

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **12-60307**

21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
21 U.S.C. § 853

CR-ZLOCH

/MATTHEWMAN

UNITED STATES OF AMERICA

vs.

CHUCK WAYNE BOYD,

a/k/a "Dred,"

a/k/a "Jamaican,"

a/k/a "Bumble Bee,"

ANTHONY DELANCEY,

a/k/a "Bussi,"

a/k/a "Anthony Delancy,"

a/k/a "Big Man,"

JOHNNY ROY TARVER,

a/k/a "J Baby,"

ANDRE ANTONIO JACKSON,

a/k/a "Dre,"

KALIN DEMETRIUS MAREUS,

a/k/a "Butter,"

a/k/a "AB,"

KEYON JAMOR WILLIAMS,

a/k/a "Black Boy,"

a/k/a "Yon,"

KERRY BERNARD WILLIAMS,

EDDIE LONSO FOSTER, JR.,

a/k/a "Bootha,"

DONNIE EARL MATHES,

a/k/a "Donnie Earl Mathis,"

VASHAWN CHANELL THURSTON,

RICHARD EUGENE YOUNG, JR.,

ESTMANE LUCDOR,

JULIUS WACO WADE,

a/k/a "Jitt Dogg,"

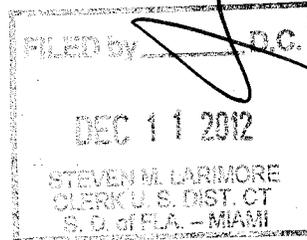
a/k/a "Jitt,"

MIGUEL ANGEL ORTIZ,

a/k/a "Chico,"

ANTHONY DONNELL ROSE,

a/k/a "Lil' Legs,"



**a/k/a "Ant," and
TESHON RENEE YARBOUGH,**

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT 1

On or about September 28, 2010, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 2

Beginning at least as early as on or about November 27, 2010, and continuing through in or around August of 2012, in Miami-Dade County, in the Southern District of Florida, the defendants,

**CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"
ANTHONY DELANCEY,
a/k/a "Bussi,"
a/k/a "Anthony Delancy,"**

**ak/a "Big Man,"
and
JOHNNY ROY TARVER,
a/k/a "J Baby,"**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marijuana.

COUNT 3

On or about November 27, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants,

**CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"
and
ANTHONY DELANCEY,
a/k/a "Bussi,"
a/k/a "Anthony Delancy,"
ak/a "Big Man,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marijuana.

COUNT 4

Beginning at least as early as on or about July 28, 2011, and continuing through in or around December of 2011, in Miami-Dade County, in the Southern District of Florida, the defendants,

**ANTHONY DELANCEY,
a/k/a "Bussi,"
a/k/a "Anthony Delancy,"
ak/a "Big Man,"
JOHNNY ROY TARVER,
a/k/a "J Baby,"
and
ANDRE ANTONIO JACKSON,
a/k/a "Dre,"**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled

substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 5

On or about December 14, 2011, in Miami-Dade County, in the Southern District of Florida, the defendants,

**ANTHONY DELANCEY,
a/k/a "Bussi,"
a/k/a "Anthony Delancy,"
ak/a "Big Man,"
JOHNNY ROY TARVER,
a/k/a "J Baby,"
and
ANDRE ANTONIO JACKSON,
a/k/a "Dre,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 6

On or about April 15, 2012, in Miami-Dade County, in the Southern District of Florida, the defendants,

CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"
ANTHONY DELANCEY,
a/k/a "Bussi,"
a/k/a "Anthony Delancy,"
a/k/a "Big Man,"
and
JOHNNY ROY TARVER,
a/k/a "J Baby,"

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 7

On or about December 14, 2010, in Miami-Dade County, in the Southern District of Florida, the defendant,

CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

Pursuant to Title 21, United States Code, Section 841(b)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of heroin.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 8

Beginning at least as early as on or about December 14, 2010, and continuing through on or about May 16, 2011, in Miami-Dade County, in the Southern District of Florida, the defendants,

**CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"
KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"
KERRY BERNARD WILLIAMS,
EDDIE LONSO FOSTER, JR.,
a/k/a "Bootha,"
and
DONNIE EARL MATHES,
a/k/a "Donnie Earl Mathis,"**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 9

On or about March 23, 2011, in Miami-Dade County, in the Southern District of Florida, the defendant,

**DONNIE EARL MATHES,
a/k/a "Donnie Earl Mathis,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 10

On or about March 29, 2011, in Miami-Dade County, in the Southern District of Florida, the defendant,

**EDDIE LONSO FOSTER, JR.,
a/k/a "Bootha,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 11

On or about April 5, 2011, in Miami-Dade County, in the Southern District of Florida, the defendants,

KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"
EDDIE LONSO FOSTER, JR.,
a/k/a "Bootha,"
and
DONNIE EARL MATHES,
a/k/a "Donnie Earl Mathis,"

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marijuana.

COUNT 12

On or about April 13, 2011, in Miami-Dade County, in the Southern District of Florida, the defendants,

KERRY BERNARD WILLIAMS,
and
DONNIE EARL MATHES,
a/k/a "Donnie Earl Mathis,"

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base,

commonly referred to as "crack."

COUNT 13

On or about April 26, 2011, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**DONNIE EARL MATHES,
a/k/a "Donnie Earl Mathis,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 14

On or about May 4, 2011, in Miami-Dade County, in the Southern District of Florida, the
defendant,

KERRY BERNARD WILLIAMS,

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 15

On or about May 16, 2011, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 16

On or about June 13, 2011, in Miami-Dade County, in the Southern District of Florida, the defendants,

**KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"
and
VASHAWN CHANELL THURSTON,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 17

On or about June 13, 2011, in Miami-Dade County, in the Southern District of Florida, the defendants,

**KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"
and
VASHAWN CHANELL THURSTON,**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 18

On or about June 19, 2011, in Miami-Dade County, in the Southern District of Florida, the defendants,

**VASHAWN CHANELL THURSTON,
and
RICHARD EUGENE YOUNG, JR.,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 19

On or about June 19, 2011, in Miami-Dade County, in the Southern District of Florida,

the defendants,

**VASHAWN CHANELL THURSTON,
and
RICHARD EUGENE YOUNG, JR.,**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 20

On or about August 3, 2011, in Miami-Dade County, in the Southern District of Florida, the defendant,

VASHAWN CHANELL THURSTON,

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 21

On or about July 5, 2011, in Miami-Dade County, in the Southern District of Florida, the defendants,

**KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"**

**a/k/a "Yon,"
and
ESTMANE LUCDOR,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 22

On or about July 5, 2011, in Miami-Dade County, in the Southern District of Florida, the defendants,

**KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"
and
ESTMANE LUCDOR,**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 23

Beginning at least as early as on or about January 26, 2012, and continuing through in or around August of 2012, in Miami-Dade County, in the Southern District of Florida, the defendants,

CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"
KALIN DEMETRIUS MAREUS,
a/k/a "Butter,"
a/k/a "AB,"
KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"
and
EDDIE LONSO FOSTER, JR.,
a/k/a "Bootha,"

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 24

On or about January 26, 2012, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 25

On or about March 8, 2012, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 26

On or about April 18, 2012, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**EDDIE LONSO FOSTER, JR.,
a/k/a "Bootha,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 27

On or about May 4, 2012, in Miami-Dade County, in the Southern District of Florida, the defendants,

**KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"
and
EDDIE LONSO FOSTER, JR.,
a/k/a "Bootha,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 28

On or about June 7, 2012, in Miami-Dade County, in the Southern District of Florida, the defendant,

**KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in

violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 29

On or about August 8, 2012, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 30

On or about August 13, 2012, in Miami-Dade County, in the Southern District of Florida, the defendant,

**KALIN DEMETRIUS MAREUS,
a/k/a "Butter,"
a/k/a "AB,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that

this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

COUNT 31

On or about August 21, 2012, in Miami-Dade County, in the Southern District of Florida, the defendant,

**CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 32

Beginning at least as early as in or around October of 2011, and continuing through at least in or around April of 2012, in Miami-Dade County, in the Southern District of Florida, the defendants,

**ANTHONY DELANCEY,
a/k/a "Bussi,"
a/k/a "Anthony Delancy,"
a/k/a "Big Man,"
and
JULIUS WACO WADE,
a/k/a "Jitt Dogg,"**

a/k/a "Jitt,"

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 33

On or about October 4, 2011, in Miami-Dade County, in the Southern District of Florida, the defendant,

**JULIUS WACO WADE,
a/k/a "Jitt Dogg,"
a/k/a "Jitt,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 34

On or about October 18, 2011, in Miami-Dade County, in the Southern District of Florida, the defendant,

**JULIUS WACO WADE,
a/k/a "Jitt Dogg,"
a/k/a "Jitt,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in

violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 35

On or about October 20, 2011, in Miami-Dade County, in the Southern District of Florida, the defendant,

**JULIUS WACO WADE,
a/k/a "Jitt Dogg,"
a/k/a "Jitt,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 36

On or about January 19, 2012, in Miami-Dade County, in the Southern District of Florida, the defendant,

**JULIUS WACO WADE,
a/k/a "Jitt Dogg,"
a/k/a "Jitt,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 37

Beginning at least as early as in or around March of 2012, and continuing through at least in or around April of 2012, in Miami-Dade County, in the Southern District of Florida, the defendants,

**JULIUS WACO WADE,
a/k/a "Jitt Dogg,"
a/k/a "Jitt,"
ANTHONY DONNELL ROSE,
a/k/a "Ant,"
and
TESHON RENEE YARBOUGH,**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marijuana.

COUNT 38

On or about April 3, 2012, in Miami-Dade County, in the Southern District of Florida, the defendant,

**ANTHONY DONNELL ROSE,
a/k/a "Ant,"**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marijuana.

COUNT 39

On or about April 5, 2012, in Miami-Dade County, in the Southern District of Florida,
the defendant,

**ANTHONY DONNELL ROSE,
a/k/a "Ant,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of marijuana.

COUNT 40

On or about April 6, 2012, in Miami-Dade County, in the Southern District of Florida,
the defendants,

**JULIUS WACO WADE,
a/k/a "Jitt Dogg,"
a/k/a "Jitt,"
and
ANTHONY DONNELL ROSE,
a/k/a "Ant,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 41

Beginning at least as early as March of 2012, and continuing through at least in or around April of 2012, in Miami-Dade County, in the Southern District of Florida, the defendants,

**JULIUS WACO WADE,
a/k/a "Jitt Dogg,"
a/k/a "Jitt,"
and
MIGUEL ANGEL ORTIZ,
a/k/a "Chico,"**

did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack."

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that

this violation involved a mixture and substance containing a detectable amount of marijuana.

COUNT 42

On or about April 6, 2012, in Miami-Dade County, in the Southern District of Florida,
the defendants,

**MIGUEL ANGEL ORTIZ,
a/k/a "Chico,"
and
JULIUS WACO WADE,
a/k/a "Jitt Dogg,"
a/k/a "Jitt,"**

did knowingly and intentionally possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

CRIMINAL FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging criminal forfeiture to the United States of America of certain property in which the defendants,

**CHUCK WAYNE BOYD,
a/k/a "Dred,"
a/k/a "Jamaican,"
a/k/a "Bumble Bee,"
ANTHONY DELANCEY,
a/k/a "Bussi,"
a/k/a "Anthony Delancy,"
a/k/a "Big Man,"
JOHNNY ROY TARVER,
a/k/a "J Baby,"
ANDRE ANTONIO JACKSON,
a/k/a "Dre,"
KALIN DEMETRIUS MAREUS,
a/k/a "Butter,"
a/k/a "AB,"
KEYON JAMOR WILLIAMS,
a/k/a "Black Boy,"
a/k/a "Yon,"
KERRY BERNARD WILLIAMS,
EDDIE LONSO FOSTER, JR.,
a/k/a "Bootha,"
DONNIE EARL MATHES,
a/k/a "Donnie Earl Mathis,"
VASHAWN CHANELL THURSTON,
RICHARD EUGENE YOUNG, JR.,
ESTMANE LUCDOR,
JULIUS WACO WADE,
a/k/a "Jitt Dogg,"
a/k/a "Jitt,"
MIGUEL ANGEL ORTIZ,
a/k/a "Chico,"
ANTHONY DONNELL ROSE,
a/k/a "Lil' Legs,"
a/k/a "Ant," and
TESHON RENEE YARBOUGH,**

have an interest.

2. Upon conviction of a violation of Title 21, United States Code, Section 841 and/or Section 846, as alleged in this Indictment, the defendant so convicted shall forfeit to the United States of America all of his right, title and interest in the following property, pursuant to Title 21, United States Code, Section 853(a)(1)-(2):

(a) any property constituting or derived from any proceeds obtained, directly or indirectly, as the result of such violation; and

(b) any property used or intended to be used in any manner or part to commit or to facilitate the commission of such violation.

3. The property which is subject to criminal forfeiture includes, but is not limited to, the following:

(a) One 2006 Cadillac CTS (V.I.N.: 1G6DP577760100167);

(b) One 2005 Nissan Altima (V.I.N.: 1N4AL11D55C354367);

(c) One 1998 Mercury Grand Marquis (V.I.N.: 2MEFM74W1WX633069);

(d) \$28,170 in United States currency, which was seized on or about November 27, 2010, from the premises located at 2400 NW 19th Avenue, Miami, Florida, 33135;

(e) \$16,413 in United States currency, which was seized on or about December 14, 2010, from the premises located at 630 NW 173rd Street, Miami, Florida, 33142;

(f) \$1,080 in United States currency, which was seized on or about April 6, 2012 from Julius Waco Wade, a/k/a "Jitt Dogg," a/k/a "Jitt," and Miguel Angel Ortiz, a/k/a "Chico"; and

(g) a sum of money equal in value to the property constituting or derived from any proceeds obtained, directly or indirectly, as the result of the violations alleged in this

Indictment, which the United States of America will seek as a forfeiture money judgment against the defendants, jointly and severally, at sentencing pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

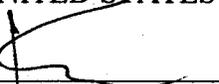
All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL



WIFREDO A FERRER
UNITED STATES ATTORNEY

FOREPERSON



ROY K. ALTMAN
ASSISTANT UNITED STATES ATTORNEY