

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

U. S. DISTRICT COURT
Southern District of Ga.
Filed In Office

3.1 2018

Deputy Clerk
RJY

UNITED STATES OF AMERICA

v.

JOHN EUGENE OVERCASH,
a/k/a "Cowboy,"
KENNETH LEON BRADLEY,
JEREMY MCINTYRE,
RICHARD CARTER,
DARRIUS MERRELL,
ANDREW JACKSON,
a/k/a "Drew,"
KENEIL KING,
JESSICA TABUTEAU,
TROY CROSBY,
AMY MANSON,
EDRIN TEMPLE,
a/k/a "Pete McCiver,"
ANTHONY BERNARD LEWIS,
a/k/a "Amp,"
JOSEPH SIMMONS,
a/k/a "Bug,"
TOMMY MURRAY,
CLIFTON FOSTER, and
MARCUS MUNGIN.

) CR _____

) CR 218 014

) 21 U.S.C. § 846

) Conspiracy to Possess With

) Intent to Distribute and to

) Distribute Controlled Substances

) (Cocaine, Crack, Marijuana)

)

) 21 U.S.C. § 841(a)(1)

) Distribution/Possession with

) Intent to Distribute a Controlled

) Substance (Cocaine, Crack,

) Marijuana)

)

) 18 U.S.C. § 922(g)

) Possession of a Firearm by a

) Prohibited Person

)

) 21 U.S.C. § 856(a)(1)

) Maintaining a Drug-Involved

) Premises

)

) 18 U.S.C. § 924(c)

) Possession of a Firearm in

) Furtherance of a Drug

) Trafficking Crime

THE GRAND JURY CHARGES THAT:

COUNT ONE

*Conspiracy to Possess With Intent to Distribute and
to Distribute Controlled Substances (5 Kilograms or More of Cocaine, a Quantity of
Cocaine Base "Crack," and a Quantity of Marijuana)*
21 U.S.C. § 846

Beginning on a date at least as early as December 19, 2016, and continuing up to and including March 2018, the precise dates being unknown, in Glynn and McIntosh Counties, within the Southern District of Georgia, and elsewhere, the defendants,

**JOHN EUGENE OVERCASH,
a/k/a "Cowboy,"
KENNETH LEON BRADLEY,
JEREMY MCINTYRE,
RICHARD CARTER,
DARRIUS MERRELL,
ANDREW JACKSON,
a/k/a "Drew,"
KENEIL KING,
JESSICA TABUTEAU,
TROY CROSBY,
AMY MANSON,
EDRIN TEMPLE,
a/k/a "Pete McCiver,"
ANTHONY BERNARD LEWIS,
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JOSEPH SIMMONS,
a/k/a "Bug,"
TOMMY MURRAY,
CLIFTON FOSTER, and
MARCUS MUNGIN,**

aided and abetted by others known and unknown, with some joining the conspiracy earlier and others joining later, did knowingly and intentionally combine, conspire, confederate and agree with others, known and unknown, to possess with intent to

distribute and to distribute 5 kilograms or more of cocaine, a quantity of cocaine base, both schedule II controlled substances, and a quantity of marijuana, a schedule I controlled substance.

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

COUNT TWO
Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1)

On or about January 3, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

KENNETH LEON BRADLEY,

did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance.

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

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

On or about January 6, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

KENNETH LEON BRADLEY,

did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance.

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

COUNT FOUR
Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1)

On or about January 12, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

KENNETH LEON BRADLEY,

did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance.

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

COUNT FIVE

Distribution of Controlled Substance (Cocaine and Crack)
21 U.S.C. § 841(a)(1)

On or about January 26, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

KENNETH LEON BRADLEY,

did knowingly and intentionally distribute a quantity of cocaine and a quantity of cocaine base (“crack”), Schedule II controlled substances.

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

COUNT SIX
Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1)

On or about February 10, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

KENNETH LEON BRADLEY,

did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance.

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

COUNT SEVEN
Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1)

On or about February 18, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

KENNETH LEON BRADLEY,

did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance.

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

COUNT EIGHT

Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1)

On or about April 10, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

KENNETH LEON BRADLEY,

did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance.

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

COUNT NINE

Distribution of Controlled Substance (Cocaine and Crack)
21 U.S.C. § 841(a)(1)

On or about May 9, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

KENNETH LEON BRADLEY,

did knowingly and intentionally distribute a quantity of cocaine and a quantity of cocaine base, Schedule II controlled substances.

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

COUNT TEN
Distribution of Controlled Substance (Cocaine and Crack)
21 U.S.C. § 841(a)(1)

On or about June, 20, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

KENNETH LEON BRADLEY,

did knowingly and intentionally distribute a quantity of cocaine and cocaine base (“crack”), Schedule II controlled substances.

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

COUNT ELEVEN
Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2

On or about May 18, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

TROY CROSBY AND AMY MANSON,

each being aided and abetted by the other, did knowingly and intentionally distribute a quantity 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 TWELVE
Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2

On or about May 25, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

TROY CROSBY AND AMY MANSON,

each being aided and abetted by the other, did knowingly and intentionally distribute a quantity 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 THIRTEEN
Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2

On or about June 8, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

TROY CROSBY AND AMY MANSON,

each being aided and abetted by the other, did knowingly and intentionally distribute a quantity 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 FOURTEEN

Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2

On or about July 13, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

TROY CROSBY AND AMY MANSON,

each being aided and abetted by the other, did knowingly and intentionally distribute a quantity 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 FIFTEEN

Distribution of Controlled Substance (Crack)
21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2

On or about July 28, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

TROY CROSBY AND AMY MANSON,

each being aided and abetted by the other, did knowingly and intentionally distribute a quantity of cocaine base (“crack”), 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 SIXTEEN
Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2

On or about August 4, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

TROY CROSBY AND AMY MANSON,

each being aided and abetted by the other, did knowingly and intentionally distribute a quantity 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 SEVENTEEN
Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2

On or about August 10, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

TROY CROSBY AND AMY MANSON,

each being aided and abetted by the other, did knowingly and intentionally distribute a quantity 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 EIGHTEEN
Distribution of Controlled Substance (Cocaine)
21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2

On or about August 17, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

TROY CROSBY AND AMY MANSON,

each being aided and abetted by the other, did knowingly and intentionally distribute a quantity 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 NINETEEN

Possession of Controlled Substance with Intent to Distribute (Cocaine)
21 U.S.C. § 841(a)(1)

On or about July 20, 2017, in McIntosh County, within the Southern District of Georgia, the defendant,

EDRIN TEMPLE, a/k/a “Pete McCiver,”

did knowingly and intentionally possess a quantity of cocaine, a Schedule II controlled substance, with the intent to distribute.

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

COUNT TWENTY
Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(3)

Beginning at a time unknown but at least from a time between on or about June 24, 2017, and November 1, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

JEREMY MCINTYRE,

an unlawful user of a controlled substance, as defined in section 102 of the Controlled Substances Act, did knowingly possess, in and affecting commerce, a Ruger .45 caliber pistol, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(3).

COUNT TWENTY-ONE
Maintaining a Drug-Involved Premises
21 U.S.C. § 856(a)(1) & 18 U.S.C. § 2

Beginning at a time unknown until on or about November 1, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

JEREMY MCINTYRE, and KENNETH LEON BRADLEY,
aided and abetted by others known and unknown, did unlawfully and knowingly use and maintain a place located at 508 Lucas Lane, Brunswick, Georgia, for the purpose of distributing cocaine.

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

COUNT TWENTY-TWO

Possession of Controlled Substance with Intent to Distribute (Cocaine)
21 U.S.C. § 841(a)(1)

On or about November 1, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

JEREMY MCINTYRE, and KENNETH LEON BRADLEY,

did knowingly and intentionally possess a quantity of cocaine, a Schedule II controlled substance, with the intent to distribute.

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

COUNT TWENTY-THREE

Possession of Controlled Substance with Intent to Distribute (500 Grams or More of Cocaine and Marijuana)
21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2

On or about August 29, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

JOHN EUGENE OVERCASH, a/k/a “Cowboy,” and RICHARD CARTER, being aided and abetted by the other, did knowingly and intentionally possess 500 grams or more of cocaine, a Schedule II controlled substance, and a quantity of marijuana, a Schedule I controlled substance, with the intent to distribute.

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

COUNT TWENTY-FOUR
Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about August 29, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

JOHN EUGENE OVERCASH, a/k/a "Cowboy,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, at least one of the following firearms and ammunition:

- 1) Springfield Armory .30 Caliber Rifle,
- 2) Savage .270 Caliber Rifle,
- 3) Savage .30-06 Caliber Rifle,
- 4) Ruger .223 Caliber Rifle,
- 5) Savage .22 Caliber Rifle,
- 6) Henry Repeating Rifle Company .22 Caliber Rifle,
- 7) Winchester 12 Gauge Shotgun,
- 8) Berretta Pietro S.P.A. 20 Gauge Shotgun,
- 9) Arcadia Machine and Tool .380 Caliber Pistol,
- 10) Assorted ammunition,

all of which had been transported in interstate commerce.

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

COUNT TWENTY-FIVE
Maintaining a Drug-Involved Premises
21 U.S.C. § 856(a)(1) & 18 U.S.C. § 2

Beginning at a time unknown until on or about August 29, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

JOHN EUGENE OVERCASH, a/k/a “Cowboy,” and RICHARD CARTER, aided and abetted by others known and unknown, did unlawfully and knowingly use and maintain a place located at 1199 West Shore Drive, Brunswick, Georgia, for the purpose of distributing cocaine and marijuana.

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

COUNT TWENTY-SIX

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

Beginning at a time unknown but at least until on or about August 29, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

JOHN EUGENE OVERCASH,

did knowingly possess at least one firearm, in furtherance of at least one of the following drug trafficking crimes for which he 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, 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 Twenty-Three of the Indictment, Maintaining a Drug-Involved Premises, in violation of Title 21, United States Code, Section 856(a)(1), as charged in Count Twenty-Five of this Indictment.

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

COUNT TWENTY-SEVEN
Possession of Controlled Substance with Intent to Distribute
(Marijuana)
21 U.S.C. § 841(a)(1)

On or about September 22, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

DARRIUS MERRELL,

did knowingly and intentionally possess a quantity of marijuana, a Schedule I controlled substance, with the intent to distribute.

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

COUNT TWENTY-EIGHT
Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about September 22, 2017, in Glynn County, within the Southern District of Georgia, the defendant,

DARRIUS MERRELL,

having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a loaded Ruger 9mm semi-automatic pistol, which had been transported in interstate commerce.

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

COUNT TWENTY-NINE

Possession of Controlled Substance with Intent to Distribute

(500 Grams or More of Cocaine)

21 U.S.C. § 841(a)(1) & 18 U.S.C. § 2

On or about September 22, 2017, in Glynn County, within the Southern District of Georgia, the defendants,

DARRIUS MERRELL, KENEIL KING, JESSICA TABUTEAU, & ANDREW JACKSON, a/k/a “Drew,”

being aided and abetted by the other, and others, did knowingly and intentionally possess 500 grams or more of cocaine, a Schedule II controlled substance, with the intent to distribute.

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

COUNTS THIRTY THROUGH THIRTY-SIX

Unlawful Use of a Communications Facility
 21 U.S.C. § 843(b) & 18 U.S.C. § 2

That on or about the dates below, in Glynn and McIntosh Counties, within the Southern District of Georgia, and elsewhere, the defendants listed below, aided and abetted by each other and by others known and unknown, knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing, and facilitating the conspiracy to possess with intent to distribute and to distribute controlled substances, as alleged in Count One of this Indictment, incorporated by reference herein, which constitutes a felony violation of Title 21 U.S.C. § 846:

COUNT NUMBER	DEFENDANTS	DATE
30	KENNETH LEON BRADLEY & MARCUS MUNGIN	July 15, 2017
31	KENNETH LEON BRADLEY & MARCUS MUNGIN	July 16, 2017
32	KENNETH LEON BRADLEY & CLIFTON FOSTER	July 18, 2017
33	KENNETH LEON BRADLEY & ANTHONY BERNARD LEWIS, a/k/a "Amp"	July 21, 2017
34	KENNETH LEON BRADLEY & AMY MANSON	July 27, 2017
35	JOHN EUGENE OVERCASH & JOSEPH SIMMONS, a/k/a "Bug,"	August 10, 2017
36	KENNETH LEON BRADLEY & TOMMY MURRAY	November 1, 2017

All done in violation of Title 18, United States Code, Section 2 and Title 21, United States Code, Section 843(b).

FORFEITURE ALLEGATIONS

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

Pursuant to Title 21, United States Code, Section 853, upon conviction of any offense in violation of Title 21, United States Code set forth in this Indictment, Defendants

**JOHN EUGENE OVERCASH,
a/k/a "Cowboy,"
KENNETH LEON BRADLEY,
JEREMY MCINTYRE,
RICHARD CARTER,
DARRIUS MERRELL,
ANDREW JACKSON,
a/k/a "Drew,"
KENEIL KING,
JESSICA TABUTEAU,
TROY CROSBY,
AMY MANSON,
EDRIN TEMPLE,
a/k/a "Pete McCiver,"
ANTHONY BERNARD LEWIS,
a/k/a "Amp,"
JOSEPH SIMMONS,
a/k/a "Bug,"
TOMMY MURRAY,
CLIFTON FOSTER, and
MARCUS MUNGIN**

shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s). The property to be forfeited includes but is not limited to 1199 West Shore Drive, Brunswick, Georgia.

Upon conviction of one or more of the offenses set forth in Counts One through Twenty-Nine of this Indictment, Defendants

**JOHN EUGENE OVERCASH,
a/k/a "Cowboy,"
KENNETH LEON BRADLEY,
JEREMY MCINTYRE,
RICHARD CARTER,
DARRIUS MERRELL,
ANDREW JACKSON,
a/k/a "Drew,"
KENEIL KING,
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TOMMY MURRAY,
CLIFTON FOSTER, and
MARCUS MUNGIN**

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 firearms and ammunition involved in the commission of the offense(s).

If any of the property described above, as a result of any act or commission of the defendant:

- 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,

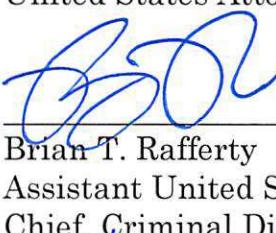
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Signatures on following page

A True Bill.



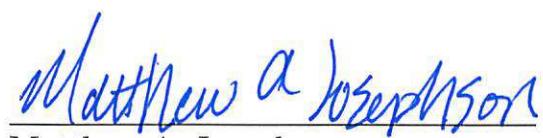
Bobby L. Christine
United States Attorney



Brian T. Rafferty
Assistant United States Attorney
Chief, Criminal Division



E. Greg Gilluly, Jr.
Assistant United States Attorney
*Lead Counsel



Matthew A. Josephson
Assistant United States Attorney
*Lead Counsel