

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA



**INDICTMENT FOR CONSPIRACY; DISTRIBUTION OF HEROIN;
FURANYL FENTANYL, METHAMPHETAMINE, AND CLONAZOLAM;
DISTRIBUTION OF COUNTERFEIT SUBSTANCES; DISTRIBUTION AND
POSSESSION WITH INTENT TO DISTRIBUTE 50 GRAMS OR MORE OF
METHAMPHETAMINE; POSSESSION WITH INTENT TO DISTRIBUTE
CLONAZOLAM, ACRYL FENTANYL, U-4770, MARIJUANA, AND 500 GRAMS OR
MORE OF METHAMPHETAMINE; POSSESSION OF PUNCHES AND DIES FOR
COUNTERFEITING CONTROLLED SUBSTANCES; MAINTAINING DRUG-
INVOLVED PREMISES; POSSESSION OF FIREARMS BY CONVICTED FELONS;
POSSESSION OF FIREARMS IN FURTHERANCE OF DRUG-TRAFFICKING
CRIMES; UNLAWFUL USE OF COMMUNICATION FACILITIES; ENGAGING IN
MONETARY TRANSACTIONS IN PROPERTY DERIVED FROM SPECIFIED
UNLAWFUL ACTIVITY; FAILURE TO FILE IRS FORM 8300;
AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

versus

CRIMINAL NO. 18-83-BAJ-EWD

BYRON ROBINS, a.k.a. "Pre," "Daddy," and	:	21 U.S.C. § 846
"Byron R. Robbins,"	:	21 U.S.C. § 841(a)(1)
SHANARD ZELRON BANKS, a.k.a. "Nardie,"	:	21 U.S.C. § 841(a)(2)
REUBEN MAURICE CRAWFORD, a.k.a. "Mo,"	:	21 U.S.C. § 841(b)(1)(C)
TODDRIQUEZ DEANGELO BRADLEY, a.k.a.	:	21 U.S.C. § 841(b)(2)
"Dickey Duke,"	:	21 U.S.C. § 841(b)(1)(A)(viii)
CHRIS D. DAVIS, a.k.a. "Boogie,"	:	21 U.S.C. § 841(b)(1)(B)(viii)
MICHAEL WAYNE BROWN, JR.,	:	21 U.S.C. § 841(b)(1)(D)
LE'ALAN DEQUAN BANKS, a.k.a. "Lee,"	:	21 U.S.C. § 843(a)(5)
RICKY ELVIS JOSEPH,	:	21 U.S.C. § 843(b)
RODERICK DEMOND HARRIS, a.k.a. "Ben" and	:	21 U.S.C. § 856(a)(1)
"Fat Boy,"	:	21 U.S.C. § 856(a)(2)
CHARLENE LATRICE BROCK,	:	21 U.S.C. § 856(b)
DARLENE PATRICE BROCK,	:	18 U.S.C. § 922(g)(1)
LATASHA NICOLE BROCK,	:	18 U.S.C. § 924(c)(1)(A)
NAKIA MARTELL BROCK, a.k.a. "Nakita Brock,"	:	18 U.S.C. § 1957
STANLEY RENARD LIAS, JR.,	:	18 U.S.C. § 2
KENTRELL DONTAY AUGUSTUS, a.k.a. "Trell,"	:	31 U.S.C. § 5324(b)(1)
ZION HURST, a.k.a. "Flea,"	:	31 U.S.C. § 5324(d)(2)
TREMAYNE DABNEY, a.k.a. "Big Kel,"	:	21 U.S.C. § 853
DARYL JOSEPH ADAMS,	:	18 U.S.C. § 924(d)(1)
JONATHAN LATARD BOOTH, a.k.a. "J-Roc,"	:	18 U.S.C. § 982(a)(1)
CLINTON KEITH CHAFFOLD, JR., and	:	28 U.S.C. § 2461(c)
MARJOE SANCHEZ HOLMES	:	31 U.S.C. § 5317(c)(1)

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

1. **BYRON ROBINS**, a.k.a. “Pre,” “Daddy,” and “Byron R. Robbins,” (hereinafter referred to as “**ROBINS**”), a resident of Zachary, Louisiana, was a leader of **FreeBandz**, a drug-trafficking organization (hereinafter referred to as the “**FreeBandz DTO**”) engaged in the unlawful distribution of controlled substances, including, but not limited to, the production and distribution of counterfeit controlled substance pharmaceutical pills tainted with undisclosed heroin, methamphetamine, furanyl fentanyl, clonazepam, and other dangerous substances, based in Baton Rouge, Louisiana. **ROBINS** associated with many others in the endeavor to distribute controlled substances.

2. **SHANARD ZELRON BANKS**, a.k.a. “Nardie,” (hereinafter referred to as “**S. BANKS**”), a resident of Baton Rouge, Louisiana, was a leader of **FreeBandz DTO** and worked directly with **ROBINS** in their endeavor to distribute controlled substances.

3. **REUBEN MAURICE CRAWFORD**, a.k.a. “Mo,” (hereinafter referred to as “**CRAWFORD**”), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances, and he collected and distributed **FreeBandz DTO’s** drugs and drug proceeds as directed by **ROBINS**.

4. **TODDRIQUEZ DEANGELO BRADLEY**, a.k.a. “Dickey Duke,” (hereinafter referred to as “**BRADLEY**”), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances, and he collected and distributed **FreeBandz DTO’s** drugs and drug proceeds as directed by **ROBINS**.

5. **CHRIS D. DAVIS**, a.k.a. “Boogie,” (hereinafter referred to as “**DAVIS**”), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to

distribute controlled substances, and he collected and distributed **FreeBandz DTO's** drug proceeds as directed by **ROBINS**.

6. **MICHAEL WAYNE BROWN, JR.** (hereinafter referred to as "**BROWN**"), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

7. **LE'ALAN DEQUAN BANKS**, a.k.a. "Lee," (hereinafter referred to as "**L. BANKS**"), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

8. **RICKY ELVIS JOSEPH** (hereinafter referred to as "**R. JOSEPH**"), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

9. **RODERICK DEMOND HARRIS**, a.k.a. "Ben" and "Fat Boy," (hereinafter referred to as "**HARRIS**"), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

10. **CHARLENE LATRICE BROCK** (hereinafter referred to as "**C. BROCK**"), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

11. **DARLENE PATRICE BROCK** (hereinafter referred to as "**D. BROCK**"), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

12. **LATASHA NICOLE BROCK** (hereinafter referred to as "**L. BROCK**"), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

13. **NAKIA MARTELL BROCK**, a.k.a. "Nakita Brock," (hereinafter referred to as "**N. BROCK**"), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

14. **STANLEY RENARD LIAS, JR.** (hereinafter referred to as "**LIAS**"), a resident of Baker, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

15. **KENTRELL DONTAY AUGUSTUS**, a.k.a. "Trell," (hereinafter referred to as "**AUGUSTUS**"), a resident of Baker, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

16. **ZION HURST**, a.k.a. "Flea," (hereinafter referred to as "**HURST**"), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

17. **TREMAYNE DABNEY**, a.k.a. "Big Kel," (hereinafter referred to as "**DABNEY**"), a resident of Baton Rouge, Louisiana, assisted **ROBINS** and **S. BANKS** in their endeavor to distribute controlled substances in Baton Rouge and elsewhere.

18. **DARYL JOSEPH ADAMS** (hereinafter referred to as "**ADAMS**"), a resident of River Ridge, Louisiana, obtained substantial quantities of controlled substance pills from **FreeBandz DTO** and resold such drugs for profit in the New Orleans area and elsewhere.

19. **JONATHAN LATARD BOOTH**, a.k.a. "J-Roc," (hereinafter referred to as "**BOOTH**"), a resident of Baton Rouge, Louisiana, obtained substantial quantities of controlled substance pills from **FreeBandz DTO** and resold such drugs for profit in the Baton Rouge area and elsewhere.

20. **CLINTON KEITH CHAFFOLD, JR.** (hereinafter referred to as "**CHAFFOLD**"), a resident of Baton Rouge, Louisiana, obtained substantial quantities of

controlled substance pills from **FreeBandz DTO** and resold such drugs for profit in the Baton Rouge area and elsewhere.

21. **MARJOE SANCHEZ HOLMES** (hereinafter referred to as "**HOLMES**"), a defendant herein, was the owner and operator of Sanchez Holmes LLC. Sanchez Holmes LLC, which operated under the registered trade name Mardy's Fine Cars, was a used car dealership in Baton Rouge, Louisiana. In addition, **HOLMES** participated in, supervised, and approved sales, and exercised control over all aspects of the business operation.

COUNT ONE
(Conspiracy)

22. Beginning on an exact date unknown to the Grand Jury, but in or before 2016, and continuing until the present time, in the Middle District of Louisiana and elsewhere, the defendants herein,

BYRON ROBINS, a.k.a. "Pre," "Daddy," and "Byron R. Robbins,"
SHANARD ZELRON BANKS, a.k.a. "Nardie,"
REUBEN MAURICE CRAWFORD, a.k.a. "Mo,"
TODDRIQUEZ D. BRADLEY, a.k.a. "Dickey Duke,"
CHRIS D. DAVIS, a.k.a. "Boogie,"
MICHAEL WAYNE BROWN, JR.,
LE'ALAN DEQUAN BANKS, a.k.a. "Lee,"
RICKY ELVIS JOSEPH,
RODERICK DEMOND HARRIS, a.k.a. "Ben" and "Fat Boy,"
CHARLENE LATRICE BROCK,
DARLENE PATRICE BROCK,
LATASHA NICOLE BROCK,
NAKIA MARTELL BROCK, a.k.a. "Nakita Brock,"
STANLEY RENARD LIAS, JR.,
KENTRELL DONTAY AUGUSTUS, a.k.a. "Trell,"
ZION HURST, a.k.a. "Flea,"
TREMAYNE DABNEY, a.k.a. "Big Kel,"
DARYL JOSEPH ADAMS,
JONATHAN LATARD BOOTH, a.k.a. "J-Roc," and
CLINTON KEITH CHAFFOLD, JR.

did conspire, with one another and others known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute controlled substances,

including heroin, furanyl fentanyl, acryl fentanyl, and U-4770, Schedule I controlled substances; fifty (50) grams or more of methamphetamine and 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, Schedule II controlled substances; and clonazepam, a Schedule IV controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), and did aid and abet in the commission of said conspiracy.

OBJECT OF THE CONSPIRACY

23. The object of the conspiracy was to obtain bulk quantities of controlled substances, manufacture pills tainted with controlled substances, and profit from the distribution and sale of controlled substances in Baton Rouge, Louisiana, and elsewhere.

MANNER AND MEANS OF ACCOMPLISHING THE CONSPIRACY

24. In order to accomplish the purposes of the conspiracy, the defendants used, and caused others to use, the following manners and means:

a. **ROBINS, S. BANKS, CRAWFORD, BRADLEY, DAVIS, BROWN, L. BANKS, JOSEPH, HARRIS, C. BROCK, D. BROCK, L. BROCK, N. BROCK, LIAS, AUGUSTUS, HURST, and DABNEY** (hereinafter collectively referred to as “**FreeBandz DTO members**”) used cellular telephones, which were listed in their names and the names of others, to coordinate the manufacture and distribution of controlled substance pills. They also used telephones to facilitate the exchange of monies related to the buying and selling of various controlled substances.

b. **ROBINS** controlled **FreeBandz DTO**’s operations by exercising decision-making authority, and through, in part, the delegation of duties to other members of **FreeBandz DTO**. In addition, **ROBINS** served as the financier for **FreeBandz DTO** – collecting, storing, and distributing monies and proceeds generated from drug sales. **ROBINS** kept large amounts of

United States currency on hand in order to maintain and finance **FreeBandz DTO's** ongoing drug-trafficking business, which operated on a cash basis.

c. **ROBINS** purchased kilogram quantities of controlled substances, including heroin and crystal methamphetamine, from various sources of supply located in Houston, Texas, and Los Angeles, California.

d. For drugs obtained from sources of supply based in Houston, Texas, **ROBINS** arranged and coordinated ground transportation of those controlled substances. Often, **ROBINS** relied upon couriers to drive vehicles with after-market hidden compartments from Texas to Louisiana. Once the drugs arrived in Louisiana, lower-level co-conspirators, both known and unknown to the Grand Jury, took possession of controlled substances on **ROBINS's** behalf.

e. For drugs obtained from sources of supply based in Los Angeles, California, **CRAWFORD** arranged and coordinated air transportation of those controlled substances. **CRAWFORD** and lower-level co-conspirators, both known and unknown to the Grand Jury, traveled between Louisiana and California, via commercial air carriers, to take possession of, and make payment for, the controlled substances.

f. **S. BANKS** controlled **FreeBandz DTO's** illegal pill-pressing operation. **S. BANKS** ordered pill-pressing equipment and ingredients from various suppliers located in California, Texas, and China. For example, an account registered to **C. BROCK** ordered approximately three pill press machines and numerous pill press punches or dies, in various shapes and imprints including ghosts, a dolphin, the "Heisenberg" caricature, Pac-Man®, the Superman® emblem, and imprints for several controlled substance pharmaceuticals, from sellers on eBay. In addition, **S. BANKS**, **C. BROCK**, and **N. BROCK** regularly ordered and received kilogram shipments of magnesium stearate, microcrystalline cellulose, and caffeine powder, which the conspirators used as fillers and binders in the manufacture of controlled substance pills.

g. **D. BROCK** maintained a clandestine laboratory at her residence, where **S. BANKS, BROWN, L. BANKS, JOSEPH, and HARRIS** manufactured a variety of controlled substance pills, including counterfeit controlled substance pharmaceutical pills tainted with undisclosed heroin, methamphetamine, furanyl fentanyl, fentanyl analogues, clonazepam and other controlled substances. Thereafter, **FreeBandz DTO members** distributed controlled substance pills and counterfeit controlled substance pharmaceutical pills tainted with undisclosed heroin, methamphetamine, furanyl fentanyl, fentanyl analogues, clonazepam and/or other controlled substances, to their unsuspecting drug customers.

h. During phone conversations and text message exchanges, **FreeBandz DTO members** used codes and slang terms in reference to drugs, money, and/or firearms, in an effort to avoid detection by law enforcement, and to avoid potential arrest and prosecution. **FreeBandz DTO members** shared information surrounding law enforcement activity to conceal their criminal activities from law enforcement.

i. **FreeBandz DTO members** stored drugs and drug proceeds at business premises and residences in Baton Rouge, Louisiana, and elsewhere.

j. **FreeBandz DTO members** used public and private places, including various business premises, residences, and parking lots, to arrange drug transactions and, thereafter, carry out the exchange of drugs and money.

k. **FreeBandz DTO members** frequently used vehicles to transport drugs, often secreting drugs in natural voids in the vehicles or after-market hidden compartments installed in the vehicles to prevent law enforcement detection.

l. **FreeBandz DTO members** possessed firearms, ammunition, and/or ballistic vests in order to protect their illegal drug-trafficking business.

m. **ROBINS** and **S. BANKS** sometimes “fronted,” or provided on consignment, substantial amounts of drugs to their customers, including to **D. ADAMS**, **BOOTH**, and **CHAFFOLD**, who would distribute those drugs to others and then repay **ROBINS** and **S. BANKS**.

ACTS IN FURTHERANCE OF THE CONSPIRACY

25. In furtherance of the conspiracy and to accomplish their purposes and objectives, the defendants herein did commit, and did cause to be committed, the following overt acts in the Middle District of Louisiana and elsewhere, among others:

a. Each of the allegations set forth in Counts Two (2) through Sixty-Six (66) is incorporated and re-alleged as though restated herein, as an individual overt act done in furtherance of the conspiracy.

b. On or about November 1, 2016, **BROWN** arranged to sell 350 purported oxycodone pills to a customer for \$750. Thereafter, **LIAS** and **L. BANKS** picked up **BROWN** and drove him to another location to retrieve drugs. In order to protect their drug-trafficking operation, **L. BANKS**, **BROWN**, and **LIAS** each possessed a loaded firearm.

c. On or about March 3, 2017, **LIAS** and **AUGUSTUS** traveled from Baton Rouge, Louisiana, to Yazoo City, Mississippi, with approximately 3,709 methamphetamine pills in a variety of colors, shapes, and imprints, including the Playboy® bunny, a tongue, the Porsche® logo, the “Heisenberg” caricature, and a dolphin, which pills they intended to distribute. In an effort to evade detection and to conceal his identity, **LIAS** provided false identification information to law enforcement.

d. On or about April 3, 2017, **N. BROCK** received a 36-pound parcel containing caffeine powder shipped from a supplier located in Ft. Worth, Texas. The following day, **BROWN** transported the same 36-pound parcel to **D. BROCK**’s residence.

e. On or about May 12, 2017, **C. BROCK** received a parcel containing 500 grams of magnesium stearate and 500 grams of microcrystalline cellulose from a supplier located in La Jolla, California.

f. On or about June 14, 2017, **ROBINS** and **S. BANKS** possessed approximately \$200,000 in U.S. currency, which constituted proceeds of drug-trafficking activities.

g. On or about June 29, 2017, **ROBINS** possessed an electric bill counter, a hydraulic drug press used to compress narcotics into 1-kilogram bricks, and mannitol, a cutting agent used to dilute narcotics.

h. On or about January 25, 2018, **CRAWFORD** obtained approximately 889 grams of crystal methamphetamine from a source of supply in Los Angeles, California, which drugs he intended to transport to Louisiana via a commercial air carrier. In an effort to evade law enforcement detection, **CRAWFORD** concealed the crystal methamphetamine inside a box of cheese snacks hidden in luggage, and he provided false identification information to law enforcement.

The above is a violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

COUNT TWO
(Distribution of Heroin)

26. On or about October 19, 2016, in the Middle District of Louisiana, **MICHAEL WAYNE BROWN, JR.**, defendant herein, knowingly and intentionally distributed a mixture and substance containing a detectable quantity of heroin, a Schedule I controlled substance.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE

(Distribution of Counterfeit Substance)

27. On or about October 19, 2016, in the Middle District of Louisiana, **MICHAEL WAYNE BROWN, JR.**, defendant herein, knowingly and intentionally distributed counterfeit substances, to wit: 197 blue round pills containing heroin, a Schedule I controlled substance, which without authorization bore the identifying mark and imprint of Actavis, a manufacturer and distributor of a Schedule II controlled substance pharmaceutical containing 30 mg oxycodone, which did not, in fact, manufacture and distribute such substances, and which substances were, thereby, falsely purported and represented to be products of Actavis.

The above is a violation of Title 21, United States Code, Sections 841(a)(2) and (b)(1)(C).

COUNT FOUR

(Distribution of Heroin and Methamphetamine)

28. On or about November 21, 2016, in the Middle District of Louisiana, **MICHAEL WAYNE BROWN, JR.**, defendant herein, knowingly and intentionally distributed mixtures and substances containing detectable quantities of heroin, a Schedule I controlled substance, and methamphetamine, a Schedule II controlled substance.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FIVE

(Distribution of Counterfeit Substance)

29. On or about November 21, 2016, in the Middle District of Louisiana, **MICHAEL WAYNE BROWN, JR.**, defendant herein, knowingly and intentionally distributed counterfeit substances, to wit: 156 blue round pills containing methamphetamine, a Schedule II controlled substance, which without authorization bore the identifying mark and imprint of Actavis, a manufacturer and distributor of a Schedule II controlled substance pharmaceutical containing 30

mg oxycodone, which did not, in fact, manufacture and distribute such substances, and which substances were thereby falsely purported and represented to be products of Actavis.

The above is a violation of Title 21, United States Code, Sections 841(a)(2) and (b)(1)(C).

COUNT SIX
(Distribution of Furanyl Fentanyl)

30. On or about January 11, 2017, in the Middle District of Louisiana, defendants **MICHAEL WAYNE BROWN, JR.**, and **LATASHA NICOLE BROCK**, knowingly and intentionally distributed a mixture and substance containing a detectable quantity of furanyl fentanyl, a Schedule I controlled substance, and did aid and abet each other to do so.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVEN
(Distribution of Counterfeit Substance)

31. On or about January 11, 2017, in the Middle District of Louisiana, defendants **MICHAEL WAYNE BROWN, JR.**, and **LATASHA NICOLE BROCK** knowingly and intentionally distributed counterfeit substances, to wit: 226 blue round pills containing furanyl fentanyl, a Schedule I controlled substance, which without authorization bore the identifying mark and imprint of Mallinckrodt Pharmaceuticals, a manufacturer and distributor of a Schedule II controlled substance pharmaceutical containing 30 mg oxycodone, which did not, in fact, manufacture and distribute such substances, and which substances were thereby falsely purported and represented to be products of Mallinckrodt Pharmaceuticals, and did aid and abet each other to do so.

The above is a violation of Title 21, United States Code, Sections 841(a)(2) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT EIGHT

(Distribution of Clonazepam)

32. On or about February 24, 2017, in the Middle District of Louisiana, **MICHAEL WAYNE BROWN, JR.**, defendant herein, knowingly and intentionally distributed a mixture and substance containing a detectable quantity of clonazepam, a Schedule IV controlled substance.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(2).

COUNT NINE

(Distribution of Counterfeit Substance)

33. On or about February 24, 2017, in the Middle District of Louisiana, **MICHAEL WAYNE BROWN, JR.**, defendant herein, knowingly and intentionally distributed counterfeit substances, to wit: 674 white oblong pills containing clonazepam, a Schedule IV controlled substance, which without authorization bore the identifying mark and imprint of Sandoz Pharmaceuticals Inc., a manufacturer and distributor of a Schedule IV controlled substance pharmaceutical containing 2 mg alprazolam, which did not, in fact, manufacture and distribute such substances, and which substances were thereby falsely purported and represented to be products of Sandoz Pharmaceuticals Inc.

The above is a violation of Title 21, United States Code, Sections 841(a)(2) and (b)(2).

COUNT TEN

(Distribution of Counterfeit Substance)

34. On or about February 24, 2017, in the Middle District of Louisiana, **MICHAEL WAYNE BROWN, JR.**, defendant herein, knowingly and intentionally distributed counterfeit substances, to wit: 299 yellow oblong pills containing clonazepam, a Schedule IV controlled substance, which without authorization bore the identifying mark and imprint of Actavis, a manufacturer and distributor of a Schedule IV controlled substance pharmaceutical containing 2

mg alprazolam, which did not, in fact, manufacture and distribute such substances, and which substances were thereby falsely purported and represented to be products of Actavis.

The above is a violation of Title 21, United States Code, Sections 841(a)(2) and (b)(2).

COUNT ELEVEN

(Distribution of 50 Grams or More of Methamphetamine)

35. On or about April 27, 2017, in the Middle District of Louisiana, **MICHAEL WAYNE BROWN, JR.**, defendant herein, knowingly and intentionally distributed fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii).

COUNT TWELVE

(Possession with Intent to Distribute 50 Grams or More of Methamphetamine)

36. On or about April 27, 2017, in the Middle District of Louisiana, **DARYL JOSEPH ADAMS**, defendant herein, knowingly and intentionally possessed with intent to distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii).

COUNT THIRTEEN

(Distribution of 50 Grams or More of Methamphetamine)

37. On or about May 17, 2017, in the Middle District of Louisiana, **SHANARD ZELRON BANKS**, a.k.a. "Nardie," defendant herein, knowingly and intentionally distributed fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii).

COUNT FOURTEEN

(Possession with Intent to Distribute 50 Grams or More of Methamphetamine)

38. On or about May 17, 2017, in the Middle District of Louisiana, **JONATHAN LATARD BOOTH**, a.k.a. "J-Roc," defendant herein, knowingly and intentionally possessed with intent to distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii).

COUNT FIFTEEN

(Possession with Intent to Distribute 50 Grams or More of Methamphetamine)

39. On or about June 29, 2017, in the Middle District of Louisiana, **RICKY ELVIS JOSEPH** and **LATASHA NICOLE BROCK**, defendants herein, knowingly and intentionally possessed with intent to distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other to do so.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii), and Title 18, United States Code, Section 2.

COUNT SIXTEEN

(Possession with Intent to Distribute Clonazepam)

40. On or about June 29, 2017, in the Middle District of Louisiana, **RICKY ELVIS JOSEPH** and **LATASHA NICOLE BROCK**, defendants herein, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of clonazepam, a Schedule IV controlled substance, and did aid and abet each other to do so.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(2), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

(Possession with Intent to Distribute Acryl Fentanyl and U-47700)

41. On or about June 29, 2017, in the Middle District of Louisiana, **RICKY ELVIS JOSEPH** and **LATASHA NICOLE BROCK**, defendants herein, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of acryl fentanyl and U-47700, Schedule I controlled substances, and did aid and abet each other to do so.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

(Possession of Firearms in Furtherance of Drug-Trafficking Crimes)

42. On or about June 29, 2017, in the Middle District of Louisiana, **RICKY ELVIS JOSEPH**, defendant herein, knowingly possessed the following firearms:

- a. Hi-Point, model CF380, .380-caliber pistol, bearing serial number P8020392,
- b. Glock GMBH, model 43, 9-mm pistol, bearing serial number BAXT258, and
- c. Glock GMBH, model 32, .357-caliber pistol, bearing serial number RHX533,

in furtherance of the drug-trafficking crimes charged in Counts One, Fifteen, Sixteen, and Seventeen, which are violations of Title 21, United States Code, Sections 846 and 841(a)(1).

The above is a violation of Title 18, United States Code, Sections 924(c)(1)(A).

COUNT NINETEEN

(Possession of Firearms in Furtherance of Drug-Trafficking Crimes)

43. On or about June 29, 2017, in the Middle District of Louisiana, **LATASHA NICOLE BROCK**, defendant herein, knowingly possessed the following firearms:

- a. Jimenez Arms, model J.A. 380, .380-caliber pistol, bearing serial number 033047, and
- b. Hi-Point, model CF380, .380-caliber pistol, bearing serial number P8020392,

in furtherance of the drug-trafficking crimes charged in Counts One, Fifteen, Sixteen, and Seventeen, which are violations of Title 21, United States Code, Sections 846 and 841(a)(1).

The above is a violation of Title 18, United States Code, Sections 924(c)(1)(A).

COUNT TWENTY

(Possession of Firearms by a Convicted Felon)

44. On or about June 29, 2017, in the Middle District of Louisiana, **RICKY ELVIS JOSEPH**, defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, a felony, knowingly possessed the following firearms:

- a. Hi-Point, model CF380, .380-caliber pistol, bearing serial number P8020392,
- b. Glock GMBH, model 43, 9-mm pistol, bearing serial number BAXT258, and
- c. Glock GMBH, model 32, .357-caliber pistol, bearing serial number RHX533,

which firearms previously had been shipped and transported in interstate and foreign commerce.

The above is a violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-ONE

(Possession of Firearms by a Convicted Felon)

45. On or about June 29, 2017, in the Middle District of Louisiana, **LATASHA NICOLE BROCK**, defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, a felony, knowingly possessed the following firearms:

- a. Jimenez Arms, model J.A. 380, .380-caliber pistol, bearing serial number 033047, and
- b. Hi-Point, model CF380, .380-caliber pistol, bearing serial number P8020392,

which firearms previously had been shipped and transported in interstate and foreign commerce.

The above is a violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-TWO

(Possession with Intent to Distribute 50 Grams or More of Methamphetamine)

46. On or about June 29, 2017, in the Middle District of Louisiana, **SHANARD ZELRON BANKS**, a.k.a. "Nardie," and **DARLENE PATRICE BROCK**, defendants herein, knowingly and intentionally possessed with intent to distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, and did aid and abet each other to do so.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) (viii), and Title 18, United States Code, Section 2.

COUNT TWENTY-THREE

(Possession with Intent to Distribute 50 Grams or More of Methamphetamine)

47. On or about June 29, 2017, in the Middle District of Louisiana, **SHANARD ZELRON BANKS**, a.k.a. "Nardie," and **DARLENE PATRICE BROCK**, defendants herein, knowingly and intentionally possessed with intent to distribute fifty (50) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other to do so.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B)(viii), and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

(Possession with Intent to Distribute Marijuana)

48. On or about June 29, 2017, in the Middle District of Louisiana, **DARLENE PATRICE BROCK**, defendant herein, knowingly and intentionally possessed with intent to distribute marijuana, a Schedule I controlled substance.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

COUNT TWENTY-FIVE

(Possession of a Firearm in Furtherance of Drug-Trafficking Crimes)

49. On or about June 29, 2017, in the Middle District of Louisiana, **DARLENE PATRICE BROCK**, defendant herein, knowingly possessed a firearm, that is, an HS Products, model XD9, 9-mm pistol, bearing serial number S4912751, in furtherance of the drug-trafficking crimes charged in Counts One, Twenty-Two, Twenty-Three, and Twenty-Four, which are violations of Title 21, United States Code, Sections 846 and 841(a)(1).

The above is a violation of Title 18, United States Code, Sections 924(c)(1)(A).

COUNT TWENTY-SIX

(Possession of Punches and Dies for Counterfeiting Controlled Substances)

50. Beginning on an exact date unknown to the Grand Jury, but in or before 2016, and continuing until June 29, 2017, in the Middle District of Louisiana, **SHANARD ZELRON BANKS**, a.k.a. "Nardie," **MICHAEL WAYNE BROWN, JR.**, **LE'ALAN DEQUAN BANKS**, a.k.a. "Lee," **RODERICK DEMOND HARRIS**, a.k.a. "Ben" and "Fat Boy," **RICKY ELVIS JOSEPH**, and **DARLENE PATRICE BROCK**, defendants herein, knowingly and intentionally possessed punches and dies designed to print, imprint, and reproduce the trademark, trade name, and other identifying marks and imprints upon a drug so as to render such a drug a counterfeit substance, and did aid and abet each other to do so.

The above is a violation of Title 21, United States Code, Section 843(a)(5), and Title 18, United States Code, Section 2.

COUNT TWENTY-SEVEN

(Maintaining Drug-Involved Premises)

51. Beginning on an exact date unknown to the Grand Jury, and continuing until June 29, 2017, in the Middle District of Louisiana, **DARLENE PATRICE BROCK**, defendant herein, did manage and control a residence, located at 9307 Chinn Street, Baton Rouge, Louisiana, permanently and temporarily, as an owner, occupant, and mortgagee, and did knowingly and intentionally profit from and make available to others for use, with and without compensation, the aforementioned residence for the purpose of unlawfully manufacturing, storing, and distributing controlled substances.

The above is a violation of Title 21, United States Code, Sections 856(a)(2) and (b).

COUNT TWENTY-EIGHT
(Maintaining Drug-Involved Premises)

52. Beginning on an exact date unknown to the Grand Jury, and continuing until June 29, 2017, in the Middle District of Louisiana, **BYRON ROBINS**, a.k.a. “Pre,” “Daddy,” and “Byron R. Robbins,” defendant herein, knowingly opened, used, and maintained a place, located at 855 North 22nd Street, Baton Rouge, Louisiana, permanently and temporarily, for the purpose of manufacturing and distributing controlled substances.

The above is a violation of Title 21, United States Code, Sections 856(a)(1) and (b).

COUNT TWENTY-NINE
(Possession with Intent to Distribute 500 Grams or More of Methamphetamine)

53. On or about June 29, 2017, in the Middle District of Louisiana, **SHANARD ZELRON BANKS**, a.k.a. “Nardie,” and **MICHAEL WAYNE BROWN, JR.**, defendants herein, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other to do so.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) (viii), and Title 18, United States Code, Section 2.

COUNT THIRTY
(Possession of Firearms in Furtherance of Drug-Trafficking Crimes)

54. On or about June 29, 2017, in the Middle District of Louisiana, defendants **SHANARD ZELRON BANKS**, a.k.a. “Nardie,” and **MICHAEL WAYNE BROWN, JR.**, defendants herein, knowingly possessed the following firearms:

- a. Taurus, model M380 Ultralite, .380-caliber revolver, bearing serial number IX78412;
- b. German Sports Gun, model GSG-1911, .22-caliber pistol, bearing serial number A407965;
- c. Masterpiece Arms, model Defender, 9-mm pistol, bearing serial number FX00713;

- d. Smith & Wesson, model SD40VE, .40-caliber pistol, bearing serial number HEB7617;
- e. Smith & Wesson, model M&P 15, .556-caliber semi-automatic rifle, bearing serial number SM75866;
- f. FNH USA, model FNS-9, 9-mm pistol, bearing serial number GKU0008499; and
- g. Smith & Wesson, model M&P Shield, .40-caliber pistol, bearing serial number HLB4035,

in furtherance of the drug-trafficking crimes charged in Counts One and Twenty-Nine, which are violations of Title 21, United States Code, Sections 846 and 841(a)(1), and did aid and abet each other to do so.

The above is a violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT THIRTY-ONE

(Possession of Firearms by a Convicted Felon)

55. On or about June 29, 2017, in the Middle District of Louisiana, **SHANARD ZELRON BANKS**, a.k.a. "Nardie," defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, a felony, knowingly possessed the following firearms:

- a. Taurus, model M380 Ultralite, .380-caliber revolver, bearing serial number IX78412;
- b. German Sports Gun, model GSG-1911, .22-caliber pistol, bearing serial number A407965;
- c. Masterpiece Arms, model Defender, 9-mm pistol, bearing serial number FX00713;
- d. Smith & Wesson, model SD40VE, .40-caliber pistol, bearing serial number HEB7617;
- e. Smith & Wesson, model M&P 15, .556-caliber semi-automatic rifle, bearing serial number SM75866;
- f. FNH USA, model FNS-9, 9-mm pistol, bearing serial number GKU0008499; and
- g. Smith & Wesson, model M&P Shield, .40-caliber pistol, bearing serial number HLB4035,

which firearms previously had been shipped and transported in interstate and foreign commerce.

The above is a violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTY-TWO

(Possession of a Firearm by a Convicted Felon)

56. On or about June 29, 2017, in the Middle District of Louisiana, **RODERICK DEMOND HARRIS**, a.k.a. "Ben" and "Fat Boy," defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, a felony, knowingly possessed a firearm, that is, a Springfield Armory, model 1911-A1, .45-caliber handgun, bearing serial number WW37678, which firearm previously had been shipped and transported in interstate and foreign commerce.

The above is a violation of Title 18, United States Code, Section 922(g)(1).

COUNT THIRTY-THREE

(Possession with Intent to Distribute 500 grams or More of Methamphetamine)

57. On or about June 29, 2017, in the Middle District of Louisiana, **CHARLENE LATRICE BROCK**, defendant herein, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii).

COUNT THIRTY-FOUR

(Possession of Firearms in Furtherance of Drug-Trafficking Crimes)

58. On or about June 29, 2017, in the Middle District of Louisiana, **CHARLENE LATRICE BROCK**, defendant herein, knowingly possessed the following firearms:

- a. Glock GMBH, model 21, .45-caliber pistol, bearing serial number SMB691 and
- b. Glock GMBH, model 22, .40-caliber pistol, bearing serial number RFE535,

in furtherance of the drug-trafficking crimes charged in Counts One and Thirty-Three, which are violations of Title 21, United States Code, Sections 846 and 841(a)(1).

The above is a violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THIRTY-FIVE

(Possession with Intent to Distribute 500 grams or More of Methamphetamine)

59. On or about December 6, 2017, in the Middle District of Louisiana, **RODERICK DEMOND HARRIS**, a.k.a. “Ben” and “Fat Boy,” **ZION HURST**, a.k.a. “Flea,” and **TREMAYNE DABNEY**, a.k.a. “Big Kel,” defendants herein, knowingly and intentionally possessed with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and did aid and abet each other to do so.

The above is a violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A)(viii), and Title 18, United States Code, Section 2.

COUNT THIRTY-SIX

(Possession of Firearms in Furtherance of Drug-Trafficking Crimes)

60. On or about December 6, 2017, in the Middle District of Louisiana, **ZION HURST**, a.k.a. “Flea,” defendant herein, knowingly possessed a firearm, that is, a Ruger, model LCP380, .380-caliber pistol, bearing serial number 371906059, in furtherance of the drug-trafficking crimes charged in Counts One and Thirty-Five, which are violations of Title 21, United States Code, Sections 846 and 841(a)(1).

The above is a violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THIRTY-SEVEN

(Possession of Firearms in Furtherance of Drug-Trafficking Crimes)

61. On or about December 6, 2017, in the Middle District of Louisiana, **TREMAYNE DABNEY**, a.k.a. “Big Kel,” defendant herein, knowingly possessed a firearm, that is, a Ruger, model SR9, 9-mm pistol, bearing serial number 33505604, in furtherance of the drug-trafficking crimes charged in Counts One and Thirty-Five, which are violations of Title 21, United States Code, Sections 846 and 841(a)(1).

The above is a violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNTS THIRTY-EIGHT TO SIXTY-SIX
(Unlawful Use of Communication Facilities)

62. On or about the dates listed below, in the Middle District of Louisiana, the below named defendants, knowingly and intentionally used communication facilities (telephones), in committing, in causing, and in facilitating the commission of felonies under the Controlled Substances Act, that is, distribution and possession with the intent to distribute controlled substances, and conspiring to do the same, which are violations of Title 21, United States Code, Sections 846 and 841(a)(1), each use constituting a separate count:

COUNT	DATE	DEFENDANT(S)	SESSION	DESCRIPTION OF USE
38	4/11/17	MICHAEL WAYNE BROWN, JR., and SHANARD ZELRON BANKS , a.k.a. "Nardie"	42	Discussion regarding production of controlled substance pills and acquisition of punches, dies, and other pill press equipment to make counterfeit controlled substance pharmaceuticals.
39	4/14/17	MICHAEL WAYNE BROWN, JR., and TREMAYNE DABNEY , a.k.a. "Big Kel"	226	Discussion about poor quality of drugs.
40	4/26/17	MICHAEL WAYNE BROWN, JR., and DARYL JOSEPH ADAMS	1057	Discussion of controlled substances and fillers used in pill-pressing operation, drug testing by customers, BROWN's plan to produce additional controlled substance pills at clandestine laboratory location on 4/27/17, and ADAMS's intention to engage in future weekly drug sales.
41	4/27/17	MICHAEL WAYNE BROWN, JR., and LE'ALAN DEQUAN BANKS , a.k.a. "Lee"	1110	BROWN inquired about L. BANKS's location before their planned meeting at clandestine laboratory to press controlled substance pills with other co-conspirators.

42	4/27/17	MICHAEL WAYNE BROWN, JR., and BYRON ROBINS, a.k.a. "Pre," "Daddy," and "Byron R. Robbins"	1155	Discussion of law enforcement surveillance.
43	5/1/17	MICHAEL WAYNE BROWN, JR., and DARYL JOSEPH ADAMS	1441	Discussion about shipment of ecstasy via mail and ADAMS's suspicions about law enforcement action and seizure of drugs on 4/27/17.
44	5/15/17	SHANARD ZELRON BANKS, a.k.a. "Nardie," and DARLENE PATRICE BROCK	95	Discussion about co-conspirators' payment to D. BROCK for use of her residence to press controlled substance pills.
45	5/17/17	SHANARD ZELRON BANKS, a.k.a. "Nardie," and JONATHAN LATARD BOOTH, a.k.a. "J-Roc"	255	BOOTH ordered 3,000 controlled substance pills from S. BANKS.
46	5/18/17	SHANARD ZELRON BANKS, a.k.a. "Nardie," and STANLEY RENARD LIAS, JR.	427	LIAS inquired about drug inventory and advised that he needed to obtain 1,000 controlled substance pills from S. BANKS.
47	5/18/17	SHANARD ZELRON BANKS, a.k.a. "Nardie," and RICKY ELVIS JOSEPH	448	S. BANKS instructed JOSEPH to retrieve 1,000 pills from storage location in stash house for distribution to drug customers.
48	5/22/17	SHANARD ZELRON BANKS, a.k.a. "Nardie," and NAKIA MARTELL BROCK, a.k.a. "Nakita Brock"	803	Discussion about money and S. BANKS's repair of a broken pill press machine.
49	5/24/17	SHANARD ZELRON BANKS, a.k.a. "Nardie," and CLINTON KEITH CHAFFOLD, JR.	1062	S. BANKS discussed his inventory of controlled substance pills and gave CHAFFOLD instructions to meet with JOSEPH to complete drug transaction.

50	5/25/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and KENTRELL DONTAY AUGUSTUS , a.k.a. "Trell"	1213	Discussion regarding suspicious conduct of drug customer whom they believe may be cooperating with law enforcement.
51	5/25/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and BYRON ROBINS , a.k.a. "Pre," "Daddy," and "Byron R. Robbins"	1301	Discussion about money and meeting with other co-conspirators.
52	5/25/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and CHRIS D. DAVIS , a.k.a. "Boogie"	1302	S. BANKS instructed DAVIS to obtain money from ROBINS .
53	5/26/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and CHRIS D. DAVIS , a.k.a. "Boogie"	1374	Discussion about distribution of drug proceeds among co-conspirators.
54	5/26/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and CLINTON KEITH CHAFFOLD, JR.	1469	Discussion regarding CHAFFOLD's payment via an intermediary for drugs obtained on consignment from S. BANKS .
55	6/2/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and RICKY ELVIS JOSEPH	2385	Discussion regarding pill-pressing ingredients and supplies.
56	6/5/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and MICHAEL WAYNE BROWN, JR.	2813	Discussion regarding purchase of equipment for pill-pressing operation.
57	6/7/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and REUBEN MAURICE CRAWFORD , a.k.a. "Mo"	307	Discussion about collection of money from co-conspirators.

58	6/12/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and NAKIA MARTELL BROCK , a.k.a. "Nakita Brock"	1114	Discussion about retrieval of 10,000 controlled substance pills from stash house for distribution to a customer and agreed upon price for the transaction.
59	6/14/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and RODERICK DEMOND HARRIS , a.k.a. "Ben" and "Fat Boy"	1370	Discussion regarding retrieval of supplies from CRAWFORD before pill pressing.
60	6/17/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and LATASHA NICOLE BROCK	1891	Discussion regarding retrieval of 1,000 controlled substance pills from C. BROCK .
61	6/19/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and REUBEN MAURICE CRAWFORD , a.k.a. "Mo"	2141	Discussion regarding surveillance by federal agents and plan to conduct counter-surveillance.
62	6/20/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and TREMAYNE DABNEY , a.k.a. "Big Kel"	2470	Discussion about drug debt owed by customer.
63	6/23/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and CHARLENE LATRICE BROCK	3024	S. BANKS instructed C. BROCK to locate, retrieve, and provide 2,000 controlled substance pills to JOSEPH .
64	6/23/17	SHANARD ZELRON BANKS , a.k.a. "Nardie," and TODDRIQUEZ D. BRADLEY , a.k.a. "Dickey Duke"	3062	Agreement to meet in order for BRADLEY to replenish drug supply from S. BANKS at clandestine laboratory.
65	1/2/18	BYRON ROBINS , a.k.a. "Pre," "Daddy," and "Byron R. Robbins" and CHRIS D. DAVIS , a.k.a. "Boogie"	2124	Discussion about planned meeting during which ROBINS cautioned DAVIS against sending text messages for fear of law enforcement detection.

66	1/6/18	BYRON ROBINS , a.k.a. "Pre," "Daddy," and TODDRIQUEZ D. BRADLEY , a.k.a. "Dickey Duke"	2407	Discussion about acquisition of drugs, prices, and remaining drug inventory.
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Each of the above is a violation of Title 21, United States Code, Section 843(b), and Title 18, United States Code, Section 2.

COUNT SIXTY-SEVEN

(Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity)

63. From on or about June 1, 2017, through on or about June 10, 2017, in the Middle District of Louisiana, **MARJOE SANCHEZ HOLMES**, **SHANARD ZELRON BANKS**, a.k.a. "Nardie," and **BYRON ROBINS**, a.k.a. "Pre," "Daddy," and "Byron R. Robbins," defendants herein, knowingly engaged and attempt to engage in monetary transactions involving criminally derived property of a value greater than \$10,000, which property was derived from a specified unlawful activity, namely, distribution of controlled substances and conspiracy to do the same, in violation of Title 21, United States Code, Sections 841 and 846, which transactions affected interstate commerce, and did aid and abet each other to do so.

The above is a violation of Title 18, United States Code, Sections 1957 and 2.

COUNT SIXTY-EIGHT

(Failure to File IRS Form 8300)

64. The Internal Revenue Service (IRS) was an agency of the United States Department of Treasury. The Financial Crimes Enforcement Network (FinCEN) was a bureau within the United States Department of Treasury.

65. Title 31, United States Code, Section 5331(a)(1) and Title 31, Code of Federal Regulations, Section 1010.330 required any person engaged in a trade or business, who, in the course of that trade or business, received more than \$10,000 in U.S. currency in a single transaction or two or more related transactions, to file an IRS Form 8300 with the IRS and FinCEN, within

fifteen (15) days of receiving the cash. The recipient of the cash must verify and report the identity of the person from whom the cash is received, along with other pertinent information.

66. The IRS and FinCEN were responsible for collecting and maintaining reports of persons who received cash payments in excess of \$10,000.

67. From on or about June 1, 2017, through on or about June 10, 2017, in the Middle District of Louisiana, **MARJOE SANCHEZ HOLMES**, defendant herein, knowingly and for the purpose of evading the reporting requirements of Section 5331 of Title 31, United States Code, and the regulations prescribed thereunder, did cause and attempt to cause Sanchez Holmes LLC, a nonfinancial trade or business, to fail to file a report required under the aforementioned statute and regulations, namely, IRS Form 8300 reporting the receipt of approximately \$20,000 in United States currency from the sale of a 2011 Porsche Panamera.

The above is a violation of Title 31, United States Code, Sections 5324(b)(1) and (d)(2).

NOTICE OF FORFEITURE FOR DRUG TRAFFICKING

68. Upon conviction for the felony offenses alleged in Counts One through Seventeen, Twenty-Two through Twenty-Four, Twenty-Six through Twenty-Nine, Thirty-Three, and Thirty-Five, **BYRON ROBINS**, a.k.a. "Pre," "Daddy," and "Byron R. Robbins," **SHANARD ZELRON BANKS**, a.k.a. "Nardie," **REUBEN MAURICE CRAWFORD**, a.k.a. "Mo," **TODDRIQUEZ DEANGELO BRADLEY**, a.k.a. "Dickey Duke," **CHRIS D. DAVIS**, a.k.a. "Boogie," **MICHAEL WAYNE BROWN, JR.**, **LE'ALAN DEQUAN BANKS**, a.k.a. "Lee," **RICKY ELVIS JOSEPH**, **RODERICK DEMOND HARRIS**, a.k.a. "Ben" and "Fat Boy," **CHARLENE LATRICE BROCK**, **DARLENE PATRICE BROCK**, **LATASHA NICOLE BROCK**, **NAKIA MARTELL BROCK**, a.k.a. "Nakita Brock," **STANLEY RENARD LIAS, JR.**, **KENTRELL DONTAY AUGUSTUS**, a.k.a. "Trell," **ZION HURST**, a.k.a. "Flea," **TREMAYNE DABNEY**, a.k.a. "Big Kel," **DARYL JOSEPH ADAMS**, **JONATHAN**

LATARD BOOTH, a.k.a. “J-Roc,” and **CLINTON KEITH CHAFFOLD, JR.**, defendants herein, respectively, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all 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 violations.

69. If any of the property or proceeds obtained directly or indirectly as a result of the drug trafficking offenses charged, due to any act of 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 a forfeiture money judgment and shall be allowed to forfeit substitute property pursuant to Title 21, United States Code, Section 853(p), in satisfaction of the forfeiture money judgment.

NOTICE OF FORFEITURE FOR FIREARMS AND AMMUNITION

70. Upon conviction on Counts Eighteen and Twenty, defendant **RICKY ELVIS JOSEPH** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearms or ammunition involved in or used in said violations, namely:

- a. Hi-Point, model CF380, .380-caliber pistol, bearing serial number P8020392,
- b. Glock GMBH, model 43, 9-mm pistol, bearing serial number BAXT258, and
- c. Glock GMBH, model 32, .357-caliber pistol, bearing serial number RHX533.

71. Upon conviction on Counts Nineteen and Twenty-One, defendant **LATASHA NICOLE BROCK** shall forfeit to the United States, pursuant to Title 18, United States Code,

Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearms or ammunition involved in or used in said violations, namely:

- a. Jimenez Arms, model J.A. 380, .380-caliber pistol, bearing serial number 033047, and
- b. Hi-Point, model CF380, .380-caliber pistol, bearing serial number P8020392.

72. Upon conviction on Count Twenty-Five, defendant **DARLENE PATRICE BROCK** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in said violation, namely, an HS Products, model XD9, 9-mm pistol, bearing serial number S4912751.

73. Upon conviction on Counts Thirty and Thirty-One, defendants **SHANARD ZELRON BANKS**, a.k.a. "Nardie," and **MICHAEL WAYNE BROWN, JR.** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearms or ammunition involved in or used in said violations, namely:

- a. Taurus, model M380 Ultralite, .380-caliber revolver, bearing serial number IX78412;
- b. German Sports Gun, model GSG-1911, .22-caliber pistol, bearing serial number A407965;
- c. Masterpiece Arms, model Defender, 9-mm pistol, bearing serial number FX00713;
- d. Smith & Wesson, model SD40VE, .40-caliber pistol, bearing serial number HEB7617;
- e. Smith & Wesson, model M&P 15, .556-caliber semi-automatic rifle, bearing serial number SM75866;
- f. FNH USA, model FNS-9, 9-mm pistol, bearing serial number GKU0008499; and
- g. Smith & Wesson, model M&P Shield, .40-caliber pistol, bearing serial number HLB4035.

74. Upon conviction on Count Thirty-Two, defendant **RODERICK DEMOND HARRIS**, a.k.a. “Ben” and “Fat Boy,” shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in said violations, namely, a Springfield Armory, model 1911-A1, .45-caliber handgun, bearing serial number WW37678.

75. Upon conviction on Count Thirty-Four, defendant **CHARLENE LATRICE BROCK** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in said violation, namely, a Glock GMBH, model 21, .45-caliber pistol, bearing serial number SMB691, and a Glock GMBH, model 22, .40-caliber pistol, bearing serial number RFE535.

76. Upon conviction on Count Thirty-Six, defendant **ZION HURST**, a.k.a. “Flea,” shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in said violation, namely, a Ruger, model LCP380, .380-caliber pistol, bearing serial number 371906059.

77. Upon conviction on Count Thirty-Seven, defendant **TREMAYNE DABNEY**, a.k.a. “Big Kel,” shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in said violation, namely, a Ruger, model SR9, 9-mm pistol, bearing serial number 33505604.

NOTICE OF FORFEITURE FOR MONETARY TRANSACTIONS

78. Upon conviction on Count Sixty-Seven, **MARJOE SANCHEZ HOLMES**, **SHANARD ZELRON BANKS**, a.k.a “Nardie,” and **BYRON ROBINS**, a.k.a. “Pre,” “Daddy,” and “Byron R. Robbins,” defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property, including, but not limited to, a 2011 Porsche Panamera, VIN WP0AA2A74BL020584, and \$20,000 in United States currency.

79. Upon conviction on Count Sixty-Eight, **MARJOE SANCHEZ HOLMES**, defendant herein, shall forfeit to the United States, pursuant to Title 31, United States Code, Section 5317(c)(1), any property, real or personal, involved in such offense and any property traceable thereto, including, but not limited to, a 2011 Porsche Panamera, VIN WP0AA2A74BL020584, and \$20,000 in United States currency.

80. If any property described in paragraphs 78 and 79, 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, 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 a forfeiture money judgment and shall be allowed to forfeit substitute property pursuant to Title 21, United States Code, Section 853(p), as

incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), in satisfaction of the forfeiture money judgment.

UNITED STATES OF AMERICA, BY

A TRUE BILL



BRANDON J. FREMIN
UNITED STATES ATTORNEY
MIDDLE DISTRICT OF LOUISIANA

REDACTED
PER PRIVACY ACT

GRAND JURY FOREPERSON



CAM T. LE
ASSISTANT UNITED STATES ATTORNEY

6-13-18

DATE