FILED

2013 Apr-29 AM 11:56 U.S. DISTRICT COURT N.D. OF ALABAMA

JWV/GRD: MAY 2013 GJ# <u>30</u>

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

UNITED STATES OF AMERICA)
v.)) Case No.:
**) Case 110
BILLY WILLIAMS, JR.,)
also known as)
"Champ,")
WALTER JOHNSON,)
also known as)
"Walt T,")
SAMMUEL DEWAYNE GULLEY,)
also known as)
"Rosé,")
GRADY ISAM JENKINS,)
also known as)
"Shady Grady,")
DEANDRE R. MURRELL,)
also known as)
"Laray,")
also known as)
"Tojo,")
DEALDRE R. MURRELL,)
also known as)
"Twin,")
ABE JOHNSON,)
also known as)
"Cuz,")
VERNON LLWELLYN MCADORY,)
also known as)
" <i>RJ</i> ,")
WILBERT CURTIS DALTON, JR.,)
also known as)
"Bing,")

and)
MARION REYNOLDS, JR.,)
also known as)
"Tuna")

INDICTMENT

COUNT ONE: [21 U.S.C. §§ 846, 841(a)(1), (b)(1)(A) and (b)(1)(C)]

The Grand Jury charges that:

From in or about May, 2012, to on or about the 23rd day of April, 2013, more exact dates being unknown to the Grand Jury, in Jefferson County, within the Northern District of Alabama, and elsewhere, the defendants,

BILLY WILLIAMS, JR., also known as "Champ," WALTER JOHNSON, also known as "Walt T," SAMMUEL DEWAYNE GULLEY, also known as "Rosé," **GRADY ISAM JENKINS,** also known as "Shady Grady," DEANDRE R. MURRELL, also known as "Laray," also known as "Tojo," **DEALDRE R. MURRELL,** also known as "Twin," ABE JOHNSON, also known as "Cuz,"

VERNON LLWELLYN MCADORY,
also known as
"RJ,"
and
MARION REYNOLDS, JR.,
also known as
"Tuna,"

did knowingly, intentionally, and unlawfully conspire and agree with each other and with others both known and unknown to the Grand Jury to knowingly, intentionally, and unlawfully possess with the intent to distribute and to distribute one kilogram or more of a mixture and substance containing a detectible amount of heroin, and five kilograms or more of a mixture and substance containing a detectable amount of cocaine hydrochloride, each a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), and an amount of codeine (Phernergan with promethazine-codeine) and hydrocodone (Tussionex), each a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), all in violation of Title 21, United States Code, Section 846.

COUNT TWO: [21 U.S.C. §§ 841(a)(1) and (b)(1)(C)]

The Grand Jury charges that:

On or about the 28th day of November, 2012, in Jefferson County, within the Northern District of Alabama, the defendants,

GRADY ISAM JENKINS,
also known as
"Shady Grady,"
and
WILBERT CURTIS DALTON, JR.,
also known as
"Bing,"

did knowingly, intentionally, and unlawfully distribute an amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE: [21 U.S.C. §§ 841(a)(1) and (b)(1)(A)]

The Grand Jury charges that:

On or about the 25th day of January, 2013, in Jefferson County, within the Northern District of Alabama, the defendants,

BILLY WILLIAMS, JR.,
also known as
"Champ,"
and
SAMMUEL DEWAYNE GULLEY,
also known as
"Rosé,"

did knowingly, intentionally, and unlawfully possess with the intent to distribute one kilogram or more of a mixture and substance containing a detectible amount of heroin, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT FOUR: [21 U.S.C. §§ 841(a)(1) and (b)(1)(B)]

The Grand Jury charges that:

On or about the 25th day of January, 2013, in Jefferson County, within the Northern District of Alabama, the defendants,

BILLY WILLIAMS, JR.,
also known as
"Champ,"
and
SAMMUEL DEWAYNE GULLEY,
also known as
"Rosé,"

did knowingly, intentionally, and unlawfully possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectible amount of cocaine hydrochloride, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FIVE: [21 U.S.C. §§ 841(a)(1) and (b)(1)(C)]

The Grand Jury charges that:

On or about the 9th day of April, 2013, in Jefferson County, within the Northern District of Alabama, the defendant,

GRADY ISAM JENKINS, also known as "Shady Grady,"

did knowingly, intentionally, and unlawfully distribute an amount of heroin, a

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNTS SIX THROUGH FORTY-ONE: [21 U.S.C. § 843(b)]

The Grand Jury charges:

- 1. That on or about the date and time listed below, in Jefferson County, within the Northern District of Alabama, and elsewhere, the defendant(s), as more specifically identified herein, did knowingly, intentionally, and unlawfully use a communication facility, that being, a telephone, to facilitate the commission of a felony that is a drug trafficking crime, that is, the drug trafficking crime, alleged in Count One of this Indictment, in violation of Title 21, United States Code, Section 843(b).
- 2. The allegations set forth in paragraph 1, above, are hereby realleged and incorporated by reference for each of the following counts, as though fully set forth therein:

COUNT	DATE	TIME	DEFENDANT(S)
6	10/18/12	7:33 p.m.	BILLY WILLIAMS, JR. and WALTER JOHNSON
7	10/19/12	10:14 p.m.	BILLY WILLIAMS, JR. and WALTER JOHNSON
8	11/05/12	8:42 p.m.	DEANDRE R. MURRELL and BILLY WILLIAMS, JR.

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9	11/05/12	10:03 p.m.	BILLY WILLIAMS, JR. and GRADY ISAM JENKINS
10	11/06/12	2:56 p.m.	BILLY WILLIAMS, JR. and DEANDRE R. MURRELL
11	11/06/12	5:59 p.m.	BILLY WILLIAMS, JR. and DEANDRE R. MURRELL
12	11/07/12	3:03 p.m.	SAMMUEL DEWAYNE GULLEY and BILLY WILLIAMS, JR.
13	11/08/12	3:29 p.m.	BILLY WILLIAMS, JR.
14	11/08/12	7:43 p.m.	BILLY WILLIAMS, JR.
15	11/09/12	9:18 p.m.	WALTER JOHNSON and BILLY WILLIAMS, JR.
16	11/09/12	10:21 p.m.	DEALDRE R. MURRELL and BILLY WILLIAMS, JR.
17	11/10/12	4:04 p.m.	BILLY WILLIAMS, JR. and DEALDRE R. MURRELL
18	11/10/12	6:15 p.m.	DEALDRE R. MURRELL and BILLY WILLIAMS, JR.
19	11/10/12	9:17 p.m.	BILLY WILLIAMS, JR.
20	11/27/12	7:30 p.m.	BILLY WILLIAMS, JR. and GRADY ISAM JENKINS
21	11/27/12	8:27 p.m.	BILLY WILLIAMS, JR. and MARION REYNOLDS, JR.
22	11/27/12	8:50 p.m.	BILLY WILLIAMS, JR. and SAMMUEL DEWAYNE GULLEY

23	11/27/12	10:36 a.m.	BILLY WILLIAMS, JR. and GRADY ISAM JENKINS
24	11/28/12	1:34 p.m.	BILLY WILLIAMS, JR. and GRADY ISAM JENKINS
25	11/28/12	10:15 p.m.	BILLY WILLIAMS, JR. and SAMMUEL DEWAYNE GULLEY
26	11/28/12	10:55 p.m.	BILLY WILLIAMS, JR. and SAMMUEL DEWAYNE GULLEY
27	11/29/12	6:36 p.m.	BILLY WILLIAMS, JR. and VERNON LLWELLYN MCADORY
28	12/03/12	5:36 p.m.	ABE JOHNSON and BILLY WILLIAMS, JR.
29	12/03/12	7:02 p.m.	WALTER JOHNSON and BILLY WILLIAMS, JR.
30	12/19/12	10:36 p.m.	BILLY WILLIAMS, JR. and ABE JOHNSON
31	12/19/12	10:47 p.m.	BILLY WILLIAMS, JR. and SAMMUEL DEWAYNE GULLEY
32	12/20/12	5:40 p.m.	MARION REYNOLDS, JR. and BILLY WILLIAMS, JR.
33	12/20/12	7:04 p.m.	BILLY WILLIAMS, JR. and SAMMUEL DEWAYNE GULLEY
34	1/23/13	6:15 p.m.	SAMMUEL DEWAYNE GULLEY BILLY WILLIAMS, JR.
35	1/23/13	9:27 p.m.	WALTER JOHNSON and BILLY WILLIAMS, JR.

36	1/23/13	9:31 p.m.	SAMMUEL DEWAYNE GULLEY BILLY WILLIAMS, JR.
37	1/24/13	4:07 p.m.	BILLY WILLIAMS, JR. and SAMMUEL DEWAYNE GULLEY
38	1/24/13	8:20 p.m.	BILLY WILLIAMS, JR. and SAMMUEL DEWAYNE GULLEY
39	1/25/13	5:49 p.m.	BILLY WILLIAMS, JR. and DEANDRE R. MURRELL
40	1/25/13	8:09 p.m.	BILLY WILLIAMS, JR. and SAMMUEL DEWAYNE GULLEY
41	1/25/13	9:00 p.m.	BILLY WILLIAMS, JR. and SAMMUEL DEWAYNE GULLEY

NOTICE OF FORFEITURE: [21 U.S.C. § 853(a)(1) and (a)(2)]

The Grand Jury further notifies the defendants that:

- 1. The allegations of Counts One through Forty-One of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States pursuant to the provisions of Title 21, United States Code, Sections 853(a)(1) and (a)(2).
- 2. Pursuant to Rule 32.2(a), Fed. R. Crim. P., the defendants are hereby notified that, upon conviction of one or more of the offenses alleged in Counts

 One through Forty-One of this Indictment, defendants,

BILLY WILLIAMS, JR., also known as

"Champ," WALTER JOHNSON, also known as *"Walt T,"* SAMMUEL DEWAYNE GULLEY, also known as "Rosé," **GRADY ISAM JENKINS,** also known as "Shady Grady," DEANDRE R. MURRELL, also known as "Laray," also known as "Tojo," **DEALDRE R. MURRELL,** also known as "Twin," ABE JOHNSON, also known as "Cuz," VERNON LLWELLYN MCADORY, also known as "*RJ*," WILBERT CURTIS DALTON, JR., also known as "Bing," and MARION REYNOLDS, JR., also known as "Tuna,"

shall forfeit to the United States pursuant to 21 U.S.C. § 853(a), 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:

JUDGMENT FOR PROCEEDS

A sum of money equal to at least \$5,000,000 in United States currency, representing the amount of proceeds obtained as a result of the offenses charged in Counts One through Forty of this Indictment, for which the defendants are jointly and severally liable.

- 3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):
 - 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), to seek forfeiture of any other property of said defendant(s) up to the value of the

forfeitable property described above.

All in accordance with Title 21, United States Code, Sections 853(a)(1) and (a)(2).

A TRUE BILL

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FOREMAN OF THE GRAND JURY

JOYCE WHITE VANCE United States Attorney

/s/

GREGORY R. DIMLER Assistant United States Attorney