

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

UNITED STATES OF AMERICA

v.

**SEALED
INDICTMENT**

CHARLES ZACHARIAH SINDYLEK

a/k/a "Zack"

BRANDON CRAIG REMEYER

SANFORD EUGENE JOHNSON III

a/k/a "Bubba"

WILLIAM BRETT BROWNELL

a/k/a "Ginger"

WILLIAM EZRA BROWNELL

DAVID DELGIACCO

ANDREW PAUL MARCELONIS

a/k/a "Slim"

and

STEVEN RYAN MICHAEL SHOLLY

3:17cr74/RV

THE GRAND JURY CHARGES:

COUNT ONE

Between on or about January 1, 2014, and on or about June 20, 2017, in the
Northern District of Florida and elsewhere, the defendants,

CHARLES ZACHARIAH SINDYLEK,

a/k/a "Zack,"

BRANDON CRAIG REMEYER,

SANFORD EUGENE JOHNSON III,

a/k/a "Bubba,"

WILLIAM BRETT BROWNELL,

a/k/a "Ginger,"

Returned in open court pursuant to Rule 6(f)

July 18, 2017
Date

Elizabeth M. Perry

United States Magistrate Judge

**WILLIAM EZRA BROWNELL,
DAVID DELGIACCO,
ANDREW PAUL MARCELONIS,
a/k/a “Slim,”
and
STEVEN RYAN MICHAEL SHOLLY,**

did knowingly and willfully combine, conspire, confederate, and agree together and with other persons to distribute and possess with intent to distribute a controlled substance, and this offense involved marijuana, in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substance Involved in the Conspiracy

With respect to defendants **CHARLES ZACHARIAH SINDYLEK, a/k/a “Zack,” BRANDON CRAIG REMEYER, SANFORD EUGENE JOHNSON III, a/k/a “Bubba,” and WILLIAM BRETT BROWNELL, a/k/a “Ginger,”** the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other coconspirators reasonably foreseeable to them, is 100 kilograms or more of a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B)(vii).

With respect to defendants **WILLIAM EZRA BROWNELL, DAVID DELGIACCO, ANDREW PAUL MARCELONIS, a/k/a “Slim,” and STEVEN RYAN MICHAEL SHOLLY,** the amount involved in the conspiracy

attributable to them is a quantity of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(C).

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

COUNT TWO

Between on or about January 1, 2014, and on or about June 20, 2017, in the Northern District of Florida and elsewhere, the defendants,

**CHARLES ZACHARIAH SINDYLEK,
a/k/a “Zack,”
BRANDON CRAIG REMEYER,
SANFORD EUGENE JOHNSON III,
a/k/a “Bubba,”
WILLIAM BRETT BROWNELL,
a/k/a “Ginger,”
WILLIAM EZRA BROWNELL,
DAVID DELGIACCO,
and
ANDREW PAUL MARCELONIS,
a/k/a “Slim,”**

did knowingly combine, conspire, confederate, and agree together and with other persons to conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, that is, the interstate transfer of monetary instruments in the form of United States currency within a financial institution, involving funds that were proceeds of a specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a) and 846, and that the defendants knew to be

the proceeds of some form of unlawful activity, with the intent to promote the carrying on of the specified unlawful activity, and knowing that these transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

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

CONTROLLED SUBSTANCE FORFEITURE

The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

From their engagement in the violation alleged in Count One, punishable by imprisonment for more than one year, the defendants,

**CHARLES ZACHARIAH SINDYLEK,
a/k/a “Zack,”
BRANDON CRAIG REMEYER,
SANFORD EUGENE JOHNSON III,
a/k/a “Bubba,”
WILLIAM BRETT BROWNELL,
a/k/a “Ginger,”
WILLIAM EZRA BROWNELL,
DAVID DELGIACCO,
ANDREW PAUL MARCELONIS,
a/k/a “Slim,”
and
STEVEN RYAN MICHAEL SHOLLY,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853(a)(1) and 853(a)(2), all of their interest in:

A. Property constituting or derived from any proceeds the defendants obtained directly or indirectly as the result of such violation.

B. Property used in any manner or part to commit or to facilitate the commission of such violation.

The property to be forfeited includes, but is not limited to, the following:

- i. approximately \$18,683.00 in United States currency seized from the residence of **STEVEN RYAN MICHAEL SHOLLY**; and
- ii. approximately \$25,440.00 in United States currency seized from the residence of **SANFORD EUGENE JOHNSON III, a/k/a "Bubba."**

If any of the property subject to forfeiture as a result of any act or omission of the defendants:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third person;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or

- v. has been commingled with other property that cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

MONEY LAUNDERING FORFEITURE

The allegations contained in Count Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1). From the defendants' engagement in the violation alleged in Count Two of this Indictment, the defendants,

**CHARLES ZACHARIAH SINDYLEK,
a/k/a "Zack,"
BRANDON CRAIG REMEYER,
SANFORD EUGENE JOHNSON III,
a/k/a "Bubba,"
WILLIAM BRETT BROWNELL,
a/k/a "Ginger,"
WILLIAM EZRA BROWNELL,
DAVID DELGIACCO,
and
ANDREW PAUL MARCELONIS,
a/k/a "Slim,"**

shall forfeit to the United States of America any and all of the defendants' right, title, and interest in any property, real and personal, involved in such offense, and any property traceable to such property.

The property to be forfeited includes, but is not limited to, the following:

- i. approximately \$18,683.00 in United States currency seized from the residence of **STEVEN RYAN MICHAEL SHOLLY**; and
- ii. approximately \$25,440.00 in United States currency seized from the residence of **SANFORD EUGENE JOHNSON III, a/k/a "Bubba."**

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- i. cannot be located upon the exercise of due diligence;
- ii. has been transferred or sold to, or deposited with, a third person;
- iii. has been placed beyond the jurisdiction of this Court;
- iv. has been substantially diminished in value; or
- v. has been commingled with other property that cannot be divided without difficulty,


it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

A TRUE BILL:



FOREPERSON

18 July 2017
DATE


CHRISTOPHER P. CANOVA
United States Attorney


ALICIA H. KIM
Assistant United States Attorney