

FILED

MAY 16 2018

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA,  
INDIANAPOLIS DIVISION

U.S. CLERK'S OFFICE  
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Cause No. 1:18-cr-00116-TWP-MJD
V.	)	
	)	
PIERRE RILEY,	)	-01
REGGIE BALENTINE	)	
a/k/a Pudge,	)	-02
MICHAEL O'BANNON	)	
a/k/a Lunchy,	)	-03
KRISTIN KINNEY	)	
a/k/a Cupcake,	)	-04
MICHAEL JONES	)	
a/k/a MJ,	)	-05
JASON REED	)	
a/k/a Jamon	)	
a/k/a Jasil,	)	-06
DERRICK OWENS,	)	-07
DESHOUN EVERHART,	)	-08
PERRY JONES,	)	-09
SHAUN MYERS	)	
a/k/a OL,	)	-10
MELISSA BAIRD,	)	-11
BRADLEY CLARK, and	)	-12
ANTWON ABBOTT,	)	-13
	)	
Defendants.	)	

**SECOND SUPERSEDING INDICTMENT**

The Grand Jury charges that:

Count One

*(21 U.S.C. 841(a)(1) and 846—Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances)*

Beginning at a date unknown to the grand jury, and continuing up to and including May 1, 2018, in the Southern District of Indiana and elsewhere, PIERRE RILEY, REGGIE BALENTINE a/k/a Pudge, MICHAEL O'BANNON a/k/a Lunchy, KRISTIN KINNEY a/k/a Cupcake, MICHAEL JONES a/k/a MJ, JASON REED a/k/a Jamon a/k/a Jasil, DERRICK OWENS, DESHOUN EVERHART, PERRY JONES, SHAUN MYERS a/k/a OL, MELISSA BAIRD, and BRADLEY CLARK, defendants herein, did knowingly conspire together and with diverse other persons, known and unknown to the Grand Jury, to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

*OBJECT OF THE CONSPIRACY*

The object of the conspiracy was to possess with intent to distribute and to distribute controlled substances, including 50 grams or more of methamphetamine (actual), a Schedule II controlled substance.

*MANNER AND MEANS*

1. REGGIE BALENTINE communicated with a source of supply located in the State of Georgia, PIERRE RILEY, to obtain controlled substances, including methamphetamine. PIERRE RILEY would then send the methamphetamine to REGGIE BALENTINE using couriers who would bring the methamphetamine from Georgia to Kokomo, Indiana.

2. REGGIE BALENTINE worked with individuals such as MICHAEL O'BANNON, PERRY JONES, and others to distribute the controlled substances.

3. REGGIE BALENTINE routinely stored drugs and/or drug proceeds with individuals such as KRISTIN KINNEY, MELISSA BAIRD, and BRADLEY CLARK. KINNEY would bring BALENTINE the controlled substances when BALENTINE was ready to sell them. KINNEY would also assist in counting the drug proceeds for BALENTINE. MELISSA BAIRD acted in a similar role as

KINNEY, in that she would hold BALENTINE's controlled substances, and traveled to Georgia at BALENTINE's request to pick up controlled substances.

4. REGGIE BALENTINE would distribute the drugs to individuals such as MICHAEL JONES, JASON REED, DESHOUN EVERHART, DERRIK OWENS, and SHAUN MYERS.

5. The coconspirators receiving the drugs would further distribute them to others for a profit.

6. The coconspirators routinely utilized cellular phones to communicate and discuss their ongoing drug distribution activities.

7. Many of the coconspirators also possessed firearms in relation to their drug trafficking activities, in order to protect themselves, their drugs, and their drug proceeds.

All in violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

#### Count Two

*(21 U.S.C. 841(a)(1) Possession with Intent to Distribute Controlled Substances)*

On or about January 26, 2018, in the Southern District of Indiana, DESHOUN EVERHART, defendant herein, knowingly and intentionally possessed with the intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

#### Count Three

*(21 U.S.C. 841(a)(1) Distribution of Controlled Substances)*

On or about February 24, 2018, in the Southern District of Indiana, REGGIE BALENTINE a/k/a Pudge and Jason REED a/k/a Jamon a/k/a Jasil, defendants herein, knowingly and intentionally distributed

50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

Count Four

*(21 U.S.C. 841(a)(1) Possession with Intent to Distribute Controlled Substances)*

On or about February 24, 2018, in the Southern District of Indiana, DERRICK OWENS, defendant herein, knowingly and intentionally possessed with the intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Count Five

*(18 U.S.C. 922(g)(1) Felon in Possession of a Firearm)*

On or about March 8, 2018, in the Southern District of Indiana, PERRY JONES, defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one year (to wit: felony Dealing in Cocaine or Narcotic Drug, Howard County, Indiana, Cause Number 34CO19311CF00078) did knowingly possess in and affecting interstate or foreign commerce a firearm, that is, a black Springfield Armory XD40 handgun, and/or a black Taurus PT11G 9mm handgun, in violation of Title 18, United States Code, Section 922(g)(1).

Count Six

*(18 U.S.C. 922(g)(1) Felon in Possession of a Firearm)*

From on or about March 8, 2018 through on or about March 11, 2018, in the Southern District of Indiana, REGGIE BALENTINE a/k/a Pudge, defendant herein, having been convicted of a crime

punishable by imprisonment for a term exceeding one year (to wit: felony Conspiracy/Dealing in Cocaine or Narcotic Drug, Howard County, Indiana, Cause Number 34D01-0912-FA-01146; felony Assisting a Criminal, Howard County, Indiana, Cause Number 34D01-0911-MR-01001; felony Dealing in Cocaine or Narcotic Drug, Howard County, Indiana, Cause Number 34C01-9611-CF-00072; felony Obstruction of Justice, Howard County, Indiana, Cause Number 34D04-0911-FC-00165), did knowingly possess in and affecting interstate or foreign commerce a firearm, that is, a black Springfield Armory XD40 handgun, and/or a black Taurus PT11G 9mm handgun, in violation of Title 18, United States Code, Section 922(g)(1).

Count Seven

*(18 U.S.C. 922(g)(1) Felon in Possession of a Firearm)*

On or about March 11, 2018, in the Southern District of Indiana, JASON REED a/k/a Jamon a/k/a Jasil, defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one year (to wit: felony Conspiracy to Possess with the Intent to Distribute Cocaine Base, Southern District of Illinois, Cause Number 4:97-CR-40071-01; felony Resisting Law Enforcement, Howard County, Indiana, Cause Number 34D02-0310-FB-00396; felony Possession of Cocaine or Narcotic Drug, Howard County, Indiana, Cause Number 34D01-0701-MR-00040), did knowingly possess in and affecting interstate or foreign commerce a firearm, that is, a black Springfield Armory XD40 handgun, and/or a black Taurus PT11G 9mm handgun, in violation of Title 18, United States Code, Section 922(g)(1).

Count Eight

*(18 U.S.C. 922(g)(3) User of Controlled Substances in Possession of a Firearm)*

On or about May 1, 2018, in the Southern District of Indiana, BRADLEY CLARK, defendant herein, then being an illegal user of a controlled substance as defined by Title 21, United States Code, Section 802, did knowingly possess in and affecting interstate or foreign commerce a firearm, that is, a Jiminez .380 caliber handgun, a Ruger .45 caliber handgun, a Hi-Point 9 mm handgun, a Rossi 32 caliber Smith & Wesson revolver, a Rossi .357 caliber revolver, and/or a Hi-Point 9 mm handgun, in violation of Title 18, United States Code, Section 922(g)(3).

Count Nine

*(21 U.S.C. 841(a)(1)-Possession with Intent to Distribute Controlled Substances)*

On or about May 1, 2018, in the Southern District of Indiana, ANTWON ABBOTT, defendant herein, did knowingly and intentionally possess with the intent to distribute 5 grams or more of methamphetamine (actual), a Schedule I Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

**FORFEITURE**

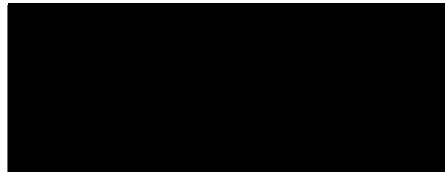
1. Pursuant to Title 21, United States Code, Section 853, if convicted of any of the offenses set forth in Counts One through Four or Count Nine of the Second Superseding Indictment, the defendants shall forfeit to the United States any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offenses, 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.

2. The United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and as incorporated by Title 28, United States Code, Section 2461(c), if any of the property described above in paragraph 1, as a result of any act or omission of the defendants:

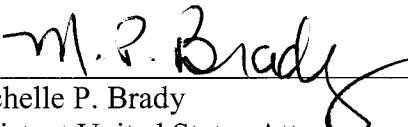
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty.

3. Pursuant to Title 18, United States Code, Section 924(d), if convicted of the offenses set forth in Counts Five, Six, Seven, or Eight of this Second Superseding Indictment, the defendants shall forfeit to the United States “any firearm or ammunition involved in” the offense.

A TRUE BILL:



JOSH J. MINKLER  
United States Attorney

By:   
Michelle P. Brady  
Assistant United States Attorney