

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

MAY - 9 2013

JAMES W. McDORMACK, CLERK
By:  DEP CLERK

UNITED STATES OF AMERICA)
)
vs.)
)
IDALIA RAMOS RANGEL,)
a/k/a La Tia or Big Momma;)
MOHAMMED KAZAM MARTINEZ,)
a/k/a Mo;)
EMMANUEL ILO, a/k/a Chi Chi or Chi;)
MERVIN JOHNSON, a/k/a Slim;)
HOMAR MARTINEZ;)
MANUEL GARZA, a/k/a Manny;)
JAIME BENAVIDES;)
NISHME MARTINEZ, a/k/a La Gorda;)
DENICE DURAN MARTINEZ;)
YADIRA ANAHY MARTINEZ;)
DWATNEY NOID;)
DWIGHT McLITTLE, a/k/a D.A.;)
SHANIEKA TATUM;)
LAMONT WILLIAMS, a/k/a Peter Rabbit;)
GERARD TRICE, a/k/a Fly; and)
TARVARS HONORABLE, a/k/a Pudgy)

4:13CR00148 SMW

Title 21, U.S.C. § 846
Title 21, U.S.C. § 841(a)(1)
Title 21, U.S.C. § 843(b)
Title 18, U.S.C. § 3013
Title 18, U.S.C. § 3571
Title 18, U.S.C. § 3583

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

From in or about June 2008 until the return of this Indictment, in the Eastern District
of Arkansas, the defendants,

IDALIA RAMOS RANGEL, a/k/a La Tia or Big Momma;
MOHAMMED KAZAM MARTINEZ, a/k/a Mo;
EMMANUEL ILO, a/k/a Chi Chi or Chi;
MERVIN JOHNSON, a/k/a Slim;
HOMAR MARTINEZ;
MANUEL GARZA, a/k/a Manny;

JAIME BENAVIDES;
NISHME MARTINEZ, a/k/a La Gorda;
DENICE DURAN MARTINEZ;
YADIRA ANAHY MARTINEZ;
DWATNEY NOID;
DWIGHT McLITTLE, a/k/a D.A.;
SHANIEKA TATUM;
LAMONT WILLIAMS, a/k/a Peter Rabbit;
GERARD TRICE, a/k/a Fly; and
TARVARS HONORABLE, a/k/a Pudgy,

conspired and agreed with each other, and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, in violation of Title 21, U.S.C. § 841(a)(1), and five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

1. It was part of the conspiracy that IDALIA RAMOS RANGEL, a/k/a La Tia or Big Momma, a high-ranking member of the Gulf Cartel, directed a drug trafficking organization based in Matamoros, Mexico (hereinafter, the RAMOS RANGEL DTO), that was responsible for the distribution of hundreds of kilograms of cocaine to and in the Eastern District of Arkansas, and elsewhere.

2. It was further part of the conspiracy that IDALIA RAMOS RANGEL's son, MOHAMMED KAZAM MARTINEZ, a/k/a Mo, a federal inmate in the Bureau of Prisons, recruited inmates at the Federal Correctional Complex in Forrest City, Arkansas, to distribute RAMOS RANGEL DTO cocaine upon their release from prison. Those inmates included EMMANUEL ILO, a/k/a Chi Chi or Chi, and MERVIN JOHNSON, a/k/a Slim, who upon

their release from federal prison in approximately 2010, began distributing kilogram and multi-ounce quantities of the RAMOS RANGEL DTO cocaine in the greater central Arkansas area.

3. It was further part of the conspiracy that MOHAMMED KAZAM MARTINEZ, a/k/a Mo, communicated with RAMOS RANGEL DTO members using the prison telephone and e-mail systems to coordinate the distribution of cocaine to, and the collection of drug proceeds from, former federal inmates and others. For example, on November 18, 2010, at approximately 11:26 a.m., MOHAMMED KAZAM MARTINEZ, a/k/a Mo, using a telephone at the Federal Correctional Complex in Beaumont, Texas, called MERVIN JOHNSON, a/k/a Slim, to complain that JOHNSON had not paid for drugs previously received and was jeopardizing the RAMOS RANGEL DTO's distribution of drugs, stating, "You owe Big Momma [RAMOS RANGEL] some money If you keep f***ing up, they gonna cut everybody off. You are gonna f**k Chi Chi [ILO] and me up because of you."

4. It was further part of the conspiracy that HOMAR MARTINEZ; MANUEL GARZA, a/k/a Manny; JAIME BENAVIDES; NISHME MARTINEZ, a/k/a La Gorda; DENICE DURAN MARTINEZ; and ANAHY MARTINEZ, among others, assisted and facilitated the operation of the RAMOS RANGEL DTO by, among other things: arranging and coordinating shipments of cocaine from Mexico and Texas to the Eastern District of Arkansas, ensuring safe passage of the drug shipments to Little Rock; collecting proceeds of these shipments in bulk cash; creating bank accounts for the purpose of depositing and withdrawing drug proceeds; physically transporting bulk cash drug proceeds across the

border to Mexico; and/or acting as conduits for coconspirators in the Eastern District of Arkansas to communicate with other coconspirators in the RAMOS RANGEL DTO in Mexico and elsewhere.

5. It was further part of the conspiracy that EMMANUEL ILO, a/k/a Chi Chi or Chi, distributed RAMOS RANGEL DTO cocaine to DWATNEY NOID; DWIGHT McLITTLE, a/k/a D.A.; LAMONT WILLIAMS, a/k/a Peter Rabbit; GERARD TRICE, a/k/a Fly; TARVARS HONORABLE, a/k/a Pudgy; and others, for redistribution to customers in the Eastern District of Arkansas. SHANIEKA TATUM assisted EMMANUEL ILO, a/k/a Chi Chi or Chi, in this endeavor by storing ILO's cocaine at her residence.

6. It was further part of the conspiracy that the defendants and their coconspirators used mobile telephones to communicate with each other and to facilitate their drug trafficking activities. For example, on May 21, 2012, at approximately 6:08 p.m., Call 3138 (Target Phone 2), SHANIEKA TATUM contacted EMMANUEL ILO, a/k/a Chi Chi or Chi. During this call, TATUM informed ILO that ILO had left a package containing approximately one and three-quarter kilograms of cocaine at her residence.

7. It was further part of the conspiracy that the defendants and their coconspirators did conceal and hide, and cause to be concealed and hidden, the purposes and the acts done in furtherance of the conspiracy, and did use coded language, counter-surveillance, and other means to avoid detection and apprehension by law enforcement authorities.

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

COUNT 2

On or about March 10, 2011, in the Eastern District of Arkansas, the defendant,

DWIGHT McLITTLE, a/k/a D.A.,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and approximately 13.9357 grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 3

On or about March 11, 2011, in the Eastern District of Arkansas, the defendant,

DWIGHT McLITTLE, a/k/a D.A.,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and less than five hundred (500) grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 4

On or about April 6, 2011, in the Eastern District of Arkansas, the defendant,

DWIGHT McLITTLE, a/k/a D.A.,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and approximately 109.8 grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 5

On or about September 27, 2011, in the Eastern District of Arkansas, the defendants,

DWIGHT McLITTLE, a/k/a D.A., and
EMMANUEL ILO, a/k/a Chi Chi or Chi,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and approximately 242.3 grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 6

On or about October 6, 2011, in the Eastern District of Arkansas, the defendant,

EMMANUEL ILO, a/k/a Chi Chi or Chi,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and approximately 115.6 grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 7

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

DWIGHT McLITTLE, a/k/a D.A., and
EMMANUEL ILO, a/k/a Chi Chi or Chi,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and approximately 256.5 grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 8

On or about October 25, 2011, in the Eastern District of Arkansas, the defendant,

EMMANUEL ILO, a/k/a Chi Chi or Chi,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and approximately 111.4 grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 9

On or about March 9, 2012, in the Eastern District of Arkansas, the defendants,

EMMANUEL ILO, a/k/a Chi Chi or Chi, and
DWATNEY NOID

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and approximately 27.4063 grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 10

On or about May 10, 2012, in the Eastern District of Arkansas, the defendants,

EMMANUEL ILO, a/k/a Chi Chi or Chi, and
DWATNEY NOID,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and approximately 28.3479 grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 11

On or about May 30, 2012, in the Eastern District of Arkansas, the defendant,

TARVARS HONORABLE, a/k/a Pudgy,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, and approximately 2.3587 grams of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 12

On or about October 25, 2012, in the Eastern District of Arkansas, the defendant,

MERVIN JOHNSON, a/k/a Slim,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and approximately 1.4561 grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 13

On or about February 12, 2013, in the Eastern District of Arkansas, the defendant,

DWIGHT McLITTLE, a/k/a D.A.,

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and approximately 134.8 grams of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, were involved.

All in violation of Title 21, U.S.C. § 841(a)(1).

COUNT 14

On or about February 17, 2012, Call 5 (TP1), in the Eastern District of Arkansas, and elsewhere, the defendant,

EMMANUEL ILO, a/k/a Chi Chi or Chi,

defendant herein, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating a conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

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

COUNT 15

On or about May 5, 2012, Call 1435 (TP2), in the Eastern District of Arkansas, and elsewhere, the defendant,

EMMANUEL ILO, a/k/a Chi Chi or Chi,

defendant herein, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating a conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

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

COUNT 16

On or about April 17, 2012, Call 169 (TP2), in the Eastern District of Arkansas, and elsewhere, the defendant,

DWATNEY NOID,

defendant herein, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating a conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

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

COUNT 17

On or about May 2, 2012, Call 1002 (TP2), in the Eastern District of Arkansas, and elsewhere, the defendant,

DWATNEY NOID,

defendant herein, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating a conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

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

COUNT 18

On or about May 4, 2012, Call 1259 (TP2), in the Eastern District of Arkansas, and elsewhere, the defendant,

SHANIEKA TATUM,

defendant herein, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating a conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

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

COUNT 19

On or about May 9, 2012, Call 1592 (TP2), in the Eastern District of Arkansas, and elsewhere, the defendant,

SHANIEKA TATUM,

defendant herein, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating a conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

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

COUNT 20

On or about May 21, 2012, Call 3138 (TP2), in the Eastern District of Arkansas, and elsewhere, the defendant,

SHANIEKA TATUM,

defendant herein, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating a conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

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

COUNT 21

On or about May 10, 2012, Call 1777 (TP2), in the Eastern District of Arkansas, and elsewhere, the defendant,

LAMONT WILLIAMS, a/k/a Peter Rabbit,

defendant herein, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating a conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

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

COUNT 22

On or about May 15, 2012, Call 2318 (TP2), in the Eastern District of Arkansas, and elsewhere, the defendant,

LAMONT WILLIAMS, a/k/a Peter Rabbit,

defendant herein, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating a conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

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

COUNT 23

On or about May 3, 2012, Call 1066 (TP2), in the Eastern District of Arkansas, and elsewhere, the defendant,

GERARD TRICE, a/k/a Fly,

defendant herein, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating a conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846.

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

COUNT 24

On or about May 9, 2012, Call 1591 (TP2), in the Eastern District of Arkansas,
and elsewhere, the defendant,

GERARD TRICE, a/k/a Fly,

defendant herein, knowingly and intentionally used a communication facility, to wit, a
telephone, in committing, causing and facilitating a conspiracy to distribute and possess
with intent to distribute a controlled substance, in violation of Title 21, United States
Code, Section 846.

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

COUNT 25

On or about May 11, 2012, Call 1896 (TP2), in the Eastern District of Arkansas,
and elsewhere, the defendant,

TARVARS HONORABLE, a/k/a Pudgy,

defendant herein, knowingly and intentionally used a communication facility, to wit, a
telephone, in committing, causing and facilitating a conspiracy to distribute and possess
with intent to distribute a controlled substance, in violation of Title 21, United States
Code, Section 846.

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

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