

STATE GRAND JURY OF SOUTH CAROLINA

STATE OF SOUTH CAROLINA )
)
VS. )
)
JAMEL TYEQUAN WILLIAMS, )
(A/K/A "POPEYE"); )
DEMARIO JAWAUN HYMAN, )
(A/K/A "MARIO"), (A/K/A "MAN"); )
KOMAYNE LATRONE BROWN; )
CRAIG ROSHELL MAXWELL, )
(A/K/A "CRAIG MAC"), (A/K/A "C MAC"); )
GARY LEE BROWN, )
(A/K/A "BIGGIE"), (A/K/A "BIGGS"); )
JOSEPH ROBERTS, )
(A/K/A "JOE"); )
DAVID LEGETTE, )
(A/K/A "TOOTIE"), (A/K/A "FEDDI"); )
JOVAN STEVEN GRAVES, )
(A/K/A "J"); )
MURICE CAPRI MCFADDEN, )
(A/K/A "BIG SHOW"), (A/K/A "SHOW"); )
CHARLES EDWARD TAYLOR, JR., )
(A/K/A "CT"); )
DUSTIN LEVON ROGERS; )
PHILLIP LEROY JOHNSON, )
(A/K/A "YANK"); )
TEOFILO ROMELL CLARK, )
(A/K/A "FLO"); )
)
)
DEFENDANTS. )

CASE NO. \_\_\_\_\_

INDICTMENT FOR UNLAWFUL DRUGS

Possession with Intent to Distribute Cocaine Base (Crack) S.C. Code Ann. § 44-53-375(B) (1 Count)

Distribution of Marijuana S.C. Code Ann. § 44-53-370(b)(2) (3 Counts)

Distribution of Controlled Substance Within Proximity of School S.C. Code Ann. §44-53-445 (18 Counts)

Distribution of Cocaine Base (Crack) S.C. Code Ann. § 44-53-375(B) (12 Counts)

Possession with Intent to Distribute Marijuana S.C. Code Ann. § 44-53-370(b)(2) (2 Counts)

Possession with Intent to Distribute Controlled Substance Within Proximity of School S.C. Code Ann. §44-53-445 (1 Count)

Possession of a Firearm During the Commission of a Violent Crime S.C. Code Ann. § 16-23-490 (5 Counts)

Distribution of Methamphetamine S.C. Code Ann. § 44-53-375(B) (1 Count)

) Trafficking Cocaine Base (Crack),  
 ) 10 - 28 Grams  
 ) S.C. Code Ann. § 44-53-375(C)(1)  
 ) (2 Counts)  
 )  
 ) Financial Transactions Involving  
 ) Property Derived from Drug Activity  
 ) (Money Laundering)  
 ) S.C. Code Ann. § 44-53-475(A)(1)  
 ) (2 Counts)  
 )  
 ) Possession with Intent to Distribute  
 ) Methamphetamine  
 ) S.C. Code Ann. § 44-53-375(B)  
 ) (1 Count)  
 )  
 ) Trafficking in Illegal Drugs (Heroin),  
 ) 14 - 28 Grams  
 ) S.C. Code Ann. § 44-53-370(e)(3)(b)  
 ) (2 Counts)  
 )  
 ) Trafficking in Illegal Drugs (Heroin),  
 ) 4-14 Grams  
 ) S.C. Code Ann. § 44-53-370(e)(3)(a)  
 ) (1 Count)  
 )  
 ) Trafficking Marijuana,  
 ) 10 – 100 Pounds  
 ) S.C. Code Ann. § 44-53-370(e)(1)  
 ) (1 Count)  
 )  
 ) Possession of a Firearm by Person  
 ) Convicted of a Violent Offense  
 ) S.C. Ann. § 16-23-500  
 ) (1 Count)

At a session of the State Grand Jury of South Carolina, convened in Columbia, South Carolina on February 15, 2018, the State Grand Jurors present upon their oath:

**COUNT ONE**  
**POSSESSION WITH INTENT TO DISTRIBUTE COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That JAMEL TYEQUAN WILLIAMS (A/K/A “POPEYE”) did in Marion County on or about September 7, 2016, knowingly possess with intent to distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT TWO**  
**DISTRIBUTION OF MARIJUANA**  
**S.C. Code Ann. § 44-53-370(b)(2)**

That DEMARIO JAWAUN HYMAN (A/K/A “MARIO”) (A/K/A “MAN”) did in Marion County, on or about September 28, 2016, knowingly and intentionally manufacture, distribute, dispense, or deliver a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THREE**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That DEMARIO JAWAUN HYMAN (A/K/A “MARIO”) (A/K/A “MAN”) in Marion County, on or about September 28, 2016, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion High School and Green Street Park (Marion City Recreation Center). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FOUR**  
**DISTRIBUTION OF MARIJUANA**  
**S.C. Code Ann. § 44-53-370(b)(2)**

That KOMAYNE LATRONE BROWN did in Marion County, on or about October 27, 2016, knowingly and intentionally manufacture, distribute, dispense, or deliver a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FIVE**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That KOMAYNE LATRONE BROWN did in Marion County, on or about October 27, 2016, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion High School and Green Street Park (Marion City Recreation Center). All in violation of §44-53-445 of the South Carolina Code

of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT SIX**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That CRAIG ROSHELL MAXWELL (A/K/A “CRAIG MAC”) (A/K/A “C MAC”) did in Marion County on or about January 20, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT SEVEN**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That CRAIG ROSHELL MAXWELL (A/K/A “CRAIG MAC”) (A/K/A “C MAC”) in Marion County, on or about January 20, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess

with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult Education Center. All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT EIGHT**  
**DISTRIBUTION OF MARIJUANA**  
**S.C. Code Ann. § 44-53-370(b)(2)**

That DEMARIO JAWAUN HYMAN (A/K/A “MARIO”) (A/K/A “MAN”) did in Marion County, on or about March 21, 2017, knowingly and intentionally manufacture, distribute, dispense, or deliver a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT NINE**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That DEMARIO JAWAUN HYMAN (A/K/A “MARIO”) (A/K/A “MAN”) in Marion County, on or about March 21, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion High School and Green Street Park (Marion City Recreation Center). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.



**COUNT TEN**  
**POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA**  
**S.C. Code Ann. § 44-53-370(b)(2)**

That DEMARIO JAWAUN HYMAN (A/K/A “MARIO”) (A/K/A “MAN”) did in Marion County, on or about March 23, 2017, knowingly and intentionally manufacture, distribute, dispense, or deliver a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT ELEVEN**  
**POSSESSION WITH INTENT TO DISTRIBUTE CONTROLLED SUBSTANCE**  
**WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That DEMARIO JAWAUN HYMAN (A/K/A “MARIO”) (A/K/A “MAN”) in Marion County, on or about March 23, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant did possess with the intent to distribute a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as

amended, within one half mile of Marion High School and Green Street Park (Marion City Recreation Center). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT TWELVE**  
**POSSESSION OF A FIREARM DURING THE COMMISSION OF A VIOLENT CRIME**  
**S.C. Code Ann. § 16-23-490**

That DEMARIO JAWAUN HYMAN (A/K/A “MARIO”) (A/K/A “MAN”) did in Marion County, on or about March 23, 2017, possess or visibly display a firearm during the commission of or attempt to commit a violent crime to wit: the defendant did possess a .38 caliber Rohm RG revolver, bearing serial number FF282988, during the commission of and in furtherance of a marijuana trafficking conspiracy, in violation of § 16-23-490, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct arising out of or in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTEEN**  
**POSSESSION OF A FIREARM DURING THE COMMISSION OF A VIOLENT CRIME**  
**S.C. Code Ann. § 16-23-490**

That DEMARIO JAWAUN HYMAN (A/K/A “MARIO”) (A/K/A “MAN”) did in Marion County, on or about March 23, 2017, possess or visibly display a firearm during the commission of or attempt to commit a violent crime to wit: the defendant did possess a .380 caliber Taurus PT pistol, bearing serial number 82392E, during the commission of and in furtherance of a marijuana trafficking conspiracy, in violation of § 16-23-490, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct arising out of or in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FOURTEEN**  
**DISTRIBUTION OF METHAMPHETAMINE**  
**S.C. Code Ann. § 44-53-375(B)**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”) did in Marion County, on or about March 28, 2017, knowingly manufacture, distribute, dispense, or deliver a quantity of methamphetamine (“ice” or “crank”), a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FIFTEEN**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”) did in Marion County, on or about March 28, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of methamphetamine, a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion High School and Green Street Park (Marion City Recreation Center). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT SIXTEEN**  
**TRAFFICKING COCAINE BASE (CRACK), 10 -28 GRAMS**  
**S.C. Code Ann. § 44-53-375(C)(1)**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”) did in Marion County, on or about March 29, 2017, knowingly possess (actually or constructively), sell, manufacture, deliver, purchase, or bring into this State, or provide financial assistance or otherwise aid, abet, attempt, or conspire to possess (actually or constructively), sell, manufacture, deliver, purchase, or bring into this State, ten (10) grams or more of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT SEVENTEEN**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”) did in Marion County, on or about March 29, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit:

the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion High School and Green Street Park (Marion City Recreation Center). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT EIGHTEEN**  
**FINANCIAL TRANSACTIONS INVOLVING PROPERTY DERIVED FROM**  
**UNLAWFUL DRUG ACTIVITY**  
**(MONEY LAUNDERING)**  
**S.C. Code Ann. § 44-53-475(A)(1)**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”) and MURICE CAPRI MCFADDEN (A/K/A “BIG SHOW”) (A/K/A “SHOW”) in Marion County, on or about May 4, 2017, knowing that the property involved in a financial transaction represented the proceeds of, and was derived directly and indirectly from the proceeds of unlawful activity relating to narcotic drugs or controlled substances, did conduct and attempt to conduct a financial transaction which in fact involved the proceeds, with the intent to promote the carrying on of unlawful activity relating to narcotic drugs or controlled substances, and knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, sources, ownership, and control of the proceeds of the unlawful activity.

All in violation of § 44-53-475 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than

one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT NINETEEN**  
**FINANCIAL TRANSACTIONS INVOLVING PROPERTY DERIVED FROM**  
**UNLAWFUL DRUG ACTIVITY**  
**(MONEY LAUNDERING)**  
**S.C. Code Ann. § 44-53-475(A)(1)**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”) and CRAIG ROSHELL MAXWELL (A/K/A “CRAIG MAC”) (A/K/A “C MAC”) in Marion County, on or about May 4, 2017, knowing that the property involved in a financial transaction represented the proceeds of, and was derived directly and indirectly from the proceeds of unlawful activity relating to narcotic drugs or controlled substances, did conduct and attempt to conduct a financial transaction which in fact involved the proceeds, with the intent to promote the carrying on of unlawful activity relating to narcotic drugs or controlled substances, and knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, sources, ownership, and control of the proceeds of the unlawful activity.

All in violation of § 44-53-475 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT TWENTY**  
**TRAFFICKING COCAINE BASE (CRACK), 10 -28 GRAMS**  
**S.C. Code Ann. § 44-53-375(C)(1)**

That MURICE CAPRI MCFADDEN (A/K/A “BIG SHOW”) (A/K/A “SHOW”) did in Marion County, on or about May 9, 2017, knowingly possess (actually or constructively), sell, manufacture, deliver, purchase, or bring into this State, or provide financial assistance or otherwise aid, abet, attempt, or conspire to possess (actually or constructively), sell, manufacture, deliver, purchase, or bring into this State, ten (10) grams or more of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT TWENTY ONE**  
**POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE**  
**S.C. Code Ann. § 44-53-375(B)**

That MURICE CAPRI MCFADDEN (A/K/A “BIG SHOW”) (A/K/A “SHOW”) did in Marion County on or about May 9, 2017, knowingly possess with intent to distribute, dispense, and deliver a quantity of methamphetamine (“ice” or “crank”), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.



**COUNT TWENTY TWO**  
**POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA**  
**S.C. Code Ann. § 44-53-370(b)(2)**

That MURICE CAPRI MCFADDEN (A/K/A “BIG SHOW”) (A/K/A “SHOW”) did in Marion County, on or about May 9, 2017, knowingly possess with intent to manufacture, distribute, dispense, and deliver a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT TWENTY THREE**  
**TRAFFICKING IN ILLEGAL DRUGS (HEROIN), 14-28 GRAMS**  
**S.C. Code Ann. § 44-53-370(e)(3)(b)**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”), JOSEPH ROBERTS, (A/K/A “JOE”), and CHARLES EDWARD TAYLOR, JR., (A/K/A “CT”) did in Marion County, on or about May 11, 2017, knowingly possess (actually or constructively), sell, manufacture, deliver, purchase, or bring into this State, or provide financial assistance or otherwise aid, abet, attempt, or conspire to possess (actually or constructively), sell, manufacture, deliver, purchase, or bring into this State, fourteen (14) grams or more of heroin, a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT TWENTY FOUR**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”) and CHARLES EDWARD TAYLOR, JR., (A/K/A “CT”) did in Marion County, on or about May 11, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendants sold a quantity of heroin, a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult Education Center, Johnakin Middle School, and Grice’s Recreation Center (Marion City Recreation Center). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT TWENTY FIVE**  
**TRAFFICKING IN ILLEGAL DRUGS (HEROIN), 4-14 GRAMS**  
**S.C. Code Ann. § 44-53-370(e)(3)(a)**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”) and CHARLES EDWARD TAYLOR, JR., (A/K/A “CT”) did in Marion County, on or about May 15, 2017, knowingly possess (actually or constructively), sell, manufacture, deliver, purchase, or bring into this State, or provide financial assistance or otherwise aid, abet, attempt, or conspire to possess (actually or constructively), sell, manufacture, deliver, purchase, or bring into this State, four (4) grams or more of heroin, a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT TWENTY SIX**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”) and CHARLES EDWARD TAYLOR, JR., (A/K/A “CT”) did in Marion County, on or about May 15, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT TWENTY SEVEN**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That GARY LEE BROWN (A/K/A “BIGGIE”) (A/K/A “BIGGS”) and CHARLES EDWARD TAYLOR, JR., (A/K/A “CT”) did in Marion County, on or about May 15, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendants sold a mixture of heroin and cocaine base (crack), controlled substances under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult Education Center, Johnakin Middle School, and Grice’s Recreation Center (Marion City Recreation Center). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT TWENTY EIGHT**  
**TRAFFICKING MARIJUANA, 10 - 100 POUNDS**  
**S.C. Code Ann. § 44-53-370(e)(1)**

That DUSTIN LEVON ROGERS did in Marion County, on or about May 22, 2017, knowingly possess (actually or constructively), sell, manufacture, cultivate, deliver, purchase, or bring into this State, or provide financial assistance or otherwise aid, abet, attempt, or conspire to possess (actually or constructively), sell, manufacture, cultivate, deliver, purchase, or bring into this State, ten (10) pounds or more of marijuana, a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State.

**COUNT TWENTY NINE**  
**POSSESSION OF A FIREARM DURING THE COMMISSION OF A VIOLENT CRIME**  
**S.C. Code Ann. § 16-23-490**

That DUSTIN LEVON ROGERS did in Marion County, on or about May 22, 2017, possess or visibly display a firearm during the commission of or attempt to commit a violent crime to wit: the defendant did possess a .44 caliber Taurus revolver, bearing serial number RF653763, during the commission of trafficking marijuana, in violation of § 16-23-490, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct arising out of or in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTY**  
**POSSESSION OF A FIREARM DURING THE COMMISSION OF A VIOLENT CRIME**  
**S.C. Code Ann. § 16-23-490**

That DUSTIN LEVON ROGERS did in Marion County, on or about May 22, 2017, possess or visibly display a firearm during the commission of or attempt to commit a violent crime to wit: the defendant did possess a Taurus 9mm pistol, bearing serial number TJP08666, during the commission of trafficking marijuana, in violation of § 16-23-490, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct arising out of or in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTY ONE**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That PHILLIP LEROY JOHNSON (A/K/A “YANK) did in Marion County, on or about July 19, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTY TWO**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That PHILLIP LEROY JOHNSON (A/K/A “YANK) did in Marion County, on or about July 19, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult Education Center. All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTY THREE**  
**TRAFFICKING IN ILLEGAL DRUGS (HEROIN), 14-28 GRAMS**  
**S.C. Code Ann. § 44-53-370(e)(3)(b)**

That CHARLES EDWARD TAYLOR, JR. (A/K/A “CT”) did in Marion County, on or about August 1, 2017, knowingly possess (actually or constructively), sell, manufacture, deliver, purchase, or bring into this State, or provide financial assistance or otherwise aid, abet, attempt, or conspire to possess (actually or constructively), sell, manufacture, deliver, purchase, or bring into this State, fourteen (14) grams or more of heroin, a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTY FOUR**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That CHARLES EDWARD TAYLOR, JR., (A/K/A “CT”) did in Marion County, on or about August 1, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the



defendant sold a quantity of heroin a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult Education Center, Johnakin Middle School, and Grice's Recreation Center (Marion City Recreation Center). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTY FIVE**  
**POSSESSION OF A FIREARM DURING THE COMMISSION OF A VIOLENT CRIME**  
**S.C. Code Ann. § 16-23-490**

That CHARLES EDWARD TAYLOR, JR., (A/K/A "CT") did in Marion County, on or about August 1, 2017, possess or visibly display a firearm during the commission of or attempt to commit a violent crime to wit: the defendant did possess a Glock .45 caliber pistol, bearing serial number BAVW045, during the commission of trafficking in illegal drugs (heroin), in violation of § 16-23-490, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct arising out of or in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTY SIX**  
**POSSESSION OF A FIREARM BY PERSON CONVICTED OF VIOLENT OFFENSE**  
**S.C. Code Ann. § 16-23-500**

That CHARLES EDWARD TAYLOR, JR., (A/K/A “CT”) did in Marion County, on or about August 1, 2017, possess or visibly display a firearm having previously been convicted of a violent crime, as defined by Section 16-1-60, that is classified as a felony offense, in violation of § 16-23-500, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct arising out of or in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTY SEVEN**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That KOMAYNE LATRONE BROWN did in Marion County, on or about August 29, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTY EIGHT**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That KOMAYNE LATRONE BROWN did in Marion County, on or about August 29, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult Education Center and Tilghman Park (Marion City Recreation Park). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT THIRTY NINE**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That KOMAYNE LATRONE BROWN did in Marion County, on or about August 31, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FORTY**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That KOMAYNE LATRONE BROWN did in Marion County, on or about August 29, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult

Education Center and Tilghman Park (Marion City Recreation Park). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FORTY ONE**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That KOMAYNE LATRONE BROWN did in Marion County, on or about September 8, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FORTY TWO**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That KOMAYNE LATRONE BROWN did in Marion County, on or about September 8, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did

distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult Education Center and Tilghman Park (Marion City Recreation Park). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FORTY THREE**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That TEOFILO ROMELL CLARK (A/K/A “FLO”) did in Marion County, on or about September 15, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FORTY FOUR**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That TEOFILO ROMELL CLARK (A/K/A “FLO”) did in Marion County, on or about September 15, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult Education Center and Tilghman Park (Marion City Recreation Park). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FORTY FIVE**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That KOMAYNE LATRONE BROWN did in Marion County, on or about September 26, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FORTY SIX**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That KOMAYNE LATRONE BROWN did in Marion County, on or about September 26, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult



Education Center and Tilghman Park (Marion City Recreation Park). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FORTY SEVEN**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That TEOFILO ROMELL CLARK (A/K/A “FLO”) did in Marion County, on or about September 27, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FORTY EIGHT**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That TEOFILO ROMELL CLARK (A/K/A “FLO”) did in Marion County, on or about September 27, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or

university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult Education Center. All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FORTY NINE**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That JAMEL TYEQUAN WILLIAMS (A/K/A “POPEYE”) did in Marion County, on or about September 28, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FIFTY**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That JAMEL TYEQUAN WILLIAMS (A/K/A “POPEYE”) did in Marion County, on or about September 28, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult Education Center. All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FIFTY ONE**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That KOMAYNE LATRONE BROWN did in Marion County, on or about October 13, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FIFTY TWO**  
**DISTRIBUTION OF CONTROLLED SUBSTANCE WITHIN PROXIMITY OF SCHOOL**  
**S.C. Code Ann. § 44-53-445**

That KOMAYNE LATRONE BROWN did in Marion County, on or about October 13, 2017, knowing that he was in, on, or within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; did distribute, sell, purchase, manufacture, or unlawfully possess with intent to distribute, a controlled substance within a one-half mile radius of the grounds of a public or private elementary, middle, or secondary school; a public playground or park; a public vocational or trade school or technical educational center; or a public or private college or university; to wit: the defendant sold a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, within one half mile of Marion County Adult

Education Center and Tilghman Park (Marion City Recreation Park). All in violation of §44-53-445 of the South Carolina Code of Laws (1976), as amended, such conduct not having been authorized by law; such conduct having significance in more than one county of this State; and such conduct arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

**COUNT FIFTY THREE**  
**DISTRIBUTION OF COCAINE BASE (CRACK)**  
**S.C. Code Ann. § 44-53-375(B)**

That PHILLIP LEROY JOHNSON (A/K/A “YANK”) did in Marion County, on or about December 12, 2017, knowingly and intentionally distribute, dispense, and deliver a quantity of cocaine base (crack), a controlled substance under the provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, such conduct not having been authorized by law and such conduct having significance in more than one county of this State and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances having transpired in more than one county of this State and having significance in more than one county of this State.

Against the peace and dignity of the State and contrary to the statute in such case made and provided.

A \_\_\_\_\_ Bill

\_\_\_\_\_  
FOREMAN

\_\_\_\_\_  
ALAN WILSON (jru)  
ATTORNEY GENERAL