone number from target Matthew Powell Fletcher.
29. On June 10, 2016, "KB" told target Thaddeus Julian Culpepper that "he wasn't there but whatever you need me to do I'll do it." Target Culpepper replied "so you weren't there but you know what's going on?"
30. On June 10, 2016, target Thaddeus Julian Culpepper told "KB" to call him when he ("KB") returned to California.
31. On June 22, 2016, target Thaddeus Julian Culpepper called "KB". "KB" told Target Culpepper "I'll do whatever...but you know what, I'm gonna need a few dollars...maybe later down the line." Target Culpepper responded "of course, or course."
32. On June 28, 2016, target Thaddeus Julian Culpepper met with "KB" at a restaurant in Los Angeles. Target Culpepper offered to draft a declaration for "KB" to sign and "KB" agreed.
33. On June 28, 2016, target Thaddeus Julian Culpepper met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Culpepper told Knight that "KB" was willing to testify that he saw guns at the murder scene.
34. On June 29, 2016, "KB" met with target Thaddeus Julian Culpepper in Encino California. Target Culpepper told "KB" that he intended to prepare a declaration for "KB" to sign. In addition, he wanted "KB" to watch the surveillance video from the murder. Target Culpepper provided "KB" with a handwritten note containing a Los Angeles address; he told "KB" to "tuck that away."
35. On June 29, 2016, target Thaddeus Julian Culpepper met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Culpepper and Knight agreed to use "KB" as a witness but to withhold his identity until the commencement of the trial.
36. On June 29, 2016, during the same meeting at Men's Central Jail, Marion Hugh "Suge" Knight asked target Thaddeus Julian Culpepper if "KB" was in custody at the time of the murder. Target Culpepper responded that he had already checked and that he (KB) was not in custody.
37. On August 21, 2016, target Matthew Powell Fletcher met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Fletcher told Knight that witness Marvin Kincy had to be paid for his testimony; Knight agreed.
38. On September 16, 2016, target Matthew Powell Fletcher met with Marion Hugh "Suge" Knight in a interview room at the Men's Central Jail in Los Angeles. Target Fletcher told Knight that the surviving victim in the attempted murder, Cle "Bone" Sloan, needed to be paid money for his testimony." And Knight agreed.

* * * * *

COUNT 4

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **MATTHEW POWELL FLETCHER AND THADDEUS JULIAN CULPEPPER** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **ACCESSORY AFTER THE FACT-KNOWLEDGE OF PERSON**, in violation of **Penal Code Section 32**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between March 9, 2015 and September 16, 2016, in the County of Los Angeles, the said **MATTHEW POWELL FLETCHER and THADDEUS JULIAN CULPEPPER** did unlawfully, having knowledge that **Marion Hugh "Suge" Knight** was convicted of the crime of **MURDER/MANSLAUGHTER**, a felonies, in violation of Sections **187/192** of the Penal Code of the State of California, did attempt to harbor, conceal, and aid said **Marion Hugh "Suge" Knight**, with the intent that he/she might avoid and escape from arrest, trial, conviction, and punishment for said felonies.

* * * * *

COUNT 5

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **THADDEUS JULIAN CULPEPPER AND OTHER UNINDICTED CO-CONSPIRATORS** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT A CRIME**, in violation of **Penal Code Section 182(a)(1)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or between June 3, 2016 thru February 15, 2017, in the County of Los Angeles, the said **THADDEUS JULIAN CULPEPPER AND OTHER UNINDICTED CO-CONSPIRATORS** did unlawfully conspire together and with another person and persons whose identity is unknown to commit the crime of **DISOBEYING COURT ORDER**, in violation of Section 166(a)(4) of the Penal Code, a felony; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy, the said defendant(s) committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On June 3, 2016, target Thaddeus Julian Culpepper facilitated a three-way telephone call between Marion Hugh "Suge" Knight, Toilin Kelly and other unidentified individuals, in direct violation of a January 29, 2016 court order and September 1, 2016 court order restricting Knight's phone privileges and specifically prohibiting "three-way calls".
2. On September 21, 2016, target Thaddeus Julian Culpepper facilitated a three-way telephone call between Marion Hugh "Suge" Knight, Toilin Kelly and other unidentified individuals, in direct violation of a January 29, 2016 court order and September 1, 2016 court order restricting Knight's phone privileges.
3. On November 4, 2016, target Thaddeus Julian Culpepper facilitated a three-way telephone call between Marion Hugh "Suge: Knight, Toilin Kelly and other unidentified individuals, in direct violation of a January 29, 2016 court order and September 1, 2016 court order restricting Knight's phone privileges.
4. On February 15, 2017, target Thaddeus Julian Culpepper facilitated a Three-way telephone call between Marion Hugh "Suge" Knight, Toilin Kelly and other unidentified individuals, in direct violation of a January 29, 2016 court order and September 1, 2016 court restricting Knight's phone privileges.

* * * * *

COUNT 6

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforestated Count hereof, the said **THADDEUS JULIAN CULPEPPER AND OTHER UNINDICTED CO-CONSPIRATORS** are accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **CONSPIRACY TO COMMIT AN ACT INJURIOUS TO PUBLIC**, in violation of **Penal Code Section 182(a)(5)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On and between June 3, 2016 thru February 15, 2017 in the County of Los Angeles, the said **THADDEUS JULIAN CULPEPPER AND OTHER UNINDICTED CO-CONSPIRATORS** did unlawfully conspire together and with another person and persons whose identity is unknown to commit and act injurious to the public health, to public morals, and pervert and obstruct justice, and the due administration of laws; that pursuant to and for the purpose of carrying out the objectives and purposes of the aforesaid conspiracy the said defendants committed the following overt act and acts at and in the County of Los Angeles:

OVERT ACTS

1. On June 3, 2016, target Thaddeus Julian Culpepper facilitated a three-way telephone call between Marion Hugh "Suge" Knight, Toilin Kelly and other unidentified individuals, in direct violation of a January 29, 2016 court order and September 1, 2016 court order restricting Knight's phone privileges and specifically prohibiting "three-way calls".
2. On September 21, 2016, target Thaddeus Julian Culpepper facilitated a three-way telephone call between Marion Hugh "Suge" Knight, Toilin Kelly and other unidentified individuals, in direct violation of a January 29, 2016 court order and September 1, 2016 court order restricting Knight's phone privileges.
3. On November 4, 2016, target Thaddeus Julian Culpepper facilitated a three-way telephone call between Marion Hugh "Suge: Knight, Toilin Kelly and other unidentified individuals, in direct violation of a January 29, 2016 court order and September 1, 2016 court order restricting Knight's phone privileges.
4. On February 15, 2017, target Thaddeus Julian Culpepper facilitated a three-way telephone call between Marion Hugh "Suge" Knight, Toilin Kelly and other unidentified individuals, in direct violation of a January 29, 2016 court order and September 1, 2016 court restricting Knight's phone privileges.

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COUNT 7

For a further and separate cause of action, being a different offense of the same class of crimes and offenses as the charge set forth in the aforesated Count hereof, the said **MATTHEW POWELL FLETCHER** is accused by the Grand Jury of the County of Los Angeles, State of California, by this Indictment, of the crime of **PERJURY UNDER OATH**, in violation of **Penal Code Section 118(a)**, a Felony, committed prior to the finding of this Indictment, and as follows:

On or about March 21, 2016, in the County of Los Angeles, the said Matthew Powell Fletcher, being a person who, having taken on an oath that he would testify, declare, depose, and certify truly before a competent tribunal, officer, or person, to wit, Clerk of the Court of the State Bar Court of the State of California, in a case in which such an oath may by law be administered, to wit, Disciplinary Proceedings before the State Bar Court of the State of California, did contrary to such oath state as true material matter which he knew to be false, to wit: 1. That he never communicated with Christopher Daniel by text message in January 2014/ and 2. That he never provided Christopher Daniel his (Fletcher's) banking information.

* * * * *

NOTICE: Conviction of this offense will require the defendant to provide DNA samples and print impressions pursuant to Penal Code sections 296 and 296.1. Willful refusal to provide the samples and impressions is a crime.

NOTICE: The People of the State of California intend to present evidence and seek jury findings regarding all applicable circumstances in aggravation, pursuant to Penal Code section 1170(b) and *Cunningham v. California* (2007) 549 U.S. 270.

NOTICE: A Suspected Child Abuse Report (SCAR) may have been generated within the meaning of Penal Code §§ 11166 and 11168 involving the charges alleged in this complaint. Dissemination of a SCAR is limited by Penal Code §§ 11167 and 11167.5 and a court order is required for full disclosure of the contents of a SCAR

NOTICE: Any allegation making a defendant ineligible to serve a state prison sentence in the county jail shall not be subject to dismissal pursuant to Penal Code § 1385.

NOTICE: Conviction of this offense prohibits you from owning, purchasing, receiving, possessing, or having under your custody and control any firearms, and effective January 1, 2018, will require you to complete a Prohibited Persons Relinquishment Form ("PPR") pursuant to Penal Code § 29810.

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WITNESS LIST

1. RICHARD WOODROW BIDDLE
- 2 SHERNELL McFARLANE
- 3 CHRISTOPHER DANIEL
- 4 FRANCIS XAVIER HARDIMAN

DEFENDANTS

BOOKING NO. BAIL RECOM'D BAIL

1. MATTHEW POWELL FLETCHER

_____ \$1,000,000 _____

2. THADDEUS JULIAN CULPEPPER

_____ \$1,000,000 _____