

US DISTRICT COURT
WESTERN DIST ARKANSAS
FILED

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION

SEP 14 2011

CHRIS R. JOHNSON, Clerk
By

Deputy Clerk

UNITED STATES OF AMERICA)
)
 v.)
)
 GREGORY LEWIS, (01))
 aka "Eggy")
 JAMONDO LEWIS, (02))
 aka "Mill" and/or "Real")
 WILLIE TATUM, (03))
 aka "Man Man")
 VICTOR WILLIAMS, (04))
 aka "Neckbreaker")
 TERREAL DUKE, (05))
 aka "Smoke")
 MARCUS SIMS, (06))
 aka "Killer Clown" and/or "Big Marc")
 ISIAH WATSON, (07))
 aka "Ike 7")
 CLYDE O'GUIN, (08))
 aka "Pud")
 KENNETH M. JOHNSON, (09))
 aka "Frog" and/or "Kenneth Crowell")
 TREMAINE RICHARDSON, (10))
 ADRIAN WITCHER, (11))
 aka "Stump")
 DONTE WILLIAMS, (12))
 aka "Yogi")
 PATRICK CORNELIUS, SR., (13))
 aka "Ikey")
 GARY MCNEAL, (14))
 aka "Moe")
 TAVARIS WILLIAMS, (15))
 aka "Dope")
 FREDRICK D. LAW, (16))
 EDWARD YOUNG, (17))
 aka "Dap")
 ULYSSES MCCLINTON, (18))
 aka "Scrub")
 ANTONIO WHITE, (19))
 aka "Icy" and/or "Bone")
 ALVIN WEEKLY, (20))
 CATRAYL SPIVEY, (21))
 aka "Trailerhead")
 ANTHONY BRADLEY, (22))
 aka "Insane" and/or "Black")
 ANTHONY R. JOHNSON, (23))
 AARIUS COOKS, (24))
 aka "A-Town")

No. 4:11CR 40037-001
thru 066.

JOHNNY JOHNSON, (25))
aka "Hawk")
TALVIN WARREN, (26))
aka "Bright Eyes")
GARY KENDRICKS, (27))
aka "Boo-T")
MAURICE OWENS, (28))
JAMARCUS BROWN, (29))
aka "J-Boy")
CHAMEKA SMITH, (30))
aka "Shay")
TERRON PEARSE, (31))
aka "Creep")
PATRICK CORNELIUS, JR., (32))
aka "Pat")
DESMOND STUTSON, (33))
aka "Black")
EMMANUEL BAKER, (34))
aka "Little E")
CHRISTOPHER ROBERTSON, (35))
aka "Little Homie")
RICKY BAKER, (36))
aka "Debo")
CEDRIC DANIELS, (37))
aka "Three-Two")
ANTONIO TIMMONS, (38))
KNICQUELAS MATLOCK, (39))
aka "Nook the Crook")
DAMEON RICHARD, (40))
aka "D-Rich")
MICHAEL WALKER, (41))
aka "Big Mike")
MARKEITH EVANS, (42))
THOMAS LEAKS, (43))
aka "Tom Tom")
CHANNING PENNINGTON, (44))
aka "Blackberry")
DERRICK GOODNIGHT, (45))
ANTONIO RICHARD, (46))
aka "Tek")
JEREMIAH OWENS, (47))
aka "JD")
RANDY CORNELIUS, (48))
aka "Drop")
CHAD JONES, (49))
aka "Big Slump")
DOMINIQUE ROBERTSON, (50))
aka "DD")
DEADRICK TATUM, (51))
aka "Toda")
TAVEAS GREEN, (52))
MORGAN DANSBY, (53))
aka "G")
DEWON BEAD, (54))
aka "The One")

ROLAND SMITH, (55))
LEON COLLINS, (56))
 aka "Pee Wee")
DERRIAN FOSTER, (57))
MARCEL JOHNSON, (58))
 aka "Cel")
SHOKLUTA BRADLEY, (59))
 aka "Luke" and/or "Shokla Demarks")
WILLIE RAY GILLIAM, (60))
 aka "Dude")
BRIDGET STARKEY, (61))
CHANDRA GILMORE, (62))
DEROYCE TATUM, (63))
ADREN BROWN, (64))
 aka "A.D.")
TERRY D. MARTIN, (65))
JASON E. WILLIAMS, (66))
 aka "J-Rod")

INDICTMENT

The Grand Jury Charges:

COUNT 1

Violation: Title 21 U.S.C. § 846
(Conspiracy to distribute cocaine base, also known as "crack cocaine")

From on or about June 2010, the exact date being unknown to the United States Grand Jury, and continuing thereafter until at least the date of the return of this Indictment, in the Western District of Arkansas and elsewhere, **GREGORY LEWIS**, also known as Eggy, **JAMONDO LEWIS**, also known as Mill and/or Real, **WILLIE TATUM**, also known as Man Man, **VICTOR WILLIAMS**, also known as Neckbreaker, **TERREAL DUKE**, also known as Smoke, **MARCUS SIMS**, also known as Killer Clown and/or Big Marc, **ISIAH WATSON**, also known as Ike 7, **CLYDE O'GUIN**, also known as Pud, **KENNETH M. JOHNSON**, also known as Frog and/or Kenneth Crowell, **TREMAINE RICHARDSON**, **ADRIAN WITCHER**, also known as Stump, **DONTE WILLIAMS**, also known as Yogi, **PATRICK CORNELIUS, SR.**, also known as Ikey, **GARY MCNEAL**, also known as Moe, **TAVARIS WILLIAMS**, also known as Dope, **FREDRICK D. LAW**, **EDWARD YOUNG**, also known as Dap, **ULYSSES MCCLINTON**, also known as Scrub, **ANTONIO WHITE**, also known as Icy and/or Bone, **ALVIN WEEKLY**, **CATRAYL SPIVEY**, also known as Trailerhead, **ANTHONY BRADLEY**, also known as Insane and/or Black, **ANTHONY R. JOHNSON**, **AARIUS COOKS**, also known as A-Town, **JOHNNY JOHNSON**, also known as Hawk, **TALVIN WARREN**, also known as Bright Eyes, **GARY KENDRICKS**, also known as

Boo-T, **MAURICE OWENS**, **JAMARCUS BROWN**, also known as J-Boy, **CHAMEKA SMITH**, also known as Shay, **TERRON PEARSE**, also known as Creep, **PATRICK CORNELIUS, JR.**, also known as Pat, **DESMOND STUTSON**, also known as Black, **EMMANUEL BAKER**, also known as Little E, **CHRISTOPHER ROBERTSON**, also known as Little Homie, **RICKY BAKER**, also known as Debo, **CEDRIC DANIELS**, also known as Three-Two, **ANTONIO TIMMONS**, **KNICQUELAS MATLOCK**, also known as Nook the Crook, **DAMEON RICHARD**, also known as D-Rich, **MICHAEL WALKER**, also known as Big Mike, **MARKEITH EVANS**, **THOMAS LEAKS**, aka Tom Tom, **CHANNING PENNINGTON**, also known as Blackberry, **DERRICK GOODNIGHT**, **ANTONIO RICHARD**, also known as Tek, **JEREMIAH OWENS**, also known as JD, **RANDY CORNELIUS**, also known as Drop, **CHAD JONES**, also known as Big Slump, **DOMINIQUE ROBERTSON**, also known as DD, **DEADRICK TATUM**, also known as Toda, **TAVEAS GREEN**, **MORGAN DANSBY**, also known as G, **DEWON BEAD**, also known as The One, **ROLAND SMITH**, **LEON COLLINS**, also known as Pee Wee, **DERRIAN FOSTER**, **MARCEL JOHNSON**, also known as Cel, **SHOKLUTA BRADLEY**, also known as Luke and/or Shokla Demarks, **WILLIE RAY GILLIAM**, also known as Dude, **BRIDGET STARKEY**, **CHANDRA GILMORE**, **DEROYCE TATUM**, **ADREN BROWN**, also known as A.D., **TERRY D. MARTIN**, and **JASON E. WILLIAMS**, also known as J-Rod, Defendants herein, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree together, with each other and with others, both known and unknown to the United States Grand Jury, to violate a law of the United States of America, to wit, Title 21, United States Code, Sections 841(a) and 841(b)(1)(A)(iii), prohibiting the distribution of 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, also known as “crack cocaine”, a Schedule II controlled substance, all in violation of Title 21, U.S.C. § 846.

COUNT 2

Violation: Title 21 U.S.C. §§ 841(a)(1) and 18 U.S.C. § 2
(Possession with intent to distribute cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about June 1, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **AARIUS COOKS**, aka “A-Town”, and **JAMONDO LEWIS**, aka “Mill” and/or “Real”, aiding and abetting each other and others known and unknown, did knowingly possess with intent to distribute 6.5117 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 3

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a) and
18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack
cocaine” near a school – aiding and abetting)

On or about September 10, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **AARIUS COOKS, aka “A-Town”,** and **GREGORY LEWIS, aka “Eggy”,** aiding and abetting each other and others known and unknown, did knowingly distribute 6.1910 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of Vera Kilpatrick Elementary School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a), and 18 U.S.C. § 2.

COUNT 4

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack
cocaine)

On or about September 14, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **AARIUS COOKS, aka “A-Town”,** did knowingly distribute 10.3210 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 5

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack
cocaine” – aiding and abetting)

On or about September 22, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **ULYSSES MCCLINTON, aka “Scrub”,** and **GARY KENDRICKS, aka “Boo-T”,** aiding and abetting each other and others known and unknown, did knowingly distribute 27.3191 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 6

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about September 23, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **KENNETH M. JOHNSON**, aka “Frog” and/or aka “Kenneth Crowell”, did knowingly distribute 12.7621 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 7

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine near a school”)

On or about September 29, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MAURICE OWENS**, did knowingly distribute .2117 grams a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 8

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about October 1, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **MARCEL JOHNSON**, aka “Cel”, and **SHOKLUTA BRADLEY**, aka “Luke” and/or aka “Shokla Demarks”, aiding and abetting each other and others known and unknown, did knowingly distribute 5.5727 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 9

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about October 19, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JAMARCUS BROWN**, aka “J-Boy”, did knowingly distribute 5.1384 grams of a mixture or substance

containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 10

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about October 20, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JAMARCUS BROWN, aka "J-Boy"**, did knowingly distribute 4.8954 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 11

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about October 22, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **KENNETH M. JOHNSON, aka "Frog" and/or aka "Kenneth Crowell"**, did knowingly distribute 27.4967 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 12

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about October 27, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ULYSSES MCCLINTON, aka "Scrub"**, did knowingly distribute 6.8811 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 13

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as "crack cocaine near a school")

On or about October 27, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MAURICE OWENS**, did knowingly distribute 0.1858 grams of a mixture or substance containing

cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 14

Violation: Title 21 U.S.C. §§ 841(a)(1), 860(a) and (b)(1)(B)(iii)
(Distribution of more than 28 grams of cocaine base, commonly known as “crack cocaine”, near a school)

On or about November 2, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TERREAL A. DUKE**, aka “Smoke”, did knowingly distribute more than 28 grams (54.1008) of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Booker T. Washington, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii) and 860(a).

COUNT 15

Violation: Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii)
(Possession with intent to distribute more than 50 grams of methamphetamine)

On or about November 2, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **FREDRICK D. LAW**, did knowingly possess with intent to distribute more than 50 grams (58.3021) of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii).

COUNT 16

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about November 12, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **KENNETH JOHNSON**, aka “Frog” and/or “Kenneth Crowell”, and **CHAMEKA SMITH**, aka “Shay”, aiding and abetting each other and others known and unknown, did knowingly distribute 13.3655 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 17

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about November 19, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **MARCEL JOHNSON, aka “Cel”, and SHOKLUTA BRADLEY, aka “Luke” and/or “Shokla Demarks”**, aiding and abetting each other and others known and unknown, did knowingly distribute 2.8943 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 18

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a public housing authority facility)

On or about December 1, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TAVARIS WILLIAMS, aka “Dope”**, did knowingly distribute 22.9675 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 19

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about December 2, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ISIAH WATSON, aka “Ike 7”**, did knowingly distribute 23.5207 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 20

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about December 3, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ISIAH WATSON, aka “Ike 7”**, did knowingly distribute 13.4324 grams of a mixture or substance

containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 21

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a public housing authority facility)

On or about December 13, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TAVARIS WILLIAMS, aka “Dope”**, did knowingly distribute 11.2727 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 22

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about December 15, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **JAMARCUS BROWN, aka “J-Boy”**, and **ULYSSES MCCLINTON, aka “Scrub”**, aiding and abetting each other and others known and unknown, did knowingly distribute 9.3474 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 23

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of methamphetamine)

On or about December 16, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TALVIN WARREN, aka “Bright Eyes”**, did knowingly distribute 6.9489 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 24

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about December 21, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **AARIUS COOKS**, aka “**A-Town**”, did knowingly distribute 9.8314 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 25

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about December 21, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **AARIUS COOKS**, aka “**A-Town**”, did knowingly distribute 16.1459 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 26

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about December 29, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ULYSSES MCCLINTON**, aka “**Scrub**”, did knowingly distribute 6.4679 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 27

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a playground)

On or about December 31, 2010, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GARY MCNEAL**, aka “**Moe**”, did knowingly distribute 24.7248 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet

of the real property comprising the Sandflat-Glendale Neighborhood Center, a public playground, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 28

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about January 3, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ALVIN WEEKLY**, did knowingly distribute 1.9360 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 29

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about January 4, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GARY KENDRICKS, aka “Boo-T”**, did knowingly distribute .3452 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 30

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about January 5, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GARY KENDRICKS, aka “Boo-T”**, did knowingly distribute .1552 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 31

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about January 5, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GREGORY LEWIS, aka “Eggy”**, did knowingly distribute 2.3361 grams of a mixture or substance

containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Vera Kilpatrick Elementary School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 32

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about January 6, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GREGORY LEWIS, aka "Eggy"**, did knowingly distribute 6.3158 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 33

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as "crack cocaine" near a school)

On or about January 6, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TAVARIS WILLIAMS, aka "Dope"**, did knowingly distribute 5.5214 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 34

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about January 7, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GARY MCNEAL, aka "Moe"**, did knowingly distribute 25.9429 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 35

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about January 11, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GREGORY LEWIS, aka “Eggy”**, did knowingly distribute 12.3811 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 36

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a school)

On or about January 13, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TAVARIS WILLIAMS, aka “Dope”**, did knowingly distribute 5.3602 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Arkansas High School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 37

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a playground)

On or about January 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GARY MCNEAL, aka “Moe”**, did knowingly distribute 26.9343 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising the Sandflat-Glendale Neighborhood Center, a public playground, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 38

Violation: Title 18 U.S.C. §§ 922(g)(1), 924(a)(2) and 924(e)(1))
(Possession of a firearm by convicted felon)

On or about January 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GARY MCNEAL, aka “Moe”**, having been previously convicted of a crime punishable by

imprisonment for term exceeding one year, possessed a Davis Industries .380 caliber pistol, bearing serial number AP248455, which had previously traveled in interstate commerce, in violation of Title 18 U.S.C. §§ 922(g)(1), 924(a)(2) and 924(e)(1).

COUNT 39

Violation: Title 21 U.S.C. §§ 841(a)(1) & (b)(1)(B)(iii)
(Possession with intent to distribute more than 28 grams of cocaine base, commonly known as “crack cocaine”)

On or about January 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GARY MCNEAL, aka “Moe”**, did knowingly possess with intent to distribute more than 28 grams (169.84 grams) of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(iii).

COUNT 40

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about January 15, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TREMAINE RICHARDSON**, did knowingly distribute 24.5750 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 41

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of methamphetamine)

On or about January 18, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **EDWARD YOUNG, aka “Dap”**, did knowingly distribute 3.3332 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 42

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of methamphetamine)

On or about January 20, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **EDWARD YOUNG, aka “Dap”**, did knowingly distribute 6.0664 grams of a mixture or substance

containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 43

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a), and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” near a public housing authority facility – aiding and abetting)

On or about January 25, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **MARCUS SIMS, aka “Killer Clown” and/or “Big Marc”,** and **EMMANUEL BAKER, aka “Little E”,** aiding and abetting each other and others known and unknown, did knowingly distribute 9.0204 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a), and 18 U.S.C. § 2.

COUNT 44

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about January 25, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **MARCUS SIMS, aka “Killer Clown” and/or “Big Marc”,** **TERRON PEARSE, aka “Creep”,** and **PATRICK CORNELIUS, JR., aka “Pat”,** aiding and abetting each other and others known and unknown, did knowingly distribute 12.7311 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 45

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about January 25, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DESMOND STUTSON, aka “Black”,** did knowingly distribute .2936 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 46

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about January 26, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **EMMANUEL BAKER, aka “Little E”**, did knowingly distribute .5412 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 47

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about January 26, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **DESMOND STUTSON, aka “Black”**, and **CHRISTOPHER ROBERTSON, aka “Little Homie”**, aiding and abetting each other and others known and unknown, did knowingly distribute .4659 grams and .2375 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 48

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about January 27, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **GREGORY LEWIS, aka “Eggy”**, did knowingly distribute 10.9564 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 49

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a school)

On or about January 27, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ALVIN WEEKLY**, did knowingly distribute 11.1500 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real

property comprising North Heights Junior High School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 50

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about January 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **EMMANUEL BAKER, aka “Little E”**, did knowingly distribute .8000 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 51

Violation: Title 18 U.S.C. § 924(c)(1)(A)
(Use and carrying of a firearm during a drug trafficking crime)

On or about January 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **EMMANUEL BAKER, aka “Little E”**, did knowingly use and carry a firearm, to wit: a Maverick Arms Model 88 12 gauge shotgun, bearing serial number MV85158M, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute cocaine base, commonly known as “crack cocaine”, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1), all in violation of Title 18 U.S.C. § 924(c)(1)(A).

COUNT 52

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near public housing authority facility)

On or about January 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **RICKY BAKER, aka “Debo”**, did knowingly distribute .1634 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 53

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about January 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CEDRIC DANIELS**, aka “**Three-Two**”, did knowingly distribute .1968 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Booker T. Washington, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 54

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about January 29, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TREMAINE RICHARDSON**, did knowingly distribute 25.1700 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 55

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a), and
18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” near a public housing authority facility -- aiding and abetting)

On or about January 31, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **MARCUS SIMS**, aka “**Killer Clown**” and/or “**Big Marc**”, and **EMMANUEL BAKER**, aka “**Little E**”, aiding and abetting each other and others known and unknown, did knowingly distribute 5.1127 grams and 1.6673 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a) and 18 U.S.C. § 2.

COUNT 56

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about February 1, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ALVIN WEEKLY**, did knowingly distribute 14.5938 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 57

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about February 2, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TERRON PEARSE, aka “Creep”**, did knowingly distribute 2.0394 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 58

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of methamphetamine)

On or about February 2, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TALVIN WARREN, aka “Bright Eyes”**, did knowingly distribute 6.7056 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 59

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about February 3, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **MARCUS SIMS, aka “Killer Clown” and/or “Big Marc”**, and **ANTONIO TIMMONS**, aiding and abetting each other and others known and unknown, did knowingly distribute 11.6659 grams and 1.0566 grams of a

mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 60

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as "crack cocaine", near a public housing authority facility)

On or about February 7, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **EMMANUEL BAKER, aka "Little E"**, did knowingly distribute .1923 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 61

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as "crack cocaine", near a public housing authority facility)

On or about February 7, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **EMMANUEL BAKER, aka "Little E"**, did knowingly distribute .1739 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 62

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about February 7, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **PATRICK CORNELIUS, JR., aka "Pat"**, did knowingly distribute .1630 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 63

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as "crack cocaine", near public housing authority facility)

On or about February 10, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **RICKY BAKER, aka "Debo"**, did knowingly distribute .4799 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 64

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about February 10, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **KNICQUELAS MATLOCK, aka "Nook the Crook"**, did knowingly distribute 3.1419 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 65

Violation: Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(viii)
(Distribution of more than 5 grams of actual methamphetamine)

On or about February 10, 2011, in the Western District of Arkansas, Texarkana Division, the defendant, **EDWARD YOUNG, aka "Dap"**, did knowingly distribute more than 5 grams of actual methamphetamine, a Schedule II controlled substance, in violation of Title 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii).

COUNT 66

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as "crack cocaine", near public housing authority facility)

On or about February 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **RICKY BAKER, aka "Debo"**, did knowingly distribute .7043 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet

of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 67

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about February 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **PATRICK CORNELIUS, JR., aka “Pat”**, did knowingly distribute .5801 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 68

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about February 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DAMEON RICHARD, aka “D-Rich”**, did knowingly distribute .7387 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 69

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about February 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JEREMIAH OWENS, aka “JD”**, did knowingly distribute .1974 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 70

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about February 17, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **PATRICK CORNELIUS, JR., aka “Pat”**, did knowingly distribute .3425 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 71

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about February 17, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MAURICE OWENS**, did knowingly distribute .1951 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 72

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about February 17, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MICHAEL WALKER, aka “Big Mike”**, did knowingly distribute 6.3582 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 73

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about February 21, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **PATRICK CORNELIUS, JR., aka “Pat”**, did knowingly distribute .1861 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within

1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 74

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about February 21, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARKEITH EVANS**, did knowingly distribute .1900 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 75

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about February 22, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JAMONDO LEWIS, aka “Mill” and/or “Real”**, did knowingly distribute 11.6834 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Vera Kilpatrick Elementary School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 76

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about February 24, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTHONY BRADLEY, aka “Insane” and/or “Black”**, did knowingly distribute .8944 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 77

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about February 24, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JAMANDO LEWIS**, aka “**Mil**” and/or “**Real**”, did knowingly distribute 21.7505 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 78

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about February 25, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **THOMAS LEAKS**, aka “**Tom Tom**”, did knowingly distribute .0988 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 79

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about February 25, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CHANNING PENNINGTON**, aka “**Blackberry**”, did knowingly distribute .1299 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 80

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a), and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility – aiding and abetting)

On or about February 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **RICKY BAKER**, aka “Debo”, and **DERRICK GOODNIGHT**, aiding and abetting each other known and unknown, did knowingly distribute .1539 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a), and 18 U.S.C. § 2.

COUNT 81

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about February 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CEDRIC DANIELS**, aka “Three-Two”, did knowingly distribute .3020 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Booker T. Washington, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 82

Violation: Title 21 U.S.C. § 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about February 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARKEITH EVANS**, did knowingly distribute .1590 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 83

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about February 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **THOMAS LEAKS, aka “Tom Tom”**, did knowingly distribute .2306 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 84

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about February 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CHANNING PENNINGTON, aka “Blackberry”**, did knowingly distribute .2550 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 85

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 1, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TREMAINE RICHARDSON**, did knowingly distribute 19.3689 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 86

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 2, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TALVIN WARREN, aka “Bright Eyes”**, did knowingly distribute 5.8393 grams of a mixture or

substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 87

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of methamphetamine)

On or about March 2, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TALVIN WARREN, aka “Bright Eyes”**, did knowingly distribute 3.9591 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 88

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about March 3, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CATRAYL SPIVEY, aka “Trailerhead”**, did knowingly distribute 6.2618 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A Academy, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 89

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 3, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MICHAEL WALKER, aka “Big Mike”**, did knowingly distribute 1.6375 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 90

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about March 4, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARKEITH EVANS**, did knowingly distribute .2121 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 91

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about March 4, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DERRICK GOODNIGHT**, did knowingly distribute .1816 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 92

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about March 4, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTONIO RICHARD**, aka “Tek”, did knowingly distribute .1192 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 93

Violation: Title 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii) and 860(a)

(Distribution of more than 28 grams of cocaine base, commonly known as “crack cocaine” near a public housing authority facility)

On or about March 5, 2011, in the Western District of Arkansas, Texarkana Division, the defendant, **VICTOR WILLIAMS, aka “Neckbreaker”**, did knowingly distribute more than 28 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii) and 860(a).

COUNT 94

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)

(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about March 7, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARKEITH EVANS**, did knowingly distribute .1358 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 95

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)

(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about March 7, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JEREMIAH OWENS, aka “JD”**, did knowingly distribute .1845 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 96

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about March 7, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTONIO RICHARD, aka “Tek”**, did knowingly distribute .2219 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 97

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 7, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CATRAYL SPIVEY, aka “Trailerhead”**, did knowingly distribute 7.5236 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 98

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about March 9, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JEREMIAH OWENS, aka “JD”**, did knowingly distribute .1621 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 99

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a public housing authority facility)

On or about March 9, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **RICKY BAKER, aka “Debo”**, did knowingly distribute .2815 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 100

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about March 9, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTONIO RICHARD, aka “Tek”**, did knowingly distribute .2057 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 101

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about March 10, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **JAMONDO LEWIS, aka “Mill” and/or “Real”**, and **AARIUS COOKS, aka “A-Town”**, aiding and abetting each other known and unknown, did knowingly distribute 4.9224 of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 102

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 10, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MICHAEL WALKER, aka “Big Mike”**, did knowingly distribute 8.6107 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 103

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a public housing authority facility)

On or about March 11, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **RICKY BAKER, aka “Debo”**, did knowingly distribute .2354 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 104

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about March 11, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **RANDY CORNELIUS, aka “Drop”**, did knowingly distribute .2751 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 105

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about March 11, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DERRICK GOODNIGHT**, did knowingly distribute .2157 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 106

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 11, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CHAD JONES, aka “Big Slump”**, did knowingly distribute 6.0903 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 107

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about March 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MAURICE OWENS**, did knowingly distribute .3240 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Carver Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 108

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a public housing authority facility)

On or about March 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DOMINIQUE ROBERTSON, aka “DD”**, did knowingly distribute .1903 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 109

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 15, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ALVIN WEEKLY**, did knowingly distribute 13.6522 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 110

Violation: Title 18 U.S.C. §§ 922(g)(1), 924(a)(2), and 924(e)(1)
(Felon in Possession of Firearm)

On or about March 15, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TAVARIS WILLIAMS, aka “Dope”**, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, possessed one or more of the following firearms, specifically a Makarov 9mm semi-automatic pistol, bearing serial number J048618, and a High Point .380 caliber semi-automatic pistol, bearing serial number P780082, all of which had previously traveled in interstate commerce, in violation of Title 18 U.S.C. §§ 922(g)(1), 924(a)(2), and 924(e)(1).

COUNT 111

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about March 16, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DOMINIQUE ROBERTSON, aka “DD”**, did knowingly distribute .1746 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising College Hill Middle School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 112

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 17, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JAMONDO LEWIS, aka “Mill” and/or “Real”**, did knowingly distribute 10.3001 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 113

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 17, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARCUS SIMS, aka “Killer Clown” and/or “Big Marc”**, did knowingly distribute 5.9241 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 114

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 17, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARCUS SIMS, aka “Killer Clown” and/or “Big Marc”**, did knowingly distribute 6.8942 grams of a

mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 115

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 17, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ALVIN WEEKLY**, did knowingly distribute 4.6415 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 116

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 18, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARCUS SIMS, aka “Killer Clown” and/or “Big Marc”**, did knowingly distribute 6.7865 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 117

Violation: Title 18 U.S.C. §§ 922(g)(1), 924(a)(2), and 924(e)(1)
(Felon in Possession of a Firearm)

On or about March 19, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTONIO RICHARD, aka “Tek”**, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, possessed a firearm, specifically a Smith & Wesson .38 caliber revolver, serial number obliterated, which had previously traveled in interstate commerce, in violation of Title 18 U.S.C. §§ 922(g)(1), 924(a)(2), and 924(e)(1).

COUNT 118

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a) and
18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack
cocaine”, near a public housing authority facility – aiding and
abetting)

On or about March 23, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **AARIUS COOKS, aka “A-Town”, and DEADRICK TATUM, aka “Toda”**, aiding and abetting each other and others known and unknown, did knowingly distribute .1194 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a), and 18 U.S.C. § 2.

COUNT 119

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack
cocaine”, near a school)

On or about March 23, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DOMINIQUE ROBERTSON, aka “DD”**, did knowingly distribute .2510 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising College Hill Middle School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 120

Violation: Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(iii)
(Attempt to distribute more than 280 grams of cocaine base,
commonly known as “crack cocaine”)

On or about March 25, 2011, in the Western District of Arkansas, Texarkana Division, the defendant, **VICTOR WILLIAMS, aka “Neckbreaker”**, did knowingly attempt to distribute more than 280 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(A)(iii).

COUNT 121

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about March 30, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **EMMANUEL BAKER**, aka “**Little E**”, did knowingly distribute .3993 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A Academy, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 122

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about March 30, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARCUS SIMS**, aka “**Killer Clown**” and/or “**Big Marc**”, did knowingly distribute 12.4944 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 123

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about March 30, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DEADRICK TATUM**, aka “**Toda**”, did knowingly distribute .1836 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 124

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about March 30, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **MARCEL JOHNSON, aka “Cel”**, and **WILLIE RAY GILLIAM, aka “Dude”**, aiding and abetting each other and others known and unknown, did knowingly distribute a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 125

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 5, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARCUS SIMS, aka “Killer Clown” and/or “Big Marc”**, did knowingly distribute 9.3410 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 126

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 5, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DONTE WILLIAMS, aka “Yogi”**, did knowingly distribute 27.9948 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 127

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about April 6, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **PATRICK CORNELIUS, SR., aka “Ikey”**, did knowingly distribute 12.9889 grams of a mixture or

substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Inghram Homes, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 128

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near school)

On or about April 6, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **EMMANUEL BAKER, aka “Little E”**, did knowingly distribute .2973 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A Academy, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 129

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about April 6, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DEADRICK TATUM, aka “Toda”**, did knowingly distribute .1790 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 130

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 7, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTONIO WHITE, aka “Icy” and/or “Bone”**, did knowingly distribute 6.6282 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 131

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 8, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DEADRICK TATUM**, aka “**Toda**”, did knowingly distribute .1957 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 132

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 13, 2011, in the Western District of Arkansas, Texarkana Division, the defendant, **MARCUS SIMS**, aka “**Killer Clown**” and/or “**Big Marc**”, did knowingly distribute 12.5952 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 133

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine)

On or about April 13, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DONTE WILLIAMS**, aka “**Yogi**”, did knowingly distribute 14.0173 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 134

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about April 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **WILLIE TATUM**, aka “**Man Man**”, did knowingly distribute 5.9086 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet

of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 135

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **WILLIE TATUM, aka “Man Man”**, did knowingly distribute 11.6441 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 136

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 15, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTONIO WHITE, aka “Icy” and/or “Bone”**, did knowingly distribute 13.4448 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 137

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 15, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CHRISTOPHER ROBERTSON, aka “Little Homie”**, did knowingly distribute .2044 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 138

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 18, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DAMEON RICHARD, aka “D Rich”**, did knowingly distribute .1390 grams a mixture or substance

containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 139

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about April 18, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CHRISTOPHER ROBERTSON**, aka "**Little Homie**", did knowingly distribute .2140 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 140

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about April 21, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTONIO WHITE**, aka "**Icy**" and/or "**Bone**", did knowingly distribute 13.2416 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 141

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about April 22, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTHONY BRADLEY**, aka "**Insane**" and/or "**Black**", did knowingly distribute 2.3311 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 142

Violation: Title 18 U.S.C. § 924(c)(1)(A)
(Use and carrying of a firearm during a drug trafficking crime)

On or about April 22, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTHONY BRADLEY**, aka "**Insane**" and/or "**Black**", did knowingly use and carry a firearm, to wit:

a Springfield (HS Products) XD .40 caliber semi-automatic pistol, bearing serial number US223268, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute cocaine base, commonly known as "crack cocaine", a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1), all in violation of Title 18 U.S.C. § 924(c)(1)(A).

COUNT 143

Violation: Title 18 U.S.C. § 922(g)(1)
(Felon in possession of a firearm)

On or about April 22, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTHONY BRADLEY, aka "Insane" and/or "Black"**, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, possessed a firearm, specifically, a Springfield (HS Products) XD .40 caliber semi-automatic pistol, bearing serial number US223268, which had previously traveled in interstate commerce, in violation of Title 18, U.S.C. §§ 922(g)(1), 924 (a)(2) and 924(e)(1).

COUNT 144

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about April 22, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DAMEON RICHARD, aka "D Rich"**, did knowingly distribute .1291 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 145

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as "crack cocaine" – aiding and abetting)

On or about April 22, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **CHRISTOPHER ROBERTSON, aka "Little Homie", and DAMEON RICHARD, aka "D Rich"**, aiding and abetting each other and others known and unknown, did knowingly distribute .1248 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 146

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 22, 2011, in the Western District of Arkansas, Texarkana Division, the defendant, **CHRISTPOHER ROBERTSON**, aka “**Little Homie**”, did knowingly distribute .1458 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 147

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 26, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TAVEAS GREEN**, did knowingly distribute 26.3838 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 148

Violation: Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(iii)
(Distribution of more than 28 grams of cocaine base, commonly known as “crack cocaine”)

On or about April 26, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TAVEAS GREEN**, did knowingly distribute more than 28 grams (51.5260), of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(iii).

COUNT 149

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about April 26, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ISIAH WATSON**, aka “**Ike 7**”, did knowingly distribute 12.7602 grams of a mixture or substance

containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 150

Violation: Title 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii) and 860(a) and 18 U.S.C. § 2
(Possession with intent to distribute more than 500 grams of cocaine, near a public housing authority facility – aiding and abetting)

On or about April 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **DONTE WILLIAMS, aka “Yogi”, and BRIDGET STARKEY**, aiding and abetting each other and others known and unknown, did knowingly possess with intent to distribute more than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising Carver Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(ii) and 860(a), and 18 U.S.C. § 2.

COUNT 151

Violation: Title 21 U.S.C. § 856(a)(1)
(Maintaining a drug premises)

On or about April 28, 2011, in the Western District of Arkansas, Texarkana Division, the defendants, **DONTE WILLIAMS, aka “Yogi”, and BRIDGET STARKEY**, did knowingly use and maintain a place, namely, a residence located at 2110 Preston Street, Apartment #137, Texarkana, Arkansas, for the purpose of distributing and using a controlled substance, in violation of Title 21 U.S.C. § 856(a)(1).

COUNT 152

Violation: Title 18 U.S.C. § 924(c)(1)(A)
(Use and carrying of a firearm during a drug trafficking crime)

On or about April 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DONTE WILLIAMS, aka “Yogi”,** did knowingly use and carry one or more of the following firearms, to wit: a Thompson/Center Arms Co. .45 caliber handgun, bearing serial number 4393; a RG Industries .22 caliber revolver Model RG23, bearing serial number T678759; a Lorcin Engineering .380 caliber semi-automatic pistol model L380, bearing serial number 197790; a FEG .40 caliber semi-automatic pistol model 40RZ, bearing serial number NZ00150; a Hi-Point 9mm semi-automatic pistol Model C9, bearing serial number P1386699; and a Bryco Arms 9mm semi-automatic pistol model Jennings Nine, bearing serial number 1487560, during and in relation to a

drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute more than 500 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1), all in violation of Title 18 U.S.C. § 924(c)(1)(A).

COUNT 153

Violation: Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(iii), and 18 U.S.C. § 2
(Possession with intent to distribute more than 28 grams of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about April 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **ISIAH WATSON, aka “Ike 7” and CHANDRA GILMORE**, aiding and abetting each other, did knowingly possess with intent to distribute more than 28 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(iii), and 18 U.S.C. § 2.

COUNT 154

Violation: Title 21 U.S.C. § 856(a)(1)
(Maintaining a drug premises)

On or about April 28, 2011, in the Western District of Arkansas, Texarkana Division, the defendants, **ISIAH WATSON, aka “Ike 7” and CHANDRA GILMORE**, did knowingly use and maintain a place, namely, a residence located at 4303 County Avenue, Apartment #64, Texarkana, Arkansas, for the purpose of distributing and using a controlled substance, in violation of Title 21 U.S.C. § 856(a)(1).

COUNT 155

Violation: Title 18 U.S.C. §§ 922(g)(1), 924(a)(2), and 924(e)(1)
(Felon in Possession of Ammunition)

On or about April 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ISIAH WATSON, aka “Ike 7”**, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, possessed ammunition, specifically forty three rounds of Remington .45 caliber ammunition, which had previously traveled in interstate commerce, in violation of Title 18 U.S.C. §§ 922(g)(1), 924(a)(2), and 924(e)(1).

COUNT 156

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about May 5, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **MORGAN DANSBY**, aka “G”, and **DEWON BEAD**, aka “The One”, aiding and abetting each other known and unknown, did knowingly distribute 27.1260 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 157

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about May 12, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTHONY R. JOHNSON**, did knowingly distribute 12.3312 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine”, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 158

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of methamphetamine near a school)

On or about May 12, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **FREDRICK D. LAW**, did knowingly distribute 12.4842 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, within 1000 feet of the real property comprising Arkansas High School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 159

Violation: Title 21 U.S.C. § 841(a)(1)
(Possession with intent to distribute cocaine base, commonly known as “crack cocaine”)

On or about May 17, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ROLAND SMITH**, did knowingly possess with intent to distribute 4.8518 grams of a mixture or

substance containing cocaine base, commonly known as “crack cocaine”, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 160

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about May 17, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARCEL JOHNSON, aka “Cel”**, did knowingly distribute 12.1466 grams of a mixture or substance containing a detectable amount of cocaine base, commonly known as “crack cocaine”, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 161

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of methamphetamine near a school)

On or about May 18, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **FREDRICK D. LAW**, did knowingly distribute 7.9556 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, within 1000 feet of the real property comprising Arkansas High School, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 162

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about May 20, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **RANDY CORNELIUS, aka “Drop”**, did knowingly distribute 1.0553 grams of a mixture or substance containing a detectable amount of cocaine base, commonly known as “crack cocaine”, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 163

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a public housing authority facility)

On or about May 23, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **RANDY CORNELIUS, aka “Drop”**, did knowingly distribute .1900 grams of a mixture or substance

containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 164

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as "crack cocaine", near a public housing authority facility)

On or about May 23, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **RANDY CORNELIUS, aka "Drop"**, did knowingly distribute .1835 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 165

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a) and
18 U.S.C. § 2
(Distribution of cocaine base, commonly known as "crack cocaine", near a public housing authority facility -- aiding and abetting)

On or about May 25, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **LEON COLLINS, aka "Pee Wee", and MARCUS SIMS, aka "Killer Clown" and/or "Big Marc"**, aiding and abetting each other and others known and unknown, did knowingly distribute 1.0127 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a) and 18 U.S.C. § 2.

COUNT 166

Violation: Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2
(Distribution of cocaine base, commonly known as "crack cocaine" -- aiding and abetting)

On or about June 1, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **LEON COLLINS, aka "Pee Wee" and MARCUS SIMS, aka "Killer Clown" and/or "Big Marc"**, aiding and abetting each other and others known and unknown, did knowingly distribute 3.7703 grams of a mixture

or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 2.

COUNT 167

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine)

On or about June 6, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CLYDE O'GUIN, aka "Pud"**, did knowingly distribute 126.775 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 168

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as "crack cocaine", near a school)

On or about June 9, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CEDRIC DANIELS, aka "Three-Two"**, did knowingly distribute .1678 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Booker T. Washington, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 169

Violation: Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(iii)
(Distribution of more than 28 grams of cocaine base, commonly known as "crack cocaine")

On or about June 10, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **CLYDE O'GUIN, aka "Pud"**, did knowingly distribute more than 28 grams (102.4164 grams) of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(iii).

COUNT 170

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as "crack cocaine" near a playground)

On or about June 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DEWON BEAD, aka "The One"**, did knowingly distribute 8.9685 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Sandflat-Glendale Neighborhood Center, a public playground, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 171

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about June 14, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ADRIAN WITCHER, aka "Stump"**, did knowingly distribute 12.7947 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 172

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about June 15, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ANTHONY R. JOHNSON**, did knowingly distribute 5.2466 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 173

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about June 17, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ADRIAN WITCHER, aka "Stump"**, did knowingly distribute 10.9552 grams of a mixture or substance

containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 174

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about June 22, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ADRIAN WITCHER, aka "Stump"**, did knowingly distribute 10.3118 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 175

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as "crack cocaine")

On or about June 27, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DEADRICK TATUM, aka "Toda"**, did knowingly distribute .1850 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 176

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as "crack cocaine" near a public housing facility)

On or about June 27, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JOHNNY JOHNSON, aka "Hawk"**, did knowingly distribute .1900 grams of a mixture or substance containing cocaine base, commonly known as "crack cocaine," a Schedule II controlled substance, within 1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 177

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a public housing authority facility)

On or about June 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JOHNNY JOHNSON**, aka “**Hawk**”, did knowingly distribute .6447 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 178

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about June 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MAURICE OWENS**, did knowingly distribute .1722 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A Academy, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 179

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine”, near a school)

On or about June 28, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **DEROYCE TATUM**, did knowingly distribute .1492 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Washington 4-A Academy, a public school, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 180

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a public housing facility)

On or about July 4, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JOHNNY JOHNSON, aka “Hawk”**, did knowingly distribute 1.0326 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 181

Violation: Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(iii), and 18 U.S.C. § 2
(Possession with intent to distribute more than 28 grams of cocaine base, commonly known as “crack cocaine” – aiding and abetting)

On or about July 5, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **ADREN BROWN, aka “A.D.” and TERRY D. MARTIN**, aiding and abetting each other and others known and unknown, did knowingly possess with intent to distribute more than 28 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, in violation of Title 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)(iii), and 18 U.S.C. § 2.

COUNT 182

Violation: Title 21 U.S.C. § 841(a)(1)
(Possession with intent to distribute marijuana)

On or about July 5, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ADREN BROWN, aka “A.D.”**, did knowingly possess with intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

COUNT 183

Violation: Title 18 U.S.C. § 924(c)(1)(A)
(Use and carrying of a firearm during a drug trafficking crime)

On or about July 5, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **ADREN BROWN, aka “A.D.”**, did knowingly use and carry a firearm, to wit: a FII (Berretta USA) .40 caliber semi-automatic pistol, bearing serial number SN024217, during and in relation to a drug trafficking crime for

which he may be prosecuted in a court of the United States, that is possession with intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21 U.S.C. § 841(a)(1), all in violation of Title 18 U.S.C. § 924(c)(1)(A).

COUNT 184

Violation: Title 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii) and 860(a) and 18 U.S.C. § 2
(Distribution of more than 28 grams of cocaine base, commonly known as “crack cocaine” near a public housing authority facility – aiding and abetting)

On or about July 8, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **DERRIAN FOSTER** and **PATRICK D. CORNELIUS, SR., aka “Ikey”**, aiding and abetting each other and others known and unknown, did knowingly distribute more than 28 grams (81.7708 grams) of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising Ingrham Homes, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii) and 860(a), and 18 U.S.C. § 2.

COUNT 185

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a)
(Distribution of cocaine base, commonly known as “crack cocaine” near a public housing authority facility)

On or about July 12, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **TERRY D. MARTIN**, did knowingly distribute .3276 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of the real property comprising High Point Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a).

COUNT 186

Violation: Title 21 U.S.C. §§ 841(a)(1) and 860(a) and 18 U.S.C. § 2
(Distribution of cocaine near a public housing authority facility – aiding and abetting)

On or about July 13, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **TAVARIS WILLIAMS, aka “Dope”**, and **DEWON BEAD, aka “The One”**, aiding and abetting each other and others known and unknown, did knowingly distribute 64.4607 grams of a mixture or substance

containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising Pinehurst Village, a housing facility owned by a public housing authority in violation of Title 21 U.S.C. §§ 841(a)(1) and 860(a), and 18 U.S.C. § 2.

COUNT 187

Violation: Title 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii) and 860(a)
(Possession with intent to distribute more than 28 grams of cocaine base, commonly known as “crack cocaine” near a public housing authority facility)

On or about July 16, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendants, **JASON E. WILLIAMS, aka “J-Rod”**, did knowingly possess with intent to distribute more than 28 grams of a mixture or substance containing cocaine base, commonly known as “crack cocaine,” a Schedule II controlled substance, within 1000 feet of Bramble Courts, a housing facility owned by a public housing authority, in violation of Title 21 U.S.C. §§ 841(a)(1), (b)(1)(B)(iii) and 860(a).

COUNT 188

Violation: Title 18 U.S.C. § 924(c)(1)(A)
(Use and carrying of a firearm during a drug trafficking crime)

On or about July 16, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JASON E. WILLIAMS, aka “J-Rod”**, did knowingly use and carry a firearm, to wit: a Colt Cobra .38 special revolver, bearing serial number 2680LW, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is possession with intent to distribute crack cocaine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1), all in violation of Title 18 U.S.C. § 924(c)(1)(A).

COUNT 189

Violation: Title 18 U.S.C. §§ 922(g)(1), 924(a)(2), and 924(e)(1)
(Felon in Possession of Firearm)

On or about July 16, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **JASON E. WILLIAMS, aka “J-Rod”**, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, possessed a firearm, specifically a Colt Cobra .38 special revolver, bearing serial number 2680LW, which had previously traveled in interstate commerce, in violation of Title 18 U.S.C. §§ 922(g)(1), 924(a)(2), and 924(e)(1).

COUNT 190

Violation: Title 21 U.S.C. § 841(a)(1)
(Distribution of cocaine base, commonly known as “crack cocaine”)

On or about August 10, 2011, in the Western District of Arkansas, Texarkana Division, and elsewhere, the defendant, **MARCEL JOHNSON**, aka “Cel”, did knowingly distribute a mixture or substance containing cocaine base, commonly known as “crack cocaine”, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1).

FORFEITURE ALLEGATION

The Grand Jury re-alleges and incorporates by reference herein Counts 1 through 191 of this Indictment.

Upon conviction of any or all of Counts 1 through Counts 37, Counts 39 through Counts 50, Counts 52 through Counts 109, Counts 110 through Counts 116, Counts 118 through Counts 141, Counts 144 through Counts 151, Counts 153 through Counts 154, Counts 156 through Counts 187, and Count 190 of this Indictment, the defendants shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to the following:

a. A sum of United States currency representing the amount of proceeds obtained by each defendant named herein as a result of the said violations.

b. All real and personal property, derived from, involved in, or used to facilitate the said violations, including, but not limited to:

1. The real property, along with any attached buildings and appurtenances, located at 127 CR 1304, Wake Village, Texas, more particularly described as follows: All that certain tract or parcel of land situated in Bowie County, Texas, and being a part of the NANCY DYCUS HEADNIGHT SURVEY, A-145, and being a part of the 10 acre tract of land owned by J. C. Hicks and wife, Gussie Hicks, and located North of the Old Redwater Road, and described as follows: BEGINNING at the Northwest Corner of said 10 acre tract; THENCE South 290 feet to a stake for corner; THENCE East 200 feet to a stake for corner; THENCE North, 290 feet to the North boundary line of said 10 acre tract; THENCE West 200 feet to the

Place of Beginning, Containing 1-1/2 acres of land, same being out of the Northwest corner of said 10 acre tract.

2. a 2000 GMC Denali, VIN: 1GKEK13R5YR145949
3. a 2004 Hyundai Santa Fe, VIN: KM8SB12B74U789040
4. a 2002 Chevrolet Tahoe, VIN: 1GNEC13Z32R229002
5. a 2001 Suburban, VIN: 3GNEC16T41G217138
6. a 2005 Chrysler 300, VIN: 2C3JA53G85H658681
7. a 2001 Ford Truck, VIN: 1FTRW07L91KB19449
8. a 2002 Ford Truck, Harley Davidson Edition, VIN: 1FTRW07322KD37752

Upon conviction of any or all of Counts 38, 51, 110, 117, 142, 143, 152, 155, 188, and 189 of this Indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. §§ 924(d) and 3665 the firearms and any accompanying ammunition used in the offense, to wit:

1. a Davis Industries .380 caliber pistol, bearing serial number AP248455
2. a Maverick Arms Model 88 12 gauge shotgun, bearing serial number MV85158M
3. a Makarov 9mm semi-automatic pistol, bearing serial number J048618
4. a High Point .380 caliber semi-automatic pistol, bearing serial number P780082
5. a Smith & Wesson .38 caliber revolver, serial number obliterated
6. a Springfield (HS Products) XD .40 caliber semi-automatic pistol, bearing serial number US223268
7. a Thompson/Center Arms Co. .45 caliber handgun, bearing serial number 4393
8. a RG Industries .22 caliber revolver Model RG23, bearing serial number T678759
9. a Lorcin Engineering .380 caliber semi-automatic pistol model L380, bearing serial number 197790;
10. a FEG .40 caliber semi-automatic pistol model 40RZ, bearing serial number NZ00150
11. a Hi-Point 9mm semi-automatic pistol Model C9, bearing serial number P1386699
12. a Bryco Arms 9mm semi-automatic pistol model Jennings Nine, bearing serial number 1487560
13. Forty three rounds of Remington .45 caliber ammunition
14. a Colt Cobra .38 special revolver, bearing serial number 2680LW

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty,


it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) and 18 U.S.C. § 982(b)(1), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A True Bill.

/s/Grand Jury Foreperson
Foreperson

CONNER ELDRIDGE
UNITED STATES ATTORNEY

By:


Matthew C. Quinn
Assistant U.S. Attorney
Arkansas Bar No. 2003-152
500 N. Stateline Ave., Suite 402
Texarkana, AR 71854
(903) 794-9481
E-mail Matt.Quinn@usdoj.gov