IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

DAVARES ANTONIO ARCHIE a/k/a "Dee" SHAUN CONARD BROWN a/k/a "Snake" RICARDO BUTLER a/k/a "Slick Rick" ISAAC EZELL JONES a/k/a "Ike" TORREY RONDELL LAWSON a/k/a "T-Roly" TRACY MITCHELL MCCANTS a/k/a "Murder" RODERICK LAMONT MCCLINTON a/k/a "Rara" JAMEL JOROME PUGH a/k/a "Moonshine" BRIAN DANIEL RICHARDSON a/k/a "Baby Brian" a/k/a "Baby B" DEMORY JAMES ROBINSON a/k/a "Demo" a/k/a "Unc" ISAAC MAURICE ROBINSON a/k/a "Ike" MICHAEL THERON STEARNS a/k/a "Big Mike" ISAAC JERMAINE WALLACE JEREMY PUGH WASHINGTON a/k/a "Fatboy" a/k/a "Munchkin" SHANNON D. WHITE TYRONE C. WISE a/k/a "T-Wise" a/k/a "Ty" FNU LNU a/k/a "Pook" FNU LNU a/k/a "Weezo" FNU LNU a/k/a "Tim"

CR No .: 3:14cr 667

18 USC § 1956(h) 21 USC § 841(a)(1) 21 USC § 841(b)(1)(A) 21 USC § 841(b)(1)(B) 21 USC § 841(b)(1)(C) 21 USC § 846

INDICTMENT

FNU LNU a/k/a "Lil Brah" FNU LNU a/k/a "Dee"

COUNT 1

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THE GRAND JURY CHARGES:

1. That beginning at a time unknown to the grand jury, but beginning at least in or around July 2013, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina, the defendants, DAVARES ANTONIO ARCHIE, a/k/a "Dee": SHAUN CONARD BROWN, a/k/a "Snake"; RICARDO BUTLER, a/k/a "Slick Rick"; ISAAC EZELL JONES, a/k/a "Ike": TORREY RONDELL LAWSON, a/k/a "T-Roly"; TRACY MITCHELL MCCANTS, a/k/a "Murder"; RODERICK LAMONT MCCLINTON, a/k/a "Rara"; JAMEL JOROME PUGH, a/k/a "Moonshine"; BRIAN DANIEL RICHARDSON, a/k/a "Baby Brian", a/k/a "Baby B"; DEMORY JAMES ROBINSON, a/k/a "Demo", a/k/a "Unc"; ISAAC MAURICE ROBINSON, a/k/a "Ike"; MICHAEL THERON STEARNS, a/k/a "Big Mike"; ISAAC JERMAINE WALLACE; JEREMY PUGH WASHINGTON, a/k/a "Fatboy", a/k/a "Munchkin"; SHANNON D. WHITE; TYRONE C. WISE, a/k/a "T-Wise", a/k/a "Ty"; FNU LNU, a/k/a "Pook"; FNU LNU, a/k/a "Weezo"; FNU LNU, a/k/a "Tim"; FNU LNU, a/k/a "Lil Brah"; and FNU LNU, a/k/a "Dee"; knowingly and intentionally did combine, conspire and agree together and have tacit understanding each other with and others, both known and unknown to the grand jury, to knowingly, intentionally and unlawfully possess with intent to distribute and distribute cocaine and cocaine base (commonly known as "crack" cocaine), both Schedule II controlled substances:

- a. With respect to DAVARES ANTONIO ARCHIE, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(A);
- b. With respect to SHAUN CONARD BROWN, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(A);
- c. With respect to RICARDO BUTLER, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(A);
- d. With respect to ISAAC EZELL JONES, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(A);
- e. With respect to TORREY RONDELL LAWSON, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine and 280

grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(A);

- f. With respect to TRACY MITCHELL MCCANTS, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(A);
- g. With respect to RODERICK LAMONT MCCLINTON, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(A);
- h. With respect to JAMEL JOROME PUGH, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(A);
- i. With respect to BRIAN DANIEL RICHARDSON, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(A);

- j. With respect to DEMORY JAMES ROBINSON, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(A);
- k. With respect to ISAAC MAURICE ROBINSON, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(A);
- With respect to MICHAEL THERON STEARNS, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(A);
- m. With respect to ISAAC JERMAINE WALLACE, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 500 grams or more of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(A);
- n. With respect to JEREMY PUGH WASHINGTON, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of cocaine and 280

grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

- o. With respect to SHANNON D. WHITE, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(A);
- p. With respect to TYRONE C. WISE, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(A);
- q. With respect to FNU LNU, a/k/a "Pook," the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(A);
- With respect to FNU LNU, a/k/a "Weezo," the amount involved in the conspiracy г. attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 280 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(A);

- s. With respect to FNU LNU, a/k/a "Tim," the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 28 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(B);
- t. With respect to FNU LNU, a/k/a "Lil Brah," the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 28 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(B);
- with respect to FNU LNU, a/k/a "Dee," the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is a quantity of cocaine and 28 grams or more of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(B);

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

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COUNT 2

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the grand jury, but beginning at least in or around July 2013, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina, the defendants, DAVARES ANTONIO ARCHIE, a/k/a "Dee"; SHAUN CONARD BROWN, a/k/a "Snake"; RICARDO BUTLER, a/k/a "Slick Rick"; ISAAC EZELL JONES, a/k/a "Ike"; RODERICK LAMONT MCCLINTON, a/k/a "Rara": BRIAN DANIEL RICHARDSON, a/k/a "Baby Brian", a/k/a "Baby B"; ISAAC MAURICE ROBINSON, a/k/a "Ike"; MICHAEL THERON STEARNS, a/k/a "Big Mike"; ISAAC JERMAINE WALLACE; SHANNON D. WHITE; FNU LNU, a/k/a "Pook"; FNU LNU, a/k/a "Weezo"; and FNU LNU, a/k/a "Dee"; knowingly and willfully did combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury, to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is buying, selling and otherwise dealing in narcotic controlled substances including cocaine and cocaine base, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, and further knowing that the transactions were intended to promote the carrying on of said specified unlawful activity. in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i);

All in violation of Title 18, United States Code, Section 1956(h).

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(jdr) WILLIAM N. NETTLES UNITED STATES ATTORNEY