ORIGINAL



CLERK US DISTRICT COURT NORTHERN DIST. OF TX FILED

2017 NOV -8 AM 11: 37

UNITED STATES OF AMERICA

v.

NYKEES EARL CAMPBELL (01)

a.k.a. "#1"

a.k.a. "NaNa"

a.k.a. "Ny-Nizzle"

AVERY WAYNE DAVIS (02)

a.k.a. "AD"

DEMOND LYNN (03)

a.k.a. "Slime"

KEARWON DMARGO MAGEE (04)

RODNEY EUGENE ROQUEMORE (05)

a.k.a. "Turbo"

LAWRENCE WILLIAMS (06)

a.k.a. "One Eye"

KRIS LANDON GREENE (07)

a.k.a. "#5"

BRYSON DEONTAE BRIGHT (08)

RALPH EARL CAMPBELL III (09)

GARRY DEWAYNE NEWTON (10)

a.k.a. "#4"

STACY MOORE (11)

a.k.a. "Jay"

MARCUS JACKSON (12)

a.k.a. "Marty-Mar"

MITCHELL HOLMES (13)

CEDRIC CHARLES WITCHER (14)

FILED UNDER SEAL

- AA

NO.

3-17 CR-567-M

SEALED INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Possess With Intent to Distribute a Schedule II Controlled Substance (Violation of 21 U.S.C. § 846)

Beginning in or about January 2016, the exact date being unknown to the Grand Jury, and continuing thereafter until the return of this indictment, in the Dallas Division of the Northern District of Texas and elsewhere. Nvkees Earl Campbell a.k.a. "NaNa." a.k.a. "Ny-Nizzle," a.k.a. "#1", Avery Wayne Davis a.k.a. "AD," Demond Lynn a.k.a. "Slime," Kearwon Dmargo Magee, Rodney Eugene Roquemore a.k.a. "Turbo," Lawrence Williams a.k.a. "One Eye," Kris Landon Green a.k.a. "#5", Bryson Deontae Bright, Ralph Earl Campbell, III, Garry Dewayne Newton a.k.a. "#4", Stacy Moore a.k.a. "Jay," Marcus Jackson a.k.a. "Marty-Mar," Mitchell Holmes, Cedric Charles Witcher and others both known and unknown to the Grand Jury, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, with each other and with other persons both known and unknown, to commit certain offenses against the United States, to-wit: to possess with the intent to distribute and to distribute 28 grams or more of a mixture or substance containing a detectible amount of cocaine base, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(B)(iii) and to possess with the intent to distribute and to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and 841(b)(1)(B)(ii).

Manner and Means of the Conspiracy

During the conspiracy as alleged herein, it was part of the conspiracy that one or more of the defendants and coconspirators would:

- Promote and enhance the activities of a criminal street gang known as
 "YNB Stretchgang" and the activities of the gang's members and associates, in Dallas,
 Texas, and elsewhere;
- 2. Promote and enhance the activities of a Dallas-based drug distribution group known as "2600 Money Block" and the activities of the group's members and associates, in Dallas, Texas, and elsewhere;
- 3. Arrange for the acquisition of cocaine, cocaine base (crack cocaine), marijuana, methamphetamine and ecstasy/OxyContin pills ("XOs") from both known and unknown sources in Dallas, Texas and elsewhere;
- 4. Utilize an area within Dallas, Texas referred to as "2600 Money Block" (4300-4500 block of Maple Avenue) to cut, package and distribute quantities of cocaine, cocaine base (crack cocaine), marijuana, methamphetamine and ecstasy/OxyContin pills ("XOs") to numerous customers;
- 5. Act as intermediaries and brokers and negotiate the acquisition, price, delivery and payment for quantities of cocaine, cocaine base (crack cocaine), marijuana, methamphetamine, ecstasy/OxyContin pills ("XOs") and firearms;
- 6. Utilize cellular telephones to discuss, negotiate and facilitate drug and firearms transactions:
- 7. Act as "look-outs" or engage in counter-surveillance when drug transactions were occurring to become aware of any police presence; and
- 8. Use proceeds acquired from the sale of drugs to produce and appear in music videos glorifying acts of violence and promoting the lifestyle of "YNB Stretchgang" members and associates.

Case 3:17-cr-00567-M Document 1 Filed 11/08/17 Page 4 of 33 PageID 4 All in violation of 21 U.S.C. § 846, the penalty for which is found at 21 U.S.C. § 841(b)(1).

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Count Two

Possession of a Firearm by a User of a Controlled Substance (Violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2))

On or about September 18, 2016, in the Dallas Division of the Northern District of Texas and elsewhere, the defendant, Nykees Earl Campbell a.k.a. "NaNa," a.k.a. "Ny-Nizzle," a.k.a. "#1" being an unlawful user of a controlled substance, namely marijuana, did knowingly possess in and affecting interstate commerce the following firearm: 9mm Smith & Wesson handgun bearing serial number FXF1519.

In violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2).

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Count Three Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about September 14, 2017, in the Dallas Division of the Northern District of Texas, **Avery Wayne Davis a.k.a. "AD,"** defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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Count Four Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about July 7, 2017, in the Dallas Division of the Northern District of Texas, **Avery Wayne Davis a.k.a. "AD,"** defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

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Count Five Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about April 13, 2017, in the Dallas Division of the Northern District of Texas, **Avery Wayne Davis a.k.a. "AD,"** defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

Count Six Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about May 9, 2017, in the Dallas Division of the Northern District of Texas, Avery Wayne Davis a.k.a. "AD," defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

Count Seven Distribution of a Schedule II Controlled Substance

(Violation of 21 U.S.C. § 841(b)(1)(C))

On or about May 12, 2017, in the Dallas Division of the Northern District of Texas, Avery Wayne Davis a.k.a. "AD," and Rodney Eugene Roquemore a.k.a. "Turbo," defendants herein, aided and abetted by each other, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

Count Eight Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about May 12, 2017, in the Dallas Division of the Northern District of Texas, **Avery Wayne Davis a.k.a. "AD,"** defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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Count Nine Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about June 1, 2017, in the Dallas Division of the Northern District of Texas, Avery Wayne Davis a.k.a. "AD," defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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Count Ten Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about August 1, 2017, in the Dallas Division of the Northern District of Texas, **Demond Lynn a.k.a. "Slime,"** defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

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Count Eleven Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about October 12, 2017, in the Dallas Division of the Northern District of Texas, **Demond Lynn a.k.a. "Slime,"** defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

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Count Twelve Felon in Possession of a Firearm (Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about August 15, 2017, in the Dallas Division of the Northern District of Texas, the defendant, **Demond Lynn a.k.a.** "Slime," having being convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess in and affecting interstate and foreign commerce a firearm, namely a .380 semi-automatic handgun bearing serial number FS103504.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

Count Thirteen Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about July 11, 2017, in the Dallas Division of the Northern District of Texas, **Kearwon Dmargo Magee**, defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

Count Fourteen Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about July 7, 2017, in the Dallas Division of the Northern District of Texas, Lawrence Williams a.k.a. "One Eye," defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

Count Fifteen Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about September 1, 2017, in the Dallas Division of the Northern District of Texas, **Kris Landon Greene a.k.a.** "#5", defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

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Count Sixteen

Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about October 3, 2017, in the Dallas Division of the Northern District of Texas, **Rodney Eugene Roquemore a.k.a.** "**Turbo,**" defendant herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

Count Seventeen Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about October 5, 2017, in the Dallas Division of the Northern District of Texas, **Bryson Deontae Bright**, defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

Count Eighteen Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about October 5, 2017, in the Dallas Division of the Northern District of Texas, **Ralph Earl Campbell, III**, defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

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Count Nineteen

Possession with Intent to Distribute a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about July 18, 2017, in the Dallas Division of the Northern District of Texas, the defendant, **Garry Dewayne Newton a.k.a.** "#4", knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

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Count Twenty

Possession of a Firearm by a User of a Controlled Substance (Violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2))

On or about July 18, 2017, in the Dallas Division of the Northern District of Texas, the defendant, **Garry Dewayne Newton a.k.a.** "#4", being an unlawful user of a controlled substance, namely marijuana, did knowingly possess in and affecting interstate commerce the following firearm: 9mm Taurus handgun bearing serial number TTB81813.

In violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2).

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Count Twenty-One

Possession of a Firearm in Furtherance of a Drug Trafficking Crime (Violation of 18 U.S.C. § 924(c))

On or about July 18, 2017, in the Dallas Division of the Northern District of Texas, **Garry Dewayne Newton a.k.a.** "#4", defendant herein, knowingly carried and possessed a firearm during and in relation to and in the furtherance of a drug trafficking crime, for which he may be prosecuted in a court of the United States, that is the drug offense listed in Count Nineteen of this indictment.

In violation of 18 U.S.C. § 924(c).

Count Twenty-Two Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about October 5, 2017, in the Dallas Division of the Northern District of Texas, **Cedric Charles Witcher**, defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

Count Twenty-Three Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about August 25, 2017, in the Dallas Division of the Northern District of Texas, Marcus Jackson a.k.a. "Marty-Mar," and Mitchell Holmes, defendants herein, aided and abetted by each other, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

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<u>Count Twenty-Four</u> Possession with Intent to Distribute a Schedule II Controlled Substance

(Violation of 21 U.S.C. § 841(b)(1)(C))

On or about October 23, 2017, in the Dallas Division of the Northern District of Texas, the defendant, **Bryson Deontae Bright**, knowingly possessed with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

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Count Twenty-Five

Possession of a Firearm by a User of a Controlled Substance (Violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2))

On or about October 24, 2017, in the Dallas Division of the Northern District of Texas, the defendant, **Kris Landon Green a.k.a.** "#5", being an unlawful user of a controlled substance, namely marijuana, did knowingly possess in and affecting interstate commerce the following firearm: 9mm Sig Sauer P290RS handgun bearing serial number 26C002471.

In violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2).

Count Twenty-Six Distribution of a Schedule II Controlled Substance (Violation of 21 U.S.C. § 841(b)(1)(C))

On or about October 12, 2017, in the Dallas Division of the Northern District of Texas, **Stacy Moore a.k.a. "Jay,"** defendant herein, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

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Forfeiture Notice [21 U.S.C. § 853(a)]

Upon conviction of the Counts One through Twenty-Five of this Indictment and pursuant to 21 U.S.C. § 853(a), the defendants, Nykees Earl Campbell a.k.a. "NaNa," a.k.a. "Ny-Nizzle," a.k.a. "#1", Avery Wayne Davis a.k.a. "AD," Demond Lynn a.k.a. "Slime," Kearwon Dmargo Magee, Rodney Eugene Roquemore a.k.a. "Turbo," Lawrence Williams a.k.a. "One Eye," Kris Landon Green a.k.a. "#5", Bryson Deontae Bright, Ralph Earl Campbell, III, Garry Dewayne Newton a.k.a. "#4", Stacy Moore a.k.a. "Jay," Marcus Jackson a.k.a. "Marty-Mar," Mitchell Holmes, Cedric Charles Witcher, shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as a result of the respective offense; and any property, real or personal, used or intended to be used, in any manner or part, to commit or facilitate the commission of the respective offense. Said property includes:

- 1. 9mm Smith & Wesson handgun bearing serial number FXF1519.
- 2. .380 semi-automatic handgun bearing serial number FS103504.
- 3. 9mm Taurus bearing Serial Number TTB81813.
- 4. 9mm Sig Sauer P290RS handgun bearing serial number 26C002471

A TRUE BILL

FOREPERSON

JOHN R. PARKER

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS **DALLAS DIVISION**

THE UNITED STATES OF AMERICA

NYKEES EARL CAMPBELL (01) a.k.a. "#1" a.k.a. "NaNa", a.k.a. "Ny-Nizzle" AVERY WAYNE DAVIS (02) a.k.a. "AD", DEMOND LYNN (03) a.k.a. "Slime" **KEARWON DMARGO MAGEE (04)** RODNEY EUGENE ROQUEMORE (05) a.k.a. "Turbo" LAWRENCE WILLIAMS (06) a.k.a. "One Eye" KRIS LANDON GREENE (07) a.k.a. "#5" **BRYSON DEONTAE BRIGHT (08)** RALPH EARL CAMPBELL III (09) GARRY DEWAYNE NEWTON (10) a.k.a. "#4" STACY MOORE (11) a.k.a. "Jay" MARCUS JACKSON (12) a.k.a. "Marty-Mar" MITCHELL HOLMES (13) CEDRIC CHARLES WITCHER (14)

SEALED INDICTMENT

21 U.S.C. § 846 Conspiracy to Possess With Intent to Distribute a Schedule II Controlled Substance

18 U.S.C. §§ 922(g)(3) and 924(a)(2)Possession of a Firearm by a User of a Controlled Substance

21 U.S.C. § 841(b)(1)(C) Distribution of a Schedule II Controlled Substance 18 U.S.C. § 924(c) Drug Trafficking Crime

21 U.S.C. § 853(a) Forfeiture Notice

26 Counts

A true bill rendered	
DALLAS	FOREPERSON
Filed in open court this th day of November, 2017.	
Warrant to be Issued for all Defendants	
UNITED STATES MAGISTRATE JUDGE	3
No Criminal Matter Pending	