AUG 15 2019

STATE GRAND JURY OF SOUTH CAROLINA

JAMES R. PARKS CLERK, STATE GRAND JURY

STATE OF SOUTH CAROLINA) CASE NO. 2018-GS-47-56
V.	SUPERSEDING INDICTMENT FOR
BARAKA NABIL RAMOS, (A/K/A "CHRIST"); ANTHONY JAMUR PYATT, (A/K/A "MP"), (A/K/A "REFLECTION"); NAE'KWON O'NORE SINGLETON, (A/K/A "TARZAN"); ALEXANDER LAMONT RILEY; STEVENSON LAMONT BAILEY; LINWOOD LEROY EASON, JR., (A/K/A "LJ"); ALEXANDERIA L. BLAIR; INDIA LECANDICE MCCALL, (A/K/A "KANDY"); MARCUS ANTHONY DESHNER; FLORIA SHAUNTE LATORIA LEE, (A/K/A "TAY"); TAMELA MECHELLE PYATT, (A/K/A "COCO"), (A/K/A "COKE"); FELICIA E. HARDIE, (A/K/A "LELE"); TANGELINE MONIQUE GRAHAM; LADELIA JENKINS; JERMAINE ASHLEY STEWART; EDWARD RONALD YANNACEY; DEFENDANTS.	CRIMINAL CONSPIRACY, TRAFFICKING METHAMPHETAMINE 200 GRAMS OR MORE (CONSPIRACY), TRAFFICKING MARIJUANA 10-100 POUNDS OR MORE (CONSPIRACY), FURNISHING OF CONTRABAND TO A PRISONER, ACCESSORY BEFORE THE FACT TO THE FURNISHING OF CONTRABAND TO A PRISONER, POSSESSION WITH INTENT TO DISTRIBUTE A SCHEDULE I CONTROLLED SUBSTANCE, DISTRIBUTION OF MARIJUANA MARIJUANA
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At a session of the State Grand Jury of South Carolina, convened in Columbia, South Carolina, on August 15, 2019, the State Grand Jurors present upon their oath:

INTRODUCTION

Contraband is readily available to inmates in the South Carolina Department of Corrections ("SCDC"), despite the best efforts of many SCDC staff to stem the tide. An extensive, sophisticated, and very lucrative black market has existed within the prison system for the sale and delivery of contraband. The operations of this black market require the assistance of people both inside and outside of the prison walls.

The most prevalent types of contraband include pounds of loose cigarette tobacco, cell phones and cell phone accessories, marijuana, alcoholic beverages, and Synthetic Cannabinoid, also known as "K2", "Deuce" or "Spice". Other drugs, such as methamphetamine, suboxone, cocaine, and crack cocaine are also trafficked within the walls of the state prisons.

The methods used to introduce the contraband into the state prisons are varied and limited only by the ingenuity of the inmates and the willingness of staff and people on the outside to assist.

Inmate leaders coordinate their own extremely profitable black market ventures, and essentially employ people both inside and outside the prisons to assist in obtaining and distributing the contraband. These inmate leaders take orders from inmate customers, marshal resources on the outside to gather and package the contraband, arrange for delivery times and smuggling methods into the prison system, and coordinate distribution and delivery not only within a single institution but also from institution to institution. These inmate leaders use sophisticated and varied financial mechanisms to get paid and to pay all their "employees", with methods designed to hide the true source of the income.

Friends, wives, girlfriends, relatives, former inmates, and others all play a significant role in gathering the contraband items and packaging them, not only for ease of smuggling into the various institutions, but also for distinguishing packages for delivery to the right customers among the prisoners. Color coded tape is often used on the packages of contraband to help the distribution network determine which packages go to which customers in which institution.

The contraband can command high prices in the prisons, and prices go up as the security level of the institution increases. For example, in a low level prison even a small medicine "cap" of tobacco can bring as much as \$25. Cell phones can bring hundreds if not thousands of dollars.

The contraband trade in the prisons drives not only a lucrative black market but also contributes to gang power, gang rivalries, and gang violence among the competing factions within the prison walls.

One such mechanism by which contraband has been smuggled into the South Carolina Department of Corrections is through the dairy facilities at the Wateree Correctional Institution in Sumter County. The dairy at Wateree Correctional Institution provides milk to the institutions within all of the prison system. The dairy facilities and pasture land surround the Wateree prison but are not within its secure perimeter.

Inmates designated to work in the prison dairy facilities thus would leave the prison yard during the daily work shifts. These inmates were typically only supervised by few civilian staff and had access to various dairy and farm facilities and pasture land, which is not otherwise fenced or secured.

Contraband was delivered by coconspirators on the outside and left during the

night at predeterminated hiding locations on the prison dairy farmland. The contraband was typically in large duffle bags, containing cell phones, tobacco, drugs, and other items individually packaged and marked with the color coded tape. Inmates on the dairy work shifts retrieved the contraband on the farmland and took it back to the dairy facilities.

The inmates on the dairy work shifts would then use plastic wrap to roll some of the contraband into small capsules called "eggs", which would be placed in the rectums of the inmates to be smuggled back into the Wateree prison yard once the work shifts were over.

The inmates secreted the majority of the contraband into the milk crates, which were packaged on pallets and ultimately trucked to all of the institutions with the system. The packages were secretly marked so inmates who assist at the receiving institutions would know which ones contain contraband. In this manner SCDC's food distribution network was used against itself to facilitate the contraband trade.

Another manner by which contraband was introduced into the prison system was through a bakery in Columbia that sells bread to the South Carolina Department of Corrections for consumption by inmates throughout the various institutions. Inmates working in the Food Services warehouse at Goodman Correctional Institution would be assigned to accompany truck drivers to the bakery to help load the bread. Once there, the inmates would sneak boxes of contraband which had been hidden adjacent to the bakery onto the truck, where it would be returned back within the prison walls. From there, the contraband could be secreted into pallets or packages of foodstuffs that would be delivered out to the various institutions in the entire Department of Corrections

system.

Another method by which contraband was smuggled into the prison system involved inmates assigned to work at the State House grounds in Columbia. Coconspirators on the outside would take contraband and hide it at various locations around the State House and the state office buildings. Inmates on State House work duty would obtain it and return it back within the prison walls for delivery throughout the system.

WHEREAS, THE GRAND JURY CHARGES:

COUNT ONE CRIMINAL CONSPIRACY (S.C. Code Ann. § 16-17-410)

BARAKA NABIL RAMOS (A/K/A "CHRIST"), ANTHONY JAMUR PYATT (A/K/A "MP"), NAE'KWON O'NORE SINGLETON (A/K/A "TARZAN"), ALEXANDER LAMONT RILEY, STEVENSON LAMONT BAILEY, LINWOOD LEROY EASON, JR. (A/K/A "LJ"), ALEXANDERIA L. BLAIR, INDIA LECANDICE MCCALL (A/K/A "KANDY"), MARCUS ANTHONY DESHNER, FLORIA SHAUNTE LATORIA LEE (A/K/A "TAY"), TAMELA MECHELLE PYATT (A/K/A "COCO") (A/K/A "COKE"), FELICIA E. HARDIE (A/K/A "LELE"), TANGELINE MONIQUE GRAHAM, LADELIA JENKINS, JERMAINE ASHLEY STEWART, EDWARD RONALD YANNACEY, and other persons known and unknown to the Grand Jury, in Sumter County, on or about from some time in January of 2017 until some time in November of 2018, did, wilfully, unlawfully, and feloniously unite, combine, conspire, confederate, agree and have a tacit understanding and agreement

between one or more persons, for the purpose of accomplishing an unlawful object or lawful object by unlawful means, including but not limited to violations of § 24-3-950, § 44-53-370 and § 44-53-375, § 35-11-740, to wit: RAMOS, PYATT, LONG, SINGLETON, RILEY, BAILEY, EASON, JR., BLAIR, MCCALL, DESHNER, LEE, PYATT, HARDIE, GRAHAM, JENKINS, STEWART, and YANNACEY did conspire to run an operation that smuggled illegal drugs, weapons and tools, tobacco, cell phones, cell phone accessories, and other contraband into the South Carolina Department of Corrections system through the Wateree CI prison dairy facilities and the SCDC food services network.

All in violation of Section 16-17-410 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multicounty nature and having transpired 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.

COUNT TWO TRAFFICKING METHAMPHETAMINE, 200 GRAMS OR MORE (CONSPIRACY) S.C. Code Ann. § 44-53-375(C)

That BARAKA NABIL RAMOS (A/K/A "CHRIST"), ANTHONY JAMUR PYATT (A/K/A "MP"), ALEXANDERIA L. BLAIR, INDIA LECANDICE MCCALL (A/K/A "KANDY"), and JERMAINE ASHLEY STEWART did, in Sumter County, on or about from some time in October of 2017 until some time in August of 2018, 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, two hundred (200) grams or more 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.

All in violation of Section 44-53-375 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature 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.

COUNT THREE TRAFFICKING MARIJUANA, 10-100 POUNDS OR MORE (BY CONSPIRACY) S.C. Code Ann. § 44-53-370(e)(1)

That That BARAKA NABIL RAMOS (A/K/A "CHRIST"), ANTHONY JAMUR PYATT (A/K/A "MP"), ALEXANDERIA L. BLAIR, INDIA LECANDICE MCCALL (A/K/A "KANDY"), TAMELA MECHELLE PYATT (A/K/A "COCO") (A/K/A "COKE"), and JERMAINE ASHLEY STEWART did, in Sumter County, on or about from some time in October of 2017 until some time in August of 2018, 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, one hundred (100) 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.

All in violation of Section 44-53-370 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature 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.

COUNT FOUR FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That NAE'KWON O'NORE SINGLETON (A/K/A "TARZAN") did, in Sumter County, on or about March 18, 2018, knowingly attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: SINGLETON did attempt to smuggle through the dairy facilities at the Wateree Correctional Institution a quantity of Synthetic Cannabinoid (also known as K2 or "Spice"), to prisoners within the South Carolina Department of Corrections.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics,

dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

COUNT FIVE FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That ALEXANDER LAMONT RILEY did, in Sumter County, on or about March 18, 2018, knowingly attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: RILEY did attempt to smuggle through the dairy facilities at the Wateree Correctional Institution a quantity of Synthetic Cannabinoid (also known as K2 or "Spice"), to prisoners within the South Carolina Department of Corrections.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

COUNT SIX FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That STEVENSON LAMONT BAILEY did, in Sumter County, on or about March 18, 2018, knowingly attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: BAILEY did attempt to smuggle through the dairy facilities at the Wateree Correctional Institution a quantity of Synthetic Cannabinoid (also known as K2 or "Spice"), to prisoners within the South Carolina Department of Corrections.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

COUNT SEVEN FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That LINWOOD LEROY EASON, JR. (A/K/A "LJ") did, in Sumter County, on or about March 18, 2018, knowingly attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: EASON did attempt to smuggle through the dairy facilities at the Wateree Correctional Institution a quantity of Synthetic Cannabinoid (also known as K2)

or "Spice"), to prisoners within the South Carolina Department of Corrections.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

COUNT EIGHT ACCESSORY BEFORE THE FACT TO THE FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That BARAKA NABIL RAMOS (A/K/A "CHRIST") did, in Sumter County, on or about March 18, 2018, knowingly aid, abet, hire, procure, and counsel an attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: RAMOS did procure, aid and abet an attempt to smuggle a quantity of Synthetic Cannabinoid (also known as K2 or "Spice"), through the dairy facilities at the Wateree Correctional Institution to prisoners within the South Carolina Department of Corrections.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

COUNT NINE ACCESSORY BEFORE THE FACT TO THE FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That ANTHONY JAMUR PYATT (A/K/A "MP"), did, in Sumter County, on or about March 18, 2018, knowingly aid, abet, hire, procure, and counsel an attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: PYATT did procure, aid and abet an attempt to smuggle a quantity of Synthetic Cannabinoid (also known as K2 or "Spice"), through the dairy facilities at the Wateree Correctional Institution to prisoners within the South Carolina Department of Corrections.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

COUNT TEN POSSESSION WITH INTENT TO DISTRIBUTE A SCHEDULE I CONTROLLED SUBSTANCE S.C. Code Ann. § 44-53-370(b)(2)

That NAE'KWON O'NORE SINGLETON (A/K/A "TARZAN") did, in Sumter

County, on or about March 18, 2018, knowingly possess with intent to distribute, dispense, and deliver a quantity of Synthetic Cannabinoid (also known as K2 or "Spice"), a controlled substance under the provisions of § 44 53 110, et seq., Code of Laws of South Carolina (1976), as amended.

All in violation of Section 44-53-370 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature 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.

COUNT ELEVEN POSSESSION WITH INTENT TO DISTRIBUTE A SCHEDULE I CONTROLLED SUBSTANCE S.C. Code Ann. § 44-53-370(b)(2)

That ALEXANDER LAMONT RILEY did, in Sumter County, on or about March 18, 2018, knowingly possess with intent to distribute, dispense, and deliver a quantity of Synthetic Cannabinoid (also known as K2 or "Spice"), a controlled substance under the provisions of § 44 53 110, et seq., Code of Laws of South Carolina (1976), as amended.

All in violation of Section 44-53-370 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature 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.

COUNT TWELVE
POSSESSION WITH INTENT TO DISTRIBUTE A SCHEDULE I CONTROLLED
SUBSTANCE
S.C. Code Ann. § 44-53-370(b)(2)

That STEVENSON LAMONT BAILEY did, in Sumter County, on or about March 18, 2018, knowingly possess with intent to distribute, dispense, and deliver a quantity of Synthetic Cannabinoid (also known as K2 or "Spice"), a controlled substance under the provisions of § 44 53 110, et seq., Code of Laws of South Carolina (1976), as amended.

All in violation of Section 44-53-370 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature 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.

COUNT THIRTEEN POSSESSION WITH INTENT TO DISTRIBUTE A SCHEDULE I CONTROLLED SUBSTANCE S.C. Code Ann. § 44-53-370(b)(2)

That LINWOOD LEROY EASON, JR. (A/K/A "LJ") did, in Sumter County, on or about March 18, 2018, knowingly possess with intent to distribute, dispense, and deliver a quantity of Synthetic Cannabinoid (also known as K2 or "Spice"), a controlled substance under the provisions of § 44 53 110, et seq., Code of Laws of South Carolina

(1976), as amended.

All in violation of Section 44-53-370 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature 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.

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

That JERMAINE ASHLEY STEWART did, in Sumter County, on or about May 24, 2018, knowingly distribute, dispense, and deliver, or conspire to 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.

All in violation of Section 44-53-370 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature 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.

COUNT FIFTEEN FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That JERMAINE ASHLEY STEWART did, in Sumter County, on or about May 24, 2018, knowingly attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: STEWART did attempt to smuggle into the Wateree Correctional Institution a quantity of marijuana for prisoners within the South Carolina Department of Corrections.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

COUNT SIXTEEN ACCESSORY BEFORE THE FACT TO THE FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That BARAKA NABIL RAMOS (A/K/A "CHRIST") did, in Sumter County, on or about May 24, 2018, knowingly aid, abet, hire, procure, and counsel an attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: RAMOS did procure, aid and abet an attempt to smuggle a quantity of marijuana into the South Carolina Department of Corrections through the dairy facilities at the Wateree Correctional Institution.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

COUNT SEVENTEEN ACCESSORY BEFORE THE FACT TO THE FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That ANTHONY JAMUR PYATT (A/K/A "MP") did, in Sumter County, on or about May 24, 2018, knowingly aid, abet, hire, procure, and counsel an attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: PYATT did procure, aid and abet an attempt to smuggle a quantity of marijuana into the South Carolina Department of Corrections through the dairy facilities at the Wateree Correctional Institution.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

COUNT EIGHTEEN ACCESSORY BEFORE THE FACT TO THE FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That BARAKA NABIL RAMOS (A/K/A "CHRIST") did, in Sumter County, on or about March 29, 2018, knowingly aid, abet, hire, procure, and counsel an attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: RAMOS did procure, aid and abet an attempt to smuggle a quantity of marijuana into the South Carolina Department of Corrections through the dairy facilities at the Wateree Correctional Institution.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

COUNT NINETEEN ACCESSORY BEFORE THE FACT TO THE FURNISHING OF CONTRABAND TO A PRISONER S.C. Code Ann. § 24-3-950

That ANTHONY JAMUR PYATT (A/K/A "MP") did, in Sumter County, on or about March 29, 2018, knowingly aid, abet, hire, procure, and counsel an attempt to furnish any prisoner under the jurisdiction of the Department of Corrections with any matter declared by the director to be contraband, to wit: PYATT did procure, aid and abet an

attempt to smuggle a quantity of marijuana into the South Carolina Department of Corrections through the dairy facilities at the Wateree Correctional Institution.

All in violation of Section 24-3-950 of the South Carolina Code of Laws, and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having transpired 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.

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ALAN WILSON (scw) ATTORNEY GENERAL