

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED

SEP 06 2023

U.S. CLERK'S OFFICE
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

RAMIRO RICO DE LEON)

a/k/a Rami,)

GREGORY HENDERSON, JR.)

a/k/a Grego a/k/a Whitey,)

OCTAVIO VICENCIO,)

ERICK FOSTER,)

GEORGE TAYLOR,)

J.C. SMITH,)

DONTORIA GILBERT,)

DAVID BENNETT,)

GREGORY EASTER,)

LAUREN EGGERT,)

QUOSHAWN STEWART,)

CHRISTOPHER NORFOLK)

a/k/a Chris Lacy,)

MAURICE ERVIN)

a/k/a Big Moe,)

MICHAEL SANDERS)

a/k/a Lil Mike,)

JAMES CROONS)

a/k/a Jimmy a/k/a Lil Jimmy,)

CHARLES RICHARDSON III)

a/k/a Chuck,)

LANDON JONES)

a/k/a The Comedian,)

EDWARD BRONAUGH)

a/k/a Ted the Transporter,)

DONAVON TIPLER,)

MARVIN JOHNSON JR.)

a/k/a Lil Big, and)

TYRONE BELL,)

Defendants.)

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Cause No.

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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, but no later than November 2022 and continuing up to and including August 31, 2023, in the Southern District of Indiana and elsewhere, RAMIRO RICO DE LEON a/k/a Rami, GREGORY HENDERSON, JR. a/k/a Grego a/k/a Whitey, OCTAVIO VICENCIO, ERICK FOSTER, GEORGE TAYLOR, J.C. SMITH, DONTORIA GILBERT, DAVID BENNETT, GREGORY EASTER, LAUREN EGGERT, and QUOSHAWN STEWART, 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, Section 841(a)(1).

OBJECTS OF THE CONSPIRACY

The charged conspiracy had the following objects:

1. The distribution of 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (“fentanyl”), a Schedule II, controlled substance.
2. The distribution of 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.
3. The distribution of five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substances.

OVERT ACTS

In furtherance of the conspiracy and to accomplish the object of the conspiracy, that is to distribute controlled substances, the members of the conspiracy did commit, among others, the following overt acts:

1. On December 9, 2022, RAMIRO RICO DE LEON and GREGORY HENDERSON communicated over WhatsApp where HENDERSON confirmed that he needed high quality controlled substances to from RICO DE LEON. RICO DE LEON assured HENDERSON he would provide high quality narcotics and indicated how much HENDERSON would owe for these narcotics.

2. On or about May 4, 2023, QUOSHAWN STEWART, at GREGORY HENDERSON's direction, drove HENDERSON to Ohio so that HENDERSON could obtain more controlled substances from an individual.

3. On or about May 21, 2023, DONTORIA GILBERT and DAVID BENNETT spoke to Gregory HENDERSON on the phone; in this call, GILBERT and BENNETT requested nine ounces of cocaine, and GREGORY HENDERSON indicated that he did have the requested cocaine to distribute to them and would charge them \$5,500 for them to obtain it from HENDERSON.

4. On or about May 24, 2023, LAUREN EGGERT and GREGORY EASTER called GREGORY HENDERSON to inform him that GREGORY EASTER was in the custody of the Marion County Jail, but that LAUREN EGGERT would be taking over his drug trafficking business until he was released, and that GREGORY HENDERSON should continue to distribute controlled substances to LAUREN EGGERT at the present time.

5. In the course of the conspiracy, J.C. SMITH assisted GREGORY HENDERSON in his drug trafficking activities, such as on May 31, 2023, when J.C. SMITH obtained an ounce of a controlled substance so that he could give it to HENDERSON and HENDERSON could sell it.

6. On or about June 15, 2023, GEORGE TAYLOR drove GREGORY HENDERSON to Ohio to see ERICK FOSTER and get controlled substances from FOSTER (which FOSTER had previously received via RAMIRO RICO DE LEON).

7. On or about July 17, 2023, OCTAVIO VICENCIO distributed fentanyl to GREGORY HENDERSON, which VICENCIO had previously received through RAMIRO RICO DE LEON.

8. On or about August 1, 2023, at the direction of RAMIRO RICO DE LEON, GREGORY HENDERSON sent GEORGE TAYLOR to Ohio to deliver 500 grams of fentanyl; this fentanyl was seized by law enforcement.

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

COUNT TWO
18 U.S.C. § 1956(h)
Conspiracy to Launder Monetary Instruments

From in or about March 2023 through August 31, 2023, the exact dates being unknown to the Grand Jury, in the Southern District of Indiana and elsewhere, RAMIRO RICO DE LEON a/k/a Rami and GREGORY HENDERSON JR. a/k/a Grego a/k/a Whitey, defendants herein, did knowingly conspire together and with diverse other persons known and unknown to the Grand Jury to knowingly and intentionally conduct and attempt to conduct financial transactions, knowing that the property involved in the financial transactions represented, in whole or in part,

the proceeds of a specified unlawful activity (that is, distribution of controlled substances), and knowing that the transactions were designed, in whole or in part, to conceal or disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

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

COUNT THREE
7 U.S.C. § 2156 and 18 U.S.C. § 371
Conspiracy to Engage in an Animal Fighting Venture (Dogfighting)

Beginning at a date unknown to the grand jury, but no later than December 2020 and continuing up to and including August 31, 2023, in the Southern District of Indiana and elsewhere, GREGORY HENDERSON JR. a/k/a Grego a/k/a Whitey, CHRISTOPHER NORFOLK a/k/a Chris Lacy, MAURICE ERVIN a/k/a Big Moe, MICHAEL SANDERS a/k/a Lil Mike, JAMES CROONS a/k/a Jimmy a/k/a Lil Jimmy, CHARLES RICHARDSON III a/k/a Chuck, LANDON JONES a/k/a The Comedian, EDWARD BRONAUGH a/k/a Ted the Transporter, DONAVON TIPLER, MARVIN JOHNSON JR. a/k/a Lil Big, defendants herein, did knowingly conspire together and with diverse other persons, known and unknown to the Grand Jury, to engage in the exhibition of an animal in an animal fighting venture, in violation of Title 7, United States Code, Section 2156(a)(1).

OVERT ACTS

In furtherance of the conspiracy and to accomplish the object of the conspiracy, that is to engage in an animal fighting venture, the members of the conspiracy did commit, among others, the following overt acts:

1. On or about August 7, 2020, Edward BRONAUGH filed Articles of Organization for a Domestic Limited Liability Company known as Roll & Hold Pet Express LLC.

2. On or about December 10, 2020, Donovan TIPLER sent a video to Charles RICHARDSON that displayed a dog fight; in this videotaped dog fight, one dog killed another dog in a very quick fashion. Upon receiving the video, RICHARDSON replied to TIPLER that he wanted to acquire the dog that had killed the other dog.

3. Beginning in 2021 and continuing through August 31, 2023, Landon JONES maintained a secondary residence on Barry Road in Indianapolis, Indiana where he housed his fighting dogs; on multiple occasions in the course of this conspiracy, JONES hosted dog fights at this same location.

4. On or about January 19, 2022, TIPLER and RICHARDSON conversed about a coming dog fight, in which both had decided to bet on the same dog.

5. On or about February 6, 2022, RICHARDSON communicated with BRONAUGH, letting BRONAUGH know that he had provided people with BRONAUGH's contact information, so they could use BRONAUGH as their fighting dog transporter.

6. On or about June 26, 2022, Maurice ERVIN and TIPLER engaged dogs in a dog fight, which was video recorded.

7. On March 3, 2022, NORFOLK sent a text message to BRONAUGH that he (NORFOLK) needed a dog picked-up from Mississippi. Prior to NORFOLK and BRONAUGH's discussion, NORFOLK had extensive Facebook Messenger conversations with this individual in Mississippi regarding the purchase and transportation of a dog.

8. On March 10, 2022, BRONAUGH asked NORFOLK where he should drop off the dog; NORFOLK provided BRONAUGH with his (NORFOLK's) home address in Indianapolis, Indiana.

9. On or about May 31, 2023 Christopher NORFOLK requested that Gregory HENDERSON bring NORFOLK his hanging scale, so that he could weigh one of his fighting dogs.

10. On or about June 3, 2023, NORFOLK hosted individuals at his house in Indianapolis, Indiana, for the purpose of fighting dogs.

11. On or about June 3, 2023, HENDERSON subjected one of his dogs to a fight with another dog at the dog fighting venture that had been hosted by NORFOLK at NORFOLK's Indianapolis, Indiana residence.

12. On or about June 15, 2023, NORFOLK hosted individuals at his house in Indianapolis, Indiana, for the purpose of fighting dogs; among others, HENDERSON, SANDERS, NORFOLK, and others attended this animal fighting venture.

13. On or about June 15, 2023, SANDERS advised another conspirator, Christopher NORFOLK, regarding how to handle one of NORFOLK's fighting dogs, advising NORFOLK not to fight the dog until the dog grew older and had more training.

14. On or about July 1, 2023, SANDERS obtained a carpet for the purposes of finishing a dog fighting pit; after SANDERS' carpet was deemed unacceptable, CROONS was then tasked with also obtaining a carpet for purposes of placing it in a dog fighting pit, so that another animal fighting venture could be held.

15. On or about August 19, 2023, JOHNSON JR. attended a dog fight being held at NORFOLK's Indianapolis, Indiana residence, and at this animal fighting exhibition, JOHNSON JR. fought one of his dogs against another dog that had been brought to the location.

All in violation of Title 7, United States Code, Section 2156 and Title 18, United States Code, Section 371.

COUNT FOUR
18 U.S.C. § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about August 31, 2023, within the Southern District of Indiana, TYRONE BELL, defendant herein, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms having been shipped and transported in interstate commerce; to-wit, a Bersa semi-automatic handgun, and/or a Smith & Wesson revolver, after having sustained convictions for the following offense: Dealing in Cocaine or Narcotic Drug, a Class A felony, in Marion County, Indiana, on or about September 9, 1997.

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

COUNT FIVE
18 U.S.C. § 922(g)(1)
Possession of a Firearm by a Convicted Felon

On or about August 31, 2023, within the Southern District of Indiana, CHARLES RICHARDSON III a/k/a Chuck, defendant herein, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms having been shipped and transported in interstate commerce; to-wit, Century Arms Centurion 39 Sporter rifle (7.62 x 39 mm), after having sustained convictions for the following offenses: Possession of Cocaine, Level 4 Felony, Marion County, Indiana, on or about August 4, 2017; Dealing in Cocaine (Level 2 Felony) and Promoting an Animal Fighting Contest (Level 6 Felony), Marion County, Indiana, on or about August 4, 2017; Dealing in Cocaine, C Felony, Marion County, Indiana, on or about April 30, 2002; and/or Possession of Cocaine, D Felony, Marion County, Indiana, on or about February 22, 2001.

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

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Six of the Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 982, Title 7, United States Code, Section 2156 as incorporated by Title 28 United States Code, Section 2461, and Title 18, Section 924.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense charged in Count One, in violation of Title 21, United States Code, Section 841, RAMIRO RICO DE LEON a/k/a Rami, GREGORY HENDERSON, JR. a/k/a Grego a/k/a Whitey, OCTAVIO VICENCIO, ERICK FOSTER, GEORGE TAYLOR, J.C. SMITH, DONTORIA GILBERT, DAVID BENNETT, GREGORY EASTER, LAUREN EGGERT, and QUOSHAWN STEWART, the defendants herein, shall forfeit to the United States of America 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.

3. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense charged in Count Two, in violation of Title 18, United States Code, Section 1956, RAMIRO RICO DE LEON a/k/a Rami and GREGORY HENDERSON JR. a/k/a Grego a/k/a Whitey, the defendants herein, shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

4. Upon conviction of the offense charged in Count Three, in violation of Title 7, United States Code, Section 2156, GREGORY HENDERSON JR. a/k/a Grego a/k/a Whitey, CHRISTOPHER NORFOLK a/k/a Chris Lacy, MAURICE ERVIN a/k/a Big Moe, MICHAEL SANDERS a/k/a Lil Mike, JAMES CROONS a/k/a Jimmy a/k/a Lil Jimmy, CHARLES RICHARDSON III a/k/a Chuck, LANDON JONES a/k/a The Comedian, EDWARD BRONAUGH a/k/a Ted the Transporter, DONAVON TIPLER, MARVIN JOHNSON JR. a/k/a Lil Big, the defendants herein, shall forfeit to the United States any and all animals involved in the commission of the offense.

5. Upon conviction of the offenses charged in Counts Four through Six, in violation of Title 18, United States Code, Section 922, TYRONE BELL, MICHAEL SANDERS a/k/a Lil Mike, and CHARLES RICHARDSON III a/k/a Chuck, the defendants herein 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 offenses.

6. If any of the property described above, as a result of any act or omission of the defendant[s]:

- 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 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:



FOREPERSON

ZACHARY A. MYERS
United States Attorney

By:

Handwritten signature of Michelle P. Brady in cursive script.

Michelle P. Brady
Adam Eakman
Assistant United States Attorneys