

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. **10-20410** CR-LENARD

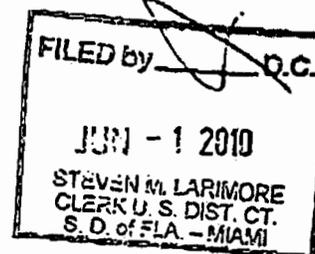
MAGISTRATE JUDGE  
**KURNOFF**

21 U.S.C. § 846  
21 U.S.C. § 841(a)(1)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(c)(1)(A)(i)  
18 U.S.C. § 1028(a)(3)  
18 U.S.C. § 924(d)(1)  
18 U.S.C. § 982(a)(2)(B)  
18 U.S.C. § 1028(b)(5)  
21 U.S.C. § 853

UNITED STATES OF AMERICA

vs.

ANTWAN ROSHAX GRAY  
a/k/a "Sugie,"  
SHERLINE RICHARD,  
a/k/a "Zoe,"  
JEROME LE'KEITH McMILLAN,  
ERIC ALEXANDER MAYNARD, III,  
a/k/a "E"  
a/k/a "E Bone,"  
DEXTER EARL KEMP,  
a/k/a "Boss,"  
a/k/a "Dex,"  
TREMAINE EDWARD KALE,  
a/k/a "Main,"  
RAYMOND TONEY,  
a/k/a "Charlie,"  
JONATHAN GIOVANNI MORLEY,  
a/k/a "Yoshi,"  
TRAVIS LEONDRÉ PARKER,  
a/k/a "Tippy,"  
a/k/a "Boo,"  
KENWIN D. SEEPERSAD, JR.,  
a/k/a "Boobie,"  
ARTRELL TERRANCE GRAY,  
a/k/a "Trelly,"  
AHMAD JAMAL COZART,  
a/k/a "Rah Rah,"  
SAHEED RASHEED THOMPSON,



a/k/a "Barney,"  
a/k/a "Bob,"  
SHAHEED RASHARD THOMPSON,  
a/k/a "Heed," and  
RAHMIN J. JEFFERSON,  
a/k/a "LT,"  
Defendants.

---

INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning in or about May 2009, and continuing until on or about December 16, 2009, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

ANTWAN ROSHAX GRAY,  
a/k/a "Sugie,"  
SHERLINE RICHARD,  
a/k/a "Zoe,"  
JEROME LE'KEITH McMILLAN,  
ERIC ALEXANDER MAYNARD, III,  
a/k/a "E"  
a/k/a "E Bone,"  
DEXTER EARL KEMP,  
a/k/a "Boss,"  
a/k/a "Dex,"  
TREMAINE EDWARD KALE,  
a/k/a "Main,"  
RAYMOND TONEY  
a/k/a "Charlie,"  
JONATHAN GIOVANNI MORLEY,  
a/k/a "Yoshi,"  
TRAVIS LEONDRE PARKER,  
a/k/a "Tippy,"  
a/k/a "Boo,"  
KENWIN D. SEEPERSAD, JR.,  
a/k/a "Boobie,"

**ARTRELL TERRANCE GRAY,  
a/k/a "Trelly,"  
AHMAD JAMAL COZART,  
a/k/a "Rah Rah,"  
SAHEED RASHEED THOMPSON,  
a/k/a "Barney,"  
a/k/a "Bob," and  
SHAHEED RASHARD THOMPSON,  
a/k/a "Heed,"**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons, known and unknown to the Grand Jury, to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine;

Pursuant to Title 21, United States Code, Section 841(b)(1)(D), it is further alleged that this violation involved less than fifty (50) kilograms of marijuana; and

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a detectable amount of 3-4 methylenedioxymethamphetamine (MDMA), commonly referred to as Ecstasy.

**COUNT 2**

On or about November 17, 2009, in Miami-Dade County, in the Southern District of Florida,  
the defendant,

**ARTRELL TERRANCE GRAY,  
a/k/a "Trelly,"**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine;

Pursuant to Title 21, United States Code, Section 841(b)(1)(D), it is further alleged that this violation involved less than fifty (50) kilograms of marijuana.

**COUNT 3**

On or about September 16, 2009, in Miami-Dade County, in the Southern District of Florida, the defendant,

**RAHMIN J. JEFFERSON**  
a/k/a "LT,"

having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the firearm and ammunition are:

- a. One (1) 40 caliber Smith & Wesson Pistol; and
- b. Thirteen (13) rounds of Federal 40 caliber ammunition.

**COUNT 4**

On or about October 6, 2009, in Miami-Dade County, in the Southern District of Florida, the defendant,

**TREMAINE EDWARD KALE,**  
a/k/a "Main,"

having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the ammunition is:

- a. One (1) Winchester 12 gauge shotgun shell; and
- b. One (1) Winchester 9mm Luger round.

**COUNT 5**

On or about November 17, 2009, in Miami-Dade County, in the Southern District of Florida,  
the defendant,

**TREMAINE EDWARD KALE,  
a/k/a "Main,"**

having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the ammunition is:

- a. One (1) Winchester 20 gauge shotgun shell;
- b. One (1) Remington 12 gauge shotgun shell; and
- c. Four (4) Winchester 12 gauge shotgun shells.

**COUNT 6**

On or about November 17, 2009, in Miami-Dade County, in the Southern District of Florida,  
the defendants,

**ANTWAN ROSHAX GRAY,  
a/k/a "Sugie,"  
JEROME LE'KEITH McMILLAN,  
ERIC ALEXANDER MAYNARD, III,  
a/k/a "E"  
a/k/a "E Bone,"  
DEXTER EARL KEMP,  
a/k/a "Boss,"  
a/k/a "Dex,"**

**TREMAINE EDWARD KALE,  
a/k/a "Main,"  
KENWIN D. SEEPERSAD, JR.,  
a/k/a "Boobie," and  
ARTRELL TERRANCE GRAY,  
a/k/a "Trelly,"**

did knowingly possess a firearm in furtherance of a drug trafficking crime, for which the defendant may be prosecuted in a court of the United States, specifically, violations of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Counts 1 and 2 of this Indictment; in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT 7**

On or about November 18, 2009, in Miami-Dade County, in the Southern District of Florida,  
the defendant,

**KENWIN D. SEEPERSAD, JR.,  
a/k/a "Boobie,"**

having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the firearm and ammunition are:

- a. One (1) Hess Arms 5.56mm HAR-15A2 rifle;
- b. Thirty-nine (39) Remington rounds of .223 ammunition;
- c. Thirty-two (32) Remington rounds of .38 caliber ammunition;
- d. Eight (8) rounds of CCI .22 caliber ammunition;
- e. Seven (7) Winchester 20 gauge shotgun shells; and
- f. Fifty (50) rounds of Georgia Arms .308 Winchester rifle ammunition.

**COUNT 8**

On or about November 19, 2009, in Miami-Dade County, in the Southern District of Florida,  
the defendant,

**ANTWAN ROSHAX GRAY,  
a/k/a "Sugie,"**

having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the firearm and ammunition are:

- a. One (1) Glock, model 31, .357 Caliber Pistol; and
- b. Fifteen (15) rounds of Winchester .357 Sig ammunition.

**COUNT 9**

On or about December 16, 2009, in Miami-Dade County, in the Southern District of Florida,  
the defendant,

**TREMAINE EDWARD KALE,  
a/k/a "Main,"**

having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the ammunition is:

- a. One (1) Winchester 20 gauge shotgun shell; and
- b. One (1) Winchester 12 gauge shotgun shell.

**COUNT 10**

On or about November 18, 2009, in Miami-Dade County, in the Southern District of Florida,  
the defendant,

**JONATHAN GIOVANNI MORLEY,  
a/k/a "Yoshi,"**

did knowingly possess with the intent to use unlawfully and transfer unlawfully five (5) or more identification documents and false identification documents, that is three (3) Social Security cards, four (4) Florida driver licenses, and one (1) United States Passport Card, in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1028(a)(3) and 2.

**COUNT 11**

On or about November 19, 2009, in Miami-Dade County, in the Southern District of Florida,  
the defendants,

**ANTWAN ROSHAX GRAY,  
a/k/a "Sugie," and  
SHERLINE RICHARD,  
a/k/a "Zoe,"**

did knowingly possess with the intent to use unlawfully and transfer unlawfully five (5) or more identification documents and false identification documents, that is three (3) Florida driver licenses, two (2) Social Security cards, and one (1) United States Uniformed Services identification card, in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 1028(a)(3) and 2.

**FORFEITURE**

1. The allegations of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain

property in which the defendants have an interest, pursuant to the provisions of Title 18, United States Code, Section 924(d)(1), as made applicable by Title 28, United States Code, Section 2461(c), Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b)(5), and Title 21, United States Code, Section 853.

2. Upon conviction of any offense alleged in Count 1 or 2 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds which such defendant obtained, directly or indirectly, as the result of such violation, and any property which such defendant used, or intended to be used, in any manner or part, to commit or to facilitate the commission of the violation.

3. Upon conviction of any offense alleged in Counts 3 through 9 of this Indictment, or any other violation of any other federal criminal law, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), as made applicable hereto by Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in or used in the commission of the violation.

4. Upon conviction of any offense alleged in Counts 10 or 11 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), any property constituting, or derived, from proceeds such defendant obtained, directly or indirectly, as the result of the offense and, pursuant to Title 18, United States Code, Section 1028(b)(5), any personal property used or intended to be used to commit the offense.

5. The property subject to forfeiture includes, but is not limited to, the following:

Property Seized from Defendant Rahmin J. Jefferson:

- a. One (1) 40 caliber Smith & Wesson Pistol;

- b. Thirteen (13) rounds of Federal 40 caliber ammunition;

Property Seized from Defendant Tremaine Edward Kale:

- c. One (1) Winchester 12 gauge shotgun shell;
- d. One (1) Winchester 9mm Luger round;
- e. One (1) Winchester 20 gauge shotgun shell;
- f. One (1) Remington 12 gauge shotgun shell;
- g. Four (4) Winchester 12 gauge shotgun shells;

Property Seized from Defendant Kenwin D. Seepersad, Jr.

- h. One (1) Hess Arms 5.56mm HAR-15A2 rifle;
- i. Approximately thirty-nine (39) rounds of Remington .223 ammunition;
- j. Approximately thirty-two (32) rounds of Remington .38 caliber ammunition;
- k. Eight (8) rounds of CCI .22 caliber ammunition;
- l. Seven (7) Winchester 20 gauge shotgun shells;
- m. Approximately fifty (50) rounds of Georgia Arms .308 Winchester rifle ammunition;

Property Seized from Defendants Antwan Roshax Gray

- n. One (1) Glock, model 31, .357 Caliber Pistol;
- o. Fifteen (15) rounds of Winchester .357 Sig ammunition;

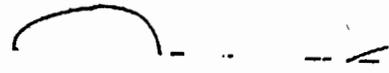
Property Seized from Defendant Tremaine Edward Kale:

- p. One (1) Winchester 20 gauge shotgun shell; and

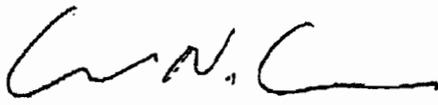
q. One (1) Winchester 12 gauge shotgun shell.

All pursuant to Title 28, United States Code, Section 2461(c); Title 18, United States Code, 924(d)(1); Title 18, United States Code, Sections 982(a)(2)(b) and 982(b); Title 18, United States Code, Sections 1028(b)(5), 1028(g) and 1028(h); and Title 21, United States Code, Section 853.

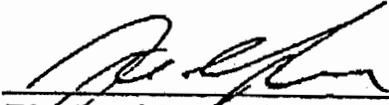
A TRUE BILL



FOREPERSON

  
*Chief, Criminal Division*

*for* WIFREDO A. FERRER  
UNITED STATES ATTORNEY

  
JUAN A. GONZALEZ  
ASSISTANT UNITED STATES ATTORNEY