IN THE DISTRICT COURT OF THE UNITED STATES FOR THE MIDDLE DISTRICT OF ALABAMA EASTERN DIVISION

CLERK U.S. DISTRICT COURT MIDDLE DIST. OF ALA.

UNITED STATES OF AMERICA	7.1000 000 41 Vu
,	Cr. No. 3:17CR 223-WKW
V.) [21 USC § 846;
) 18 USC § 1956(a)(1)(A)(i);
WORLDLY DIEAGO HOLSTICK,	18 USC § 1956(a)(1)(B)(i);
a/k/a "Wo,"	18 USC § 1956(a)(1)(B)(ii)
MARQUIS LANEZ MILLER,	18 USC § 1956(h);
a/k/a "Ned,") 21 USC § 841(a)(1);
JOHN WILLIE MADDOX, JR,	18 USC § 2;
a/k/a "Boochie,"	18 USC § 924(c)(1)(A)(i)]
ALFRED LORENZO COLE,)
a/k/a "Fifty,")
TYESHA LANISE LOCKHART,	<u>INDICTMENT</u>
a/k/a "Esha,"	
ERIN KRISTEN TURNER,)
	<u>UNDER SEAL</u>
SAKEYA MONIQUE DONALDSON,	
LESTER STEPHEN YOUNG, III,)
a/k/a "Jersey,")
TIMOTHY LAMAR SPINKS,)
a/k/a "Biscuit," and "BI,")
JERMICHAEL LAMAR HART,)
a/k/a "Red Man,")
LATEASHA LASHUN WILLIAMS,)
a/k/a "Shun,")
MACKENZIE LEIGH KEITH,)
LEANNE GRIMMETT, and	
,)

The Grand Jury charges:

I. THE DRUG CONSPIRACY

COUNT 1

Beginning from an unknown date, and continuing through in or about June 2017, the exact dates being unknown to the Grand Jury, in Lee County and Montgomery, County, within the Middle District of Alabama, and elsewhere, the defendants,

WORLDLY DIEAGO HOLSTICK, a/k/a "Wo,"

MARQUIS LANEZ MILLER,
a/k/a "Ned,"
JOHN WILLIE MADDOX, JR,
a/k/a "Boochie,"
ALFRED LORENZO COLE,
a/k/a "Fifty,"
TYESHA LANISE LOCKHART,
a/k/a "Esha,"
ERIN KRISTEN TURNER,

SAKEYA MONIQUE DONALDSON,
LESTER STEPHEN YOUNG, III,
a/k/a "Jersey,"
TIMOTHY LAMAR SPINKS,
a/k/a "Biscuit," and "BI,"
JERMICHAEL LAMAR HART,
a/k/a "Red Man," and

and others known and unknown to the Grand Jury, did knowingly and intentionally conspire, combine and agree together and with others both known and unknown to the Grand Jury to distribute and possess with intent to distribute:

- 500 grams or more of a mixture or substance containing a detectable amount of cocaine hydrochloride ("powder" cocaine), a Schedule II Controlled Substance;
- 2. Marijuana, a Schedule I Controlled Substance;
- 3. Alprazolam ("Xanax"), a Schedule IV Controlled Substance; and
- 4. 3,4- Methylenedioxy Amphetamine ("MDMA"), a Schedule I Controlled Substance;

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

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

II. THE MONEY-LAUNDERING CONSPIRACY

COUNT 2

Beginning from an unknown date, and continuing through in or about June 2017, the exact dates being unknown to the Grand Jury, in Lee County, within the Middle District of Alabama, and elsewhere, the defendants,

WORLDLY DIEAGO HOLSTICK, a/k/a "Wo," ALFRED LORENZO COLE, a/k/a "Fifty," ERIN KRISTEN TURNER, and LEANNE GRIMMETT,

did knowingly combine, conspire, and agree with each other, and with other persons, known and unknown, to the Grand Jury, to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to-wit: did knowingly conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is, the manufacture, importation, sale, or distribution of controlled substances, with the intent to:

- 1. promote the carrying on of specified unlawful activity; and
- conceal and disguise the nature, the location, the source, the ownership and control
 of specified unlawful activity, that is, the manufacture, importation, sale, or
 distribution of a controlled substance; and,
- 3. avoid a transaction reporting requirement under State or Federal law, and that while conducting and attempting to conduct such financial transaction, defendants knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation Title 18, United States Code, Sections 1956(a)(1)(A)(i), 1956(a)(1)(B)(i) and 1956(a)(1)(B)(ii).

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

III. SUBSTANTIVE COUNTS

COUNT 3

Beginning from an unknown date and continuing to on or about February 28, 2017, in Lee County, and elsewhere, within the Middle District of Alabama,

MARQUIS LANEZ MILLER, a/k/a "Ned," and MACKENZIE LEIGH KEITH,

defendants herein, each aided and abetted by the other, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute Alprazolam ("Xanax"), a Schedule IV Controlled Substance.

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

COUNT 4

Beginning from an unknown date and continuing to on or about April 18, 2017, in Lee County, and elsewhere, within the Middle District of Alabama,

JOHN WILLIE MADDOX, JR, a/k/a "Boochie," and LATEASHA LASHAUN WILLIAMS, a/k/a "Shun,"

defendants herein, each aided and abetted by the other, and others known and unknown to the Grand Jury, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine hydrochloride or "powder" 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 5

Beginning from an unknown date and continuing to on or about April 26, 2017, in Lee County, within the Middle District of Alabama,

MARQUIS LANEZ MILLER, a/k/a "Ned."

defendant herein, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine hydrochloride or "powder" cocaine, a Schedule II Controlled Substance.

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

COUNT 6

Beginning from an unknown date and continuing through in or about April 26, 2017, the exact dates being unknown to the Grand Jury, in Lee County, within the Middle District of Alabama, the defendant,

MARQUIS LANEZ MILLER, a/k/a "Ned,"

did knowingly possess firearms, to wit: a Taurus 9mm semiautomatic pistol and a Springfield XD45 semiautomatic pistol, better description of which are unknown to the Grand Jury, during and in relation to, and in furtherance of, a drug-trafficking crime for which he may be prosecuted in a Court of the United States, to wit: possession with intent to distribute cocaine hydrochloride, as charged in Count Five of this Indictment.

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

FORFEITURE ALLEGATION-1

(Drug Proceeds)

A. The allegations contained in Counts 1, 3, 4 and 5 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

B. Upon conviction of the offenses in violation of Title 21, United States Code, Sections 841(a)(1) and 846, set forth in Counts 1, 3, 4 and 5 of this Indictment, the defendants,

WORLDLY DIEAGO HOLSTICK,
a/k/a "Wo,"

MARQUIS LANEZ MILLER,
a/k/a "Ned,"

JOHN WILLIE MADDOX, JR.,
a/k/a "Boochie,"

ALFRED LORENZO COLE,
a/k/a "Fifty,"

TYESHA LANISE LOCKHART,
a/k/a "Esha,"

ERIN KRISTEN TURNER,

SAKEYA MONIQUE DONALDSON,
LESTER STEPHEN YOUNG, III,
a/k/a "Jersey,"
TIMOTHY LAMAR SPINKS,
a/k/a "Biscuit," and "BI,"
JERMICHAEL LAMAR HART,
a/k/a "Red Man,"
LATEASHA LASHUN WILLIAMS,
a/k/a "Shun," and
MACKENZIE LEIGH KEITH,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from proceeds the said defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses in violation of Title 21, United States Code, Sections 841(a) and 846.

- C. If any of the property described in this forfeiture allegation, as a result of any act or omission of the defendants:
 - (1) cannot be located upon the exercise of due diligence;
 - (2) has been transferred or sold to, or deposited with, a third party;
 - (3) has been placed beyond the jurisdiction of the court;
 - (4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be divided without difficulty,

the United States 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).

All pursuant to Title 21, United States Code, Section 853.

FORFEITURE ALLEGATION-2

(Money Laundering)

- A. The allegations contained in Count 2 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(1).
- B. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and (ii), set forth in Count 2 of this Indictment, the defendants,

WORLDLY DIEAGO HOLSTICK, a/k/a "Wo," ERIN KRISTEN TURNER, LEANNE GRIMMETT, and ALFRED LORENZO COLE, a/k/a "Fifty,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property constituting or derived from proceeds the said defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and (ii).

- C. If any of the property described in this forfeiture allegation, as a result of any act or omission of the defendants:
 - (1) cannot be located upon the exercise of due diligence;
 - (2) has been transferred or sold to, or deposited with, a third party;
 - (3) has been placed beyond the jurisdiction of the court;

- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty,

the United States 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).

All pursuant to Title 18, United States Code, Section 982(a)(1).

FORFEITURE ALLEGATION-3

(Firearms)

- A. The allegations contained in Count 6 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1), by Title 28, United States Code, Section 2461(c).
- B. Upon conviction of the offenses in violation of Title 18, United States Code, Section 924(c)(1)(A)(i), set forth in Count 6 of this Indictment, the defendant,

MARQUIS LANEZ MILLER, a/k/a "Ned,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) by Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offenses in violation of Title 18, United States Code, Section 924(c)(1)(A)(i) including, but not limited to, the following: a Colt .32 caliber revolver and live ammunition.

- C. If any of the property described in this forfeiture allegation, as a result of any act or omission of the defendant:
 - (1) cannot be located upon the exercise of due diligence;
 - (2) has been transferred or sold to, or deposited with, a third party;
 - (3) has been placed beyond the jurisdiction of the court;
 - (4) has been substantially diminished in value; or

List

(5) has been commingled with other property which cannot be divided without difficulty,

the United States 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).

All pursuant to Title 18, United States Code, Section 924(d)(1) by Title 28, United States Code, Section 2461(c).

A TRUE BILL:

Foreperson

A. CLARK MORRIS
ACTING UNITED STATES ATTORNEY

Verne H. Speirs

Assistant United States Attorney

Kevin P. Davidson

Assistant United States Attorney