

SEP - 5 2018

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

JAMES W. McCOFFMACK CLERK  
By:  DEF CLERK

ERIC BALDWIN, )  
a/k/a "E"; a/k/a "LIL' E" )  
NICHOLAS D. ROBINSON, JR., )  
a/k/a "LIL' NICK"; )  
KHAMBRIA ALLEN; )  
JOHN BOWMAN; )  
JOHN CHRISTOPHER BURCH; )  
JUSTIN COLLINS, )  
KAMIE COLLINS; )  
RODERICK ISOM; )  
JASON FLOWERS; )  
WINDELL FOUNTAIN; )  
a/k/a "CHARLIE"; )  
JENNIFER GOSNELL; )  
BLAKE GRAY; )  
DEKETRIC HARPER, a/k/a "DEE"; )  
AUNDRE LAMAR JONES; )  
PATRICIA JANAE KENNON; )  
CHAD LANE; )  
ROBERT McINTOSH, III; )  
LEWIS MILES, )  
a/k/a "POOTIE ROO"; )  
AARON LYNN PARKS; )  
DEAUNDREY PEOPLES; )  
RYAN RIELLY; )  
JOSEPH RIGGINS, JR.; )  
NICHOLAS D. ROBINSON, SR.; )  
CHRISTOPHER SANDERS, )  
a/k/a "CHRIS REPP"; )  
FRANCIS ANDRE SCOTT; )  
LEMAR DEVON STEWARD; )  
AUTUMN LYNN TALLEY; )  
APRIL TREAT, a/k/a "APRIL CULLUM"; )  
LORENE WILHITE; )  
ORTEZ WILLIAMS; and )  
GEORGE PERRY WRIGHT )

**FILED UNDER SEAL**

Case No. 4:18-CR-00466 BSM

18 U.S.C. § 922(g)  
18 U.S.C. § 924(c)  
21 U.S.C. § 841(a)(1), (b)(1)(A)  
21 U.S.C. § 841(a)(1), (b)(1)(B)  
21 U.S.C. § 841(a)(1), (b)(1)(C)  
21 U.S.C. § 841(a)(1), (b)(1)(D)  
21 U.S.C. § 843(b)  
21 U.S.C. § 846  
18 U.S.C. § 1956(a)(1)(A)(i)  
18 U.S.C. § 1956(a)(1)(B)(i)  
18 U.S.C. § 1956(h)  
26 U.S.C. § 5861(d)

**MOTION TO SEAL INDICTMENT**

Pursuant to Rule 6(e)(4), Federal Rules of Criminal Procedure, for the safety of law enforcement agents who will attempt to execute the arrest warrants and to guard against the risk of flight, the United States requests that the above-styled Indictment be sealed until the Defendants are in custody or have been released pending trial.

CODY HILAND  
UNITED STATES ATTORNEY



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**ORDER**

Pursuant to the above request, the Indictment in this matter shall be sealed until the Defendants are in custody or have appeared and been released pending trial.

9/5/18  
DATE




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UNITED STATE MAGISTRATE JUDGE

SEP - 5 2018

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS

JAMES W. McCORMACK, CLERK  
By:  DEPT. CLERK

ERIC BALDWIN, )  
a/k/a "E"; a/k/a "LIL' E" )  
NICHOLAS D. ROBINSON, JR., )  
a/k/a "LIL' NICK"; )  
KHAMBRIA ALLEN; )  
JOHN BOWMAN; )  
JOHN CHRISTOPHER BURCH; )  
JUSTIN COLLINS, )  
KAMIE COLLINS; )  
RODERICK ISOM; )  
JASON FLOWERS; )  
WINDELL FOUNTAIN; )  
a/k/a "CHARLIE"; )  
JENNIFER GOSNELL; )  
BLAKE GRAY; )  
DEKETRIC HARPER, a/k/a "DEE"; )  
AUNDRE LAMAR JONES; )  
PATRICIA JANAE KENNON; )  
CHAD LANE; )  
ROBERT McINTOSH, III; )  
LEWIS MILES, )  
a/k/a "POOTIE ROO"; )  
AARON LYNN PARKS; )  
DEAUNDREY PEOPLES; )  
RYAN RIELLY; )  
JOSEPH RIGGINS, JR.; )  
NICHOLAS D. ROBINSON, SR.; )  
CHRISTOPHER SANDERS, )  
a/k/a "CHRIS REPP"; )  
FRANCIS ANDRE SCOTT; )  
LEMAR DEVON STEWARD; )  
AUTUMN LYNN TALLEY; )  
APRIL TREAT, a/k/a "APRIL CULLUM"; )  
LORENE WILHITE; )  
ORTEZ WILLIAMS; and )  
GEORGE PERRY WRIGHT )

**FILED UNDER SEAL**

Case No. 4:18-CR-00464 BSM

- 18 U.S.C. § 922(g)
- 18 U.S.C. § 924(c)
- 21 U.S.C. § 841(a)(1), (b)(1)(A)
- 21 U.S.C. § 841(a)(1), (b)(1)(B)
- 21 U.S.C. § 841(a)(1), (b)(1)(C)
- 21 U.S.C. § 841(a)(1), (b)(1)(D)
- 21 U.S.C. § 843(b)
- 21 U.S.C. § 846
- 18 U.S.C. § 1956(a)(1)(A)(i)
- 18 U.S.C. § 1956(a)(1)(B)(i)
- 18 U.S.C. § 1956(h)
- 26 U.S.C. § 5861(d)

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT 1**

Beginning on a date unknown to the Grand Jury but at least as early as in or about August 2016, and continuing up to and including the date of the return of this Indictment, in the Eastern District of Arkansas, and elsewhere,

**ERIC BALDWIN, a/k/a "E", a/k/a "LIL' E";  
NICHOLAS D. ROBINSON, JR., a/k/a "LIL' NICK";  
JOHN BOWMAN;  
JOHN CHRISTOPHER BURCH  
JUSTIN COLLINS, a/k/a "DOBBER";  
KAMIE COLLINS;  
RODERICK ISOM;  
JASON FLOWERS;  
WINDELL FOUNTAIN, a/k/a "CHARLIE";  
BLAKE GRAY;  
DEKETRIC HARPER, a/k/a "DEE";  
CHAD LANE;  
ROBERT McINTOSH, III;  
LEWIS MILES, a/k/a "POOTIE ROO";  
AARON LYNN PARKS;  
DEAUNDREY PEOPLES;  
RYAN RIELLY;  
NICHOLAS D. ROBINSON, SR.;  
CHRISTOPHER SANDERS, a/k/a "CHRIS REPP";  
FRANCIS ANDRE SCOTT;  
LEMAR DEVON STEWARD;  
APRIL TREAT, a/k/a "APRIL CULLUM";  
ORTEZ WILLIAMS; and  
GEORGE PERRY WRIGHT,**

defendants herein, conspired and agreed with each other, and with others known and unknown to the grand jury, to knowingly and intentionally possess with intent to distribute and to distribute Schedule I and II controlled substances, namely, mixtures or substances

containing a detectable amount of methamphetamine, oxycodone, and marijuana, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (B), (C), and (D).

With respect to defendants ERIC BALDWIN, a/k/a "E"; a/k/a "LIL' E"; NICHOLAS D. ROBINSON, JR., a/k/a "LIL' NICK"; JOHN BOWMAN; JOHN CHRISTOPHER BURCH; JUSTIN COLLINS, a/k/a "DOBBER"; JASON FLOWERS; WINDELL FOUNTAIN, a/k/a "CHARLIE"; BLAKE GRAY; DEKETRIC HARPER, a/k/a "DEE"; CHAD LANE; ROBERT McINTOSH, III; LEWIS MILES, a/k/a "POOTIE ROO"; AARON LYNN PARKS; DEAUNDREY PEOPLES; RYAN RIELLY; NICHOLAS D. ROBINSON, SR.; FRANCIS ANDRE SCOTT; LEMAR DEVON STEWARD; and APRIL TREAT, a/k/a "APRIL CULLUM", the amount of methamphetamine, a Schedule II controlled substance, involved in the conspiracy attributable to each of them as a result of his or her own conduct, and the conduct of other co-conspirators reasonably foreseeable to him or her, is 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to defendants KAMIE COLLINS; CHRISTOPHER SANDERS, a/k/a "CHRIS REPP"; and ORTEZ WILLIAMS, the amount of methamphetamine, a Schedule II controlled substance, involved in the conspiracy attributable to each of them as a result of his or her own conduct, and the conduct of other co-conspirators reasonably foreseeable to him or her, is 50 grams or more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

With respect to defendants ERIC BALDWIN, a/k/a “E”, a/k/a “LIL’ E”; NICHOLAS D. ROBINSON, JR., a/k/a “LIL’ NICK”; GEORGE PERRY WRIGHT; and CHAD LANE, the amount of marijuana, a Schedule I controlled substance, involved in the conspiracy attributable to each of them as a result of his own conduct, and the conduct of other co-conspirators reasonably foreseeable to him, is more than 50 kilograms, in violation of Title 21, United States Code, Section 841(b)(1)(C).

With respect to defendants ROBERT McINTOSH, III; RYAN RIELLY; LEMAR DEVON STEWARD, NICHOLAS D. ROBINSON, SR., and DEKETRIC HARPER, a/k/a “DEE”, the amount of marijuana, a Schedule I controlled substance, involved in the conspiracy attributable to each of them as a result of his own conduct, and the conduct of other co-conspirators reasonably foreseeable to him, is less than 50 kilograms, in violation of Title 21, United States Code, Section 841(b)(1)(D).

Defendants ERIC BALDWIN, a/k/a “E”, a/k/a “LIL’ E”; FRANCIS ANDRE SCOTT; JUSTIN COLLINS, a/k/a “DOBBER”; CHAD LANE; and RODERICK ISOM conspired to knowingly and intentionally possess with intent to distribute oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

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

## **COUNT 2**

Beginning on a date unknown to the Grand Jury but at least as early as in or about August 2016, and continuing up to and including the date of the return of this Indictment, in the Eastern District of Arkansas, and elsewhere, the defendants,

**ERIC BALDWIN, a/k/a “E”, a/k/a “LIL’ E”;  
NICHOLAS D. ROBINSON, JR., a/k/a “LIL’ NICK”;  
KHAMBRIA ALLEN;  
JOHN CHRISTOPHER BURCH  
JUSTIN COLLINS, a/k/a “DOBBER”;  
KAMIE COLLINS;  
JENNIFER GOSNELL;  
AUNDRE LAMAR JONES;  
PATRICIA JANAË KENNON;  
CHAD LANE;  
ROBERT McINTOSH, III;  
LEWIS MILES, a/k/a “POOTIE ROO”;  
CHRISTOPHER SANDERS, a/k/a “CHRIS REPP”;  
FRANCIS ANDRE SCOTT;  
AUTUMN LYNN TALLEY; and  
LORENE WILHITE,**

voluntarily and intentionally conspired with each other and with others, known and unknown to the Grand Jury, to commit certain offenses under Title 18, United States Code, Section 1956(a)(1), namely:

(a) to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which financial transaction involved the proceeds of a specified unlawful activity, that is: the distribution of controlled substances, with the intent to promote the carrying on of specified unlawful activity, that is: the distribution of controlled substances, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i); and

(b) to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, which financial transaction involved the proceeds of a specified unlawful activity, that is: the distribution of controlled substances, knowing that the financial transaction was designed in whole or in part to conceal or disguise the nature, location, source, ownership, or control of the proceeds of said specified unlawful activity, and that while conducting such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, U.S.C. Section 1956(h).

**COUNT 3**

On or about February 15, 2017, in the Eastern District of Arkansas, the defendant,

**RODERICK ISOM,**

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 4**

On or about February 23, 2017, in the Eastern District of Arkansas, the defendant,

**RODERICK ISOM,**

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 5**

On or about March 28, 2017, in the Eastern District of Arkansas, the defendant,

**RODERICK ISOM,**



did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 6**

On or about June 29, 2017, in the Eastern District of Arkansas, the defendant,

**RODERICK ISOM,**

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 7**

On or about August 22, 2017, in the Eastern District of Arkansas, the defendant,

**ERIC BALDWIN, a/k/a “E”, a/k/a “LIL’ E”,**

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 8**

On or about August 30, 2017, in the Eastern District of Arkansas, the defendants,

**ERIC BALDWIN, a/k/a “E”, a/k/a “LIL’ E”, and RODERICK ISOM,**

did knowingly and intentionally distribute oxycodone, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 9**

On or about August 10, 2017, in the Eastern District of Arkansas, the defendant,

**AARON LYNN PARKS,**

did knowingly and intentionally distribute more than 5 grams of actual methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT 10**

On or about September 6, 2017, in the Eastern District of Arkansas, the defendants, **ERIC BALDWIN, a/k/a "E", a/k/a "LIL' E", and AARON LYNN PARKS,** did knowingly and intentionally distribute more than 50 grams of actual methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 11**

On or about September 26, 2017, in the Eastern District of Arkansas, the defendants, **ERIC BALDWIN, a/k/a "E", a/k/a "LIL' E", and ROBERT McINTOSH, III,** did knowingly and intentionally distribute more than 50 grams of actual methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 12**

On or about November 1, 2017, in the Eastern District of Arkansas, the defendant, **ERIC BALDWIN, a/k/a "E", a/k/a "LIL' E",** did knowingly and intentionally distribute more than 50 grams of actual methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 13**

On or about January 5, 2018, in the Eastern District of Arkansas, the defendant,

**ERIC BALDWIN, a/k/a "E", a/k/a "LIL' E",**

did knowingly and intentionally distribute more than 50 grams of actual methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 14**

On or about February 9, 2018, in the Eastern District of Arkansas, the defendants,

**ERIC BALDWIN, a/k/a "E", a/k/a "LIL' E",  
NICHOLAS D. ROBINSON, JR., a/k/a "LIL' NICK",  
ORTEZ WILLIAMS, and LEMAR STEWARD,**

did knowingly and intentionally distribute more than 50 grams of actual methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 15**

On or about February 16, 2018, in the Eastern District of Arkansas, the defendants,

**ERIC BALDWIN, a/k/a "E", a/k/a "LIL' E",  
NICHOLAS D. ROBINSON, JR., a/k/a "LIL' NICK",  
and ROBERT McINTOSH, III,**

did knowingly and intentionally distribute more than 50 grams of actual methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 16**

On or about February 28, 2018, in the Eastern District of Arkansas, the defendant,

**CHRISTOPHER JOHN BURCH,**

did knowingly and intentionally distribute and possess with intent to distribute more than 50 grams of a mixture or substance containing methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT 17**

On or about April 2, 2018, in the Eastern District of Arkansas, the defendant,

**APRIL TREAT, a/k/a “APRIL CULLUM”;**

did knowingly and intentionally possess with intent to distribute more than 500 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 18**

On or about April 16, 2018, in the Eastern District of Arkansas, the defendant,

**JOSEPH RIGGINS,**

did knowingly and intentionally distribute MDMA (ecstasy), a Schedule I controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 19**

On or about May 2, 2018, in the Eastern District of Arkansas, the defendant,

**ERIC BALDWIN, a/k/a “E”, a/k/a “LIL’ E”,**

did knowingly and intentionally possess with intent to distribute more than 50 grams of actual methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 20**

On or about May 18, 2018, in the Eastern District of Arkansas, the defendants,

**JUSTIN COLLINS, a/k/a/ "DOBBER", and BLAKE GRAY,**

did knowingly and intentionally possess with intent to distribute more than 50 grams of actual methamphetamine, a Schedule II controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 21**

A. Prior to May 13, 2018, the defendant,

**NICHOLAS D. ROBINSON, JR., a/k/a "LIL' NICK",**

had previously been convicted in Coconino County, Arizona, Superior Court for Money Laundering/Concealed Proceeds, in criminal case CR-2016-01060.

B. The crime set forth in paragraph A above was punishable by a term of imprisonment exceeding one year.

C. On or about May 13, 2018, in the Eastern District of Arkansas, the defendant,

**NICHOLAS ROBINSON, JR., a/k/a "LIL' NICK",**

did knowingly possess a firearm in and affecting commerce, to wit, one Spikes Tactical, model ST15, semi-automatic pistol, bearing serial number SCR048368, thereby violating Title 18, United States Code, Section 922(g)(1).

**COUNT 22**

On or about May 16, 2018, in the Eastern District of Arkansas, the defendants,  
**NICHOLAS D. ROBINSON, JR., a/k/a “LIL’ NICK”,  
DEKETRIC HARPER, a/k/a/ “DEE”, and NICHOLAS D. ROBINSON, SR.,**  
did knowingly and intentionally possess with intent to distribute more than 50 grams of  
actual methamphetamine, a Schedule II controlled substance, thereby violating Title 21,  
United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 23**

On or about May 16, 2018, in the Eastern District of Arkansas, the defendants,  
**NICHOLAS D. ROBINSON, JR., a/k/a “LIL’ NICK”,  
DEKETRIC HARPER, a/k/a/ “DEE”, and NICHOLAS D. ROBINSON, SR.,**  
did knowingly and intentionally possess with intent to distribute less than 50 kilograms of  
marijuana, a Schedule I controlled substance, thereby violating Title 21, United States  
Code, Sections 841(a)(1) and 841(b)(1)(D).

**COUNT 24**

On or about May 16, 2018, in the Eastern District of Arkansas, the defendants,  
**NICHOLAS D. ROBINSON, JR., a/k/a “LIL’ NICK”, and  
DEKETRIC HARPER, a/k/a/ “DEE”,**  
did knowingly and intentionally possess with intent to distribute fentanyl, a Schedule II  
controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1)  
and 841(b)(1)(C).

**COUNT 25**

On or about May 16, 2018, in the Eastern District of Arkansas, the defendants,

**NICHOLAS D. ROBINSON, JR., a/k/a “LIL’ NICK”,  
DEKETRIC HARPER, a/k/a/ “DEE”, and NICHOLAS D. ROBINSON, SR.,**

did knowingly and intentionally possess with intent to distribute MDMA (ecstasy), a Schedule I controlled substance, thereby violating Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 26**

On or about May 16, 2018, in the Eastern District of Arkansas, the defendants,

**NICHOLAS D. ROBINSON, JR., a/k/a “LIL’ NICK”,  
DEKETRIC HARPER, a/k/a/ “DEE”, and NICHOLAS D. ROBINSON, SR.,**

knowingly possessed at least one of the following firearms, namely: one Romarm/ Cugir, model DRACO, .762x39 caliber pistol, bearing serial number DB-2096-16RO; one Glock, model 42, .380 caliber pistol, bearing serial number ABCU007; one Glock, model 26GEN4, 9mm pistol, bearing serial number VDB459; one Herbert Schmidt, .22-caliber revolver, bearing serial number 300537; one Akkar Silah Sanayi Tic, model Charles Daly 600, 12-gauge shotgun, bearing serial number 2510435; one Colt, model Law Enforcement Carbine, .556-caliber rifle, bearing serial number LE487906, and one black, metal, cylindrical, muffling device approximately 9-1/4 inches in length and 1-5/8 inches in diameter, in furtherance of a drug trafficking crime prosecutable in a court of the United States, that is, a violation of Title 21, United States Code, Section 846, as set forth in Count 1 of this Indictment, and violations of Title 21, United States Code, Section 841(a)(1) as set forth in Counts 22-25 of this Indictment.

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

**COUNT 27**

On or about May 16, 2018, in the Eastern District of Arkansas, the defendants,

**NICHOLAS D. ROBINSON, JR., a/k/a “LIL’ NICK”,  
DEKETRIC HARPER, a/k/a/ “DEE”, and NICHOLAS D. ROBINSON, SR.,**

knowingly possessed a firearm silencer, that is, a black, metal, cylindrical, muffling device approximately 9-1/4 inches in length and 1-5/8 inches in diameter, bearing no serial number, which firearm was not registered to the defendants in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5845(a)(7), 5861(d), and 5871.

**COUNT 28**

A. Prior to May 16, 2018, the defendant,

**NICHOLAS D. ROBINSON, JR., a/k/a “LIL’ NICK”,**

had previously been convicted in Coconino County, Arizona, Superior Court for Money Laundering/Concealed Proceeds, in criminal case CR-2016-01060.

B. The crime set forth in paragraph A above was punishable by a term of imprisonment exceeding one year.

C. On or about May 16, 2018, in the Eastern District of Arkansas, the defendant,

**NICHOLAS D. ROBINSON, JR., a/k/a “LIL’ NICK”,**

did knowingly possess at least one of the following firearms in and affecting commerce, to wit, one Romarm/ Cugir, model DRACO, .762x39 caliber pistol, bearing serial number DB-2096-16RO; one Glock, model 42, .380 caliber pistol, bearing serial number



ABCU007; one Glock, model 26GEN4, 9mm pistol, bearing serial number VDB459; one Herbert Schmidt, .22-caliber revolver, bearing serial number 300537; one Akkar Silah Sanayi Tic, model Charles Daly 600, 12-gauge shotgun, bearing serial number 2510435; one Colt, model Law Enforcement Carbine, .556-caliber rifle, bearing serial number LE487906, and one black, metal, cylindrical, muffling device approximately 9-1/4 inches in length and 1-5/8 inches in diameter, bearing no serial number thereby violating Title 18, United States Code, Section 922(g)(1).

**COUNT 29**

On or about February 27, 2018, in the Eastern District of Arkansas, the defendant,

**JOHN CHRISTOPHER BURCH,**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 30**

On or about January 31, 2018, in the Eastern District of Arkansas, the defendant,

**JUSTIN COLLINS, a/k/a “DOBBER”,**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 31**

On or about March 10, 2018, in the Eastern District of Arkansas, the defendant,

**KAMIE COLLINS,**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 32**

On or about February 11, 2018, in the Eastern District of Arkansas, the defendant,

**WINDELL FOUNTAIN, a/k/a "CHARLIE",**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 33**

On or about March 11, 2018, in the Eastern District of Arkansas, the defendant,

**CHAD LANE,**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to

distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 34**

On or about February 16, 2018, in the Eastern District of Arkansas, the defendant,

**ROBERT McINTOSH, III,**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 35**

On or about February 4, 2018, in the Eastern District of Arkansas, the defendant,

**LEWIS MILES, a/k/a "POOTIE ROO",**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 36**

On or about March 3, 2018, in the Eastern District of Arkansas, the defendant,

**LEWIS MILES, a/k/a "POOTIE ROO",**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 37**

On or about January 31, 2018, in the Eastern District of Arkansas, the defendant,

**AARON LYNN PARKS,**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 38**

On or about February 6, 2018, in the Eastern District of Arkansas, the defendant,

**DEAUNDREY PEOPLES,**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 39**

On or about February 11, 2018, in the Eastern District of Arkansas, the defendant,

**DEAUNDREY PEOPLES,**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 40**

On or about February 7, 2018, in the Eastern District of Arkansas, the defendant,

**CHRISTOPHER SANDERS, a/k/a "CHRIS REPP",**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 41**

On or about February 26, 2018, in the Eastern District of Arkansas, the defendant,

**CHRISTOPHER SANDERS, a/k/a "CHRIS REPP",**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to

distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 42**

On or about February 7, 2018, in the Eastern District of Arkansas, the defendant,

**LEMAR DEVON STEWARD,**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 43**

On or about February 23, 2018, in the Eastern District of Arkansas, the defendant,

**GEORGE PERRY WRIGHT,**

knowingly and intentionally used a communication facility, to wit, a telephone, in committing, causing and facilitating conspiracy to distribute and possess with intent to distribute a controlled substance, as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 846.

In violation of Title 21, United States Code, Section 843(b).

**COUNT 44**

On or about May 9, 2017, in the Eastern District of Arkansas, the defendant,

**KHAMBRIA ALLEN,**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, to wit, a cash transfer to an individual in California via the cash transfer wire service RIA, reference number XXXXXX057, which involved the proceeds of a specified unlawful activity, that is the distribution of a controlled substance, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that, while conducting such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT 45**

On or about February 12, 2018, in the Eastern District of Arkansas, the defendant,

**JOHN CHRISTOPHER BURCH,**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, to wit, a cash transfer to an individual in California via the cash transfer wire service RIA, reference number XXXXXX187, which financial transaction involved the proceeds of a specified unlawful activity, that is: the distribution of controlled substances, with the intent to promote the carrying on of specified unlawful activity, that is: the distribution of controlled substances, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT 46**

On or about February 11, 2017, in the Eastern District of Arkansas, the defendant,

**JUSTIN COLLINS, a/k/a “DOBBER”,**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, to wit, a cash transfer to an individual in California via the cash transfer wire service RIA, reference number XXXXXX246, which financial transaction involved the proceeds of a specified unlawful activity, that is: the distribution of controlled substances, with the intent to promote the carrying on of specified unlawful activity, that is: the distribution of controlled substances, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT 47**

On or about June 28, 2017, in the Eastern District of Arkansas, the defendant,

**KAMIE COLLINS,**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, to wit, a cash transfer to an individual in California via the cash transfer wire service RIA, reference number XXXXXX414, which involved the proceeds of a specified unlawful activity, that is the distribution of a controlled substance, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that, while



conducting such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT 48**

On or about June 8, 2017, in the Eastern District of Arkansas, the defendant,

**JENNIFER GOSNELL,**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, to wit, a cash transfer to an individual in California via the cash transfer wire service RIA, reference number XXXXXX854, which involved the proceeds of a specified unlawful activity, that is the distribution of a controlled substance, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that, while conducting such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT 49**

On or about February 11, 2018, in the Eastern District of Arkansas, the defendant,

**JENNIFER GOSNELL,**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, to wit, a cash transfer to an individual in California via the cash transfer wire service RIA, reference number XXXXXX857, which involved the proceeds of a specified unlawful activity, that is the distribution of a controlled substance, knowing that the

transaction was designed in whole and in part to conceal and disguise the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that, while conducting such financial transaction, knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

**COUNT 50**

On or about November 27, 2017, in the Eastern District of Arkansas, the defendant,

**CHAD LANE,**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, to wit, a cash transfer to an individual in California via the cash transfer wire service RIA, reference number XXXXXX469, which financial transaction involved the proceeds of a specified unlawful activity, that is: the distribution of controlled substances, with the intent to promote the carrying on of specified unlawful activity, that is: the distribution of controlled substances, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT 51**

On or about September 30, 2017, in the Eastern District of Arkansas, the defendant,

**ROBERT McINTOSH, III,**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, to wit, a cash transfer to an individual in California via the cash transfer wire

service RIA, reference number XXXXXX607, which financial transaction involved the proceeds of a specified unlawful activity, that is: the distribution of controlled substances, with the intent to promote the carrying on of specified unlawful activity, that is: the distribution of controlled substances, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT 52**

On or about October 19, 2017, in the Eastern District of Arkansas, the defendant,

**LEWIS MILES, a/k/a “POOTIE ROO”,**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, to wit, a cash transfer to an individual in California via the cash transfer wire service RIA, reference number XXXXXX453, which financial transaction involved the proceeds of a specified unlawful activity, that is: the distribution of controlled substances, with the intent to promote the carrying on of specified unlawful activity, that is: the distribution of controlled substances, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

**COUNT 53**

On or about November 20, 2017, in the Eastern District of Arkansas, the defendant,

**LEWIS MILES, a/k/a “POOTIE ROO”,**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, to wit, a cash transfer to an individual in California via the cash transfer wire service RIA, reference number XXXXXX845, which financial transaction involved the proceeds of a specified unlawful activity, that is: the distribution of controlled substances, with the intent to promote the carrying on of specified unlawful activity, that is: the distribution of controlled substances, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

#### **FORFEITURE ALLEGATION 1**

Upon conviction of the offense alleged in Count 21, 26, 27, or 28 of this Indictment, the defendants, NICHOLAS D. ROBINSON, JR., a/k/a "LIL' NICK", DEKETRIC HARPER, a/k/a/ "DEE", and NICHOLAS D. ROBINSON, SR., shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code Section 843, and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense, including, but not limited to one Spikes Tactical, model ST15, semi-automatic pistol, bearing serial number SCR048368; one Romarm/ Cugir, model DRACO, .762x39 caliber pistol, bearing serial number DB-2096-16RO; one Glock, model 42, .380 caliber pistol, bearing serial number ABCU007; one Glock, model 26GEN4, 9mm pistol, bearing serial number VDB459; one Herbert Schmidt, .22-caliber revolver, bearing serial number 300537; one Akkar Silah Sanayi Tic, model Charles Daly 600, 12-gauge shotgun, bearing serial number 2510435; one Colt,

model Law Enforcement Carbine, .556-caliber rifle, bearing serial number LE487906, and a black, metal, cylindrical, muffling device approximately 9-1/4 inches in length and 1-5/8 inches in diameter, bearing no serial number.

### **FORFEITURE ALLEGATION 2**

Upon conviction of the offense alleged in Counts 1, 14, 15, or 22-25 of this Indictment, the defendants, NICHOLAS D. ROBINSON, JR., a/k/a "LIL' NICK", DEKETRIC HARPER, a/k/a/ "DEE", and NICHOLAS D. ROBINSON, SR, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, all firearms and ammunition used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses, including, but not limited to one Spikes Tactical, model ST15, semi-automatic pistol, bearing serial number SCR048368; one Romarm/ Cugir, model DRACO, .762x39 caliber pistol, bearing serial number DB-2096-16RO; one Glock, model 42, .380 caliber pistol, bearing serial number ABCU007; one Glock, model 26GEN4, 9mm pistol, bearing serial number VDB459; one Herbert Schmidt, .22-caliber revolver, bearing serial number 300537; one Akkar Silah Sanayi Tic, model Charles Daly 600, 12-gauge shotgun, bearing serial number 2510435; one Colt, model Law Enforcement Carbine, .556-caliber rifle, bearing serial number LE487906, and a black, metal, cylindrical, muffling device approximately 9-1/4 inches in length and 1-5/8 inches in diameter, bearing no serial number.

[End of text. Signature page to follow.]