


JAN 11 2012

UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF ARKANSAS
 WESTERN DIVISION

JAMES W. Mc GORMACK, CLERK
 By:  DEP. CLERK

UNITED STATES OF AMERICA)

v.)

Case No. 4:12CR 00014 SWW

JOHNNIE CAMPBELL, a/k/a Little Johnnie;)

ERIC BALDWIN, a/k/a Little E,)

a/k/a Easy Does It;)

TOMMY BRYLES, a/k/a Little Tommy;)

COURTNEY CLARK; a/k/a Tank;)

KEITH COLEMAN;)

KIMBERLY RENEE COLEMAN;)

BENAJMIN DRUFF;)

LABRONS DOMINIQUE ELLINGTON,)

a/k/a Dom Ellington;)

SHONTE FRAZIER;)

JOSEPH GALBURTH, III, a/k/a Little Duke;)

RICHARD HAWKINS;)

ANTHONY HILL, a/k/a Spanky;)

TERRELL KEENER, a/k/a TK;)

STEVEN MARCUS KNIGHT;)

JOSEPH LEATH; CORY OULETTE;)

KEITHEN PETTUS, a/k/a KP;)

JOHN STOCKARD; WILLIAM TEAGUE;)

ANDREW TUBBS; ASHTON WARNER;)

MICHAEL WATKINS, a/k/a White Mike; and)

JOSEPH PIERRE WILLIAMS a/k/a JP)

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 843(b)

18 U.S.C. § 641

18 U.S.C. § 1791(a)(2)

18 U.S.C. § 2

FILED UNDER SEAL

MOTION TO SEAL INDICTMENT AND DELAY SERVICE
AS TO CERTAIN DEFENDANTS

Pursuant to Rule 6(e)(4), Federal Rules of Criminal Procedure, the United States requests that the above-styled Indictment be sealed as to all defendants until the designated date and time stated below. Further, the United States has requested arrest warrants for some of the defendants. For the safety of law enforcement agents who will attempt to execute the arrest warrants and to guard against the risk of flight, the United States respectfully submits that none

of the defendants' identities should be revealed in any public manner until the warrants have been executed. In order to effectuate this process, the United States requests that any notification from the Clerk of Court to arrested defendants include a redacted version of the Indictment provided to the Clerk of Court by the United States until the date and time stated below.

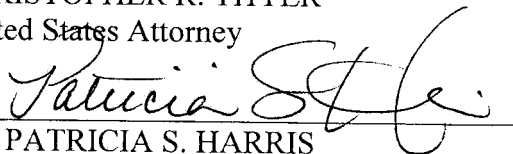
Further, summonses have been requested for the following defendants: Keith Coleman, Shonte Frazier, Richard Hawkins, Corey Oulette, William Teague, Andrew Tubbs, and Michael Watkins. The United States requests to delay notification by summons to these defendants until the date and time stated below.

Law enforcement agents intend to attempt to execute all arrest warrants in the morning hours of January 20, 2012. It is anticipated that all arrests will be made by 1:00 p.m. In the event there are any warrants not executed by that time, it would aid law enforcement agents in the apprehension of those remaining defendants to have the indictment unsealed. Furthermore, because of the number of arrests that will have been made throughout the course of the day, the warrants are likely to be common knowledge among the indicted defendants anyway. Therefore, the United States requests that the seal of the indictment and related warrants expire at 1:00 p.m. January 20, 2012, and at that point, the clerk's office would also be free to send out the summonses.

Respectfully submitted,

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ORDER

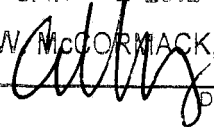
Pursuant to the above requests, the Indictment in this matter shall be sealed until 1:00 p.m. on January 20, 2012. Until such time, the Clerk of the Court is directed to produce redacted copies of the Indictment for service on arrested defendants and delay notification by summons as requested herein.

1-11-12
DATE


UNITED STATES MAGISTRATE JUDGE

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

JAN 11 2012

JAMES W. MCCORMACK, CLERK
By:  DEP. CLERK

UNITED STATES OF AMERICA)	
)	
vs.)	4:12-CR 0001A GWN
)	
JOHNNIE CAMPBELL,)	21 U.S.C. § 846
a/k/a Little Johnnie;)	21 U.S.C. § 841(a)(1)
ERIC BALDWIN,)	21 U.S.C. § 843(b)
a/k/a Little E,)	18 U.S.C. § 641
a/k/a Easy Does It;)	18 U.S.C. § 1791(a)(2)
TOMMY BRYLES a/k/a Little Tommy;)	18 U.S.C. § 2
COURTNEY CLARK,)	
a/k/a Tank;)	
KEITH COLEMAN;)	
KIMBERLY RENEE COLEMAN;)	
BENJAMIN DRUFF;)	
LABRONS DOMINIQUE ELLINGTON,)	
a/k/a Dom Ellington;)	
SHONTE FRAZIER;)	
JOSEPH GALBURTH, III,)	
a/k/a Little Duke;)	
RICHARD HAWKINS;)	
ANTHONY HILL ,)	
a/k/a Spanky;)	
TERRELL KEENER,)	
a/k/a TK;)	
STEVEN MARCUS KNIGHT;)	
JOSEPH LEATH;)	
CORY OULETTE;)	
KEITHEN PETTUS,)	
a/k/a KP;)	
JOHN STOCKARD;)	
WILLIAM TEAGUE;)	
ANDREW TUBBS;)	
ASHTON WARNER;)	
MICHAEL WATKINS;)	
a/k/a White Mike; and)	
JOSEPH PIERRE WILLIAMS,)	
a/k/a JP)	

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

From in or about August 2009, through on or about the return of this Indictment, in the Eastern District of Arkansas, the defendants,

JOHNNIE CAMPBELL, a/k/a Little Johnnie;
ERIC BALDWIN, a/k/a Little E, a/k/a Easy Does It;
TOMMY BRYLES a/k/a Little Tommy;
COURTNEY CLARK, a/k/a Tank;
KEITH COLEMAN;
KIMBERLY RENEE COLEMAN;
BENJAMIN DRUFF;
LABRONS DOMINIQUE ELLINGTON, a/k/a Dom Ellington;
JOSEPH GALBURTH, III, a/k/a Little Duke;
RICHARD HAWKINS;
ANTHONY HILL, a/k/a Spanky;
TERRELL KEENER, a/k/a TK;
STEVEN MARCUS KNIGHT;
JOSEPH LEATH;
CORY OULETTE;
KEITHEN PETTUS, a/k/a KP;
JOHN STOCKARD;
ANDREW TUBBS
ASHTON WARNER;
MICHAEL WATKINS, a/k/a White Mike; and
JOSEPH PIERRE WILLIAMS, a/k/a JP,

knowingly and intentionally conspired with one another and with persons known and unknown to the Grand Jury, to possess with intent to distribute and to distribute Oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about April 12, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 3

On or about April 23, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 4

On or about April 26, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 5

On or about May 7, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 6

On or about May 14, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 7

On or about May 19, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 8

On or about June 10, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 9

On or about June 28, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 10

On or about July 2, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 11

On or about July 6, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie,

the defendant, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 12

On or about July 19, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie,

the defendant, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 13

On or about July 20, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie,

the defendant, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 14

On or about July 21, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie,

the defendant, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 15

On or about October 7, 2011, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 16

On or about July 28, 2011, in the Eastern District of Arkansas,

ERIC BALDWIN, a/k/a Little E, a/k/a Easy Does It

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 17

On or about July 19, 2010, in the Eastern District of Arkansas,

KEITH COLEMAN

the defendant, aided and abetted the knowing and intentional distribution of Oxycodone, a Schedule II controlled substance, by Kimberly Renee Coleman, who is charged in Count 20.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 18

On or about July 2, 2010, in the Eastern District of Arkansas,

KIMBERLY RENEE COLEMAN

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 19

On or about July 6, 2010, in the Eastern District of Arkansas,

KIMBERLY RENEE COLEMAN

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 20

On or about July 19, 2010, in the Eastern District of Arkansas,

KIMBERLY RENEE COLEMAN

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 21

On or about July 20, 2010, in the Eastern District of Arkansas,

KIMBERLY RENEE COLEMAN

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 22

On or about July 21, 2010, in the Eastern District of Arkansas,

KIMBERLY RENEE COLEMAN

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 23

On or about July 21, 2010, in the Eastern District of Arkansas,

LABRONS DOMINIQUE ELLINGTON, a/k/a Dom Ellington

the defendant, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 24

On or about October 20, 2010, in the Eastern District of Arkansas,

JOSEPH GALBURTH, III, a/k/a Little Duke

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 25

On or about November 10, 2010, in the Eastern District of Arkansas,

JOSEPH GALBURTH, III, a/k/a Little Duke

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 26

On or about November 17, 2010, in the Eastern District of Arkansas,

JOSEPH GALBURTH, III, a/k/a Little Duke

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 27

On or about December 14, 2010, in the Eastern District of Arkansas,

JOSEPH GALBURTH, III, a/k/a Little Duke

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 28

On or about December 15, 2010, in the Eastern District of Arkansas,

JOSEPH GALBURTH, III, a/k/a Little Duke

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 29

On or about December 16, 2010, in the Eastern District of Arkansas,

JOSEPH GALBURTH, III, a/k/a Little Duke

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 30

On or about December 21, 2010, in the Eastern District of Arkansas,

JOSEPH GALBURTH, III, a/k/a Little Duke

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 31

On or about January 7, 2011, in the Eastern District of Arkansas,

JOSEPH GALBURTH, III, a/k/a Little Duke

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 32

On or about July 19, 2010, in the Eastern District of Arkansas,

RICHARD HAWKINS

the defendant, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 33

On or about July 28, 2011, in the Eastern District of Arkansas,

ANTHONY HILL, a/k/a Spanky

the defendant, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 34

On or about July 7, 2010, in the Eastern District of Arkansas,

TERRELL KEENER, a/k/a TK

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 35

On or about July 27, 2010, in the Eastern District of Arkansas,

TERRELL KEENER, a/k/a TK

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled

substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 36

On or about July 10, 2010, in the Eastern District of Arkansas,

STEVEN MARCUS KNIGHT

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 37

On or about June 20, 2010, in the Eastern District of Arkansas,

JOSEPH LEATH

the defendant, knowingly and intentionally possessed with intent to distribute Oxycodone and Oxymorphone, Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 38

On or about July 21, 2010, in the Eastern District of Arkansas,

CORY OULETTE

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 39

On or about April 12, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie,
KEITHEN PETTUS, a/k/a KP,
and **JOSEPH PIERRE WILLIAMS**, a/k/a JP,

the defendants, aiding and abetting each other, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 40

On or about July 2, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie
and **KEITHEN PETTUS**, a/k/a KP

the defendants, aiding and abetting each other, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 41

On or about July 2, 2010, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie
and **KEITHEN PETTUS**, a/k/a KP

the defendants, aiding and abetting each other, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 42

On or about July 16, 2010, in the Eastern District of Arkansas,

KEITHEN PETTUS, a/k/a KP

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 43

On or about July 19, 2010, in the Eastern District of Arkansas,

KEITHEN PETTUS, a/k/a KP

the defendant, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 44

On or about July 20, 2010, in the Eastern District of Arkansas,

KEITHEN PETTUS, a/k/a KP

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 45

On or about July 21, 2010, in the Eastern District of Arkansas,

KEITHEN PETTUS, a/k/a KP

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 46

On or about June 22, 2011, in the Eastern District of Arkansas,

KEITHEN PETTUS, a/k/a KP

the defendant, knowingly and intentionally distributed Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 47

On or about July 3, 2010, in the Eastern District of Arkansas,

JOHN STOCKARD

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 48

On or about July 2, 2010, in the Eastern District of Arkansas,

ANDREW TUBBS

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 49

On or about July 7, 2010, in the Eastern District of Arkansas,

ANDREW TUBBS

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 50

On or about July 9, 2010, in the Eastern District of Arkansas,

ANDREW TUBBS

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 51

On or about July 21, 2010, in the Eastern District of Arkansas,

ANDREW TUBBS

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 52

On or about July 22, 2010, in the Eastern District of Arkansas,

ANDREW TUBBS

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 53

On or about July 1, 2010, in the Eastern District of Arkansas,

ASHTON WARNER

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 54

On or about July 2, 2010, in the Eastern District of Arkansas,

ASHTON WARNER

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 55

On or about July 7, 2010, in the Eastern District of Arkansas,

ASHTON WARNER

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 56

On or about July 21, 2010, in the Eastern District of Arkansas,

ASHTON WARNER

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 57

On or about July 22, 2010, in the Eastern District of Arkansas,

ASHTON WARNER

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 58

On or about July 23, 2010, in the Eastern District of Arkansas,

ASHTON WARNER

knowingly and intentionally used a communications facility, to wit, a telephone, with the

intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 59

On or about July 29, 2010, in the Eastern District of Arkansas,

MICHAEL WATKINS, a/k/a White Mike

the defendant, knowingly and intentionally possessed with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

COUNT 60

On or about August 4, 2010, in the Eastern District of Arkansas,

MICHAEL WATKINS, a/k/a White Mike

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, the distribution of Oxycodone, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 61

On or about August 5, 2010, in the Eastern District of Arkansas,

MICHAEL WATKINS, a/k/a White Mike

the defendant, knowingly and intentionally attempted to possess with intent to distribute Oxycodone, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C) and 846.

COUNT 62

From in or about December 2009, through in or about July 2010, in the Eastern District of Arkansas, the defendants,

JOHNNIE CAMPBELL, a/k/a Little Johnnie;
SHONTE FRAZIER;
KEITHEN PETTUS, a/k/a KP; and
WILLIAM TEAGUE

knowingly and intentionally conspired with one another and with persons known and unknown to the Grand Jury, to possess with intent to distribute and to distribute hydrocodone, a Schedule III controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(D).

All in violation of Title 21, United States Code, Section 846.

COUNT 63

On or about October 4, 2010, in the Eastern District of Arkansas,

KIMBERLY RENEE COLEMAN

wilfully and knowingly stole funds of the United States to which she knew she was not entitled and the value of such funds was less than \$1,000.00.

All in violation of Title 18, United States Code, Section 641.

COUNT 64

On or about July 26, 2011, in the Eastern District of Arkansas,

JOHNNIE CAMPBELL, a/k/a Little Johnnie,

contrary to Title 18, United States Code, Section 1791(d)(1)(A) and Title 28, Code of Federal Regulations, Section 553.12, knowingly possessed a prohibited object, specifically an amount of Oxycodone, a Schedule II controlled substance, while an inmate of the Pulaski County Regional Detention Facility, a “prison” within the meaning of Title 18, United States Code,

Section 1791(d)(4).

All in violation of Title 18, United States Code, Section 1791(a)(2).

COUNT 65

On or about July 16, 2010, in the Eastern District of Arkansas,

JOSEPH PIERRE WILLIAMS a/k/a JP

knowingly and intentionally used a communications facility, to wit, a telephone, with the intent to facilitate the commission of a drug offense, to wit, possession of Oxycodone with intent to distribute, a violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE ALLEGATION 1

Upon conviction of the offenses alleged in Counts 1 or 33 of this Indictment, the defendant,

ANTHONY HILL, a/k/a Spanky

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

2001 Jaguar S-Type VIN SAJDA01P51GM15772

If 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.

(End of Text - Signature Page Attached)