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IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION

UNITED STATES OF AMERICA

: CRIMINAL NO.

v.

: 5:17-CR- 22 - MTT

- (1) DELMA GODDARD, aka "SHUG," a/k/a "BIG HXMIE",
- (2) CHAD DELACY FREEMAN, aka "BIG BONE," a/k/a BONE LOCO,"
- (3) CYNTHIA BOLSTON SMITH, aka "CYNT,"
- (4) ALONZO BUTTS,
- (5) DEMETRIUS JAMEL HARDEN, aka "MEAT DAWG,"
- (6) DESHAWN RANSOM, aka "NEPHEW,"
- (7) ERIC DEMETRIUS VEAL,
- (8) EVERETTE HILL,
- (9) DERRICK MOSLEY, aka "D. MO,"
- (10) ISHMAWIYL ABDHAL DAVIS, aka "NY, NEW YORK,"
- (11) TRAVIS GLENN, aka "T, TG"
- (12) EDWARD ANTONIO BROWN, Jr., aka "PLUG,"
- (13) MONTAVIOUS JERMELL BARNES, aka "COOT, KOOT"
- (14) JEVON DESHAWN CLARK, aka "DUB, J. DUB"
- (15) DEMALE HAMPTON, aka "RAB, RABBIT"
- (16) DEMOND MONTERIO DENNIS, aka "DOUBLE DEUCE"

: VIOLATIONS:

- : 21 U.S.C. § 856(a)(1)
- : 21 U.S.C. § 846 i/c/w
- : 21 U.S.C. § 841(a)(1)
- : 21 U.S.C. § 841(b)(1)(A)(iii)
- : 21 U.S.C. § 841(b)(1)(A)(viii)
- : 21 U.S.C. § 841(b)(1)(B)(iii)
- : 21 U.S.C. § 841(b)(1)(B)(viii)
- : 21 U.S.C. § 841(b)(1)(C)
- : 18 U.S.C. § 924(c)(1)(A)
- : 18 U.S.C. § 922(g)
- : 18 U.S.C. § 922(j)
- : 18 U.S.C. § 2
- : 21 U.S.C. § 853
- : 18 U.S.C. § 924(d)(1)
- : 28 U.S.C. § 2461(c)

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT ONE

CONSPIRACY TO POSSESS WITH INTENT TO DISTRIBUTE COCAINE BASE

That from on or about January 1, 2015, to on or about January 1, 2017, the exact dates being unknown, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

- (1) DELMA GODDARD, aka "SHUG" a/k/a "BIG HXMIE,"
- (2) CHAD DELACY FREEMAN, aka "BIG BONE" a/k/a "BONE LOCO,"

- (3) CYNTHIA BOLSTON SMITH, aka "CYNT,"
(4) ALONZO BUTTS,
(5) DEMETRIUS JAMEL HARDEN, aka "MEAT DAWG,"
(6) DESHAWN RANSOM, aka "NEPHEW,"
(7) ERIC DEMETRIUS VEAL,
(8) EVERETTE HILL,
(9) DERRICK MOSLEY, aka "D. MO,"
(10) ISHMANHYL ABDHAL DAVIS, aka "NY, NEW YORK,"
(11) TRAVIS GLEN, aka "T, TG,"
(12) ANTONIO BROWN, aka "PLUG,"
(13) MONTAVIOUS JERMELL BARNES, aka "COOT, KOOT,"
(14) JEVON DESHAWN CLARK, aka "DUB, J. DUB,"
(15) DEMALE HAMPTON, aka "RAB, RABBIT,"
and
(16) DEMOND MONTERIO DENNIS, aka "DOUBLE DEUCE"

did conspire with each other and with others, both known and unknown to the Grand Jury, to knowingly and intentionally distribute a Schedule II controlled substance, to-wit: more than 280 grams of cocaine base, also known as crack cocaine, all in violation of Title 21, United States Code, Section 846, i/c/w Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(A)(iii).

COUNT TWO
CONSPIRACY TO DISTRIBUTE METHAMPHETAMINE

That from on or about January 1, 2015, to on or about January 1, 2017, the exact dates being unknown, in the Macon Division of the Middle District of Georgia, and elsewhere within the jurisdiction of this Court,

- (1) DELMA GODDARD, aka "SHUG" a/k/a "BIG HXMIE"
and
(2) CHAD DELACY FREEMAN, aka "BIG BONE" a/k/a "BONE LOCO,"

did conspire with each other and with others, both known and unknown to the Grand Jury, to knowingly and intentionally conspire to distribute a Schedule II controlled substance, to-wit: more

than fifty (50) grams of methamphetamine; all in violation of Title 21, United States Code, Section 846, i/c/w Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii).

COUNT THREE
DISTRIBUTION OF COCAINE BASE

That on or about September 23, 2015, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE”
and
CHAD DELACY FREEMAN a/k/a “big bone” a/k/a “BONE LOCO,”

aided and abetted by each other and others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOUR
DISTRIBUTION OF COCAINE BASE

That on or about October 2, 2015, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FIVE
DISTRIBUTION OF COCAINE BASE

That on or about October 26, 2015, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SIX
DISTRIBUTION OF COCAINE BASE

That on or about November 12, 2015, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT SEVEN
DISTRIBUTION OF METHAMPHETAMINE

That on or about November 12, 2015, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than five (5) grams of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii) and Title 18, United States Code, Section 2.

COUNT EIGHT
DISTRIBUTION OF METHAMPHETAMINE

That on or about November 30, 2015, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than fifty (50) grams of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii) and Title 18, United States Code, Section 2.

COUNT NINE
DISTRIBUTION OF COCAINE BASE

That on or about November 30, 2015, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TEN
POSSESSION OF A FIREARM BY A CONVICTED FELON

That on or about November 30, 2015, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce, a firearm, that is, a Colt,

model Combat Commander, .45 caliber semi-automatic pistol, serial number 70BS73628, said firearm having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT ELEVEN
POSSESSING OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING
CRIME

That on or about November 30, 2015, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others, did knowingly possess a firearm, that is, a Colt Combat Commander, .45 caliber semi-automatic pistol, serial number 70BS73628, in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is: the offense alleged in Count Eight, Distribution of Methamphetamine, and Count Nine, Distribution of Cocaine Base, also known as crack cocaine, in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT TWELVE
DISTRIBUTION OF COCAINE BASE

That on or about December 11, 2015, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTEEN
DISTRIBUTION OF METHAMPHETAMINE

That on or about January 20, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than five (5) grams of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii) and Title 18, United States Code, Section 2.

COUNT FOURTEEN
POSSESSION OF FIREARMS BY A CONVICTED FELON

That on or about January 20, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce, firearms, to wit:

- (1) a Glock, model 22, .40 caliber semi-automatic pistol, serial number RNA730,
- (2) a Taurus, model PT740 SLIM, .40 caliber semi-automatic pistol, serial number SGN17274,
- (3) a SCCY, model CPX-2, .9mm caliber semi-automatic pistol, serial number 210618 and
- (4) a Smith and Wesson, model Bodyguard, .380 caliber semi-automatic pistol, serial number KCE5056, said firearms having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT FIFTEEN
POSSESSION OF FIREARMS IN FURTHERANCE OF A DRUG TRAFFICKING
CRIME

That on or about January 20, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others, did knowingly possess firearms, to wit:

(1) a Glock, model 22, .40 caliber semi-automatic pistol, serial number RNA730,

(2) a Taurus, model PT740 SLIM, .40 caliber semi-automatic pistol, serial number SGN17274,

(3) a SCCY, model CPX-2, .9mm caliber semi-automatic pistol, serial number 210618 and

(4) a Smith and Wesson, model Bodyguard, .380 caliber semi-automatic pistol, serial number KCE5056,

in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is: the offense alleged in Count Thirteen, Distribution of Methamphetamine, in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT SIXTEEN
DISTRIBUTION OF METHAMPHETAMINE

That on or about February 4, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE”

and

EDWARD ANTONIO BROWN, Jr., a/k/a “PLUG,”

aided and abetted by each other and others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than five (5) grams of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN
DISTRIBUTION OF COCAINE BASE

That on or about February 4, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE”
and
EDWARD ANTONIO BROWN, Jr., a/k/a “PLUG,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than twenty-eight (28) grams of cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(iii) and Title 18, United States Code, Section 2.

COUNT EIGHTEEN
DISTRIBUTION OF COCAINE BASE

That on or about February 18, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than twenty-eight (28) grams of cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(iii) and Title 18, United States Code, Section 2.

COUNT NINETEEN
POSSESSION OF A FIREARM BY A CONVICTED FELON

That on or about February 26, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce, a firearm, that is, a Norinco,

model SKS, 7.62 caliber, semi-automatic rifle, serial number 24015078B, said firearm having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWENTY
DISTRIBUTION OF METHAMPHETAMINE

That on or about March 10, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than five (5) grams of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii) and Title 18, United States Code, Section 2.

COUNT TWENTY-ONE
DISTRIBUTION OF COCAINE BASE

That on or about March 17, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO
POSSESSION OF A FIREARM BY A CONVICTED FELON

That on or about March 17, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce, a firearm, that is, a Vidalia

Police Supply, model VPS-15, 7.62 caliber semi-automatic rifle, serial number VPS00513, said firearm having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWENTY-THREE
POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING
CRIME

That on or about March 17, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

did knowingly and intentionally possess a firearm, that is, a Vidalia Police Supply, model VPS-15, 7.62 caliber semi-automatic rifle, serial number VPS00513 in furtherance of, a drug trafficking crime for which he may be prosecuted in a court of the United States, that is: the offense alleged in Count Twenty-One, Distribution of Cocaine Base also known as crack cocaine, in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR
DISTRIBUTION OF COCAINE BASE

That on or about May 6, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base also known as crack cocaine, in an amount in excess of twenty eight (28) grams, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(iii) and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE
DISTRIBUTION OF COCAINE BASE

That on or about June 16, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in an amount in excess of twenty eight (28) grams, in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(B)(iii) and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX
POSSESSION OF FIREARMS BY A CONVICTED FELON

That on or about June 16, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”
DESHAWN RANSOM a/k/a “NEPHEW,”

and

DEMETRIUS JAMEL HARDEN a/k/a “MEAT DAWG,”

aided and abetted by each other and having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce, firearms, to wit:

(1) a Springfield Armory, Model XD40, .40 caliber semi-automatic pistol, serial number US587900,

(2) a Smith and Wesson, Model SW40 VE, .40 caliber semi-automatic pistol, serial number PDM8906 and

(3) a Norinco, model SKS, 7.62 semi-automatic rifle, serial number 1614535J,

said firearms having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2) and Title 18, United States Code, Section 2.

COUNT TWENTY-SEVEN
DISTRIBUTION OF METHAMPHETAMINE

That on or about June 23, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than five (5) grams of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii) and Title 18, United States Code, Section 2.

COUNT TWENTY-EIGHT
DISTRIBUTION OF HEROIN

That on or about July 21, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”
and
EVERETTE HILL

aided and abetted by each other and by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule I controlled substance, to wit: a substance and mixture containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT TWENTY-NINE
POSSESSION OF A FIREARM BY A CONVICTED FELON

That on or about July 21, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”
and
EVERETTE HILL,

having been convicted of a crime punishable by imprisonment for a term exceeding one year, aided and abetted by each other and by others, did knowingly possess in and affecting interstate and foreign commerce, a firearm, that is, a Ruger, model LCP, .380 caliber pistol, serial number

371126263, said firearm having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT THIRTY
POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING
CRIME

That on or about July 21, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”
and
EVERETTE HILL,

aided and abetted by each other, did knowingly possess a firearm, that is, a Ruger, model LCP, .380 caliber pistol, serial number 371126263, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is: the offense alleged in Count Twenty-Eight, Distribution of Heroin, in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT THIRTY-ONE
DISTRIBUTION OF HEROIN

That on or about September 2, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a “SHUG” a/k/a “BIG HXMIE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule I controlled substance, to wit: a substance and mixture containing heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY-TWO
DISTRIBUTION OF COCAINE BASE

That on or about September 2, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a "SHUG" a/k/a "BIG HXMIE,"

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY-THREE
POSSESSION OF A FIREARM BY A CONVICTED FELON

That on or about September 2, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a "SHUG" a/k/a "BIG HXMIE,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce, a firearm, that is, a Smith and Wesson, model SW9VE, .9mm caliber pistol, serial number RCA3120, said firearm having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT THIRTY-FOUR
POSSESSION OF A FIREARM IN FURTHERANCE OF A DRUG TRAFFICKING
CRIME

That on or about September 2, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a "SHUG" a/k/a "BIG HXMIE,"

did knowingly possess a firearm, that is, a Smith and Wesson, model SW9VE, .9mm caliber pistol, serial number RCA3120, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is: the offense alleged in Count Thirty-Two, Distribution of Heroin, in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT THIRTY-FIVE
DISTRIBUTION OF COCAINE BASE

That on or about November 2, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a "SHUG" a/k/a "BIG HXMIE,"

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY-SIX
POSSESSION OF FIREARMS BY A CONVICTED FELON

That on or about November 2, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a "SHUG" a/k/a "BIG HXMIE,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate and foreign commerce, firearms, to wit:

- (1) a Glock, model 23, .40 caliber semi-automatic pistol, serial number ZVC384,
- (2) a Glock, model 22, .40 caliber semi-automatic pistol, serial number EGC536US,
- (3) a Smith and Wesson, model 64, .38 caliber revolver, serial number BPT3435 and

(4) a Smith and Wesson, model SW40VE, .40 caliber semi-automatic pistol, serial number DVJ6771,
said firearms having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT THIRTY-SEVEN
POSSESSION OF FIREARMS IN FURTHERANCE OF A DRUG TRAFFICKING
CRIME

That on or about November 2, 2016, in the Macon Division of the Middle District of Georgia,

DELMA GODDARD a/k/a "SHUG" a/k/a "BIG HXMIE,"

did knowingly possess firearms, to wit:

- (1) a Glock, model 23, .40 caliber semi-automatic pistol, serial number ZVC384,
- (2) a Glock, model 22, .40 caliber semi-automatic pistol, serial number EGC536US,
- (3) a Smith and Wesson, model 64, .38 caliber revolver, serial number BPT3435 and
- (4) a Smith and Wesson, model VE, .40 caliber semi-automatic pistol, serial number DVJ6771,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is: the offense alleged in Count Thirty-Five, Distribution of Cocaine Base, in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT THIRTY-EIGHT
DISTRIBUTION OF COCAINE BASE

That on or about February 5, 2016, in the Macon Division of the Middle District of Georgia,

CHAD DELACY FREEMAN a/k/a "BIG BONE" a/k/a "BONE LOCO,"

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as

crack cocaine, in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT THIRTY-NINE
DISTRIBUTION OF METHAMPHETAMINE

That on or about August 24, 2016, in the Macon Division of the Middle District of Georgia,
CHAD DELACY FREEMAN a/k/a “BIG BONE” a/k/a “BONE LOCO,”
aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: substance and mixture containing methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FORTY
DISTRIBUTION OF METHAMPHETAMINE

That on or about September 9, 2016, in the Macon Division of the Middle District of Georgia,
CHAD DELACY FREEMAN a/k/a “BIG BONE” a/k/a “BONE LOCO,”
aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FORTY-ONE
DISTRIBUTION OF METHAMPHETAMINE

That on or about October 25, 2016, in the Macon Division of the Middle District of Georgia,
CHAD DELACY FREEMAN a/k/a “BIG BONE” a/k/a “BONE LOCO,”
and
DEMALE HAMPTON a/k/a “RAB,” a/k/a “RABBIT,”

aided and abetted by each other and by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than five (5) grams of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii) and Title 18, United States Code, Section 2.

COUNT FORTY-TWO
DISTRIBUTION OF METHAMPHETAMINE

That on or about November 18, 2016, in the Macon Division of the Middle District of Georgia,

CHAD DELACY FREEMAN a/k/a “BIG BONE” a/k/a “BONE LOCO,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than five (5) grams of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii) and Title 18, United States Code, Section 2.

COUNT FORTY-THREE
MAINTAINING A DRUG PREMISES

That from on or about September 1, 2015, to on or about January 1, 2017, in the Macon Division of the Middle District of Georgia, the exact dates being unknown,

CYNTHIA BOLSTON SMITH a/k/a “CYNT,”

aided and abetted by and others both known and unknown to the Grand Jury, did knowingly and intentionally use and maintain a residence, namely, 110 Second Street, Milledgeville, Baldwin County, Georgia, for the purpose of manufacturing and distributing a controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Section 856(a)(1) and 856(b) and Title 18, United States Code, Section 2.

COUNT FORTY-FOUR
DISTRIBUTION OF METHAMPHETAMINE

That on or about August 19, 2016, in the Macon Division of the Middle District of Georgia,

ALONZO BUTTS

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FORTY-FIVE
DISTRIBUTION OF METHAMPHETAMINE

That on or about August 25, 2016, in the Macon Division of the Middle District of Georgia,

ALONZO BUTTS

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: more than five (5) grams of methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(B)(viii) and Title 18, United States Code, Section 2.

COUNT FORTY-SIX
DISTRIBUTION OF METHAMPHETAMINE

That on or about August 25, 2016, in the Macon Division of the Middle District of Georgia,

ALONZO BUTTS

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and distribute a Schedule II controlled substance, to wit: a substance and mixture containing methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FORTY-SEVEN
POSSESSION OF METHAMPHETAMINE WITH INTENT TO DISTRIBUTE

That on or about August 25, 2016, in the Macon Division of the Middle District of Georgia,

ALONZO BUTTS

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a Schedule II controlled substance, to wit: a substance and mixture containing methamphetamine in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FORTY-EIGHT
DISTRIBUTION OF METHAMPHETAMINE

That on or about June 9, 2016, in the Macon Division of the Middle District of Georgia,

DESHAWN RANSOM a/k/a “NEPHEW,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: a substance and mixture containing methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FORTY-NINE
DISTRIBUTION OF METHAMPHETAMINE

That on or about July 12, 2016, in the Macon Division of the Middle District of Georgia,

DESHAWN RANSOM a/k/a “NEPHEW,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: a substance and mixture containing methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FIFTY
POSSESSION OF COCAINE BASE WITH INTENT TO DISTRIBUTE

That on or about January 20, 2016, in the Macon Division of the Middle District of Georgia,

DAMOND DENNIS a/k/a “DOUBLE DEUCE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally possess with the intent to distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT FIFTY-ONE
DISTRIBUTION OF COCAINE BASE

That on or about September 2, 2016, in the Macon Division of the Middle District of Georgia,

DAMOND DENNIS a/k/a “DOUBLE DEUCE,”

aided and abetted by others both known and unknown to the Grand Jury, did knowingly and intentionally distribute a Schedule II controlled substance, to wit: cocaine base, also known as crack cocaine, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

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

1. The allegations contained in Counts One through Fifty-One of this Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeitures to the United States of America, pursuant to the provisions of Title 21, United States Code, Section 853, and/or Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense(s) in violation of Title 21, United States Code, Section 846, in connection with Sections 841(a)(1) and 841(b)(1)(A)(iii) set forth in Count One; Title 21, United States Code, Section 846, in connection with Sections 841(a)(1) and (b)(1)(A)(iii) set forth in Count Two; Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) set forth in Counts Three through Six, Nine, Twelve, Twenty-One, Thirty-One, Thirty-Two, Thirty-Five, Thirty-Eight through Forty, Forty-Four, and Forty-Six through Fifty-One; Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii) set forth in Counts Seven, Thirteen, Sixteen, Twenty, Twenty-Seven, Forty-One, Forty-Two, and Forty-Five; Title 21, United States Code, Sections 841(a)(1) and 841(h)(1)(A)(viii) set forth in Count Eight; Title 18, United States Code, Sections 922(g)(1) and 924(a)(2) set forth in Counts Ten, Fourteen, Nineteen, Twenty-Two, Twenty-Six, Twenty-Nine, Thirty-Three, and Thirty-Six; Title 18, United States Code, Section 924(c)(1)(A) set forth in Counts Eleven, Fifteen, Twenty-Three, Thirty, Thirty-Four, and Thirty-Seven; Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(B)(iii) set forth in Counts Seventeen and Eighteen; and/or Title 21, United States Code, Section 856(a)(1) and 856(b) set forth in Count Forty-Three of this Indictment, the defendant(s),

- (1) DELMA GODDARD, aka "SHUG" a/k/a "BIG HXMIE,"**
- (2) CHAD DELACY FREEMAN, aka "BIG BONE" a/k/a "BONE LOCO,"**
- (3) CYNTHIA BOLSTON SMITH, aka "CYNT,"**
- (4) ALONZO BUTTS,**
- (5) DEMETRIUS JAMEL HARDEN, aka "MEAT DAWG,"**
- (6) DESHAWN RANSOM, aka "NEPHEW,"**
- (7) ERIC DEMETRIUS VEAL,**
- (8) EVERETTE HILL,**
- (9) DERRICK MOSLEY, aka "D. MO,"**
- (10) ISHMANHYL ABDHAL DAVIS, aka "NY, NEW YORK,"**
- (11) TRAVIS GLEN, aka "T, TG,"**
- (12) ANTONIO BROWN, aka "PLUG,"**
- (13) MONTAVIOUS JERMELL BARNES, aka "COOT, KOOT,"**
- (14) JEVON DESHAWN CLARK, aka "DUB, J. DUB,"**
- (15) DEMALE HAMPTON, aka "RAB, RABBIT,"**

and

(16) DEMOND MONTERIO DENNIS, aka "DOUBLE DEUCE"

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly and indirectly, as a result of such offense(s), and any property, real or personal, used, or intended to be used in any manner or part to commit, or to facilitate the commission of, the offense(s); and/or, any firearms and ammunition involved in the commission of the offense(s), pursuant to Title 18, United States Code, Section 924(d)(1), in conjunction with Title 28, United States Code, Section 2461(c).

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon exercise of due diligence;
- (b) has been transferred, sold to or deposited with, a third person;
- (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 subdivided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), through Title 18, United States Code, Section 924(d)(1).

All pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL.

s/ Foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

PRESENTED BY:
G.F. PETERMAN, III
UNITED STATES ATTORNEY

Kimberly S Easterling
KIMBERLY S EASTERLING
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 11 day of
May A.D. 20 17.

.....
C. P. Huffman
Deputy Clerk