

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

United States of America,

Plaintiff,

vs.

Case:2:17-cr-20668

Judge: Cleland, Robert H.

MJ: Grand, David R.

Filed: 10-11-2017 At 03:24 PM

IN RE SEALED MATTER (BG)

D-1 Timothy Williams,
a.k.a "T2,"

D-2 Kristopher Anderson,
a.k.a "Flip," "Unc,"

D-3 Deaire Rayford,
a.k.a "Mun," "D," "D-Mun,"

D-4 Christopher Light,

D-5 Kourvoisiea Pittman,
a.k.a "Kaos,"

D-6 Robert Bell, Jr.,
a.k.a "Boosha,"

D-7 Deandre Mullen,
a.k.a "4 Shot," "4,"

D-8 Steven Erkins,
a.k.a "SQ," "Kool,"

D-9 Anthony Lee,
a.k.a "Tone,"

D-10 Quanzay Milton,
a.k.a "Q,"

VIOLATIONS:

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 843(b)

D-11 Antonio Bell,
a.k.a "Tone,"

D-12 James Bellmore,

D-13 Marlon McCallum,

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(21 U.S.C. § 846 – *Conspiracy to Distribute and to Possess with Intent to Distribute Controlled Substances*)

D-1 Timothy Williams
D-2 Kristopher Anderson
D-3 Deaire Rayford
D-4 Christopher Light
D-5 Kourvoisiea Pittman
D-6 Robert Bell, Jr.
D-7 Deandre Mullen
D-8 Steven Erkins
D-9 Anthony Lee
D-10 Quanzay Milton
D-11 Antonio Bell
D-12 James Bellmore

Introduction

At all times relevant to this Indictment:

1. The “TEAM” is a drug trafficking organization in Oakland County that distributes controlled substances, primarily heroin and heroin mixed with fentanyl.

2. TEAM was formed when members of the “Hustle Boys” and the “Wall Street Gorillaz” joined together to distribute heroin.

3. TEAM members demonstrate their affiliation with the organization through the tattoos “TEAM,” “HB” (Hustle Boys), “WSG” (Wall Street Gorillaz), and/or “97442” (WSGHB on a phone keypad).

4. TEAM operated primarily in Pontiac, Michigan, but it also sold narcotics in Clarkston, Commerce Township, White Lake Township, and Waterford Township, Michigan.

5. TEAM was led by Timothy Williams, also known as “T2.”

Conspiracy to Possess with
Intent to Distribute and Distribute Heroin

6. Beginning in or around 2010, the exact date being unknown to the Grand Jury, and continuing until the date of this Indictment, in the Eastern District of Michigan, the defendants, **TIMOTHY WILLIAMS, KRISTOPHER ANDERSON, DEAIRE RAYFORD,**

CHRISTOPHER LIGHT, KOURVOISIEA PITTMAN, ROBERT BELL, JR., DEANDRE MULLEN, STEVEN ERKINS, ANTHONY LEE, QUANZAY MILTON, ANTONIO BELL, JAMES BELLMORE, and others, known and unknown to the grand jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with other persons known and unknown to the Grand Jury, to possess with intent to distribute and to distribute one kilogram or more of a mixture or substance containing heroin and a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimede, commonly known as fentanyl, in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(B)(i), and 841(b)(1)(C).

Manner and Means

7. It was part of the conspiracy that Timothy Williams, Kristopher Anderson, Deandre Rayford, Christopher Light, and other members of the organization provided customers with a cellular phone number to use to purchase heroin.

8. It was further part of the conspiracy that sales were mobile. When a customer called one of the phone numbers to purchase heroin,

members of the conspiracy delivered heroin to the customer's home or directed the customer to a location where the heroin was delivered. The delivery locations included various business in the Pontiac/Waterford/Clarkston area and the parking lot of the North Hill Farms Apartments in Pontiac.

9. It was further part of the conspiracy that members used certain "trap" or "stash" houses to sell heroin, including 595 Granada Drive in Pontiac and 380 West Hopkins Avenue in Pontiac.

10. It was further part of the conspiracy that members started to mix, or "cut," the heroin sold to customers with N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimede, commonly known as fentanyl.

11. It was further part of the conspiracy that Timothy Williams and other members of the organization advertised the availability of heroin for sale to customers by sending the following text message: "FIRE." This included individual and group text messages sent to the defendant's customer base to inform them of its availability.

ENHANCED PENALTY

(21 U.S.C. § 841(b)(1) – *Death or Serious Bodily Injury Resulting From Use of Controlled Substance*)

- D-1 Timothy Williams**
- D-2 Kristopher Anderson**
- D-3 Deaire Rayford**
- D-5 Kourvoisiea Pittman**
- D-7 Deandre Mullen**
- D-8 Steven Erkins**

As a result of acts committed by **TIMOTHY WILLIAMS, KRISTOPHER ANDERSON, DEAIRE RAYFORD, KOURVOISIEA PITTMAN, DEANDRE MULLEN, STEVEN ERKINS,** and acts committed by other conspirators reasonably foreseeable to them, in furtherance of the conspiracy alleged in this Count of this Indictment, death and serious bodily injury did result from the use of a controlled substance, namely, a mixture and substance containing a detectable amount of heroin and a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimede, commonly known as fentanyl, in violation of the enhanced penalty provisions of Title 21, United States Code, Sections 841(b)(1)(A), (B), and (C).

COUNT TWO

(21 U.S.C. § 841 – *Distribution of a Controlled Substance; Serious Bodily Injury Resulting*)

D-1 Timothy Williams

On or about April 11, 2011, in the Eastern District of Michigan, the defendant, **TIMOTHY WILLIAMS**, a/k/a “**T2**,” did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the controlled substances involved were a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(c)(1)(C).

It is further alleged that the serious bodily injury of another person, “Victim 1,” whose identity is known to the Grand Jury, resulted from the use of the controlled substance so distributed, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(c)(1)(C).

COUNT THREE

(21 U.S.C. § 841 – *Distribution of a Controlled Substance; Serious Bodily Injury Resulting*)

D-1 Timothy Williams

On or about May 28, 2013, in the Eastern District of Michigan, the defendant, **TIMOTHY WILLIAMS**, a/k/a “**T2**,” did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the controlled substances involved were a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C).

It is further alleged that the serious bodily injury of another person, “Victim 2,” whose identity is known to the Grand Jury, resulted from the use of the controlled substance so distributed, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(c)(1)(C).

COUNT FOUR

(21 U.S.C. § 841 – *Distribution of a Controlled Substance; Serious Bodily Injury Resulting*)

D-1 Timothy Williams

On or about July 30, 2014, in the Eastern District of Michigan, the defendant, **TIMOTHY WILLIAMS**, a/k/a “**T2**,” did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the controlled substances involved were a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C).

It is further alleged that the serious bodily injury of another person, “Victim 2,” whose identity is known to the Grand Jury, resulted from the use of the controlled substance so distributed, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(c)(1)(C).

COUNT FIVE

(21 U.S.C. § 841 – *Distribution of a Controlled Substance; Serious Bodily Injury Resulting*)

D-1 Timothy Williams

On or about August 21, 2014, in the Eastern District of Michigan, the defendant, **TIMOTHY WILLIAMS**, a/k/a “**T2**,” did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the controlled substances involved were a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(c)(1)(C).

It is further alleged that the serious bodily injury of another person, “Victim 1,” whose identity is known to the Grand Jury, resulted from the use of the controlled substance so distributed, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(c)(1)(C).

COUNT SIX

(21 U.S.C. § 841 – *Distribution of a Controlled Substance; Serious Bodily Injury Resulting*)

D-1 Timothy Williams

On or about May 7, 2015, in the Eastern District of Michigan, the defendant, **TIMOTHY WILLIAMS**, a/k/a “**T2**,” did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the controlled substances involved were a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(c)(1)(C).

It is further alleged that the serious bodily injury of another person, “Victim 2,” whose identity is known to the Grand Jury, resulted from the use of the controlled substance so distributed, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(c)(1)(C).

COUNT SEVEN

(21 U.S.C. § 841 – *Distribution of a Controlled Substance; Serious Bodily Injury Resulting*)

D-1 Timothy Williams

On or about October 16, 2015, in the Eastern District of Michigan, the defendant, **TIMOTHY WILLIAMS**, a/k/a “**T2**,” did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the controlled substances involved were a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(c)(1)(C).

It is further alleged that the serious bodily injury of another person, “Victim 3,” whose identity is known to the Grand Jury, resulted from the use of the controlled substance so distributed, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(c)(1)(C).

COUNT EIGHT

(21 U.S.C. § 841 – *Distribution of a Controlled Substance; Serious Bodily Injury Resulting*)

D-1 Timothy Williams

On or about December 23, 2016, in the Eastern District of Michigan, the defendant, **TIMOTHY WILLIAMS**, a/k/a “**T2**,” did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the controlled substances involved were a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(c)(1)(C).

It is further alleged that the serious bodily injury of another person, “Victim 4,” whose identity is known to the Grand Jury, resulted from the use of the controlled substance so distributed, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(c)(1)(C).

COUNT NINE

(21 U.S.C. § 841 – *Distribution of a Controlled Substance; Death Resulting*)

D-2 Kristopher Anderson
D-13 Marlon McCallum

On or about July 12, 2016, in the Eastern District of Michigan, the defendant, **KRISTOPHER ANDERSON**, a/k/a “**Flip**,” and “**Unc**,” and **MARLON McCALLUM** did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

It is further alleged that the controlled substances involved were a mixture and substance containing a detectable amount of heroin and a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanimede, commonly known as fentanyl, in violation of Title 21, United States Code, Section 841(c)(1)(C).

It is further alleged that the death of another person, “Victim 5,” whose identity is known to the Grand Jury, resulted from the use of the controlled substance so distributed, in violation of the enhanced penalty provisions of Title 21, United States Code, Section 841(c)(1)(C).

COUNT TEN

(21 U.S.C. § 843(b) – Using a Communication Facility in the
Commission of a Controlled Substance Offense)

- D-1 Timothy Williams**
- D-2 Kristopher Anderson**
- D-3 Deaire Rayford**
- D-4 Christopher Light**
- D-5 Kourvoisiea Pittman**
- D-6 Robert Bell, Jr.**
- D-7 Deandre Mullen**
- D-8 Steven Erkins**
- D-9 Anthony Lee**
- D-10 Quanzay Milton**
- D-11 Antonio Bell**
- D-12 James Bellmore**

Beginning in or around 2010, the exact date being unknown to the Grand Jury, and continuing until the date of this Indictment, in the Eastern District of Michigan, the defendants, **TIMOTHY WILLIAMS, KRISTOPHER ANDERSON, DEAIRE RAYFORD, CHRISTOPHER LIGHT, KOURVOISIEA PITTMAN, ROBERT BELL, JR., DEANDRE MULLEN, STEVEN ERKINS, ANTHONY LEE, QUANZAY MILTON, ANTONIO BELL, JAMES BELLMORE**, did knowingly and intentionally use a communication facility, to wit: cellular telephones, in committing, causing or facilitating the commission of the offenses of possession with the intent to distribute a controlled substance, delivery of controlled substances and

conspiracy to do so, as charged in this indictment; all in violation of Title 21, United States Code, §843(b).

FORFEITURE ALLEGATIONS

The allegations of Counts One through Ten of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America of certain property in which the Defendants have an interest, pursuant to the provisions of Title 21, United States Code, Section 853.

Upon conviction of an offense alleged in Counts One through Ten of this Indictment, the Defendant so convicted shall forfeit to the United States any property constituting or derived from any proceeds which the Defendant obtained, directly or indirectly, or any property traceable thereto, as the result of such violation, any property which the Defendant used or intended to be used in any manner or part to commit or to facilitate the commission of such violation, and/or any property involved in such violation, or any property traceable thereto.

If the property described above as being subject to forfeiture, as a result of any act or omission of the Defendants, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited

with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the Defendants up to the value of the above forfeitable property and, in addition, to require the Defendants to return any such property to the jurisdiction of the Court for seizure and forfeiture.

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson
Grand Jury Foreperson

Dated: October 11, 2017

Daniel L. Lemisch
Acting United States Attorney

s/ John N. O'Brien, II
John N. O'Brien, II
Assistant U.S. Attorney

s/ Shane Cralle
Shane Cralle
Assistant U.S. Attorney

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 Filed: 10-11-2017 At 03:24 PM
 IN RE SEALED MATTER (BG)

United States District Court Eastern District of Michigan	Criminal Case
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>JNG</i>

Case Title: USA v. Timothy Williams, et al.

County where offense occurred : Oakland County

Check One: Felony Misdemeanor Petty

___ Indictment/ ___ Information --- no prior complaint.
 Indictment/ ___ Information --- based upon prior complaint [Case number: 17-mj-30442]
 ___ Indictment/ ___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

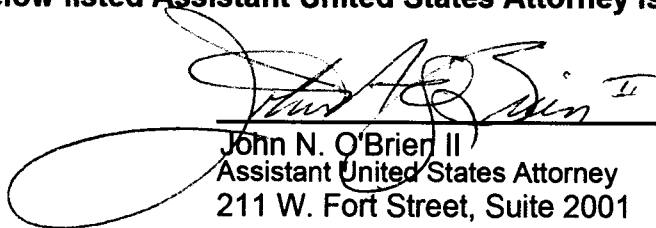
Superseding to Case No: _____ Judge: _____

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

October 11, 2017
Date



 John N. O'Brien II
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.