

**ORIGINAL SEALED**

**FILED**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

JUN 09 2020

**UNITED STATES OF AMERICA,**

*Plaintiff,*

v.

**HEATH LLOYD TAYLOR,  
KYLE LEE HAMBY,  
MARLENE ANNETTE GARCIA, a/k/a  
Marlene Annette Moss,  
EDWARD CHARLES SOFSKY,  
RHANDA DANIELLE CHAUTEE BILLY  
a/k/a Rhonda Billy, MARTY RAY  
CAMPBELL, and KEVIN LEON KING,**

*Defendants.*

SEALED

PATRICK KEANEY  
Clerk, U.S. District Court

By \_\_\_\_\_  
Deputy Clerk

Case No.

**CR 20-034-JFH**

**INDICTMENT**

The Federal Grand Jury charges:

**COUNT ONE**

**DRUG CONSPIRACY**  
**[21 U.S.C. §§ 846, 841(a)(1) & 841(b)(1)(A)]**

Beginning on a date in October 2019, the exact date being unknown to the Grand Jury, and continuing until on or about the date of this Indictment, in the Eastern District of Oklahoma and elsewhere, **HEATH LLOYD TAYLOR, KYLE LEE HAMBY, MARLENE ANNETTE GARCIA a/k/a Marlene Annette MOSS, EDWARD CHARLES SOFSKY, RHANDA DANIELLE CHAUTEE BILLY a/k/a Rhonda BILLY, MARTY RAY CAMPBELL, KEVIN LEON KING,** defendants herein, did willfully and knowingly combine, conspire, confederate, and agree together, and with others known and unknown to the Grand Jury, to commit offenses against the United States in violation of Title 21, United States Code, Section 846, as follows:

### **OBJECTS OF THE CONSPIRACY**

1. To knowingly and intentionally distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

2. To knowingly and intentionally possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

### **MANNER AND MEANS OF THE CONSPIRACY**

In order to accomplish the objects of the conspiracy, the defendants and other persons known and unknown to the Grand Jury:

1. Possessed with the intent to distribute and distributed methamphetamine to other individuals both known and unknown to the Grand Jury.

2. Acquired quantities of methamphetamine from sources located in, but not limited to, communities in southern California.

3. Arranged for the transport of quantities of methamphetamine from southern California, and other places, to the Eastern District of Oklahoma and elsewhere.

4. Maintained locations and residences in LeFlore County, Oklahoma, where methamphetamine was brought to be divided among conspirators for distribution within the Eastern District of Oklahoma and elsewhere.

5. Collected, stored and transported sums of United States Currency derived from the sale of methamphetamine.

6. Acquired certain assets, including houses, guns and vehicles, to facilitate the distribution of methamphetamine.

7. Used certain automobiles to further their narcotics conspiracy by traveling to southern California, Oklahoma City, Oklahoma, and elsewhere in order to facilitate the acquisition and distribution of methamphetamine.

8. Used electronic communications equipment to further their narcotics conspiracy by use of cellular telephones, via standard cellular telephone service and social media platforms, to communicate with co-conspirators both known and unknown to the Grand Jury and with customers to whom they distributed methamphetamine.

9. Used violence and threats of violence to collect drug proceeds, to prevent the theft of illegal drugs and drug proceeds, to maintain secrecy and to promote discipline among the co-conspirators.

10. It was part of the conspiracy and understood that individual conspirators could contact their own sources, cultivate their own customers, and otherwise act independently when they desired, but although there were disagreements, the conspirators, with knowledge and support of each other's unlawful methamphetamine distribution activities, each conspirator at some time during the course of the conspiracy knowingly and intentionally agreed and acted together jointly with other conspirators to advance the common overall goal of buying, selling and otherwise distributing methamphetamine.

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

**FORFEITURE ALLEGATION**  
**[21 U.S.C. § 853]**

The allegations contained in Count One of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offence in violation of Title 21, United States Code, Section 846, the defendants, **HEATH LLOYD TAYLOR, KYLE LEE HAMBY, MARLENE ANNETTE GARCIA a/k/a Marlene Annette MOSS, EDWARD CHARLES SOFSKY, RHANDA DANIELLE CHAUTEE BILLY a/k/a Rhonda BILLY, MARTY RAY CAMPBELL, KEVIN LEON KING**, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense[s] and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s). The property to be forfeited includes, but is not limited to, the following:

**REAL PROPERTY**

510 Noble Street, Poteau, Oklahoma 74653; also described as the West half of lots 11 and 12, Block 26 of Lakeview Addition to the City of Poteau, LeFlore County, Oklahoma;

And

14641 Ash Street, Monroe, Oklahoma 74947; also described as Lot 4, Block 13, Town of Monroe, LeFlore County, Oklahoma.

**MONEY JUDGMENT**

An asset forfeiture money judgment, pursuant to Title 21, United States Code, Section 853.

If any of the property described above, as a result of any act or omission 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 of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

BRIAN J. KUESTER  
United States Attorney



ROB WALLACE, OBA # 13130  
Assistant United States Attorney

**Pursuant to the E-Government Act,  
the original indictment has been filed  
under seal in the Clerk's Office.**

s / Foreperson  
**FOREPERSON OF THE GRAND JURY**