

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION

UNITED STATES OF AMERICA	:	CRIMINAL NO. 1:11-CR-12-WLS
	:	
v.	:	VIOLATION: 21 U.S.C. § 846 i/c/w
	:	21 U.S.C. § 841(a)(1)
CARLOS JOHNSON, KELVIN	:	21 U.S.C. § 841(a)(1)(A)(ii)
JOHNSON, NICHOLE SHEFFIELD,	:	21 U.S.C. § 841(a)(1)(A)(iii)
JOHN HARRIS, MAURICE SCOTT,	:	21 U.S.C. § 841(b)(1)(B)(iii)
TYRONE CAINE, BERNARD	:	18 U.S.C. § 2
GRAHAM, ERICA JOHNSON,	:	21 U.S.C. § 841(b)(1)(C)
ANTHONY SHULER, JIMMY	:	21 U.S.C. § 841(b)(1)(B)(ii)
VICKERS, BRANDON	:	21 U.S.C. § 853
MCKNIGHT, TERRANCE DAVIS,	:	
CASEY CLEMONS, TRAVIS	:	
BRUTON, MARIKES STROUD,	:	
JAMES WILSON, RON GOSS,	:	
ANTONIO WINBUSH AND	:	
T'MICHAEL JONES	:	

THE GRAND JURY CHARGES:

COUNT ONE

(Distribution of Cocaine Base)

From on or about December, 2008, the exact date being unknown to the Grand Jury and continuing to on or about February, 2011, both dates being approximate and inclusive, in the Albany Division of the Middle District of Georgia and elsewhere within the jurisdiction of this court, the defendants,

CARLOS JOHNSON
KELVIN JOHNSON
NICHOLE SHEFFIELD
JOHN HARRIS
MAURICE SCOTT
TYRONE CAINE

**BERNARD GRAHAM
ERICA JOHNSON
ANTHONY SHULER
JIMMY VICKERS
BRANDON MCKNIGHT
TERRANCE DAVIS
CASEY CLEMONS
TRAVIS BRUTON
MARIKES STROUD
JAMES WILSON
RON GOSS
ANTONIO WINBUSH
and
T'MICHAEL JONES**

unlawfully, knowingly, and intentionally conspired, with each other, and with other persons known and unknown to the Grand Jury, to commit the following offenses against the United States, to wit: possession with intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine and 50 grams or more of a mixture or substance containing a detectable amount of cocaine base also known as "crack cocaine", schedule II controlled substances; all in violation of Title 21, United States Code, Section 846 i/c/w Title 21, United States Code, Sections 841 (a)(1), and 841 (b)(1)(A)(ii) and (b)(1)(A)(iii)

COUNT TWO

(Distribution of Cocaine Base)

That on or about December 4, 2008, in the Albany Division of the Middle District of Georgia,

**CARLOS JOHNSON
and
JAMES WILSON**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, willfully and intentionally distribute a Schedule II controlled substance, to

wit: 50 grams or more of a mixture and substance containing a detectable amount cocaine, i.e., cocaine base also known as “crack cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(A)(iii), and Title 18, United States Code, Section 2.

COUNT THREE

(Distribution of Cocaine Base)

That on or about December 12, 2008, in the Albany Division of the Middle District of Georgia, the defendant,

CARLOS JOHNSON

aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to wit: 5 grams or more of a mixture and substance containing a detectable amount cocaine base also known as “crack cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(B)(iii), and Title 18, United States Code, Section 2.

COUNT FOUR

(Distribution of Cocaine Base)

That on or about December 19, 2008, in the Albany Division of the Middle District of Georgia, the defendant,

JAMES WILSON

aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to wit: 5 grams or more of a mixture and substance containing a detectable amount cocaine base also known as “crack cocaine”, all in

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

COUNT FIVE

(Distribution of Cocaine Base)

That on or about January 16, 2009, in the Albany Division of the Middle District of Georgia, the defendant,

KELVIN JOHNSON

aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to wit: a mixture and substance containing a detectable amount cocaine and a mixture and substance containing a detectable amount of cocaine base also known as "crack cocaine", all in violation of Title 21, United States Code Section 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SIX

(Distribution of Cocaine Base)

That on or about February 4, 2009, in the Albany Division of the Middle District of Georgia, the defendant,

KELVIN JOHNSON

aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to wit: 5 grams or more of a mixture and substance containing a detectable amount cocaine base also known as "crack cocaine", all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(B)(iii), and Title 18, United States Code, Section 2.

COUNT SEVEN

(Distribution of Cocaine Base)

That on or about March 3, 2009, in the Albany Division of the Middle District of Georgia, the defendant,

**KELVIN JOHNSON
and
BERNARD GRAHAM**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to wit: 5 grams or more of a mixture and substance containing a detectable amount cocaine base also known as “crack cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(B)(iii), and Title 18, United States Code, Section 2.

COUNT EIGHT

(Distribution of Cocaine Base)

That on or about April 1, 2009, in the Albany Division of the Middle District of Georgia, the defendant,

BERNARD GRAHAM

aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to wit: 5 grams or more of a mixture and substance containing a detectable amount cocaine base also known as “crack cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(B)(iii), and Title 18, United States Code, Section 2.

COUNT NINE

(Distribution of Cocaine Base)

That on or about March 26, 2010, in the Albany Division of the Middle District of Georgia, the defendant,

MAURICE SCOTT

aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to wit: 5 grams or more of a mixture and substance containing a detectable amount cocaine base also known as "crack cocaine", all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(B)(iii), and Title 18, United States Code, Section 2.

COUNT TEN

(Distribution of Cocaine Base)

That on or about April 9, 2010, in the Albany Division of the Middle District of Georgia, the defendant,

MAURICE SCOTT

aided and abetted by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally distribute a Schedule II controlled substance, to wit: 50 grams or more of a mixture and substance containing a detectable amount cocaine base also known as "crack cocaine", all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(A)(iii), and Title 18, United States Code, Section 2.

COUNT ELEVEN

(Possession With Intent To Distribute Cocaine)

That on or about June 3, 2010, in the Albany Division of the Middle District of Georgia, the defendant,

**CARLOS JOHNSON,
KELVIN JOHNSON,
ERICA JOHNSON,
and
RON GOSS**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to wit: a mixture and substance containing a detectable amount cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT TWELVE

(Possession With Intent To Distribute Cocaine)

That on or about June 14, 2010, in the Albany Division of the Middle District of Georgia, the defendant,

**CARLOS JOHNSON
NICHOLE SHEFFIELD
ANTHONY SHULER
and
T'MICHAEL JONES**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to wit: more than 5 kilograms of a mixture and substance containing a detectable amount

cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

COUNT THIRTEEN

(Possession With Intent To Distribute Cocaine)

That on or about June 16, 2010, in the Albany Division of the Middle District of Georgia, the defendant,

**KELVIN JOHNSON
JIMMY VICKERS
and
BRANDON MCKNIGHT**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to wit: a mixture and substance containing a detectable amount cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FOURTEEN

(Possession With Intent To Distribute Cocaine)

That on or about August 11, 2010, in the Albany Division of the Middle District of Georgia, the defendant,

**CARLOS JOHNSON
TERRANCE DAVIS
and
TYRONE CAINE**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to wit: a mixture and substance containing a detectable amount cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT FIFTEEN

(Possession With Intent To Distribute Cocaine)

That on or about August 12, 2010, in the Albany Division of the Middle District of Georgia, the defendant,

**CARLOS JOHNSON
CASEY CLEMMONS
KELVIN JOHNSON
and
T’MICHAEL JONES**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally attempt to possess with intent to distribute a Schedule II controlled substance, to wit: a mixture and substance containing a detectable amount cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1), 841(b)(1)(C) and 21, United States Code Section 846 and Title 18, United States Code, Section 2.

COUNT SIXTEEN

(Possession With Intent To Distribute Cocaine)

That on or about September 30, 2010, in the Albany Division of the Middle District of Georgia, the defendant,

**CARLOS JOHNSON
and
JOHN HARRIS**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to wit: a mixture and substance containing a detectable amount cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

(Possession With Intent To Distribute Cocaine)

That on or about October 5, 2010, in the Albany Division of the Middle District of Georgia, the defendant,

**CARLOS JOHNSON
and
TRAVIS BRUTON**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to wit: a mixture and substance containing a detectable amount cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

(Possession With Intent To Distribute Cocaine)

That on or about December 6, 2010, in the Albany Division of the Middle District of Georgia, the defendant,

**CARLOS JOHNSON
RON GOSS
and
MARIKES STROUD**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to wit: a mixture and substance containing a detectable amount cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT NINETEEN

(Possession With Intent To Distribute Cocaine)

That on or about February 10, 2011, in the Albany Division of the Middle District of Georgia, the defendant,

**CARLOS JOHNSON
ANTONIO WINBUSH
and
KELVIN JOHNSON**

aided and abetted by each other and by others, both known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally possess with intent to distribute a Schedule II controlled substance, to wit: 500 grams or more of a mixture and substance containing a detectable amount cocaine”, all in violation of Title 21, United States Code Sections 841(a)(1) and 841(b)(1)(B)(ii), and Title 18, United States Code, Section 2.

FORFEITURE NOTICE

(21 U.S.C. § 853 – Criminal Forfeiture)

1. The allegations contained in Counts One through Nineteen of this Indictment are hereby re-alleged and incorporated by reference into this Notice for the purpose of alleging forfeitures to the United States of America, pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the commission of the aforesaid violations of Title 21, United States Code, Section 846, i/c/w Title 21, United States Code 841, which are punishable by imprisonment for more than one year, the defendants,

**CARLOS JOHNSON
KELVIN JOHNSON
NICHOLE SHEFFIELD
JOHN HARRIS
MAURICE SCOTT
TYRONE CAINE
BERNARD GRAHAM
ERICA JOHNSON
ANTHONY SHULER
JIMMY VICKERS
BRANDON MCKNIGHT
TERRANCE DAVIS
CASEY CLEMONS
TRAVIS BRUTON
MARIKES STROUD
JAMES WILSON
RON GOSS
ANTONIO WINBUSH
and
T'MICHAEL JONES**

shall forfeit to the United States all of their interest in any and all property constituting and derived from any proceeds the defendants obtained, directly and indirectly as a result of such violations and

any and all property, real or personal, used and intended to be used in any manner or part to commit and to facilitate the commission of the aforesaid violations.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred, 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 up to the value of the above forfeitable property.

All as provided in Title 21, United States Code, Section 853.

A TRUE BILL.

S/
FOREPERSON OF THE GRAND JURY

PRESENTED BY:

MICHAEL J. MOORE
UNITED STATES ATTORNEY

Michael K. Dennard
MICHAEL K. DENNARD
ASSISTANT UNITED STATES ATTORNEY

Filed in open court this 9th day of

March A.D. 20 11

Maeride White
Deputy Clerk