

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA

vs.

HAROLD MATTHEW MCFADDEN
BRYANT CHRISTOPHER FORD

) CR. NO.: 3:15cr431
) 21 USC § 841(a)(1)
) 21 USC § 841(b)(1)(C)
) 21 USC § 846
) 21 USC § 853
) 21 USC § 881
) 28 USC § 2461(c)
)

INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

That beginning at a time unknown to the grand jury, but beginning at least in or around May of 2015, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the defendants, HAROLD MATTHEW MCFADDEN and BRYANT CHRISTOPHER FORD, knowingly and intentionally did combine, conspire and agree together and have tacit understanding with each other, and others, both known and unknown to the grand jury, to knowingly, intentionally and unlawfully possess with intent to distribute and distribute cocaine, a Schedule II controlled substance, said conspiracy involving a quantity of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C);

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

FORFEITURE

1. **DRUG OFFENSES:**

Upon conviction for felony violations of Title 21, United States Code as charged in this Indictment, the defendants, HAROLD MATTHEW MCFADDEN and BRYANT CHRISTOPHER FORD, shall forfeit to the United States all of the defendants' right, title and interest in and to any property, real and personal,

(a) constituting, or derived from any proceeds the defendant obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;

(b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations of Title 21, United States Code;

2. **PROPERTY:**

Pursuant to Title 21, United States Code, Sections 853(a)(1), 853(a)(2), and 881(6), and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the defendants for offenses charged in this Indictment includes, but is not limited to, the following:

A. **CASH PROCEEDS/MONEY JUDGMENT:**

A sum of money equal to all proceeds the Defendants obtained, directly or indirectly, from the Title 21 offenses charged in the Indictment, that is a minimum of \$304,431.00 and all interest and proceeds traceable thereto, in that such sum equals property that the Defendants obtained as the result of their violations, for which the defendants are jointly and severally liable.

B. Cash/Currency:

1. \$304,431 in United States currency seized from FORD on June 16, 2015.

3. SUBSTITUTION OF ASSETS:

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

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or 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;

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 defendant up to an amount equivalent to the value of the above-described forfeitable property;

Pursuant to Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

A TRUE Bill

Redacted

FOREPERSON



WILLIAM N. NETTLES
UNITED STATES ATTORNEY

(jdr)

RECORD OF GRAND JURY BALLOT

c/ 3:15cv431

THE UNITED STATES OF AMERICA v. HAROLD MATTHEW MCFADDEN and
BRYANT CHRISTOPHER FORD

(SEALED UNTIL FURTHER ORDER OF THE COURT)