

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

2018 NOV 29 PM 4:02

FILED
TAMPA, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 8:18-cr-572-T-23-AEP

21 U.S.C. § 846

21 U.S.C. § 841

18 U.S.C. § 922(g)(1)

JAMES HASKELL STEPHENS, IV,
a/k/a "Jamie,"
JERROD LEE,
a/k/a "Jig," a/k/a "Mexico,"
EDWIN CARLON,
MARVIN GROOMS,
ALLEN BROWN,
a/k/a "Jerusalem," a/k/a "Shawn,"
a/k/a "Deshon," and
TIMMY RAMSEY

SEALED

INDICTMENT

The Grand Jury charges:

COUNT ONE

Beginning on an unknown date, no later than on or about October of 2017,
and continuing through the present, in the Middle District of Florida, the defendants,

JAMES HASKELL STEPHENS, IV,
a/k/a "Jamie,"
JERROD LEE,
a/k/a "Jig," a/k/a "Mexico,"
EDWIN CARLON,
MARVIN GROOMS,
ALLEN BROWN,
a/k/a "Jerusalem," a/k/a "Shawn," a/k/a "Deshon," and
TIMMY RAMSEY,

did knowingly, willfully, and intentionally conspire with each other and other persons, both known and unknown to the Grand Jury, to manufacture, distribute, and possess with intent to distribute a controlled substance, which violation involved: a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; a mixture and substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II controlled substance; a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance; a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propenamide ("fentanyl"), a Schedule II controlled substance; and a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and is therefore punished under 21 U.S.C. SS 841(b)(1)(C).

It was part of the conspiracy that the conspirators would perform acts and make statements to hide and conceal and cause to be hidden and concealed the purpose of the conspiracy and the acts committed in furtherance thereof.

All in violation of 21 U.S.C. § 846.

COUNT TWO

On or about October 18, 2017, in the Middle District of Florida, the defendants,

JERROD LEE,
a/k/a "Jig," a/k/a "Mexico," and
MARVIN GROOMS,

aiding and abetting each other and other persons, known and unknown to the Grand Jury, possessed with intent to distribute and distributed a controlled substance, which violation involved a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1) (C).

In violation of 21 U.S.C. §§ 841(a)(1) and 2.

COUNT THREE

On or about October 12, 2018, in the Middle District of Florida, the defendant,

JAMES HASKELL STEPHENS, IV,
a/k/a "Jamie,"

having been previously convicted in any court of a crime punishable by imprisonment for a term exceeding one year, including:

1. **Aggravated Battery with a Deadly Weapon**, on or about May 24, 1999;
2. **Possession of Cocaine**, on or about May 24, 1999;
3. **Possession of Cocaine**, on or about May 24, 1999;
4. **Fleeing to Elude**, on or about May 24, 1999;
5. **Driving While License Revoked (4 Counts)**, on or about September 19, 2005; and
6. **Failure to Register as a Career Offender** on or about October 13, 2015;

The defendant,

ALLEN BROWN,
a/k/a "Jerusalem," a/k/a "Shawn," a/k/a "Deshon,"

having been previously convicted in any court of a crime punishable by imprisonment for a term exceeding one year, including:

1. **Robbery with a Firearm**, on or about March 23, 2006;
2. **Battery on a Law Enforcement Officer with Violence**, on or about March 23, 2006;
3. **Obstructing or Opposing a Law Enforcement Officer**, on or about March 23, 2006;
4. **Discharge of a Firearm from a Vehicle Occupant**, on or about June 11, 2001;
5. **Aggravated Assault with a Weapon**, on or about June 11, 2001; and
6. **Escape from Law Enforcement**, on or about June 11, 2001,

And the defendant,

TIMMY RAMSEY,

having been previously convicted in any court of a crime punishable by imprisonment for a term exceeding one year, including:

1. **Possession of Cocaine (3 counts)**, on or about August 23, 2006; and
2. **Driving While License Cancelled or Suspended (2 counts)**, on or about August 23, 2006;

did knowingly possess, in and affecting interstate and foreign commerce, firearms and ammunition, that is, a Taurus 9-millimeter pistol, an SCCY 9 millimeter pistol, and 16 rounds of 9-millimeter ammunition, and did knowingly aid and abet each other in the same.

In violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2), 924(e) and 2.

COUNT FOUR

On or about October 24, 2018, in the Middle District of Florida, the defendant,

JERROD LEE,
a/k/a "Jig," a/k/a "Mexico,"

possessed with intent to distribute and distributed a controlled substance, which violation involved 10 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propenamide ("fentanyl"), a Schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1) (B).

In violation of 21 U.S.C. § 841(a)(1).

COUNT FIVE

On or about November 13, 2018, in the Middle District of Florida, the defendant,

JERROD LEE,
a/k/a "Jig," a/k/a "Mexico,"

possessed with intent to distribute and distributed a controlled substance, which violation involved 10 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propenamide ("fentanyl"), a Schedule II controlled substance, and is therefore punished under 21 U.S.C. § 841(b)(1) (B).

In violation of 21 U.S.C. § 841(a)(1).

FORFEITURE

1. The allegations contained in the Counts above are incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d), 21

U.S.C. § 853, and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 21 U.S.C. § 841 or § 846, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a)(1) and (2), any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation.

3. Upon conviction of a violation of 18 U.S.C. § 922(g), the defendants shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c), any and all firearms and ammunition involved or used in the offenses.

4. The property to be forfeited includes, but is not limited to, the following:

- a. a 9-millimeter Taurus pistol;
- b. a 9-millimeter SCCY pistol;
- c. Sixteen rounds of 9-millimeter ammunition;
- d. An AK-style 7.62-millimeter semi-automatic pistol;
- e. A grey Infinity registered to Jerrod Lee; and
- f. \$9,190.00 in U.S. Currency.


5. If any of the property described above, as a result of any acts or omissions of the defendants:

- 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,

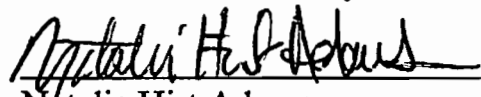
the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), directly and as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

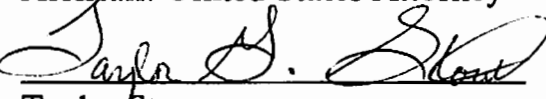


Foreperson

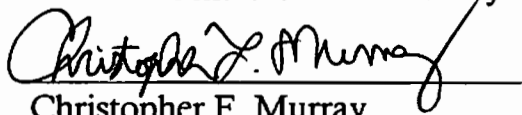
MARIA CHAPA LOPEZ
United States Attorney

By: 

Natalie Hirt Adams
Assistant United States Attorney

By: 

Taylor Stout
Assistant United States Attorney

By: 

Christopher F. Murray
Assistant United States Attorney
Chief, Violent Crimes and Narcotics Section

UNITED STATES DISTRICT COURT
Middle District of Florida
Tampa Division

THE UNITED STATES OF AMERICA

vs.

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ALLEN BROWN, a/k/a "Jerusalem," a/k/a "Shawn," a/k/a "Deshon," and
TIMMY RAMSEY

INDICTMENT

Violations: Title 21, United States Code, Section 846
Title 21, United States Code, Section 841
Title 18, United States Code, Section 922(g)(1)
Title 18, United States Code, Section 2

A true bill



Foreperson

Filed in open court this 29th day
of November, 2018.

Clerk

Bail \$ _____
