# U.S. DISTRICT COURT WESTERN DISTRICT OF LOUISIAN NITED STATES DISTRICT COURT RECEIVED LAFAYETTE

# MAR 1-3-2016 WESTERN DISTRICT OF LOUISIANA

TONY R. MOORE, CLERK WESTERN DISTRICT OF LOUISIANA LAFAYETTE, LOUISIANA

#### SHREVEPORT DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 16 UP 00057

**VERSUS** 

JUDGE HICKS

(01) TYQUARIO DERELL ADAMS, a.k.a. "PUNU"

MAGISTRATE JUDGE HORNSBY

(02) JOHNNY LEROY ADAMS, JR., a.k.a. "NUCCI,"

21 U.S.C. § 846 21 U.S.C. § 841(a)(1)

(03) ANTONIO TAWARN ROBERTSON, a.k.a. "TONY"

(04) MAKEITH LADALE ROBERTSON, a.k.a. "BOOGIE"

(05) TERRANCE D. WOODS

(06) ASHTON BERNARD SHELTON, a.k.a. "A-1"

(07) AMANDA MARIE GARNER

### **INDICTMENT**

#### THE GRAND JURY CHARGES:

### COUNT 1 Conspiracy

Beginning on a date unknown, but at least by April 4, 2015, and continuing through on or about November of 2015, the exact dates being uncertain, in the Western District of Louisiana and elsewhere, the defendants, TYQUARIO DERELL ADAMS, a.k.a. "PUNU", JOHNNY LEROY ADAMS, Jr., a.k.a. "NUCCI", ANTONIO TAWARN ROBERTSON, a.k.a. "TONY", MAKEITH LADALE ROBERTSON, a.k.a. "BOOGIE", TERRANCE D. WOODS, ASHTON BERNARD SHELTON, a.k.a. "A-1", and AMANDA MARIE GARNER, and other persons known and unknown to the Grand Jury, did knowingly and intentionally conspire and agree together to distribute and to possess

with the intent to distribute a mixture and substance containing a detectable amount of cocaine hydrochloride, also known as powder cocaine, and a mixture and substance containing a cocaine base, also known as crack cocaine, both Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

### COUNT 2 Distribution of Crack Cocaine

On or about April 30, 2015, in the Western District of Louisiana, the defendants, ANTONIO TAWARN ROBERTSON, a.k.a. "TONY", MAKEITH LADALE ROBERTSON, a.k.a. "BOOGIE", and TERRANCE D. WOODS, did knowingly and intentionally distribute a mixture and substance containing a cocaine base, also known as crack cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)]

### COUNT 3 Distribution of Crack Cocaine

On or about June 24, 2015, in the Western District of Louisiana, the defendants, ANTONIO TAWARN ROBERTSON, a.k.a. "TONY", and AMANDA MARIE GARNER, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)]

### <u>COUNT 4</u> Distribution of Crack Cocaine

On or about August 13, 2015, in the Western District of Louisiana, the defendants, ANTONIO TAWARN ROBERTSON, a.k.a. "TONY", and ASHTON BERNARD SHELTON, a.k.a. "A-1", did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)]

### <u>COUNT 5</u> Distribution of Powder Cocaine

On or about August 22, 2015, in the Western District of Louisiana, the defendants, JOHNNY LEROY ADAMS, Jr., a.k.a. "NUCCI", and ANTONIO TAWARN ROBERTSON, a.k.a. "TONY", did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine hydrochloride, also known as powder cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)]

# COUNT 6 Distribution of Powder Cocaine

On or about September 14, 2015, in the Western District of Louisiana, the defendants, JOHNNY LEROY ADAMS, Jr., a.k.a. "NUCCI", and ANTONIO TAWARN ROBERTSON, a.k.a. "TONY", did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine hydrochloride, also known as powder cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)]

## COUNT 7 Distribution of Powder Cocaine

On or about October 2, 2015, in the Western District of Louisiana, the defendants, JOHNNY LEROY ADAMS, Jr., a.k.a. "NUCCI", and ANTONIO TAWARN ROBERTSON, a.k.a. "TONY", did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine hydrochloride, also known as powder cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)]

## COUNT 8 Distribution of Powder Cocaine

On or about November 2, 2015, in the Western District of Louisiana, the defendants, TYQUARIO DERELL ADAMS, a.k.a. "PUNU", JOHNNY LEROY ADAMS, Jr., a.k.a. "NUCCI", and ANTONIO TAWARN ROBERTSON, a.k.a. "TONY", did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine hydrochloride, also known as powder cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)]

## COUNT 9 Possession with Intent to Distribute Powder Cocaine

On or about November 20, 2015, in the Western District of Louisiana, the defendant, JOHNNY LEROY ADAMS, Jr., a.k.a. "NUCCI", did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine hydrochloride, also known as powder cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). 21 U.S.C. § 841(a)(1)]

#### **FORFEITURE NOTICE**

The allegations in all counts are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

- A. Upon conviction of the controlled substances offenses alleged in the Counts set forth above of this Indictment, all of the following defendants, TYQUARIO DERELL ADAMS, a.k.a. "PUNU", JOHNNY LEROY ADAMS, Jr., a.k.a. "NUCCI", ANTONIO TAWARN ROBERTSON, a.k.a. "TONY", MAKEITH LADALE ROBERTSON, a.k.a. "BOOGIE", TERRANCE D. WOODS, ASHTON BERNARD SHELTON, a.k.a. "A-1", and AMANDA MARIE GARNER, shall forfeit to the United States all of their interest in:
  - 1. Any property consisting or derived from proceeds the defendants obtained directly or indirectly as the result of said violations as set forth in this Indictment, which include the specific amounts set forth below; and,
  - 2. Any property used or intended to be used in any manner or part to commit or facilitate the commission of the aforementioned violations.
- B. By virtue of the offenses charged in this indictment, any and all interest in the above-described property is vested in the United States and is forfeited to the United States pursuant to Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.
- C. If any of the property described above as being subject to forfeiture as a result of any act or omission of the defendants:
  - 1. cannot be located upon the exercise of due diligence;
  - 2. has been transferred or sold to, or deposited with, a third person;

- 3. has been placed beyond the jurisdiction of the Court;
- 4. has been substantially diminished in value; or
- 5. 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 property subject to forfeiture.

All in accordance with Title 21, United States Code, Section 853 and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL:

REDACTED

FC

STEPHANIE A. FINLEY UNITED STATES ATTORNEY

ALLISON D. BUSHNELL. (Bar No. 27443)

Assistant United States Attorney 300 Fannin Street, Suite 3201

Shreveport, Louisiana 71101-3068