

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
WAYCROSS DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	<b>INDICTMENT NO. 5:25cr-001</b>
	)	
<b>v.</b>	)	<b>21 U.S.C. § 846</b>
	)	<b>Conspiracy to Possess With</b>
<b>LITARUS BRINSON</b>	)	<b>Intent to Distribute and to</b>
<b>a/k/a "BEN BROKEBEFORE,"</b>	)	<b>Distribute Controlled Substances</b>
	)	<b>(Cocaine, Methamphetamine,</b>
<b>CHRISTOPHER BROCKINGTON</b>	)	<b>Oxycodone and Marijuana)</b>
<b>a/k/a "CHRIS BROCK,"</b>	)	
	)	<b>21 U.S.C. § 841(a)(1)</b>
<b>KEEVON BUSSEY</b>	)	<b>Distribution of a Controlled</b>
<b>a/k/a "GUADO GETTINGUAP</b>	)	<b>Substance</b>
<b>GOMEZ,"</b>	)	
	)	<b>21 U.S.C. § 841(a)(1)</b>
<b>STACEY DANIELS,</b>	)	<b>Possession With Intent to</b>
	)	<b>Distribute a Controlled</b>
<b>KENNETH DAVIS,</b>	)	<b>Substance</b>
	)	
<b>T'KIYA EADY,</b>	)	<b>18 U.S.C. § 924(c)</b>
	)	<b>Possession of a Firearm In</b>
<b>PATRICK ELLIS,</b>	)	<b>Furtherance of a Drug</b>
	)	<b>Trafficking Crime</b>
<b>ANTHONY GASKIN,</b>	)	
	)	<b>18 U.S.C. § 922(g)(1)</b>
<b>DACIA GASKINS</b>	)	<b>Possession of a Firearm by a</b>
<b>a/k/a "SHEREE GASKINS,"</b>	)	<b>Prohibited Person</b>
	)	
<b>ERNEST GOODMAN,</b>	)	<b>18 U.S.C. § 924(o)</b>
	)	<b>Conspiracy to Possess a Firearm</b>
<b>CHRISTOPHER HAWKINS</b>	)	<b>In Furtherance of Drug</b>
<b>a/k/a "RAYSHON HAWKINS,"</b>	)	<b>Trafficking Crime</b>
	)	
<b>QUDARIOUS HAWKINS</b>	)	<b>21 U.S.C. § 856(a)(1)</b>
<b>a/k/a "DON ESCLOBAR,"</b>	)	<b>Use of a Drug Involved Premises</b>
	)	
<b>BREANNA HENDERSON,</b>	)	<b>18 U.S.C. § 1956(h)</b>
	)	<b>Conspiracy to Launder Monetary</b>
<b>COREY HILL,</b>	)	<b>Instruments</b>
	)	
<b>DEMARCUS HOLLAND,</b>	)	

WANDA HOLLINGER, )  
)  
ZARIONNA HOLLOWAY )  
a/k/a "CHANEL PARKER," )  
)  
ROGER JENKINS )  
a/k/a "GLEE JENKINS," )  
a/k/a "WMG GLEE," )  
)  
MARQUAN JENKINS )  
a/k/a "ANNA BROOKE," )  
a/k/a "MARY THOMPSON," )  
)  
RICHARD JEWELL, )  
)  
AARON KAHN, )  
)  
JAMES LANDER, )  
)  
JEFFREY MAXWELL )  
a/k/a "EBK KOKAINE," )  
)  
DARIEN MCDANIEL, )  
)  
ANTARIOUS MCTEAR, )  
)  
ADRIAN MUNFORD )  
a/k/a "JUGG KING," )  
)  
FERLONZO NEWTON )  
a/k/a "LONZIE NEWTON," )  
a/k/a "KELL NEWTON," )  
)  
REGINALD POWELL )  
a/k/a "YETTI GLOCK," )  
)  
PATRICIA RAVEN )  
a/k/a "MS. PAT," )  
)  
MARCUS REYNOLDS )  
a/k/a "MARC MARC," )  
)  
JAMES ROBINSON, )  
)

**SEDARRIEN SMITH** )  
 a/k/a "SLUG DA MENACE," )  
 )  
**BILLY TOOMBS, JR.,** )  
 )  
**DEQUATTE TUCKER** )  
 a/k/a "DESHAWN TUCKER," )  
 a/k/a "ESCO," )  
 a/k/a "FREEBAND ESCO," )  
 )  
**TRAVIS TUCKER,** )  
 )  
**ASSYRIA WATTS** )  
 a/k/a "JEFE CAIN," )  
 )  
**and** )  
 )  
**BRIAN WRIGHT** )

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

*Conspiracy to Possess With Intent to Distribute and  
 to Distribute Controlled Substances  
 (Cocaine, Marihuana, Methamphetamine, and Oxycodone)*  
 21 U.S.C. § 846

Beginning on a date at least as early as January 14, 2021, up to and including the return date of this Indictment, the precise dates being unknown, in Atkinson County, Bacon County, and Coffee County, within the Southern District of Georgia, and elsewhere, the Defendants,

**LITARUS BRINSON**  
 a/k/a "BEN BROKEBEFORE,"

**CHRISTOPHER BROCKINGTON**  
 a/k/a "CHRIS BROCK,"

**KEEVON BUSSEY**  
 a/k/a "GUADO GETTINGUAP GOMEZ,"

**STACEY DANIELS,**

**KENNETH DAVIS,**

**T'KIYA EADY,**

**PATRICK ELLIS,**

**ANTHONY GASKIN,**

**DACIA GASKINS**  
**a/k/a "SHEREE GASKINS,"**

**ERNEST GOODMAN,**

**CHRISTOPHER HAWKINS**  
**a/k/a "RAYSHON HAWKINS,"**

**QUDARIOUS HAWKINS**  
**a/k/a "DON ESCLOBAR,"**

**BREANNA HENDERSON,**

**COREY HILL,**

**DEMARCUS HOLLAND,**

**WANDA HOLLINGER,**

**ZARIONNA HOLLOWAY**  
**a/k/a "CHANEL PARKER,"**

**ROGER JENKINS**  
**a/k/a "GLEE JENKINS,"**  
**a/k/a "WMG GLEE,"**

**MARQUAN JENKINS**  
**a/k/a "ANNA BROOKE,"**  
**a/k/a "MARY THOMPSON,"**

**RICHARD JEWELL,**

**AARON KAHN,**

**JAMES LANDER,**

**JEFFREY MAXWELL**  
**a/k/a “EBK KOKAINE,”**

**DARIEN MCDANIEL,**

**ANTARIOUS MCTEAR,**

**ADRIAN MUNFORD**  
**a/k/a “JUGG KING,”**

**FERLONZO NEWTON**  
**a/k/a “LONZIE NEWTON,”**  
**a/k/a “KELL NEWTON,”**

**REGINALD POWELL**  
**a/k/a “YETTI GLOCK,”**

**MARCUS REYNOLDS**  
**a/k/a “MARC MARC,”**

**PATRICIA RAVEN**  
**a/k/a “MS. PAT,”**

**JAMES ROBINSON,**

**SEDARRIEN SMITH**  
**a/k/a “SLUG DA MENACE,”**

**BILLY TOOMBS, JR.,**

**DEQUATTE TUCKER**  
**a/k/a “DESHAWN TUCKER,”**  
**a/k/a “ESCO,”**  
**a/k/a “FREEBAND ESCO,”**

**TRAVIS TUCKER,**

**ASSYRIA WATTS**  
**a/k/a “JEFE CAIN,”**

**and**

**BRIAN WRIGHT,**

with some joining the conspiracy earlier and others joining later, did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with others known and unknown, to possess with intent to distribute and to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance and a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance.

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

**TYPE AND QUANTITY OF CONTROLLED SUBSTANCES**

With respect to **CHRISTOPHER HAWKINS a/k/a “RAYSHON HAWKINS,” MARQUAN JENKINS a/k/a “ANNA BROOKE,” a/k/a “MARY THOMPSON,” ROGER JENKINS a/k/a “GLEE JENKINS,” a/k/a “WMG GLEE,”** and **ZARIONNA HOLLOWAY a/k/a “CHANEL PARKER,”** as a result of their own conduct, respectively, and the conduct of conspirators, it was reasonably foreseeable to these Defendants that this conspiracy involved 500 grams or more of a mixture or 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 846.

With respect to **ERNEST GOODMAN** as a result of his own conduct, and the conduct of conspirators, it was reasonably foreseeable to this Defendant that this conspiracy involved 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

With respect to **BILLY TOOMBS, JR.**, as a result of his own conduct, and the conduct of conspirators, it was reasonably foreseeable to this Defendant that this conspiracy involved 50 grams or more of a mixture or 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 846.

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

**COUNT TWO**

*Possession of a Controlled Substance With Intent to Distribute  
(Cocaine and Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about June 2, 2021, in Coffee County, within the Southern District of Georgia, the Defendants,

**DEMARCUS HOLLAND,**

**and**

**JAMES ROBINSON,**

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, and a mixture or substances containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.



**COUNT THREE**

*Possession of Firearms In Furtherance of a Drug Trafficking Crime*  
18 U.S.C. § 924(c)

On or about June 2, 2021, in Coffee County, within the Southern District of Georgia, the Defendants,

**DEMARCUS HOLLAND,**

**and**

**JAMES ROBINSON,**

aided and abetted by each other, did knowingly possess firearms, to wit:

- a MasterPiece Arms, model MAC-11 9mm handgun; and
- SCCY Industries, model CPX-2 9mm handgun,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, Possession of Controlled Substances With Intent to Distribute, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Two of this Indictment.

All in violation of Title 18, United States Code, Section 924(c) and Title 18, United States Code, Section 2.

**COUNT FOUR**

*Possession of Firearms by a Prohibited Person*  
18 U.S.C. § 922(g)(1)

On or about June 2, 2021, in Coffee County, within the Southern District of Georgia, the Defendant,

**JAMES ROBINSON,**

knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, firearms, to wit:

- a MasterPiece Arms, model MAC-11 9mm handgun; and
- SCCY Industries, model CPX-2 9mm handgun,

which had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

**COUNTS FIVE THROUGH SEVEN**  
*Distribution of a Controlled Substance (Cocaine)*  
 21 U.S.C. § 841(a)(1)

On or about the dates and times below, in Coffee County, within the Southern District of Georgia, the Defendant listed below, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance:

<b>COUNT</b>	<b>DEFENDANT</b>	<b>DATE</b>
<b>5</b>	<b>FERLONZO NEWTON a/k/a "LONZIE NEWTON" a/k/a "KELL NEWTON"</b>	September 23, 2021
<b>6</b>	<b>FERLONZO NEWTON a/k/a "LONZIE NEWTON" a/k/a "KELL NEWTON"</b>	October 18, 2021
<b>7</b>	<b>FERLONZO NEWTON a/k/a "LONZIE NEWTON" a/k/a "KELL NEWTON"</b>	October 27, 2021

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

**COUNT EIGHT**

*Possession of a Controlled Substance With Intent to Distribute  
(Cocaine Base)*

21 U.S.C. § 841(a)(1)

On or about November 30, 2021, in Coffee County, within the Southern District of Georgia, the Defendants,

**DEQUATTE TUCKER**  
**a/k/a “DESHAWN TUCKER,”**  
**a/k/a “ESCO,”**  
**a/k/a “FREEBAND ESCO,”**

**and**

**ANTHONY GASKIN,**

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT NINE**

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

On or about November 30, 2021, in Coffee County, within the Southern District of Georgia, the Defendants,

**DEQUATTE TUCKER**  
**a/k/a “DESHAWN TUCKER,”**  
**a/k/a “ESCO,”**  
**a/k/a “FREEBAND ESCO,”**

**and**

**ANTHONY GASKIN,**

aided and abetted by each other, did knowingly possess a firearm, to wit: a Ruger, model 5.7, 5.7x28mm caliber handgun in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, Possession of Controlled Substances With Intent to Distribute, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Eight of this Indictment.

All in violation of Title 18, United States Code, Section 924(c) and Title 18, United States Code, Section 2.

**COUNTS TEN THROUGH FOURTEEN**  
*Distribution of a Controlled Substance (Cocaine)*  
 21 U.S.C. § 841(a)(1)

On or about the dates and times below, in Coffee County, within the Southern District of Georgia, the Defendants listed below, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance:

<b>COUNT</b>	<b>DEFENDANTS</b>	<b>DATE</b>
<b>10</b>	<b>FERLONZO NEWTON</b> a/k/a "LONZIE NEWTON" a/k/a "KELL NEWTON"	December 7, 2021
<b>11</b>	<b>CHRISTOPHER HAWKINS</b> a/k/a "RAYSHON HAWKINS"	January 25, 2022
<b>12</b>	<b>CHRISTOPHER HAWKINS</b> a/k/a "RAYSHON HAWKINS"	January 31, 2022
<b>13</b>	<b>FERLONZO NEWTON</b> a/k/a "LONZIE NEWTON" a/k/a "KELL NEWTON"	May 2, 2022
<b>14</b>	<b>FERLONZO NEWTON</b> a/k/a "LONZIE NEWTON" a/k/a "KELL NEWTON"	May 4, 2022

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

**COUNT FIFTEEN**

*Distribution of a Controlled Substance  
(Oxycodone)*

21 U.S.C. § 841(a)(1)

On or about May 25, 2022, in Coffee County, within the Southern District of Georgia, the Defendant,

**ASSYRIA WATTS  
a/k/a “JEFE CAIN,”**

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

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

**COUNT SIXTEEN**

*Possession of a Firearm by a Prohibited Person*  
18 U.S.C. § 922(g)(1)

On or about June 7, 2022, in Coffee County, within the Southern District of Georgia, the Defendant,

**FERLONZO NEWTON**  
**a/k/a “LONZIE NEWTON,”**  
**a/k/a “KELL NEWTON,”**

knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit: an FMK, model Patriot II 9mm handgun which had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).



**COUNTS SEVENTEEN THROUGH EIGHTEEN**  
*Distribution of a Controlled Substance (Methamphetamine)*  
 21 U.S.C. § 841(a)(1)

On or about the dates and times below, in Coffee County, within the Southern District of Georgia, the Defendant listed below, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance:

<b>COUNT</b>	<b>DEFENDANT</b>	<b>DATE</b>
17	ASSYRIA WATTS a/k/a "JEFE CAIN"	September 12, 2022
18	ASSYRIA WATTS a/k/a "JEFE CAIN"	September 14, 2022

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

**COUNTS NINETEEN THROUGH TWENTY-THREE***Distribution of a Controlled Substance (Cocaine)*

21 U.S.C. § 841(a)(1)

On or about the dates and times below, in Coffee County, within the Southern District of Georgia, the Defendants listed below, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance:

<b>COUNT</b>	<b>DEFENDANTS</b>	<b>DATE</b>
<b>19</b>	<b>ASSYRIA WATTS a/k/a "JEFE CAIN"</b>	November 15, 2022
<b>20</b>	<b>ASSYRIA WATTS a/k/a "JEFE CAIN"</b>	December 2, 2022
<b>21</b>	<b>ASSYRIA WATTS a/k/a "JEFE CAIN"</b>	December 21, 2022
<b>22</b>	<b>KENNETH DAVIS</b>	February 23, 2023
<b>23</b>	<b>ASSYRIA WATTS a/k/a "JEFE CAIN"</b>	March 7, 2023

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

**COUNT TWENTY-FOUR**  
*Distribution of a Controlled Substance*  
*(Methamphetamine)*  
21 U.S.C. § 841(a)(1)

On or about March 8, 2023, in Coffee County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER BROCKINGTON**  
a/k/a “CHRIS BROCK,”

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

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

**COUNTS TWENTY-FIVE THROUGH TWENTY-SIX**  
*Distribution of a Controlled Substance (Cocaine)*  
 21 U.S.C. § 841(a)(1)

On or about the dates and times below, in Coffee County, within the Southern District of Georgia, the Defendants listed below, aided, and abetted by each other, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance:

<b>COUNT</b>	<b>DEFENDANTS</b>	<b>DATE</b>
<b>25</b>	<b>CHRISTOPHER HAWKINS</b> <b>a/k/a “RAYSHON HAWKINS”</b>	March 16, 2023
<b>26</b>	<b>CHRISTOPHER HAWKINS</b> <b>a/k/a “RAYSHON HAWKINS”</b>  <b>and</b>  <b>ASSYRIA WATTS</b> <b>a/k/a “JEFE CAIN”</b>	March 28, 2023

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNTS TWENTY-SEVEN THROUGH TWENTY-EIGHT**  
*Distribution of a Controlled Substance (Methamphetamine)*  
21 U.S.C. § 841(a)(1)

On or about the dates and times below, in Coffee County, within the Southern District of Georgia, the Defendant listed below, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance:

<b>COUNT</b>	<b>DEFENDANT</b>	<b>DATE</b>
<b>27</b>	<b>CHRISTOPHER HAWKINS a/k/a "RAYSHON HAWKINS"</b>	<b>April 6, 2023</b>
<b>28</b>	<b>CHRISTOPHER HAWKINS a/k/a "RAYSHON HAWKINS"</b>	<b>April 19, 2023</b>

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

**COUNT TWENTY-NINE**

*Possession of a Controlled Substance With Intent to Distribute  
(Methamphetamine)  
21 U.S.C. § 841(a)(1)*

On or about April 20, 2023, in Coffee County, within the Southern District of Georgia, the Defendant,

**WANDA HOLLINGER,**

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

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

**COUNTS THIRTY THROUGH THIRTY-TWO**  
*Distribution of a Controlled Substance (Methamphetamine)*  
 21 U.S.C. § 841(a)(1)

On or about the dates and times below, in Coffee County, within the Southern District of Georgia, the Defendant listed below, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance:

<b>COUNT</b>	<b>DEFENDANT</b>	<b>DATE</b>
<b>30</b>	<b>CHRISTOPHER HAWKINS a/k/a "RAYSHON HAWKINS"</b>	<b>May 5, 2023</b>
<b>31</b>	<b>CHRISTOPHER HAWKINS a/k/a "RAYSHON HAWKINS"</b>	<b>June 2, 2023</b>
<b>32</b>	<b>CHRISTOPHER HAWKINS a/k/a "RAYSHON HAWKINS"</b>	<b>June 13, 2023</b>

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

**COUNT THIRTY-THREE**  
*Distribution of a Controlled Substance*  
*(Cocaine)*  
21 U.S.C. § 841(a)(1)

On or about July 14, 2023, in Coffee County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER HAWKINS**  
**a/k/a “RAYSHON HAWKINS,”**

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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



**COUNT THIRTY-FOUR**  
*Distribution of a Controlled Substance*  
*(Methamphetamine)*  
21 U.S.C. § 841(a)(1)

On or about August 24, 2023, in Coffee County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER HAWKINS**  
**a/k/a “RAYSHON HAWKINS,”**

did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

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

**COUNT THIRTY-FIVE**

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

On or about August 24, 2023, in Coffee County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER HAWKINS**  
**a/k/a “RAYSHON HAWKINS,”**

did knowingly possess a firearm, to wit: a Charter Arms, model .38 Special, .38 caliber revolver in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, Distribution of a Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Thirty-Four of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

**COUNTS THIRTY-SIX THROUGH THIRTY-SEVEN**  
*Possession With Intent to Distribute a Controlled Substance*  
*(Marihuana)*  
 21 U.S.C. § 841(a)(1)

On or about the dates and times below, in Coffee County, within the Southern District of Georgia, the Defendants listed below, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of marihuana, a Schedule I controlled substance:

<b>COUNT</b>	<b>DEFENDANTS</b>	<b>DATE</b>
<b>36</b>	<b>KEEVON BUSSEY a/k/a "GUADO GETTINGUAP GOMEZ"</b>	September 4, 2023
<b>37</b>	<b>DARIEN MCDANIEL</b>	September 15, 2023

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

**COUNT THIRTY-EIGHT**

*Possession of a Controlled Substance With Intent to Distribute  
(Cocaine)*

21 U.S.C. § 841(a)(1)

On or about October 3, 2023, in Coffee County, within the Southern District of Georgia, the Defendants,

**KEEVON BUSSEY**  
a/k/a “GUADO GETTINGUAP GOMEZ,”

**CHRISTOPHER HAWKINS**  
a/k/a “RAYSHON HAWKINS,”

**QUDARIOUS HAWKINS**  
a/k/a “DON ESCLOBAR,”

and

**ASSYRIA WATTS**  
a/k/a “JEFE CAIN,”

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT THIRTY-NINE**

*Possession of Firearms In Furtherance of a Drug Trafficking Crime*  
18 U.S.C. § 924(c)

On or about October 3, 2023, in Coffee County, within the Southern District of Georgia, the Defendants,

**KEEVON BUSSEY**  
**a/k/a “GUADO GETTINGUAP GOMEZ,”**

**CHRISTOPHER HAWKINS**  
**a/k/a “RAYSHON HAWKINS,”**

**QUDARIOUS HAWKINS**  
**a/k/a “DON ESCLOBAR,”**

**and**

**ASSYRIA WATTS**  
**a/k/a “JEFE CAIN,”**

aided and abetted by each other, did knowingly possess firearms, to wit:

- a Glock, .40 caliber handgun;
- a Draco, 7.62 caliber handgun;
- a DTI, 5.56mm caliber rifle;
- a Glock, model 19, 9mm caliber handgun; and
- a Tarus, model G3, 9mm caliber handgun,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, Possession of Controlled Substances With Intent to Distribute, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Thirty-Eight of this Indictment.

All in violation of Title 18, United States Code, Section 924(c) and Title 18,

**United States Code, Section 2.**

**COUNT FORTY**

*Use of a Drug Involved Premises*

21 U.S.C. § 856(a)(1)

On or about and between January 1, 2022, and October 3, 2023, in Coffee County, within the Southern District of Georgia, the Defendant,

**CHRISTOPHER HAWKINS**  
**a/k/a “RAYSHON HAWKINS,”**

did unlawfully and knowingly use and maintain a place located at 606 Manilla Avenue, Douglas, Georgia, for the purpose of manufacturing and distributing cocaine, a controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1).

**COUNT FORTY-ONE**

*Possession of a Controlled Substance With Intent to Distribute  
(Cocaine)*

21 U.S.C. § 841(a)(1)

On or about October 13, 2023, in Coffee County, within the Southern District of Georgia, the Defendant,

**ERNEST GOODMAN,**

did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

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



**COUNT FORTY-TWO**

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

On or about October 13, 2023, in Coffee County, within the Southern District of Georgia, the Defendant,

**ERNEST GOODMAN,**

did knowingly possess a firearm, to wit: a Glock, model 42, .380 caliber handgun in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, Possession of a Controlled Substance With Intent to Distribute, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Forty-One of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

**COUNT FORTY-THREE**

*Possession of a Firearm by a Prohibited Person*  
18 U.S.C. § 922(g)(1)

On or about October 13, 2023, in Coffee County, within the Southern District of Georgia, the Defendant,

**ERNEST GOODMAN,**

knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit, a Glock, model 42, .380 caliber handgun, which had been transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

**PRIOR OFFENSES**

Prior to committing the offense charged in the Indictment, the Defendant,

**ERNEST GOODMAN,**

was previously convicted of at least three or more crimes of violence and/or serious drug offenses, qualifying offenses as defined by Title 18, United States Code, Section 924(e), on occasions different from one another, to wit:

1. Possession of Cocaine With Intent to Distribute, Ware County Superior Court Case Number 07R-186, Offense date: January 11, 2007, Conviction date: September 6, 2007;
2. Burglary, Ware County Superior Court Case Number 09R-021, Offense date: November 19, 2004, Conviction date: February 8, 2010; and

3. Aggravated Assault on Law Enforcement (3 Counts), Ware County Superior Court Case Number 08R-459, Offense date: October 6, 2008, Conviction date: February 8, 2010.

**COUNT FORTY-FOUR**  
*Distribution of a Controlled Substance*  
*(Methamphetamine)*  
21 U.S.C. § 841(a)(1)

On or about April 4, 2024, in Bacon County, within the Southern District of Georgia, the Defendants,

**MARQUAN JENKINS**  
a/k/a “ANNA BROOKE,”  
a/k/a “MARY THOMPSON,”

and

**ZARIONNA HOLLOWAY**  
a/k/a “CHANEL PARKER,”

aided and abetted by each other, did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

**COUNTS FORTY-FIVE THROUGH FORTY-SIX**  
*Possession With Intent to Distribute a Controlled Substance*  
*(Methamphetamine)*  
 21 U.S.C. § 841(a)(1)

On or about the dates and times below, in Bacon and Coffee County respectively, within the Southern District of Georgia, the Defendants listed below, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance:

<b>COUNT</b>	<b>DEFENDANTS</b>	<b>DATE</b>
<b>45</b>	<b>BRIAN WRIGHT</b>	May 2, 2024
<b>46</b>	<b>ZARIONNA HOLLOWAY a/k/a "CHANEL PARKER"</b>	May 2, 2024

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

**COUNT FORTY-SEVEN**

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

On or about May 2, 2024, in Coffee County, within the Southern District of Georgia, the Defendant,

**ZARIONNA HOLLOWAY**  
**a/k/a “CHANEL PARKER,”**

did knowingly possess a firearm, to wit: an RG, model 23, .22LR caliber revolver in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, Possession of a Controlled Substance With Intent to Distribute, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Forty-Six of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

**COUNT FORTY-EIGHT**

*Possession of Firearms by a Prohibited Person*

18 U.S.C. § 922(g)(1)

On or about May 2, 2024, in Coffee County, within the Southern District of Georgia, the Defendant,

**MARCUS REYNOLDS**  
**a/k/a “MARC MARC,”**

knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, to wit:

- a Smith and Wesson, 9mm caliber handgun;
- an Alexander Arms, .17 HMR caliber rifle; and
- a Hi Point, model 995 rifle,

which had been transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

**COUNTS FORTY-NINE THROUGH FIFTY**  
*Possession With Intent to Distribute a Controlled Substance*  
*(Methamphetamine)*  
21 U.S.C. § 841(a)(1)

On or about the dates and times below, in Coffee County, within the Southern District of Georgia, the Defendants listed below, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance:

<b>COUNT</b>	<b>DEFENDANTS</b>	<b>DATE</b>
<b>49</b>	<b>RICHARD JEWELL</b>	<b>June 3, 2024</b>
<b>50</b>	<b>JAMES LANDER</b>	<b>July 7, 2024</b>

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



**COUNT FIFTY-ONE**

*Possession of Firearms In Furtherance of a Drug Trafficking Crime*  
18 U.S.C. § 924(c)

On or about July 7, 2024, in Atkinson County, within the Southern District of Georgia, the Defendant,

**JAMES LANDER,**

did knowingly possess firearms, to wit:

- a Springfield, model Hellcat, 9mm caliber handgun; and
- a Bersa, model Thunder, .380 caliber handgun,

in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit, Possession of a Controlled Substance With Intent to Distribute, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Fifty of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

**COUNT FIFTY-TWO**

*Possession of Firearms by a Prohibited Person*  
18 U.S.C. § 922(g)(1)

On or about July 7, 2024, in Atkinson County, within the Southern District of Georgia, the Defendant,

**JAMES LANDER,**

knowing he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, firearms, to wit:

- a Springfield, model Hellcat, 9mm caliber handgun; and
- a Bersa, model Thunder, .380 caliber handgun,

which had been transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIFTY-THREE**

*Possession of a Controlled Substance With Intent to Distribute  
(Methamphetamine)  
21 U.S.C. § 841(a)(1)*

On or about July 7, 2024, in Bacon County, within the Southern District of Georgia, the Defendant,

**BILLY TOOMBS, JR.,**

did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

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

**COUNT FIFTY-FOUR**

*Possession of a Controlled Substance With Intent to Distribute  
(Cocaine)*

21 U.S.C. § 841(a)(1)

On or about August 7, 2024, in Coffee County, within the Southern District of Georgia, the Defendants,

**CHRISTOPHER HAWKINS  
a/k/a “RAYSHON HAWKINS,”**

**and**

**BREANNA HENDERSON,**

aided and abetted by each other, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT FIFTY-FIVE**

*Possession of Firearms In Furtherance of a Drug Trafficking Crime*  
18 U.S.C. § 924(c)

On or about August 7, 2024, in Coffee County, within the Southern District of Georgia, the Defendants,

**CHRISTOPHER HAWKINS**  
a/k/a “RAYSHON HAWKINS,”

and

**BREANNA HENDERSON,**

aided and abetted by each other, did knowingly possess firearms, to wit:

- a Rossi, model RS22, .22 caliber rifle; and
- a Draco, 7.62 caliber handgun,

in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit, Possession of a Controlled Substance With Intent to Distribute, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count Fifty-Four of this Indictment.

All in violation of Title 18, United States Code, Section 924(c) and Title 18, United States Code, Section 2.

**COUNT FIFTY-SIX**

*Conspiracy to Possess Firearms In Furtherance of a Drug Trafficking Crime*  
18 U.S.C. § 924(o)

Beginning on a date at least as early as January 14, 2021, up to and including the return date of this Indictment, the precise dates being unknown, in Atkinson County, Bacon County and Coffee County, within the Southern District of Georgia, and elsewhere, the Defendants,

**CHRISTOPHER HAWKINS**  
**a/k/a “RAYSHON HAWKINS,”**

**and**

**COREY HILL,**

did knowingly and intentionally combine, conspire, and agree with each other to possess a firearm in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit, Conspiracy to Possess With Intent to Distribute and to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 846, as charged in Count One of the Indictment.

All in violation of Title 18, United States Code, Section 924(o).

**COUNT FIFTY-SEVEN**  
*Conspiracy to Launder Monetary Instruments*  
18 U.S.C. § 1956(h)

Beginning on a date at least as early as January 14, 2021, up to and including the return date of this Indictment, the precise dates being unknown, in Atkinson County, Bacon County, and Coffee County, within the Southern District of Georgia, and elsewhere, the Defendants,

**MARQUAN JENKINS**  
**a/k/a “ANNA BROOKE,”**  
**a/k/a “MARY THOMPSON,”**

and

**ZARIONNA HOLLOWAY**  
**a/k/a “CHANEL PARKER,”**

did knowingly and intentionally combine, conspire, and agree with each other to conduct and attempt to conduct financial transactions involving proceeds derived from a specified unlawful activity to wit: Conspiracy to Possess With Intent to Distribute and to Distribute Controlled Substances, with the intent to conceal and disguise the nature, location, source, ownership, and control of proceeds.

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

**COUNT FIFTY-EIGHT**

*Conspiracy to Possess Firearms In Furtherance of a Drug Trafficking Crime*  
18 U.S.C. § 924(o)

Beginning on a date at least as early as January 14, 2021, up to and including the return date of this Indictment, the precise dates being unknown, in Atkinson County, Bacon County, and Coffee County, within the Southern District of Georgia, and elsewhere, the Defendants,

**ASSYRIA WATTS**  
a/k/a “JEFE CAIN,”

and

**DACIA GASKINS**  
a/k/a “SHEREE GASKINS,”

did knowingly and intentionally combine, conspire, and agree with each other to possess a firearm in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit, Conspiracy to Possess With Intent to Distribute and to Distribute Controlled Substances, in violation of Title 21, United States Code, Section 846, as charged in Count One of the Indictment.

All in violation of Title 18, United States Code, Section 924(o).



**COUNT FIFTY-NINE**  
*Use of a Drug Involved Premises*  
21 U.S.C. § 856(a)(1)

On or about and between March 7, 2023, and December 31, 2023, in Coffee County, within the Southern District of Georgia, the Defendant,

**PATRICIA RAVEN**  
**a/k/a “MS. PAT,”**

did unlawfully and knowingly use and maintain a place located at 606 Willow Street, Douglas, Georgia, for the purpose of manufacturing and distributing cocaine, a controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1).

**COUNT SIXTY**  
*Conspiracy to Launder Monetary Instruments*  
18 U.S.C. § 1956(h)

Beginning on a date at least as early as January 14, 2021, up to and including the return date of this Indictment, the precise dates being unknown, in Atkinson County, Bacon County, and Coffee County, within the Southern District of Georgia, and elsewhere, the Defendants,

**T<sup>o</sup>KIYA EADY,**

**and**

**CHRISTOPHER HAWKINS**  
**a/k/a “RAYSHON HAWKINS,”**

did knowingly and intentionally combine, conspire, and agree with each other to conduct and attempt to conduct financial transactions involving proceeds derived from a specified unlawful activity to wit: Conspiracy to Possess With Intent to Distribute and to Distribute Controlled Substances, with the intent to conceal and disguise the nature, location, source, ownership, and control of proceeds.

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

**FORFEITURE ALLEGATIONS**

The allegations contained in Counts One through Sixty of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d) and 982(a)(1); Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461(c).

Upon conviction of one or more of the offenses charging violations of Title 21 offenses set forth in this Indictment, the Defendants, **LITARUS BRINSON a/k/a “BEN BROKEBEFORE,” CHRISTOPHER BROCKINGTON a/k/a “CHRIS BROCK,” KEEVON BUSSEY a/k/a “GUADO GETTINGUAP GOMEZ,” STACEY DANIELS, KENNETH DAVIS, T’KIYA EADY, PATRICK ELLIS, ANTHONY GASKIN, DACIA GASKINS a/k/a “SHEREE GASKINS,” ERNEST GOODMAN, CHRISTOPHER HAWKINS a/k/a “RAYSHON HAWKINS,” QUDARIOUS HAWKINS a/k/a “DON ESCLOBAR,” BREANNA HENDERSON, COREY HILL, DEMARCUS HOLLAND, WANDA HOLLINGER, ZARIONNA HOLLOWAY a/k/a “CHANEL PARKER,” ROGER JENKINS a/k/a “GLEE JENKINS,” a/k/a “WMG GLEE,” MARQUAN JENKINS a/k/a “ANNA BROOKE,” a/k/a “MARY THOMPSON,” RICHARD JEWELL, AARON KAHN, JAMES LANDER, JEFFREY MAXWELL a/k/a “EBK KOKAINE,” DARIEN MCDANIEL, ANTARIOUS MCTEAR, ADRIAN MUNFORD a/k/a “JUGG KING,” FERLONZO NEWTON a/k/a “LONZIE NEWTON,” a/k/a “KELL NEWTON,” REGINALD POWELL a/k/a “YETTI GLOCK,” MARCUS REYNOLDS a/k/a “MARC MARC,” PATRICIA RAVEN a/k/a “MS. PAT,”**

**JAMES ROBINSON, SEDARRIEN SMITH a/k/a “SLUG DA MENACE,” BILLY TOOMBS, JR., DEQUATTE TUCKER a/k/a “DESHAWN TUCKER,” a/k/a “ESCO,” a/k/a “FREEBAND ESCO,” TRAVIS TUCKER, ASSYRIA WATTS a/k/a “JEFE CAIN,” and BRIAN WRIGHT,** shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to:

- SCCY CPX-1 9mm Pistol (S/N: 819440) and associated ammunition;
- MasterPiece Arms MAC-11 9mm Handgun (S/N: B14627) and associated ammunition;
- SCCY Industries CPX-2 Handgun (S/N: C001395) and associated ammunition;
- FMK Patriot II 9mm Handgun (S/N: BGG65687) and associated ammunition;
- Charter Arms .38 Special Handgun (S/N: 21L01578) and associated ammunition;
- Century Arms Canik SFX Rival 9x19 Handgun (S/N: T647222CM21 037) and associated ammunition;
- Glock .40 caliber Handgun (S/N: BCSU4520) and associated ammunition;
- Draco 7.62 caliber Handgun (S/N: PMD38737) and associated ammunition;

- DTI, 5.56mm caliber Rifle (S/N: B77638) and associated ammunition;
- Glock, model 19, 9mm Handgun (S/N: AGRU837) and associated ammunition;
- Taurus, model G3, 9mm Handgun (S/N: ACN783303) and associated ammunition;
- Glock, model 42, .380 caliber Handgun (S/N: AAXE568) and associated ammunition;
- RG 23 .22LR Revolver (S/N: T791824) and associated ammunition;
- Smith and Wesson, 9mm Handgun (S/N: JFY9514) and associated ammunition;
- Alexander Arms, .17 HMR caliber Handgun (S/N: 00989) and associated ammunition;
- Hi-Point, model 995 Handgun (S/N: B99348) and associated ammunition;
- Springfield, model Hellcat, 9mm caliber Handgun (S/N: BA592437) and associated ammunition;
- Bersa, model Thunder, .380 caliber Handgun (S/N: H31899) and associated ammunition;
- Rossi, model RS22, .22 caliber Handgun (S/N: 7CA355547R) and associated ammunition;
- Draco 7.62 caliber Handgun (S/N: PMD48525) and associated ammunition;
- Glock, model 42 .380 caliber Handgun (S/N: AAXE568) and associated ammunition; and

- \$17,146 United States Currency.

Upon conviction of one or more of any of the offenses set forth in this Indictment, the Defendants, **LITARUS BRINSON a/k/a “BEN BROKEBEFORE,” CHRISTOPHER BROCKINGTON a/k/a “CHRIS BROCK,” KEEVON BUSSEY a/k/a “GUADO GETTINGUAP GOMEZ,” STACEY DANIELS, KENNETH DAVIS, T’KIYA EADY, PATRICK ELLIS, ANTHONY GASKIN, DACIA GASKINS a/k/a “SHEREE GASKINS,” ERNEST GOODMAN, CHRISTOPHER HAWKINS a/k/a “RAYSHON HAWKINS,” QUDARIOUS HAWKINS a/k/a “DON ESCLOBAR,” BREANNA HENDERSON, COREY HILL, DEMARCUS HOLLAND, WANDA HOLLINGER, ZARIONNA HOLLOWAY a/k/a “CHANEL PARKER,” ROGER JENKINS a/k/a “GLEE JENKINS,” a/k/a “WMG GLEE,” MARQUAN JENKINS a/k/a “ANNA BROOKE,” a/k/a “MARY THOMPSON,” RICHARD JEWELL, AARON KAHN, JAMES LANDER, JEFFREY MAXWELL a/k/a “EBK KOKAINE,” DARIEN MCDANIEL, ANTARIOUS MCTEAR, ADRIAN MUNFORD a/k/a “JUGG KING,” FERLONZO NEWTON a/k/a “LONZIE NEWTON,” a/k/a “KELL NEWTON,” REGINALD POWELL a/k/a “YETTI GLOCK,” MARCUS REYNOLDS a/k/a “MARC MARC,” PATRICIA RAVEN a/k/a “MS. PAT,” JAMES ROBINSON, SEDARRIEN SMITH a/k/a “SLUG DA MENACE,” BILLY TOOMBS, JR., DEQUATTE TUCKER a/k/a “DESHAWN TUCKER,” a/k/a “ESCO,” a/k/a “FREEBAND ESCO,” TRAVIS TUCKER, ASSYRIA WATTS a/k/a “JEFE CAIN,” and BRIAN WRIGHT, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)**

and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the offense(s), including, but not limited to:

- SCCY CPX-1 9mm Pistol (S/N: 819440) and associated ammunition;
- MasterPiece Arms MAC-11 9mm Handgun (S/N: B14627) and associated ammunition;
- SCCY Industries CPX-2 Handgun (S/N: C001395) and associated ammunition;
- FMK Patriot II 9mm Handgun (S/N: BGG65687) and associated ammunition;
- Charter Arms .38 Special Handgun (S/N: 21L01578) and associated ammunition;
- Century Arms Canik SFX Rival 9x19 Handgun (S/N: T647222CM21 037) and associated ammunition;
- Glock .40 caliber Handgun (S/N: BCSU4520) and associated ammunition;
- Draco 7.62 caliber Handgun (S/N: PMD38737) and associated ammunition;
- DTI, 5.56mm caliber Rifle (S/N: B77638) and associated ammunition;
- Glock, model 19, 9mm Handgun (S/N: AGRU837) and associated ammunition;
- Taurus, model G3, 9mm Handgun (S/N: ACN783303) and associated ammunition;
- Glock, model 42, .380 caliber Handgun (S/N: AAXE568) and associated ammunition;

- RG 23 .22LR Revolver (S/N: T791824) and associated ammunition;
- Smith and Wesson, 9mm Handgun (S/N: JFY9514) and associated ammunition;
- Alexander Arms, .17 HMR caliber Handgun (S/N: 00989) and associated ammunition;
- Hi-Point, model 995 Handgun (S/N: B99348) and associated ammunition;
- Springfield, model Hellcat, 9mm caliber Handgun (S/N: BA592437) and associated ammunition;
- Bersa, model Thunder, .380 caliber Handgun (S/N: H31899) and associated ammunition;
- Rossi, model RS22, .22 caliber Handgun (S/N: 7CA355547R) and associated ammunition;
- Draco 7.62 caliber Handgun (S/N: PMD48525) and associated ammunition;  
and
- Glock, model 42 .380 caliber Handgun (S/N: AAXE568) and associated ammunition;

Upon conviction of one or more of the offenses charged in Counts 57 and 60 of this Indictment, the Defendants, **MARQUAN JENKINS, a/k/a “ANNA BROOKE,” a/k/a “MARY THOMPSON,” ZARIONNA HOLLOWAY, a/k/a “CHANEL PARKER,” T’KIYA EADY, and CHRISTOPHER HAWKINS, a/k/a “RAYSHON HAWKINS,”** shall forfeit to the United States, pursuant to Title 18, United States




Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property.


If any of the property described above, as a result of any act or commission 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 party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A True Bill.

  
\_\_\_\_\_  
Jill E. Steinberg  
United States Attorney

representative  
  
\_\_\_\_\_  
Bradley R. Thompson  
Assistant United States Attorney  
\*Lead Counsel

  
\_\_\_\_\_  
Tania D. Groover  
Assistant United States Attorney  
Chief, Criminal Division

  
\_\_\_\_\_  
Joshua K. Davis  
Assistant United States Attorney  
\*Co-Lead Counsel