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8 IN THE UNITED STATES DISTRICT COURT
9
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12
13 Plaintiff,

14 v.

15 MAURICE BRYANT,
WILMER HARDEN,
16 aka Armani Jackson.
TYRONE ANDERSON,
17 YOVANNY ONTIVEROS,
CHARLES CARTER,
18 BOBBY CONNER,
JEROME ADAMS,
19 DWIGHT HANEY,
ARLINGTON CAINE,
20 MARK MARTIN,
ALEX WHITE,
STEVEN HAMPTON,
21 ANDRE HELAMS,
JASON TOLBERT, and
MICHAEL HAMPTON,

22 Defendants.
23

CASE NO. 2:21-cr-00104 -MCE

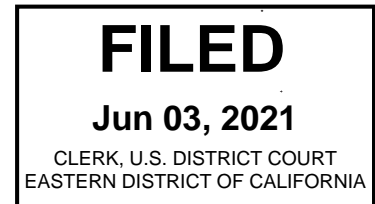
21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to
Distribute and to Possess with Intent to Distribute
Cocaine and Cocaine Base; 21 U.S.C. §§ 846,
841(a)(1) – Conspiracy to Distribute and to Possess
with Intent to Distribute Heroin; 21 U.S.C. §
841(a)(1) – Distribution of Cocaine (4 counts); 21
U.S.C. § 841(a)(1) – Distribution of Cocaine Base (3
counts); 21 U.S.C. § 841(a)(1) – Possession with
Intent to Distribute Cocaine (3 counts); 21 U.S.C. §
841(a)(1) – Possession with Intent to Distribute
Cocaine Base; 21 U.S.C. § 841(a)(1) – Possession
with Intent to Distribute Heroin; 18 U.S.C.
§ 922(g)(1) – Felon in Possession of Firearm (3
counts); 21 U.S.C. § 843(b) - Use of a
Communication Facility to Facilitate a Drug
Trafficking Offense (28 counts); 21 U.S.C. § 853(a),
18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) –
Criminal Forfeiture

24
25 INDICTMENT

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1 COUNT ONE: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and to Possess with Intent to
2 Distribute Cocaine and Cocaine Base]

3 The Grand Jury charges: T H A T

4 MAURICE BRYANT
5 WILMER HARDEN,
6 aka Armani Jackson.
7 TYRONE ANDERSON,
8 CHARLES CARTER,
9 BOBBY CONNER,
10 JEROME ADAMS,
11 DWIGHT HANEY,
ARLINGTON CAINE,
MARK MARTIN,
ALEX WHITE,
STEVEN HAMPTON,
ANDRE HELLAMS,
JASON TOLBERT, and
MICHAEL HAMPTON,

12 defendants herein, between on or about a date unknown to the Grand Jury, but no later than March 1,
13 2018, and continuing through on or about May 19, 2021, in Sacramento County, State and Eastern
14 District of California, and elsewhere, did conspire and agree with each other and with persons known
15 and unknown to the Grand Jury to distribute and to possess with intent to knowingly and intentionally
16 distribute at least 5 kilograms of a mixture and substance containing a detectible amount of cocaine, a
17 Schedule II Controlled Substance, and at least 280 grams of a mixture and substance containing a
18 detectible amount of cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United
19 States Code, Sections 846 and 841(a)(1).

20 COUNT TWO: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and to Possess with Intent to
21 Distribute Heroin]

22 The Grand Jury further charges: T H A T

23 TYRONE ANDERSON, and
24 YOVANNY ONTIVEROS,

25 defendants herein, between on or about a date unknown to the Grand Jury, but no later than July 16,
26 2018, and continuing through on or about August 13, 2018, in Sacramento County, State and Eastern
27 District of California, and elsewhere, did conspire and agree with each other and with persons known
28 and unknown to the Grand Jury to distribute and to possess with intent to knowingly and intentionally

1 distribute a mixture and substance containing a detectable amount of heroin, a Schedule I Controlled
2 Substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

3 COUNT THREE: [21 U.S.C. § 841(a)(1) – Distribution of Cocaine Base]

4 The Grand Jury further charges: T H A T

5 TYRONE ANDERSON, and
6 ALEX WHITE,

7 defendants herein, on or about March 1, 2018, in Sacramento County, State and Eastern District of
8 California, did knowingly and intentionally distribute a mixture and substance containing a detectable
9 amount of cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States
10 Code, Section 841(a)(1); Title 18, United States Code, Section 2.

11 COUNT FOUR: [21 U.S.C. § 841(a)(1) – Distribution of Cocaine]

12 The Grand Jury further charges: T H A T

13 TYRONE ANDERSON, and
14 ALEX WHITE,

15 defendants herein, on or about March 1, 2018, in Sacramento County, State and Eastern District of
16 California, did knowingly and intentionally distribute a mixture and substance containing a detectable
17 amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code,
18 Section 841(a)(1); Title 18, United States Code, Section 2.

19 COUNT FIVE: [21 U.S.C. § 841(a)(1) – Distribution of Cocaine Base]

20 The Grand Jury further charges: T H A T

21 TYRONE ANDERSON, and
22 ALEX WHITE,

23 defendants herein, on or about April 11, 2018, in Sacramento County, State and Eastern District of
24 California, did knowingly and intentionally distribute a mixture and substance containing a detectable
25 amount of cocaine base, a Schedule II Controlled Substance, in violation of Title 21, United States
26 Code, Section 841(a)(1); Title 18, United States Code, Section 2.

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1 COUNT SIX: [21 U.S.C. § 841(a)(1) – Distribution of Cocaine]

2 The Grand Jury further charges: T H A T

3 TYRONE ANDERSON, and
4 ALEX WHITE,

5 defendants herein, on or about April 11, 2018, in Sacramento County, State and Eastern District of
6 California, did knowingly and intentionally distribute a mixture and substance containing a detectable
7 amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code,
8 Section 841(a)(1); Title 18, United States Code, Section 2.

9 COUNT SEVEN: [21 U.S.C. § 841(a)(1) – Distribution of Cocaine Base]

10 The Grand Jury further charges: T H A T

11 TYRONE ANDERSON, and
12 ALEX WHITE,

13 defendants herein, on or about April 11, 2018, in Sacramento County, State and Eastern District of
14 California, did knowingly and intentionally distribute at least 28 grams of a mixture and substance
15 containing a detectable amount of cocaine base, a Schedule II Controlled Substance, in violation of Title
16 21, United States Code, Section 841(a)(1); Title 18, United States Code, Section 2.

17 COUNT EIGHT: [21 U.S.C. § 841(a)(1) – Distribution of Cocaine]

18 The Grand Jury further charges: T H A T

19 MAURICE BRYANT, and
20 TYRONE ANDERSON,

21 defendants herein, on or about July 23, 2018, in Sacramento County, State and Eastern District of
22 California, did knowingly and intentionally distribute at least 500 grams of a mixture and substance
23 containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21,
24 United States Code, Section 841(a)(1); Title 18, United States Code, Section 2.

25 COUNT NINE: [21 U.S.C. § 841(a)(1) – Distribution of Cocaine]

26 The Grand Jury further charges: T H A T

27 MAURICE BRYANT,

28 defendant herein, on or about February 27, 2019, in Sacramento County, State and Eastern District of

1 California, did knowingly and intentionally distribute a mixture and substance containing a detectable
2 amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code,
3 Section 841(a)(1); Title 18, United States Code, Section 2.

4 COUNT TEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine]

5 The Grand Jury further charges: T H A T

6 WILMER HARDEN,

7 defendants herein, on or about May 19, 2021, in Sacramento County, State and Eastern District of
8 California, did knowingly and intentionally possess with intent to distribute a mixture and substance
9 containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21,
10 United States Code, Section 841(a)(1).

11 COUNT ELEVEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine]

12 The Grand Jury further charges: T H A T

13 TYRONE ANDERSON, and
14 STEVEN HAMPTON,

15 defendants herein, on or about May 19, 2021, in Sacramento County, State and Eastern District of
16 California, did knowingly and intentionally possess with intent to distribute at least 500 grams of a
17 mixture and substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in
18 violation of Title 21, United States Code, Section 841(a)(1); Title 18, United States Code, Section 2.

19 COUNT TWELVE: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin]

20 The Grand Jury further charges: T H A T

21 TYRONE ANDERSON, and
22 STEVEN HAMPTON,

23 defendants herein, on or about May 19, 2021, in Sacramento County, State and Eastern District of
24 California, did knowingly and intentionally possess with intent to distribute at least 1,000 grams of a
25 mixture and substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in
26 violation of Title 21, United States Code, Section 841(a)(1); Title 18, United States Code, Section 2.

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1 COUNT THIRTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine Base]

2 The Grand Jury further charges: T H A T

3 TYRONE ANDERSON, and
4 STEVEN HAMPTON,

5 defendants herein, on or about May 19, 2021, in Sacramento County, State and Eastern District of
6 California, did knowingly and intentionally possess with intent to distribute at least 28 grams of a
7 mixture and substance containing a detectable amount of cocaine base, a Schedule II Controlled
8 Substance, in violation of Title 21, United States Code, Section 841(a)(1); Title 18, United States Code,
9 Section 2.

10 COUNT FOURTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine

11 The Grand Jury further charges: T H A T

12 JASON TOLBERT,

13 defendants herein, on or about May 19, 2021, in Sacramento County, State and Eastern District of
14 California, did knowingly and intentionally possess with intent to distribute a mixture and substance
15 containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21,
16 United States Code, Section 841(a)(1).

17 COUNT FIFTEEN: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

18 The Grand Jury further charges: T H A T

19 MAURICE BRYANT,

20 defendant herein, on or about May 19, 2021, in Sacramento County, State and Eastern District of
21 California, knowing that he had been convicted of a crime punishable by a term of imprisonment
22 exceeding one year, that is:

23 (1) Possession/Purchase Cocaine Base for Sale, in violation of California Health and Safety
24 Code section 11351.5, on or about January 5, 1989, in Sacramento County, California; and

25 (2) Possession/Purchase Cocaine Base for Sale, in violation of California Health and Safety
26 Code section 11351.5, on or about November 23, 1993, in Sacramento County, California,

27 did knowingly possess a firearm, specifically, a Hi-Point nine millimeter semiautomatic pistol with
28 serial number 1346085 and a Fratelli Tanfoglio S.N.C. EAA Witness model .45 caliber semiautomatic
pistol with serial number EA25684 in and affecting commerce, in that said firearms had previously been

1 transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section
2 922(g)(1).

3 COUNT SIXTEEN: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

4 The Grand Jury further charges: T H A T

5 TYRONE ANDERSON,

6 defendant herein, on or about May 19, 2021, in Sacramento County, State and Eastern District of
7 California, knowing that he had been convicted of a crime punishable by a term of imprisonment
8 exceeding one year, that is:

9 (1) Possession /Purchase for Sale Narcotic Controlled Substance, in violation of California
10 Health and Safety Code section 11351, on or about October 17, 2008, in Sacramento,
California,

11 did knowingly possess a firearm, specifically, a Glock 9 millimeter pistol with serial number BEKE419
12 and a Smith and Wesson .38 caliber revolver with serial number DDV6981 in and affecting commerce,
13 in that said firearms had previously been transported in interstate and foreign commerce, in violation of
14 Title 18, United States Code, Section 922(g)(1).

15 COUNT SEVENTEEN: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

16 The Grand Jury further charges: T H A T

17 MICHAEL HAMPTON,

18 defendant herein, on or about May 19, 2021, in Sacramento County, State and Eastern District of
19 California, knowing that he had been convicted of a crime punishable by a term of imprisonment
20 exceeding one year, that is:

21 (1) Possession Narcotic Controlled Substance, in violation of California Health and Safety Code
22 section 11350, on or about September 27, 1984, in San Francisco County, California;

23 (2) Possession Narcotic Controlled Substance, in violation of California Health and Safety Code
24 section 11350, on or about December 4, 1986, in San Francisco County, California; and

25 (3) Felon/Addict/Etc. in Possession of a Firearm, in violation of California Penal Code section
12021(A), on October 2, 1992, in San Francisco County, California,

26 did knowingly possess a firearm, specifically, a Smith and Wesson Model 659 nine millimeter
27 semiautomatic pistol with serial number TBC7123, in and affecting commerce, in that said firearm had
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1 previously been transported in interstate and foreign commerce, in violation of Title 18, United States
2 Code, Section 922(g)(1).

3 COUNT EIGHTEEN: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
4 Trafficking Offense]

5 The Grand Jury further charges: T H A T

6 MAURICE BRYANT, and
7 WILMER HARDEN,

8 defendants herein, on or about February 19, 2019, at 6:24 p.m., in session #56, in the State and Eastern
9 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
10 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
11 violation of Title 21, United States Code, Section 843(b).

12 COUNT NINETEEN: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
13 Trafficking Offense]

14 The Grand Jury further charges: T H A T

15 MAURICE BRYANT, and
16 TYRONE ANDERSON,

17 defendants herein, on or about August 9, 2018, at 11:04 a.m., in session #966, in the State and Eastern
18 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
19 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
20 violation of Title 21, United States Code, Section 843(b).

21 COUNT TWENTY: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
22 Trafficking Offense]

23 The Grand Jury further charges: T H A T

24 WILMER HARDEN,

25 defendant herein, on or about March 2, 2019, at 10:23 a.m., in session #1325, in the State and Eastern
26 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
27 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
28 violation of Title 21, United States Code, Section 843(b).

1 COUNT TWENTY-ONE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
2 Trafficking Offense]

3 The Grand Jury further charges: T H A T

4 TYRONE ANDERSON,

5 defendant herein, on or about August 14, 2018, at 11:49 a.m., in session #1275, in the State and Eastern
6 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
7 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
8 violation of Title 21, United States Code, Section 843(b).

9 COUNT TWENTY-TWO: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
10 Trafficking Offense]

11 The Grand Jury further charges: T H A T

12 JEROME ADAMS,

13 defendant herein, on or about February 22, 2019, at 8:12 a.m., in session #355, in the State and Eastern
14 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
15 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
16 violation of Title 21, United States Code, Section 843(b).

17 COUNT TWENTY-THREE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a
18 Drug Trafficking Offense]

19 The Grand Jury further charges: T H A T

20 JEROME ADAMS,

21 defendant herein, on or about March 1, 2019, at 4:01 p.m., in session #1252, in the State and Eastern
22 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
23 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
24 violation of Title 21, United States Code, Section 843(b).

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1 COUNT TWENTY-FOUR: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
2 Trafficking Offense]

3 The Grand Jury further charges: T H A T

4 CHARLES CARTER,

5 defendant herein, on or about March 4, 2019, at 7:31 p.m., in session #1768, in the State and Eastern
6 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
7 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
8 violation of Title 21, United States Code, Section 843(b).

9 COUNT TWENTY-FIVE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
10 Trafficking Offense]

11 The Grand Jury further charges: T H A T

12 CHARLES CARTER,

13 defendant herein, on or about March 14, 2019, at 9:44 a.m., in session #2817, in the State and Eastern
14 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
15 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
16 violation of Title 21, United States Code, Section 843(b).

17 COUNT TWENTY-SIX: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
18 Trafficking Offense]

19 The Grand Jury further charges: T H A T

20 BOBBY CONNER,

21 defendant herein, on or about February 26, 2019, at 5:30 p.m., in session #894, in the State and Eastern
22 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
23 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
24 violation of Title 21, United States Code, Section 843(b).

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1 COUNT TWENTY-SEVEN: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a
2 Drug Trafficking Offense]

3 The Grand Jury further charges: T H A T

4 BOBBY CONNER,
5 defendant herein, on or about March 6, 2019, at 2:59 p.m., in session #1950, in the State and Eastern
6 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
7 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
8 violation of Title 21, United States Code, Section 843(b).

9 COUNT TWENTY-EIGHT: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a
10 Drug Trafficking Offense]

11 The Grand Jury further charges: T H A T

12 DWIGHT HANEY,
13 defendant herein, on or about February 24, 2019, at 7:24 p.m., in session #659, in the State and Eastern
14 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
15 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
16 violation of Title 21, United States Code, Section 843(b).

17 COUNT TWENTY-NINE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
18 Trafficking Offense]

19 The Grand Jury further charges: T H A T

20 DWIGHT HANEY,
21 defendant herein, on or about March 2, 2019, at 2:20 p.m., in session #1382, in the State and Eastern
22 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
23 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
24 violation of Title 21, United States Code, Section 843(b).

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1 COUNT THIRTY: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
2 Trafficking Offense]

3 The Grand Jury further charges: T H A T

4 ARLINGTON CAINE,
5 defendant herein, on or about March 1, 2019, at 12:55 p.m., in session #1228, in the State and Eastern
6 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
7 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
8 violation of Title 21, United States Code, Section 843(b).

9 COUNT THIRTY-ONE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
10 Trafficking Offense]

11 The Grand Jury further charges: T H A T

12 ARLINGTON CAINE,
13 defendant herein, on or about March 8, 2019, at 12:04 p.m., in session #2171, in the State and Eastern
14 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
15 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
16 violation of Title 21, United States Code, Section 843(b).

17 COUNT THIRTY-TWO: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
18 Trafficking Offense]

19 The Grand Jury further charges: T H A T

20 MARK MARTIN,
21 defendant herein, on or about February 22, 2019, at 1:40 p.m., in session #398, in the State and Eastern
22 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
23 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
24 violation of Title 21, United States Code, Section 843(b).

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1 COUNT THIRTY-THREE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
2 Trafficking Offense]

3 The Grand Jury further charges: T H A T

4 MARK MARTIN,

5 defendant herein, on or about February 28, 2019, at 6:06 p.m., in session #1144, in the State and Eastern
6 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
7 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
8 violation of Title 21, United States Code, Section 843(b).

9 COUNT THIRTY-FOUR: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
10 Trafficking Offense]

11 The Grand Jury further charges: T H A T

12 ALEX WHITE,

13 defendant herein, on or about July 21, 2018, at 12:14 p.m., in session #264, in the State and Eastern
14 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
15 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
16 violation of Title 21, United States Code, Section 843(b).

17 COUNT THIRTY-FIVE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
18 Trafficking Offense]

19 The Grand Jury further charges: T H A T

20 ALEX WHITE,

21 defendant herein, on or about August 3, 2018, at 10:13 a.m., in session #769, in the State and Eastern
22 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
23 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
24 violation of Title 21, United States Code, Section 843(b).

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1 COUNT THIRTY-SIX: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
2 Trafficking Offense]

3 The Grand Jury further charges: T H A T

4 STEVEN HAMPTON,
5 defendant herein, on or about July 21, 2018, at 2:24 p.m., in session #273, in the State and Eastern
6 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
7 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
8 violation of Title 21, United States Code, Section 843(b).

9 COUNT THIRTY-SEVEN: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
10 Trafficking Offense]

11 The Grand Jury further charges: T H A T

12 STEVEN HAMPTON,
13 defendant herein, on or about August 11, 2018, at 6:20 p.m., in session #1165, in the State and Eastern
14 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
15 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
16 violation of Title 21, United States Code, Section 843(b).

17 COUNT THIRTY-EIGHT: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
18 Trafficking Offense]

19 The Grand Jury further charges: T H A T

20 ANDRE HELLAMS,
21 defendant herein, on or about July 17, 2018, at 10:57 a.m., in session #50, in the State and Eastern
22 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
23 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
24 violation of Title 21, United States Code, Section 843(b).

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1 COUNT THIRTY-NINE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
2 Trafficking Offense]

3 The Grand Jury further charges: T H A T

4 ANDRE HELLAMS,
5 defendant herein, on or about July 29, 2018, at 11:27 a.m., in session #583, in the State and Eastern
6 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
7 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
8 violation of Title 21, United States Code, Section 843(b).

9 COUNT FORTY: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
10 Trafficking Offense]

11 The Grand Jury further charges: T H A T

12 JASON TOLBERT,
13 defendant herein, on or about July 18, 2018, at 2:47 p.m., in session #97, in the State and Eastern
14 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
15 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
16 violation of Title 21, United States Code, Section 843(b).

17 COUNT FORTY-ONE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
18 Trafficking Offense]

19 The Grand Jury further charges: T H A T

20 JASON TOLBERT,
21 Defendant herein, on or about July 19, 2018, at 3:06 p.m., in session #151, in the State and Eastern
22 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
23 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
24 violation of Title 21, United States Code, Section 843(b).

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1 COUNT FORTY-TWO: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
2 Trafficking Offense]

3 The Grand Jury further charges: T H A T

4 MICHAEL HAMPTON,
5 defendant herein, on or about August 9, 2018, at 10:51 a.m., in session #965, in the State and Eastern
6 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
7 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
8 violation of Title 21, United States Code, Section 843(b).

9 COUNT FORTY-THREE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
10 Trafficking Offense]

11 The Grand Jury further charges: T H A T

12 MICHAEL HAMPTON,
13 defendant herein, on or about August 9, 2018, at 3:23 p.m., in session #987, in the State and Eastern
14 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
15 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
16 violation of Title 21, United States Code, Section 843(b).

17 COUNT FORTY-FOUR: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
18 Trafficking Offense]

19 The Grand Jury further charges: T H A T

20 YOVANNY ONTIVEROS,
21 defendant herein, on or about July 16, 2018, at 3:41 p.m., in session #21, in the State and Eastern
22 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
23 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
24 violation of Title 21, United States Code, Section 843(b). CUD
TWO

25 ///

26 ///

27 ///

28 ///

1 COUNT FORTY-FIVE: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
2 Trafficking Offense]

3 The Grand Jury further charges: T H A T

4 YOVANNY ONTIVEROS,

5 defendant herein, on or about July 23, 2018, at 12:07p.m., in session #347, in the State and Eastern
6 District of California, and elsewhere, did knowingly and intentionally use a communication facility in
7 committing, causing, and facilitating the commission of the felony conspiracy charged in Count One, in
8 violation of Title 21, United States Code, Section 843(b). (CLO)
Two

9 FORFEITURE ALLEGATION: [21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) –
10 Criminal Forfeiture]

11 1. Upon conviction of one or more of the offenses alleged in Counts One through Fourteen
12 and Eighteen through Forty-Five, defendants MAURICE BRYANT, WILMER HARDEN, aka Armani
13 Jackson, TYRONE ANDERSON, CHARLES CARTER, BOBBY CONNER, JEROME ADAMS,
14 DWIGHT HANEY, ARLINGTON CAINE, MARK MARTIN, ALEX WHITE, STEVEN HAMPTON,
15 ANDRE HELLAMS, JASON TOLBERT, and MICHAEL HAMPTON shall forfeit to the United States
16 pursuant to Title 21, United States Code, Section 853(a), the following property:

17 a. All right, title, and interest in any and all property involved in violations of Title
18 21, United States Code, Section 841(a)(1), or conspiracy to commit such offenses, for which the
19 defendants are convicted, and all property traceable to such property, including the following: all real or
20 personal property, which constitutes or is derived from proceeds obtained, directly or indirectly, as a
21 result of such offenses; and all property used, or intended to be used, in any manner or part to commit or
22 to facilitate the commission of the offenses.

23 b. A sum of money equal to the total amount of proceeds obtained as a result of the
24 offenses, or conspiracy to commit such offenses, for which the defendants are convicted.

25 2. Upon conviction of the offenses alleged in Counts Fifteen through Seventeen of this
26 Indictment, defendants MAURICE BRYANT, TYRONE ANDERSON, AND MICHAEL HAMPTON
27 shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28,
28 United States Code, Section 2461(c), any firearms and ammunition involved in or used in the knowing

1 commission of the offenses.

2 3. If any property subject to forfeiture, as a result of the offenses alleged in Counts One
3 through Forty-Four of this Indictment, for which the defendants are convicted:

- 4 a. cannot be located upon the exercise of due diligence;
5 b. has been transferred or sold to, or deposited with, a third party;
6 c. has been placed beyond the jurisdiction of the Court;
7 d. has been substantially diminished in value; or
8 e. has been commingled with other property which cannot be divided without
9 difficulty;

10 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28,
11 United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants, up to the
12 value of the property subject to forfeiture.

13
14 A TRUE BILL.

15 **/s/ Signature on file w/AUSA**

16
17 FOREPERSON

18 
19 PHILLIP A. TALBERT
Acting United States Attorney

No. 2:21-cr-00104 -MCE

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

MAURICE BRYANT,
WILMER HARDEN,
aka Armani Jackson.
TYRONE ANDERSON,
YOVANNY ONTIVEROS,
CHARLES CARTER,
BOBBY CONNER,
JEROME ADAMS,
DWIGHT HANEY,
ARLINGTON CAINE,
MARK MARTIN,
ALEX WHITE,
STEVEN HAMPTON,
ANDRE HELLAMS,
JASON TOLBERT, and
MICHAEL HAMPTON

I N D I C T M E N T

VIOLATION(S):

21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and to Possess with Intent to Distribute Cocaine and Cocaine Base;
21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Distribute and to Possess with Intent to Distribute Heroin;
21 U.S.C. § 841(a)(1) – Distribution of Cocaine (4 counts);
21 U.S.C. § 841(a)(1) – Distribution of Cocaine Base (3 counts);
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine (3 counts);
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine Base;
21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Heroin;
18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm (3 counts);
21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug Trafficking Offense (28 counts);
21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

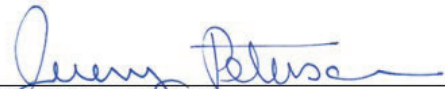
Foreman.

Filed in open court this _____ 3rd day

of June _____, A.D. 20 21 _____

_____/s/ N. Cannarozzi _____
Clerk.

Bail, \$ No process necessary as to all defendants.


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE

GPO 863 525

United States

v.

MAURICE BRYANT
WILMER HARDEN,
aka Armani Jackson.
TYRONE ANDERSON,
YOVANNY ONTIVEROS,
CHARLES CARTER,
BOBBY CONNER,
JEROME ADAMS,
DWIGHT HANEY,
ARLINGTON CAINE,
MARK MARTIN,
ALEX WHITE,
STEVEN HAMPTON,
ANDRE HELLAMS,
JASON TOLBERT, and
MICHAEL HAMPTON

Penalties for Indictment

COUNT 1: MAURICE BRYANT, WILMER HARDEN, TYRONE ANDERSON,
CHARLES CARTER, BOBBY CONNER, JEROME ADAMS, DWIGHT HANEY,
ARLINGTON CAINE, MARK MARTIN, ALEX WHITE, STEVEN HAMPTON, ANDRE
HELLAMS, JASON TOLBERT, and MICHAEL HAMPTON

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Distribute Over 5 kilograms
cocaine and over 280 grams cocaine base

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in
prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 2: **MAURICE BRYANT and YOVANNY ONTIVEROS**

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) - Conspiracy to Distribute and Possess with
Intent to Distribute Heroin

PENALTIES: A maximum of up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNTS 3 and 5: **TYRONE ANDERSON and ALEX WHITE**

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of Cocaine Base

PENALTIES: A maximum of up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNTS 4 and 6: **TYRONE ANDERSON and ALEX WHITE**

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of Cocaine

PENALTIES: A maximum of up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 7: **TYRONE ANDERSON and ALEX WHITE**

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 28 grams Cocaine Base

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40
years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 8: **MAURICE BRYANT and TYRONE ANDERSON**

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 500 grams Cocaine

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40
years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 9: **MAURICE BRYANT**

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of Cocaine

PENALTIES: A maximum of up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 10: **WILMER HARDEN**

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine

PENALTIES: A maximum of up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 11: **TYRONE ANDERSON and STEVEN HAMPTON**

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at Least 500 grams Cocaine

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 12: **TYRONE ANDERSON and STEVEN HAMPTON**

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at Least one kilogram Heroin

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 13: **TYRONE ANDERSON and STEVEN HAMPTON**

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at Least 28 grams Cocaine Base

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 14: **JASON TOLBERT**

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Cocaine

PENALTIES: A maximum of up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 15: **MAURICE BRYANT**

VIOLATION: 18 U.S.C. § 922(g) - Felon in possession of firearm

PENALTIES: Not more than 120 months,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 16: **TYRONE ANDERSON**

VIOLATION: 18 U.S.C. § 922(g) - Felon in possession of firearm

PENALTIES: Not more than 120 months,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 17: **MICHAEL HAMPTON**

VIOLATION: 18 U.S.C. § 922(g) - Felon in possession of firearm

PENALTIES: Not more than 120 months,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

PHONE COUNTS

COUNT 18: MAURICE BRYANT and WILMER HARDEN

COUNT 19: MAURICE BRYANT and TYRONE ANDERSON

COUNT 20: WILMER HARDEN

COUNT 21: TYRONE ANDERSON

COUNT 22: JEROME ADAMS

COUNT 23: JEROME ADAMS

COUNT 24: CHARLES CARTER

COUNT 25: CHARLES CARTER

COUNT 26: BOBBY CONNER

COUNT 27: BOBBY CONNER

COUNT 28: DWIGHT HANEY

COUNT 29: DWIGHT HANEY

COUNT 30: ARLINGTON CAINE

COUNT 31: ARLINGTON CAINE

COUNT 32: MARK MARTIN

COUNT 33: MARK MARTIN

COUNT 34: ALEX WHITE

COUNT 35: ALEX WHITE

COUNT 36: STEVEN HAMPTON

COUNT 37: STEVEN HAMPTON

COUNT 38: ANDRE HELLAMS

COUNT 39: ANDRE HELLAMS

COUNT 40: JASON TOLBERT

COUNT 41: JASON TOLBERT

COUNT 42: MICHAEL HAMPTON

COUNT 43: MICHAEL HAMPTON

COUNT 44: YOVANNY ONTIVEROS

COUNT 45: YOVANNY ONTIVEROS

VIOLATION: 21 U.S.C. § 843(b) - Use of Communication Facility to Facilitate a Drug Trafficking Offense

PENALTIES: Not more than 48 months,
Not more than \$100,000 fine or both
A one-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION: all Defendants

VIOLATION: 21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c) - Criminal Forfeiture

PENALTIES: As stated in the charging document