

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

) No. 10-00162-01/23-CR-W-FJG

) COUNT ONE: **All Defendants**
) 21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(A)
) NLT 10 Years, NMT Life Imprisonment
) NMT \$4,000,000 Fine
) NLT 5 Years Supervised Release
) Class A Felony

ALFONSO VELO,
[DOB: 08/05/1964]

RICARDO NEVAREZ,
[DOB: 04/17/1982]

) COUNTS TWO, THREE and FOUR: **Roberson**
) 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)
) NLT 5 Years, NMT 40 Years Imprisonment
) NMT \$2,000,000 Fine
) NLT 4 Years Supervised Release
) Class B Felony

SHAWN HAMPTON,
a/k/a "Smoke"
[DOB: 06/28/1975]

BRICE C. HALE,
[DOB: 01/11/1973]

) COUNTS FIVE, EIGHT, ELEVEN and
) FIFTEEN: **Hampton**
) 21 U.S.C. §§ 841(a)(1) and (b)(1)(B)
) NLT 5 Years, NMT 40 Years Imprisonment
) NMT \$2,000,000 Fine
) NLT 4 Years Supervised Release
) Class B Felony

DELBERT ROBERSON,
a/k/a "Del"
[DOB: 02/16/1979]

NARICCO T. SCOTT,
a/k/a "Rico"
[DOB: 01/05/1982]

) COUNTS SIX and SEVEN: **White**
) 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
) NMT 20 Years Imprisonment
) NMT \$1,000,000 Fine
) NLT 3 Years Supervised Release
) Class C Felony

CALAH D. JOHNSON,
a/k/a "Green Eyes"
[DOB: 03/14/1981]

JOHN L. HOOKER,
a/k/a "Ace"
[DOB: 05/31/1988]

) COUNTS NINE and TEN: **Scott**
) 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
) NMT 20 Years Imprisonment
) NMT \$1,000,000 Fine
) NLT 3 Years Supervised Release
) Class C Felony

RAY A. JOHNSON,
[DOB: 12/28/1978]

JASON R. CARTER,
a/k/a "J-Roc"
[DOB: 09/21/1986]



JUSTIN J. CAMPBELL,
a/k/a "Shaw"
[DOB: 10/26/1976]

ANTAR H. ROBERTS,
a/k/a "Saw"
[DOB: 08/02/1973]

GREGORY P. YOUNG,
a/k/a "Chan"
[DOB: 12/31/1972]

RONNELL A. BROWN,
[DOB: 09/17/1971]

MYLIN D. SMITH,
a/k/a "G"
[DOB: 07/12/1983]

THEODORE S. WIGGINS,
a/k/a "Theo"
[DOB: 12/23/1980]

ANDREYA JONES,
a/k/a "Pig"
[DOB: 05/18/1982]

STERLING BYNDOM,
[DOB: 09/30/1985]

MARCUS L. GAY,
[DOB: 10/25/1973]

KEIYATIE R. WHITE,
[DOB: 08/01/1981]

DOROTHEA L. CAIN,
a/k/a "Dea"
[DOB: 07/03/1971]

ADRIAN U. BARRETT,
[DOB: 02/07/1976]

) COUNT TWELVE: **C. D. Johnson**
) 18 U.S.C. §§ 922(g)(1) and 924(a)(2)
) NMT 10 Years Imprisonment
) NMT \$250,000 Fine
) NMT 3 Years Supervised Release
) Class C Felony

)
) COUNT THIRTEEN: **Wiggins**
) 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
) NMT 20 Years Imprisonment
) NMT \$1,000,000 Fine
) NLT 3 Years Supervised Release

) Class C Felony

)
) COUNT FOURTEEN: **Carter**
) 21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
) NMT 20 Years Imprisonment
) NMT \$1,000,000 Fine
) NLT 3 Years Supervised Release
) Class C Felony

)
) COUNT SIXTEEN: **Scott**
) 21 U.S.C. §§ 841(a)(1) and (b)(1)(A)
) NLT 10 Years, NMT Life Imprisonment
) NMT \$4,000,000 Fine
) NLT 5 Years Supervised Release
) Class A Felony

)
) COUNT SEVENTEEN: **Scott**
) 18 U.S.C. § 924(c)(1)(A)

) NLT 5 Years Imprisonment
) NMT Life Imprisonment
) NMT \$250,000 Fine
) NLT 5 Years Supervised Release
) Class A Felony

)
) \$100 Special Assessment for Counts One
) through Seventeen

ALEJANDRO HOLGUIN-BONILLA,)
 a/k/a "Alex")
 [DOB: 10/29/1987])
)
 Defendants.)
)
 Velo - 1)
 Nevarez - 1)
 Hampton - 1, 5, 8, 11, 15)
 Hale - 1)
 Roberson - 1, 2, 3, 4)
 Scott - 1, 9, 10, 16, 17)
 C. D. Johnson - 1, 12)
 Hooker - 1)
 R. A. Johnson - 1)
 Carter - 1, 14)
 Campbell - 1)
 Roberts - 1)
 Young - 1)
 Brown - 1)
 Smith - 1)
 Wiggins - 1, 13)
 Jones - 1)
 Byndom - 1)
 Gay - 1)
 White - 1, 6, 7)
 Cain - 1)
 Barrett - 1)
 Holguin-Bonilla - 1)

SUPERCEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

That between July 1, 2009, and the date of this Indictment, said dates being approximate, in the Western District of Missouri and elsewhere, ALFONSO VELO, RICARDO NEVAREZ, SHAWN HAMPTON, a/k/a "SMOKE", BRICE C. HALE, DELBERT ROBERSON, a/k/a "Del", NARICCO T. SCOTT, a/k/a "Rico", CALAH D. JOHNSON, a/k/a "Green Eyes", JOHN

L. HOOKER, a/k/a "Ace", RAY A. JOHNSON, JASON R. CARTER, a/k/a "J-Roc", JUSTIN J. CAMPBELL, a/k/a "Shaw", ANTAR H. ROBERTS, a/k/a "Saw", GREGORY P. YOUNG, a/k/a "Chan", RONNELL A. BROWN, MYLIN D. SMITH, a/k/a "G", THEODORE S. WIGGINS, a/k/a "Theo", ANDREYA JONES, a/k/a "Pig", STERLING BYNDOM, MARCUS L. GAY, KEIYATIE R. WHITE, DOROTHEA L. CAIN, a/k/a "Dea", ADRIAN U. BARRETT, and ALEJANDRO HOLGUIN-BONILLA, a/k/a "Alex", defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others, both known and unknown to the Grand Jury, to distribute: 1) a mixture or substance containing cocaine, a Schedule II controlled substance, in an amount of five (5) kilograms or more; and, 2) a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in an amount of fifty (50) grams or more, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and Title 21, United States Code, Section 846.

COUNT TWO

On or about August 21, 2009, in Kansas City, Missouri, within the Western District of Missouri, DELBERT ROBERSON, a/k/a "Del", defendant herein, did knowingly and intentionally distribute five (5) grams or more of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE

On or about August 25, 2009, in Kansas City, Missouri, within the Western District of Missouri, DELBERT ROBERSON, a/k/a "Del", defendant herein, did knowingly and intentionally distribute five (5) grams or more of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FOUR

On or about August 28, 2009, in Kansas City, Missouri, within the Western District of Missouri, DELBERT ROBERSON, a/k/a "Del", defendant herein, did knowingly and intentionally distribute five (5) grams or more of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FIVE

On or about October 27, 2009, in Kansas City, Missouri, within the Western District of Missouri, SHAWN HAMPTON, a/k/a "Smoke", defendant herein, did knowingly and intentionally distribute five (5) grams or more of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT SIX

On or about November 10, 2009, in Kansas City, Missouri, within the Western District of Missouri, KEIYATIE R. WHITE, defendant herein, did knowingly and intentionally distribute some quantity of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SEVEN

On or about November 11, 2009, in Kansas City, Missouri, within the Western District of Missouri, KEIYATIE R. WHITE, defendant herein, did knowingly and intentionally distribute some quantity of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT EIGHT

On or about November 12, 2009, in Kansas City, Missouri, within the Western District of Missouri, SHAWN HAMPTON, a/k/a "Smoke", defendant herein, did knowingly and intentionally distribute five (5) grams or more of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT NINE

On or about November 12, 2009, in Kansas City, Missouri, within the Western District of Missouri, NARICCO SCOTT, a/k/a "Rico", defendant herein, did knowingly and intentionally distribute some quantity of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT TEN

On or about November 19, 2009, in Kansas City, Missouri, within the Western District of Missouri, NARICCO SCOTT, a/k/a "Rico", defendant herein, did knowingly and intentionally distribute some quantity of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT ELEVEN

On or about December 3, 2009, in Kansas City, Missouri, within the Western District of Missouri, SHAWN HAMPTON, a/k/a "Smoke", defendant herein, did knowingly and intentionally distribute five (5) grams or more of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT TWELVE

On or about March 7, 2010, in the Western District of Missouri, CALAH D. JOHNSON, a/k/a "Green Eyes", defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Glock, Model 23, .40 caliber pistol, with serial number FDU846, which had been transported in interstate commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT THIRTEEN

On or about April 15, 2010, in Kansas City, Missouri, within the Western District of Missouri, THEODORE S. WIGGINS, a/k/a "Theo", defendant herein, did knowingly and intentionally distribute some quantity of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FOURTEEN

On or about April 21, 2010, in Kansas City, Missouri, within the Western District of Missouri, JASON R. CARTER, a/k/a "J-Roc", defendant herein, did knowingly and intentionally distribute some quantity of a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FIFTEEN

On or about April 28, 2010, in Kansas City, Missouri, within the Western District of Missouri, SHAWN HAMPTON, a/k/a "Smoke", defendant herein, did knowingly and intentionally distribute five hundred (500) grams or more of a mixture or substance containing

cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT SIXTEEN

On or about May 9, 2010, in Kansas City, Missouri, within the Western District of Missouri, NARICCO T. SCOTT, a/k/a "Rico", defendant herein, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing cocaine base ("crack" cocaine), a Schedule II Controlled Substance, in an amount of fifty grams or more, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

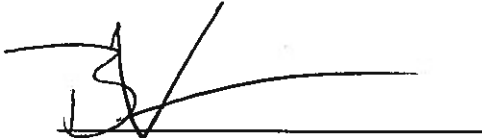
COUNT SEVENTEEN

That on or about May 9, 2010, in Kansas City, Missouri, within the Western District of Missouri, NARICCO T. SCOTT, a/k/a "Rico", defendant herein, in furtherance of the drug-trafficking crimes alleged in Count One and Count Sixteen, did knowingly and intentionally possess a firearm, in violation of Title 18, United States Code, Section 924(c)(1)(A).

A TRUE BILL.

Dated: 5/26/10


FOREPERSON OF THE GRAND JURY


Brent Venneman #17316
Assistant United States Attorney