

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

GARY BERNARD BROWN, JR., aka Gee,
ERIC ANTHONY GARNER, aka Pops,
SAUL PERCY POWELL, JR., aka Protégé,
GARY BROWN, III, aka G3,
GARY ALEXANDER RODRIGUEZ, aka Mr. T,
CHARLES DELROY SINGLETARY,
SHERRON BRIANA ROBERTS,
DEBORAH ROSEMARIE JOHNSON,
PATRICK THOMAS MARPLE,
DARIEN JACOB HORTON, aka Dee Jae,
JEFFREY LEE PULLEN,
CHRISTOPHER STERLING COGLE,
AMBER JEAN DAVIS,
ERIC LYN CUSTER,
BENJAMIN PAUL KNOTTS,
ASHLEIGH RAE SETTLE,
KAITLYN ASHLEY KNIGHT,
JOHN ANDREW CASSELL,
KRISTINA BRIDGET HUTH,
ANDREW AIYETORO WILKERSON,
DAMIAN ANTHENY COSTELLO,
HAILE MADALYNN SPEAKS,
EVA LOUISE ASHBAUGH,
KAYLEIGH NICOLE BEAVERS,
ASHLEY NICOLE STORY,
MICHAEL LEE ENGLE,
RYAN BENNET COLE,
JOSHUA PAUL BARRETT,
AMANDA NICOLE LONG,
GREGORY BRIAN LONG,
PAUL PEREKRESTS,
SCOTT ALAN SHEFFER,
SAMANTHA HELEN HOTT,
JAMES SANFORD,
LYNN WOOD CAMPBELL,
NATHANIEL FREDERICK DOWNING, JR.,
LINDA CARASSE ABSHIRE,
AMANDA NICOLE ALBERT,
JAMES BEAU BAKER,
KENDALL AXAVIER BAKER,
KIMBERLY ANN BARRETT,
JENNIFER NICOLE BARTHLOW,
RYAN JAMES BRENNAN,
GARY MICHAEL BURNS,
LANCE WADE COLE, JR.,

Criminal Action No.: 3:24-CR- 3

Violations: 18 U.S.C. § 2
21 U.S.C. § 841(a)(1)
21 U.S.C. § 841(b)(1)(A)
21 U.S.C. § 841(b)(1)(B)
21 U.S.C. § 841(b)(1)(C)
21 U.S.C. § 843(b)
21 U.S.C. § 843(d)
21 U.S.C. § 846

FILED

JAN 17 2024

U.S. DISTRICT COURT- WVND
MARTINSBURG, WV 25401

WENDY DIANE CRITES,
JEREMY JASON CROCK,
MARTHA ANN CROCK,
MICHAEL BRADLEY DECKER,
ZACHARY THOMAS DOMAN,
TIFFANY AMBER FITCH,
JAMA RICHELLE FLEETWOOD,
BROOKE GORDON,
MARISSA GREGORY-HUNTOON,
GARY EDISON HARDER, JR.,
BRENDA HENRY,
JOHN ERNEST LECLUSE,
MICHAEL REGALE LUCKETT,
JEFFREY SCOTT MAIN,
ALYSSA ROSE MCINTYRE,
CONNOR JAMES MCLAUGHLIN,
JESSICA LYNN MCLAUGHLIN,
CJ MORGAN,
NICOLE PARKINSON,
DAVID LEWIS PENNINGTON, JR.,
DELMAR SEAL, JR.,
CODY ALLEN SORRELL,
JAMIE LEE SULLIVAN,
DUSTY LYNN THOMPSON,
SHELBY ELIZABETH THOMPSON,
DANTE DUPE WASHINGTON,
CLIFFORD EUGENE WEAVER,
BRADLEY DAVID WELSH,
APRIL DAWN WENTZELL,
AUTUMN D. WILSON,
MARY ANN WRIGHT,
JOHN WESLEY YATES,
CYNTHIA RENEE YOUNG,
AARON JOSHUA JAMES,
MATTHEW DAVID VIANDS,
DANIEL LEE CORBIN, JR., and
JEREMY TYLER SHIFFLETT,

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(Conspiracy to Possess with Intent to Distribute and to Distribute
400 Grams or More of a Fentanyl Mixture)

From on or about January 1, 2021 to on or about the return of this Indictment, in Berkeley and Jefferson Counties, in the Northern District of West Virginia, and elsewhere, defendants **GARY BERNARD BROWN, JR., aka Gee, ERIC GARNER, aka Pops, SAUL PERCY POWELL, JR., aka Protégé, GARY BROWN, III, aka G3, GARY ALEXANDER RODRIGUEZ, aka Mr. T, and CHARLES DELROY SINGLETARY**, did unlawfully, knowingly, intentionally, and without authority combine, conspire, confederate, agree and have a tacit understanding with each other and other persons to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute and to distribute a mixture and substance containing 400 grams or more of a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A).

COUNT TWO

(Conspiracy to Possess with Intent to Distribute and to Distribute Fentanyl, Acetyl Fentanyl, Methamphetamine Hydrochloride, Cocaine, and Cocaine Base)

From on or about January 1, 2021 to on or about the return of this Indictment, in Berkeley, Hampshire, and Jefferson Counties, in the Northern District of West Virginia, and elsewhere, defendants **GARY BERNARD BROWN, JR., aka Gee, ERIC ANTHONY GARNER, aka Pops, SAUL PERCY POWELL, JR., aka Protégé, GARY BROWN, III, aka G3, GARY ALEXANDER RODRIGUEZ, aka Mr. T, CHARLES DELROY SINGLETARY, SHERRON BRIANA ROBERTS, DEBORAH ROSEMARIE JOHNSON, PATRICK THOMAS MARPLE, DARIEN JACOB HORTON, aka Dee Jae, JEFFREY LEE PULLEN, CHRISTOPHER STERLING COGLE, AMBER JEAN DAVIS, ERIC LYN CUSTER, BENJAMIN PAUL KNOTTS, ASHLEIGH RAE SETTLE, KAITLYN ASHLEY KNIGHT, JOHN ANDREW CASSELL, KRISTINA BRIDGET HUTH, ANDREW AIYETORO WILKERSON, DAMIAN ANTHONY COSTELLO, HAILE MADALYNN SPEAKS, EVA LOUISE ASHBAUGH, KAYLEIGH NICOLE BEAVERS, ASHLEY NICOLE STORY, MICHAEL LEE ENGLE, RYAN BENNET COLE, JOSHUA PAUL BARRETT, AMANDA NICOLE LONG, GREGORY BRIAN LONG, PAUL PEREKRESTS, SCOTT ALAN SHEFFER, SAMANTHA HOTT, JAMES SANFORD, LYNN WOOD CAMPBELL, NATHANIEL FREDERICK DOWNING, JR., LINDA CARASSE ABSHIRE, AMANDA NICOLE ALBERT, JAMES BEAU BAKER, KENDALL AXAVIER BAKER, KIMBERLY ANN BARRETT, JENNIFER NICOLE BARTHLOW, RYAN JAMES BRENNAN, GARY MICHAEL BURNS, LANCE WADE COLE, JR., WENDY DIANE CRITES, JEREMY JASON CROCK, MARTHA ANN CROCK, MICHAEL BRADLEY DECKER, ZACHARY THOMAS DOMAN, TIFFANY AMBER FITCH, JAMA RICHELLE FLEETWOOD, BROOKE ALLYSON GORDON, MARISSA GREGORY-HUNTOON, GARY EDISON HARDER, JR., BRENDA HENRY, JOHN ERNEST LECLUSE, MICHAEL REGALE**

LUCKETT, JEFFREY SCOTT MAIN, ALYSSA ROSE MCINTYRE, CONNOR JAMES MCLAUGHLIN, JESSICA LYNN MCLAUGHLIN, CJ MORGAN, NICOLE PARKINSON, DAVID LEWIS PENNINGTON, JR., DELMAR SEAL, JR., CODY ALLEN SORRELL, JAMIE LEE SULLIVAN, DUSTY LYNN THOMPSON, SHELBY ELIZABETH THOMPSON, DANTE DUPE WASHINGTON, CLIFFORD EUGENE WEAVER, BRADLEY DAVID WELSH, APRIL DAWN WENTZELL, AUTUMN D. WILSON, MARY ANN WRIGHT, JOHN WESLEY YATES, CYNTHIA RENEE YOUNG, AARON JOSHUA JAMES, MATTHEW DAVID VIANDS, DANIEL LEE CORBIN, JR., and JEREMY TYLER SHIFFLETT, did unlawfully, knowingly, intentionally, and without authority combine, conspire, confederate, agree and have a tacit understanding with each other and other persons to violate Title 21, United States Code, Section 841(a)(1). It was a purpose and object of the conspiracy to possess with intent to distribute and to distribute fentanyl, a Schedule II controlled substance; acetyl fentanyl, a Schedule I controlled substance; methamphetamine hydrochloride, also known as “ice,” a Schedule II controlled substance; cocaine hydrochloride, a Schedule II controlled substance; and cocaine base, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C).

COUNT THREE

(Distribution of Fentanyl Mixture)

On or about April 19, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendant **GARY BERNARD BROWN, JR., aka Gee**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

(Possession with Intent to Distribute Fentanyl Mixture)

On or about May 17, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendants **DEBORAH ROSEMARIE JOHNSON and PATRICK THOMAS MARPLE**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIVE

(Distribution of Fentanyl Mixture)

On or about May 25, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendant **ERIC LYN CUSTER**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIX

(Possession with Intent to Distribute Fentanyl Mixture)

On or about May 26, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendant **ERIC LYN CUSTER**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SEVEN

(Possession with Intent to Distribute Fentanyl Mixture)

On or about May 27, 2023, in Jefferson County, in the Northern District of West Virginia, defendant **BENJAMIN PAUL KNOTTS**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHT

(Distribution of Fentanyl and Acetyl Fentanyl Mixture)

On or about June 1, 2023, in Jefferson County, in the Northern District of West Virginia, defendant **DARIEN JACOB HORTON, aka Dee Jae**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT NINE

(Distribution of Fentanyl and Acetyl Fentanyl Mixture)

On or about June 13, 2023, in Berkeley County, in the Northern District of West Virginia, defendant **DELMAR SEAL, JR.**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TEN

(Distribution of Fentanyl Mixture)

On or about June 15, 2023, in Berkeley and Jefferson Counties, in the Northern District of West Virginia, and elsewhere, defendant **GARY BERNARD BROWN, JR., aka Gee**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT ELEVEN

(Possession with Intent to Distribute Fentanyl and Acetyl Fentanyl Mixture)

On or about June 15, 2023, in Jefferson County, in the Northern District of West Virginia, defendants **JOHN ANDREW CASSELL and AMANDA NICOLE ALBERT**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWELVE

(Distribution of Fentanyl Mixture)

On or about June 28, 2023, in Berkeley County, in the Northern District of West Virginia, and elsewhere, defendants **DELMAR SEAL, JR. and ALYSSA ROSE MCINTYRE**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTEEN

(Distribution of Fentanyl and Acetyl Fentanyl Mixture)

On or about July 6, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendant **GREGORY BRIAN LONG**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance, in exchange for United States currency; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOURTEEN

(Possession with Intent to Distribute a Fentanyl Mixture)

On or about July 7, 2023, in Berkeley County, in the Northern District of West Virginia, defendant **MARY ANN WRIGHT**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FIFTEEN

(Aiding and Abetting Possession with Intent to Distribute Fentanyl Mixture)

On or about August 1, 2023, in Berkeley and Jefferson Counties, in the Northern District of West Virginia, defendant **DEBORAH ROSEMARIE JOHNSON**, aided and abetted by **JEREMY TYLER SHIFFLETT**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT SIXTEEN

(Unlawful Use of Communication Facility)

On or about August 5, 2023, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendant **EVA LOUISE ASHBAUGH**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendant used a cellular device to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT SEVENTEEN

(Possession with Intent to Distribute Fentanyl and Acetyl Fentanyl Mixture)

On or about August 5, 2023, in Jefferson County, in the Northern District of West Virginia, defendants **EVA LOUISE ASHBAUGH and CONNOR JAMES MCLAUGHLIN**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT EIGHTEEN

(Unlawful Use of Communication Facility)

On or about August 7, 2023, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendant **KRISTINA BRIDGET HUTH**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendant used a cellular device to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT NINETEEN

(Unlawful Use of Communication Facility)

On or about August 7, 2023, in Jefferson County, in the Northern District of West Virginia and elsewhere, defendant **JAMES BEAU BAKER**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendant used a cellular device to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance, and cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT TWENTY

(Distribution of Fentanyl and Acetyl Fentanyl Mixture)

On or about August 8, 2023, in Jefferson County, in the Northern District of West Virginia, and elsewhere, defendant **KAYLEIGH NICOLE BEAVERS**, did unlawfully, knowingly, intentionally, and without authority, distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-ONE

(Possession with Intent to Distribute Fentanyl and Acetyl Fentanyl Mixture)

On or about August 8, 2023, in Jefferson County, in the Northern District of West Virginia, defendant **WENDY DIANE CRITES**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and acetyl fentanyl, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-TWO

(Aiding and Abetting Possession with Intent to Distribute Fentanyl Mixture)

On or about August 11, 2023, in Berkeley and Jefferson Counties, in the Northern District of West Virginia, defendants **SHELBY ELIZABETH THOMPSON and DUSTY LYNN THOMPSON**, aided and abetted by each other, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-THREE

(Aiding and Abetting Possession with Intent to Distribute Fentanyl Mixture)

On or about August 15, 2023, in Jefferson County, in the Northern District of West Virginia, defendants **MICHAEL LEE ENGLE and JAMA RICHELLE FLEETWOOD** did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FOUR

(Aiding and Abetting Possession with Intent to Distribute Fentanyl Mixture)

On or about August 16, 2023, in Jefferson County, in the Northern District of West Virginia, defendant **RYAN BENNET COLE**, aided and abetted by **MATTHEW DAVID VIANDS**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FIVE

(Possession with Intent to Distribute Fentanyl Mixture)

On or about August 31, 2023, in Jefferson County, in the Northern District of West Virginia, defendants **JOSHUA PAUL BARRETT and KIMBERLY ANN BARRETT**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-SIX

(Possession with Intent to Distribute Fentanyl Mixture)

On or about October 4, 2023, in Jefferson County, in the Northern District of West Virginia, defendant **NATHANIEL FREDERICK DOWNING, JR.**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-SEVEN

(Unlawful Use of Communication Facility)

On or about October 10, 2023, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendant **DANIEL LEE CORBIN, JR.**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendants used a Facebook Messenger account to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT TWENTY-EIGHT

(Unlawful Use of Communication Facility)

On or about October 11, 2023, in Berkeley County, in the Northern District of West Virginia and elsewhere, defendant **PAUL PEREKRESTS**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendant used a cellular device to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance, and methamphetamine hydrochloride, also known as “ice,” a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT TWENTY-NINE

(Possession with Intent to Distribute 40 Grams or More of Fentanyl Mixture)

On or about October 11, 2023, in Berkeley County, in the Northern District of West Virginia, defendants **PAUL PEREKRESTS and KENDALL AXAVIER BAKER**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute forty grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT THIRTY

(Possession with Intent to Distribute Methamphetamine Hydrochloride)

On or about October 11, 2023, in Berkeley County, in the Northern District of West Virginia, defendants **PAUL PEREKRESTS and KENDALL AXAVIER BAKER**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute methamphetamine hydrochloride, also known as “ice,” a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-ONE

(Unlawful Use of Communication Facility)

On or about October 24, 2023, in Jefferson County, in the Northern District of West Virginia and elsewhere, defendant **JENNIFER NICOLE BARTHLOW**, did knowingly and intentionally use a communication device in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), as alleged in Count Two of this Indictment, that is, the defendant used a cellular device to arrange a distribution of a mixture and substance containing fentanyl, a Schedule II controlled substance, and methamphetamine hydrochloride, also known as “ice,” a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 843(b) and 843(d).

COUNT THIRTY-TWO

(Possession with Intent to Distribute Fentanyl Mixture)

On or about November 14, 2023, in Jefferson County, in the Northern District of West Virginia, defendants **GREGORY BRIAN LONG and AUTUMN D. WILSON**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-THREE

(Possession with Intent to Distribute Fentanyl Mixture)

On or about November 15, 2023, in Hampshire County, in the Northern District of West Virginia, defendants **JEREMY JASON CROCK and MARTHA ANN CROCK**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-FOUR

(Possession with Intent to Distribute Methamphetamine)

On or about November 15, 2023, in Hampshire County, in the Northern District of West Virginia, defendants **JEREMY JASON CROCK and MARTHA ANN CROCK**, did unlawfully, knowingly, intentionally, and without authority, possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION

Controlled Substance Act

Pursuant to Title 21, United States Code, Section 853 and Title 21, United States Code, Sections 841 and 846, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property used, or intended to be used, to commit or to facilitate the commission of the above referenced offense, and any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such offense, including \$55,871.85 from JP Morgan Chase bank accounts; \$5,938; a 9mm Jimenez firearm bearing serial number 168201 with a magazine and ammunition; various designer and luxury items, to include but not limited to, clothing, bags, shoes, and jewelry seized from 555 President Street, Apartment 401, Baltimore, Maryland 21202 and 250 Mission Road, Apartment 507, Baltimore, Maryland.

A true bill,

/s/
Grand Jury Foreperson

/s/
WILLIAM IHLENFELD
United States Attorney

Lara K. Omps-Botteicher
Eleanor F. Hurney
Kyle R. Kane
Morgan C. McKee
Assistant United States Attorneys