

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES of AMERICA

v.

LAMAR LOUIS JOHNSON,
A/K/A "MCJAG"
JATON EDWARDS,
A/K/A "JULIO"
THEODORE BERNARD GADSDEN
PIERCE NELSON,
A/K/A "PASO"
ANTONIO MILLER
DEANGELO RAVENEL,
A/K/A "FAST CASH"
RYAN NELSON,
A/K/A "CLEPTO"
[REDACTED]
CONSTANCE S. MANIGAULT
LATREL DIQUAN DEMAINE HAMILTON,
A/K/A "TREL BLACK"
A/K/A "LATINO"
DAMION KAREEB BROWN,
A/K/A "D-BLACK"
JUAN BAVISTA ANGULO,
A/K/A "BUSH"
DOMANECK RYAN ASHLEY DIXON,
A/K/A "DOM"
RASHARD WHITFIELD,
A/K/A "SHARD"
TIEMEYER O'NEIL GETHERS,
A/K/A "T.O."
TIMOTHY ROBINSON, JR.,
A/K/A "THRILLER"
OREALIUS SYRON NELSON,
A/K/A "SYRON"
A/K/A "KEMO"

Criminal No.: 2:19-CR-550-DCN

18 U.S.C. § 2
18 U.S.C. § 922(g)(1)
18 U.S.C. § 924(a)(2)
18 U.S.C. § 924(c)(1)(A)(i)
18 U.S.C. § 924(e)
18 U.S.C. § 924(d)(1)
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. § 841(b)(1)(D)
21 U.S.C. § 843(b)
21 U.S.C. § 846
21 U.S.C. § 853
21 U.S.C. § 881
28 U.S.C. § 2461(c)

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FEB 25 REC'D

FLORENCE, S.C.

SEALED SUPERSEDING
INDICTMENT

RECEIVED

FEB 25 REC'D

FLORENCE, S.C.

BACKGROUND

THE GRAND JURY CHARGES:

At all times relevant to this Superseding Indictment, the Defendants were members and/or drug trafficking associates of a street gang known at the “Dorchester Terrace Crew” and/or “4-Mile.” This street gang obtained bulk supplies of cocaine and other narcotics from interstate sources of supply and then redistributed the drugs to street-level drug dealers in the greater Charleston area. The gang members and associates threatened violence and used firearms to defend themselves and their criminal enterprise from rival drug dealers and gang members.

COUNT 1

Drug Distribution Conspiracy

THE GRAND JURY FURTHER CHARGES:

The Grand Jury re-alleges and incorporates by reference all paragraphs above as if fully set forth herein.

Beginning at a time unknown to the grand jury, but beginning at least in or around March 2017, and continuing thereafter, up to and including the date of this Superseding Indictment, in the District of South Carolina and elsewhere, the Defendants **LAMAR LOUIS JOHNSON, A/K/A “MCJAG;” JATON EDWARDS, A/K/A “JULIO;” THEODORE BERNARD GADSDEN; PIERCE NELSON, A/K/A “PASO;” ANTONIO MILLER; DEANGELO RAVENEL, A/K/A “FAST CASH;” RYAN NELSON, A/K/A “CLEPTO;” [REDACTED] CONSTANCE S. MANIGAULT; LATREL DIQUAN DEMAINE HAMILTON, A/K/A “TREL BLACK,” A/K/A “LATINO;” DAMION KAREEB BROWN, A/K/A “D-BLACK;” JUAN BAVISTA ANGULO, A/K/A “BUSH;” DOMANECK RYAN ASHLEY DIXON, A/K/A “DOM;” RASHARD WHITFIELD, A/K/A “SHARD;” TIEMEYER O’NEIL GETHERS, A/K/A “T.O.;** TIMOTHY ROBINSON, JR., A/K/A “THRILLER;” and

OREALIUS SYRON NELSON, A/K/A "SYRON," A/K/A "KEMO," knowingly and intentionally did combine, conspire, agree and have tacit understanding with each other and with others, both known and unknown to the grand jury, to knowingly, intentionally and unlawfully possess with intent to distribute and distribute heroin and marijuana, both Schedule I controlled substances; and cocaine, cocaine base (commonly referred to as "crack cocaine"), a substance containing a detectable amount of methamphetamine, oxycodone, all Schedule II controlled substances;

The amount involved in the conspiracy attributable to each Defendant as a result of the Defendant's own conduct, and the conduct of other conspirators reasonably foreseeable to the Defendant, is:

DEFENDANT	CONTROLLED SUBSTANCE	PENALTY
LAMAR LOUIS JOHNSON	5 Kilograms or More of Cocaine A Quantity of Marijuana	21 U.S.C. § 841(b)(1)(A) 21 U.S.C. § 841(b)(1)(D)
JATON EDWARDS	500 Grams or More of Cocaine A Quantity of Oxycodone	21 U.S.C. § 841(b)(1)(B) 21 U.S.C. § 841(b)(1)(C)
THEODORE BERNARD GADSDEN	A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(C)
PIERCE NELSON	A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(C)
ANTONIO MILLER	500 Grams or More of Cocaine	21 U.S.C. § 841(b)(1)(B)
DEANGELO RAVENEL	500 Grams or More of Cocaine 100 Grams or More of Heroin 28 Grams or More of Crack Cocaine	21 U.S.C. § 841(b)(1)(B)
RYAN NELSON	500 Grams or More of Cocaine	21 U.S.C. § 841(b)(1)(B)

DEFENDANT	CONTROLLED SUBSTANCE	PENALTY
CONSTANCE S. MANIGAULT	50 Grams or More of Methamphetamine (Mixture) A Quantity of Heroin	21 U.S.C. § 841(b)(1)(B) 21 U.S.C. § 841(b)(1)(C)
LATREL DIQUAN DEMAINE HAMILTON	50 Grams or More of Methamphetamine (Mixture) A Quantity of Heroin	21 U.S.C. § 841(b)(1)(B) 21 U.S.C. § 841(b)(1)(C)
DAMION KAREEB BROWN	50 Grams or More of Methamphetamine (Mixture) A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(B) 21 U.S.C. § 841(b)(1)(C)
JUAN BAVISTA ANGULO	A Quantity of Cocaine A Quantity of Oxycodone	21 U.S.C. § 841(b)(1)(C)
DOMANECK RYAN ASHLEY DIXON	A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(C)
RASHARD WHITFIELD	A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(C)
TIEMEYER O'NEIL GETHERS	A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(C)
TIMOTHY ROBINSON, JR.	A Quantity of Cocaine A Quantity of Marijuana	21 U.S.C. § 841(b)(1)(C) 21 U.S.C. § 841(b)(1)(D)
OREALIUS SYRON NELSON	A Quantity of Cocaine	21 U.S.C. § 841(b)(1)(C)

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

COUNT 2

NO LONGER BEFORE THE COURT.

COUNT 3

NO LONGER BEFORE THE COURT.

COUNT 4

NO LONGER BEFORE THE COURT.

COUNT 5

NO LONGER BEFORE THE COURT.

COUNT 6

NO LONGER BEFORE THE COURT.

COUNT 7

NO LONGER BEFORE THE COURT.

COUNT 8

Possession with Intent to Distribute Controlled Substance

THE GRAND JURY FURTHER CHARGES:

That on or about February 5, 2019, in the District of South Carolina, the Defendant, **JATON EDWARDS, A/K/A "JULIO,"** knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 9

Possession of Firearm in Furtherance of Drug Trafficking

THE GRAND JURY FURTHER CHARGES:

That on or about February 5, 2019, in the District of South Carolina, the Defendant, **JATON EDWARDS, A/K/A "JULIO,"** knowingly did use and carry a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 10

Felon in Possession of Firearm/Ammunition

THE GRAND JURY FURTHER CHARGES:

That on or about February 5, 2019, in the District of South Carolina, the Defendant, **JATON EDWARDS, A/K/A "JULIO,"** knowingly and unlawfully possessed a firearm and ammunition, all of which had been shipped and transported in interstate and foreign commerce, that is, a Glock Model 30, .45 caliber handgun and .45 caliber ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 11

Possession with Intent to Distribute Controlled Substance

THE GRAND JURY FURTHER CHARGES:

That on or about February 19, 2019, in the District of South Carolina, the Defendant, **PIERCE NELSON, A/K/A "PASO,"** knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 12

Possession with Intent to Distribute Controlled Substance

THE GRAND JURY FURTHER CHARGES:

That on or about March 1, 2019, in the District of South Carolina, the Defendant, **LAMAR LOUIS JOHNSON, A/K/A “MCJAG,”** and **DEANGELO RAVENEL, A/K/A “FAST CASH,”** as principles, aider and abettors, and co-participants in a jointly undertaken activity, knowingly, intentionally and unlawfully did possess with intent to distribute 500 grams or more of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 13

Possession with Intent to Distribute Controlled Substance

THE GRAND JURY FURTHER CHARGES:

That on or about March 12, 2019, in the District of South Carolina, the Defendant, **PIERCE NELSON, A/K/A “PASO,”** knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 14

Possession of Firearm in Furtherance of Drug Trafficking

THE GRAND JURY FURTHER CHARGES:

That on or about March 12, 2019, in the District of South Carolina, the Defendant, **PIERCE NELSON, A/K/A "PASO,"** knowingly did use and carry a firearm during and in relation to, and did possess a firearm in furtherance of, a drug trafficking crime which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 15

Felon in Possession of Firearm/Ammunition

THE GRAND JURY FURTHER CHARGES:

That on or about March 12, 2019, in the District of South Carolina, the Defendant, **PIERCE NELSON, A/K/A "PASO,"** knowingly and unlawfully possessed a firearm, which had been shipped and transported in interstate and foreign commerce, to wit: a Smith & Wesson .357 caliber handgun, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 16

Possession with Intent to Distribute Controlled Substance

THE GRAND JURY FURTHER CHARGES:

That on or about July 10, 2019, in the District of South Carolina, the Defendant, **DEANGELO RAVENEL, A/K/A "FAST CASH"**, knowingly, intentionally and unlawfully did possess with intent to distribute 100 grams or more of heroin, a Schedule I controlled substance; and 500 grams or more of cocaine and 28 grams or more of cocaine base (commonly referred to as "crack cocaine"), both Schedule II controlled substances;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 17

Possession of Firearm in Furtherance of Drug Trafficking

THE GRAND JURY FURTHER CHARGES:

That on or about July 10, 2019, in the District of South Carolina, the Defendant, **DEANGELO RAVENEL, A/K/A "FAST CASH,"** knowingly did possess a firearm in furtherance of a drug trafficking crime which is prosecutable in a court of the United States;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 18

Felon in Possession of Firearm/Ammunition

THE GRAND JURY FURTHER CHARGES:

That on or about July 10, 2019, in the District of South Carolina, the Defendant, **DEANGELO RAVENEL, A/K/A "FAST CASH,"** knowingly and unlawfully possessed firearms and ammunition, which had been shipped and transported in interstate and foreign commerce, to wit: a Springfield XD Pistol, a Glock 22 pistol, an AK-style rifle, and a black Muzzlelite rifle, and miscellaneous rounds of ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 19

Possession with Intent to Distribute Controlled Substance

THE GRAND JURY FURTHER CHARGES:

That on or about November 2, 2019, in the District of South Carolina, the Defendant, **CONSTANCE S. MANIGAULT,** as principle, aider and abettor, and co-participant in a jointly undertaken activity, knowingly, intentionally and unlawfully did possess with intent to distribute and did distribute a quantity of heroin, a Schedule I controlled substance; and 50 grams or more of 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), 841(b)(1)(B) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 20

Possession with Intent to Distribute Controlled Substance

THE GRAND JURY FURTHER CHARGES:

That on or about July 10, 2019, in the District of South Carolina, the Defendant, **RASHARD WHITFIELD, A/K/A "SHARD,"** knowingly, intentionally and unlawfully did possess with intent to distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNTS 21-51

Use of Communications Facilities to facilitate Drug Felonies

THE GRAND JURY FURTHER CHARGES:

The Grand Jury re-alleges and incorporates by reference all paragraphs above as if fully set forth herein.

That on or about the dates set forth below, in the District of South Carolina, the named Defendants knowingly and intentionally did use a communication facility, to wit: a telephone, to facilitate the commission of a felony under the Controlled Substances Act, to wit: conspiracy to possess with intent to distribute and possession with intent to distribute and distribution of controlled substances as set forth above; and did aid and abet each other in the commission of the aforesaid offense, in violation of Title 21, United States Code, Sections 841(a)(1) and 846:

COUNT	DATE	DEFENDANT(S)
21	1/25/19	THEODORE BERNARD GADSDEN
22	1/27/19	THEODORE BERNARD GADSDEN
23	3/4/19	ANTONIO MILLER LAMAR LOUIS JOHNSON

COUNT	DATE	DEFENDANT(S)
24	2/22/19	ANTONIO MILLER LAMAR LOUIS JOHNSON
25	3/1/19	DEANGELO RAVENEL LAMAR LOUIS JOHNSON
26	3/2/19	DEANGELO RAVENEL LAMAR LOUIS JOHNSON
27	2/15/19	RYAN NELSON TIEMEYER O'NEIL GETHERS
28	2/14/19	RYAN NELSON
29		
30		
31	11/2/18	CONSTANCE S. MANIGAULT
32	11/2/18	CONSTANCE S. MANIGAULT
33	11/28/18	LATREL DIQUAN DEMAINE HAMILTON
34	10/30/18	LATREL DIQUAN DEMAINE HAMILTON
35	1/28/19	DOMANECK RYAN ASHLEY DIXON
36	2/1/19	DOMANECK RYAN ASHLEY DIXON
37	1/31/19	JUAN BAVISTA ANGULO

COUNT	DATE	DEFENDANT(S)
38	3/2/19	RASHARD WHITFIELD LAMAR LOUIS JOHNSON
39	3/3/19	RASHARD WHITFIELD LAMAR LOUIS JOHNSON
40	3/1/19	TIEMEYER O'NEIL GETHERS LAMAR LOUIS JOHNSON
41	3/3/19	TIMOTHY ROBINSON, JR. LAMAR LOUIS JOHNSON
42	3/6/19	TIMOTHY ROBINSON, JR. LAMAR LOUIS JOHNSON
43	3/6/19	OREALIUS SYRON NELSON LAMAR LOUIS JOHNSON
44	3/2/19	OREALIUS SYRON NELSON LAMAR LOUIS JOHNSON
45	3/1/19	PIERCE NELSON LAMAR LOUIS JOHNSON
46	3/6/19	PIERCE NELSON LAMAR LOUIS JOHNSON
47	1/25/19	JATON EDWARDS
48	2/5/19	JATON EDWARDS
49	10/30/18	DAMION KAREEB BROWN
50	12/10/18	DAMION KAREEB BROWN

All in violation of Title 21, United States Code, Section 843(b), and Title 18, United States Code, Section 2.

FORFEITURE

DRUG OFFENSES:

Upon conviction for felony violation of Title 21, United States Code as charged in this Superseding Indictment, the Defendants, **LAMAR LOUIS JOHNSON, A/K/A "MCJAG;" JATON EDWARDS, A/K/A "JULIO;" THEODORE BERNARD GADSDEN; PIERCE NELSON, A/K/A "PASO;" ANTONIO MILLER; DEANGELO RAVENEL, A/K/A "FAST CASH;" RYAN NELSON, A/K/A "CLEPTO;" [REDACTED] CONSTANCE S. MANIGAULT; LATREL DIQUAN DEMAINE HAMILTON, A/K/A "TREL BLACK;" A/K/A "LATINO," DAMION KAREEB BROWN, A/K/A "D-BLACK;" JUAN BAVISTA ANGULO, A/K/A "BUSH;" DOMANECK RYAN ASHLEY DIXON, A/K/A "DOM;" RASHARD WHITFIELD, A/K/A "SHARD;" TIEMEYER O'NEIL GETHERS, A/K/A "T.O.;" TIMOTHY ROBINSON, JR., A/K/A "THRILLER;" and OREALIUS SYRON NELSON, A/K/A "SYRON" A/K/A "KEMO," 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 Defendants 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.

PROPERTY:

Pursuant to Title 21, United States Code, Sections 853 and 881, 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 Superseding Indictment includes, but is not limited to, the following:

Proceeds/Forfeiture Judgment:

A sum of money equal to all property the Defendants obtained as a result of the drug offenses charged in the Superseding Indictment, and all interest and proceeds traceable thereto as a result for their violation of 21 U.S.C. §§ 841, 843 and 846.

SUBSTITUTION OF ASSETS:

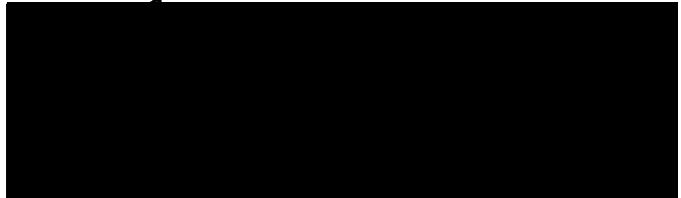
If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants:


- (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 the defendant's 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





 A. LANCE CRICK (EEM)
 ACTING UNITED STATES ATTORNEY