

INTRODUCTION

Contraband has been readily available to inmates in the South Carolina Department of Corrections ("SCDC"). 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 have required the assistance of people both inside and outside of the prison walls. The contraband trade in the prisons has driven not only that lucrative black market, but also has contributed to gang power, gang rivalries, and gang violence among the competing factions within the prison walls.

One method in which contraband has been introduced into the prison is through "throwovers". Those involved on the outside, who were in communication with inmates on the inside, would gather contraband, which could include tobacco, alcohol, illegal drugs, cell phone and cell phone accessories, JB Weld, saws and tools, and even consumer electronics such as video games.

Many of these items would be packaged in large empty plastic soft drink bottles, or "jugs". The accomplices late at night would approach the fence of an institution, typically while on a cell phone with an inmate inside who was their contact. When the time was right, either because a patrolling guard was not nearby or the inmates were in position, the contact on the inside would tell persons on the outside to throw the "jugs" and other items over the fence.

The inmates would then retrieve the contraband at the site of the throwover. Inmates would even go so far as to saw through security measures on a window, go out

into the grounds to retrieve the contraband, return inside the prison, and repair the window.

WHEREAS, THE GRAND JURY CHARGES:

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

That TRAVIS MANDELL KEMP (A/K/A "TK") (A/K/A "FORTY"), COLEY ALONZO ADAMS (A/K/A "MANE"), KIMBERLY SUE LANCASTER, JIMMY DARRELL GAGUM, JR. (A/K/A "SLIM G"), and other persons known and unknown to the Grand Jury, did in Richland County, on or about from June 1, 2017 until November 30, 2017, unlawfully, willfully, and knowingly unite, combine, conspire, confederate, agree and have tacit understanding with one or more persons for the purpose of accomplishing an unlawful object, including but not limited to violations of § 24-3-950, § 44-53-370, § 44-53-375, and § 35-11-740, to wit: KEMP, ADAMS, LANCASTER, and GAGUM, JR. did conspire to smuggle contraband into the Broad River Correctional Institution by means of a "throwover", with such contraband including illegal drugs, weapons and tools, tobacco, cell phones, cell phone accessories, and other contraband.

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 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 TWO
TRAFFICKING METHAMPHETAMINE, 10-28 GRAMS
S.C. Code Ann. § 44-53-375(C)(1)**

That TRAVIS MANDELL KEMP (A/K/A "TK") (A/K/A "FORTY"), COLEY ALONZO ADAMS (A/K/A "MANE"), and KIMBERLY SUE LANCASTER did in Richland County, on or about October 25, 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 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
FURNISHING OF CONTRABAND TO A PRISONER
S.C. Code Ann. § 24-3-950

That TRAVIS MANDELL KEMP (A/K/A "TK") (A/K/A "FORTY"), COLEY ALONZO ADAMS (A/K/A "MANE"), and KIMBERLY SUE LANCASTER did in Richland County, on or about October 25, 2017, unlawfully, willfully, and knowingly attempted to furnish a prisoner or prisoners under the jurisdiction of the South Carolina Department of Corrections with matter declared by the Director of the South Carolina Department of Corrections to be contraband, to wit: KEMP, ADAMS, and LANCASTER attempted to smuggle illegal drugs into the Broad River Correctional Institution by means of a "throwover".

All in violation of Section 24-3-950 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
POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA
S.C. Code Ann. § 44-53-370(b)(2)

That TRAVIS MANDELL KEMP (A/K/A "TK") (A/K/A "FORTY"), COLEY ALONZO ADAMS (A/K/A "MANE"), and KIMBERLY SUE LANCASTER did, in Richland County, on

or about October 25, 2017, knowingly possess with intent to 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.

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

That TRAVIS MANDELL KEMP (A/K/A "TK") (A/K/A "FORTY") and COLEY ALONZO ADAMS (A/K/A "MANE") did, in Richland County, on or about October 25, 2017, knowingly manufacture, distribute, dispense, deliver, purchase or aid, abet, attempt, or conspire to manufacture, distribute, dispense, deliver or purchase, or possess with intent to distribute, dispense, or deliver methamphetamine ("ice" or "crank"), a controlled substance under provisions of § 44-53-110, *et. seq.*, Code of Laws of South Carolina (1976), as amended, while in, on, or within a one-half mile radius of the grounds of a

public trade school, to wit: KEMP and ADAMS did cross the property of the South Carolina Criminal Justice Academy, a public trade school, while possessing and delivering contraband packages containing methamphetamine to the Broad River Correctional Institution.

All in violation of Section 44-53-445 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 SIX
TRESPASS OR LOITERING ON OR REFUSAL TO LEAVE
STATE CORRECTION PROPERTIES
S.C. Code Ann. § 24-1-270**

That TRAVIS MANDELL KEMP (A/K/A "TK") (A/K/A "FORTY") and COLEY ALONZO ADAMS (A/K/A "MANE") did, in Richland County, on or about October 25, 2017, knowingly, unlawfully, and intentionally, trespass or loiter on state correctional property after notice to leave provided by the Director of the South Carolina Department of Corrections or his authorized agents, to wit: KEMP and ADAMS did trespass at Broad River Correctional Institution, an area designated by the Director for the confinement of inmates, with notice of trespass clearly marked and provided, for the purpose of delivering contraband packages to inmates inside the facility.

All in violation of Section 24-1-270 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 SEVEN
CRIMINAL CONSPIRACY
S.C. Code Ann. § 16-17-410**

That VAQUITA EIANA SIMS and QUANTIS JAMAL PINCKNEY (A/K/A "QP") (A/K/A "REFLECTION"), did, in Richland County, on or about November 8, 2017, unlawfully, willfully, and knowingly unite, combine conspire, confederate, agree and have tacit understanding with one or more persons for the purpose of accomplishing an unlawful object, including but not limited to violations of § 44-53-370 and § 24-3-950, to wit: SIMS and PINCKNEY did conspire to smuggle contraband into the South Carolina Department of Corrections prison system, with such contraband including illegal drugs.

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 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
TRAFFICKING METHAMPHETAMINE, 400 GRAMS OR MORE (CONSPIRACY)
S.C. Code Ann. § 44-53-375(C)(5)

That VAQUITA EIANA SIMS and QUANTIS JAMAL PINCKNEY (A/K/A "QP") (A/K/A "REFLECTION") did, in Richland County, on or about November 8, 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 hundred (400) 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 NINE
CRIMINAL CONSPIRACY
S.C. Code Ann. § 16-17-410**

That KEITH EVERETT BROWN and COLEY ALONZO ADAMS (A/K/A "MANE") did, in Richland County, on or about October 4, 2017, unlawfully, willfully, and knowingly unite, combine conspire, confederate, agree and have tacit understanding with one or more persons for the purpose of accomplishing an unlawful object, including but not limited to violations of § 24-3-950, to wit: BROWN and ADAMS did conspire to smuggle contraband into the Broad River Correctional Institution by means of a "throwover", with such contraband including weapons.

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

That COLEY ALONZO ADAMS (A/K/A "MANE") did, in Richland County, on or about October 4, 2017, unlawfully, willfully, and knowingly furnished a prisoner or prisoners under the jurisdiction of the South Carolina Department of Corrections with

matter declared by the Director of the South Carolina Department of Corrections to be contraband, to wit: ADAMS did throw contraband including weapons over the fence at the South Carolina Department of Corrections.

All in violation of Section 24-3-950 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
FURNISHING OF CONTRABAND TO A PRISONER
S.C. Code Ann. § 24-3-950

That KEITH EVERETT BROWN did, in Richland County, on or about October 4, 2017, while a prisoner under the jurisdiction of the Department of Corrections, knowingly possessed any matter declared to be contraband by the Director of the South Carolina Department of Corrections, to wit: While a prisoner at Broad River Correctional Institution, BROWN possessed contraband including weapons.

All in violation of Section 24-3-950 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
POSSESSING TOOLS OR WEAPONS FOR ESCAPE
S.C. Code Ann. § 24-13-410**

That KEITH EVERETT BROWN did, in Richland County, on or about October 4, 2017, while incarcerated with the South Carolina Department of Corrections, knowingly, unlawfully, and intentionally, possess contraband materials that may be used to facilitate an escape, to wit: BROWN was found in possession of contraband including escape materials such as cellular telephones, saw blades, and wire cutters.

All in violation of Section 24-13-410 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
TRAFFICKING METHAMPHETAMINE, 28-100 GRAMS (CONSPIRACY)
S.C. Code Ann. § 44-53-375(C)(2)**

That QUANTIS JAMAL PINCKNEY (A/K/A "QP") (A/K/A "REFLECTION"), JIMMY

DARRELL GAGUM, JR. (A/K/A "SLIM G"), JANITIA DESIARIE BOWERS, KENNETH EDWARD CLARK (A/K/A "RATCHET"), RICARDO LABRUCE JOSEPH, and other persons known and unknown to the Grand Jury, did, in Richland County, on or about October 25, 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, twenty-eight (28) to one hundred (100) grams 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 FOURTEEN
ACCESSORY BEFORE THE FACT TO THE FURNISHING OF
CONTRABAND TO A PRISONER
S.C. Code Ann. § 24-3-950**

That QUANTIS JAMAL PINCKNEY (A/K/A "QP") (A/K/A "REFLECTION") did, in Richland County, on or about October 25, 2017, 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: PINCKNEY did procure, aid and abet an attempt to smuggle a quantity of methamphetamine into the Broad River Correctional Institution 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 FIFTEEN
ACCESSORY BEFORE THE FACT TO THE FURNISHING OF
CONTRABAND TO A PRISONER
S.C. Code Ann. § 24-3-950**

That JIMMY DARRELL GAGUM, JR. (A/K/A "SLIM G") did, in Richland County, on or about October 25, 2017, 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: GAGUM, JR. did procure, aid and abet an attempt to smuggle a quantity of methamphetamine into the Broad River Correctional Institution 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 FOUR
DISTRIBUTION OF MARIJUANA (CONSPIRACY)
S.C. Code Ann. § 44-53-370(b)(2)**

That QUANTIS JAMAL PINCKNEY (A/K/A "QP") (A/K/A "REFLECTION"), JIMMY DARRELL GAGUM, JR. (A/K/A "SLIM G"), and persons known and unknown to the Grand Jury did, in Richland County, on or about October 25, 2017, knowingly conspire to 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.

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

That QUANTIS JAMAL PINCKNEY (A/K/A "QP") (A/K/A "REFLECTION") did, in Richland County, on or about October 25, 2017, 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: PINCKNEY did procure, aid and abet an attempt to smuggle a quantity of marijuana into the Broad River Correctional Institution 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 EIGHTEEN
ACCESSORY BEFORE THE FACT TO THE FURNISHING OF
CONTRABAND TO A PRISONER
S.C. Code Ann. § 24-3-950

That JIMMY DARRELL GAGUM, JR. (A/K/A "SLIM G") did, in Richland County, on

or about October 25, 2017, 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: GAGUM, JR. did procure, aid and abet an attempt to smuggle a quantity of marijuana into the Broad River Correctional Institution 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 NINETEEN
TRAFFICKING COCAINE, 10-28 GRAMS (CONSPIRACY)
S.C. Code Ann. § 44-53-370(e)(2)(a)**

That QUANTIS JAMAL PINCKNEY (A/K/A "QP") (A/K/A "REFLECTION"), JIMMY DARRELL GAGUM, JR. (A/K/A "SLIM G"), and other persons known and unknown to the Grand Jury did, in Richland County, on or about October 25, 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 but less than twenty-eight (28) grams of cocaine, a controlled

substance under 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 TWENTY
ACCESSORY BEFORE THE FACT TO THE FURNISHING OF
CONTRABAND TO A PRISONER
S.C. Code Ann. § 24-3-950**

That QUANTIS JAMAL PINCKNEY (A/K/A "QP") (A/K/A "REFLECTION") did, in Richland County, on or about October 25, 2017, 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: PINCKNEY did procure, aid and abet an attempt to smuggle a quantity of cocaine into the Broad River Correctional Institution 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 TWENTY-ONE
ACCESSORY BEFORE THE FACT TO THE FURNISHING OF
CONTRABAND TO A PRISONER
S.C. Code Ann. § 24-3-950**

That JIMMY DARREL GAGUM, JR. (A/K/A "SLIM G") did, in Richland County, on or about October 25, 2017, 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: GAGUM, JR. did procure, aid and abet an attempt to smuggle a quantity of cocaine into the Broad River Correctional Institution 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 TWENTY-TWO
CRIMINAL CONSPIRACY
S.C. Code Ann. § 16-17-410**

That QUANTIS JAMAL PINCKNEY (A/K/A "QP") (A/K/A "REFLECTION"), KENNETH EDWARD CLARK (A/K/A "RATCHET"), VAQUITA EIANA SIMS, JANITIA DESIARIE BOWERS, RICARDO LABRUCE JOSEPH, and other persons known and unknown to the Grand Jury, did in Richland County, on or about from January 1, 2017 until December 31, 2017, unlawfully, willfully, and knowingly unite, combine, conspire, confederate, agree and have tacit understanding with one or more persons for the purpose of accomplishing an unlawful object, including but not limited to violations of § 24-3-950, § 44-53-370, and § 44-53-375, to wit: PINCKNEY, CLARK, SIMS, and BOWERS did conspire to smuggle contraband into the Broad River Correctional Institution, with such contraband including illegal drugs, weapons and tools, tobacco, cell phones, cell phone accessories, and other contraband..

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 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 TWENTY-THREE
CRIMINAL CONSPIRACY
S.C. Code Ann. § 16-17-410**

That KENNETH EDWARD CLARK (A/K/A "RATCHET"), JAMMIE EVERETTE THOMPSON did, in Richland County, on or about May 1, 2018, and other persons known and unknown to the Grand Jury, unlawfully, willfully, and knowingly unite, combine, conspire, confederate, agree and have tacit understanding with one or more persons for the purpose of accomplishing an unlawful object, including but not limited to violations of § 24-3-950, § 44-53-370, and § 44-53-375, to wit: CLARK and THOMPSON did conspire to smuggle contraband to prisoners within the South Carolina Department of Corrections through the inmate services provided at the South Carolina State House grounds. Such contraband included illegal drugs.

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

That KENNETH EDWARD CLARK (A/K/A "RATCHET") did, in Richland County, on or about May 1, 2018, knowingly manufacture, distribute, dispense, deliver, purchase or aid, abet, or conspire to manufacture, distribute, dispense, deliver or purchase, or possess with intent to manufacture, distribute, dispense, or deliver a quantity of marijuana, a controlled substance under provisions of § 44-53-110, *et. seq.*, Code of Laws 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.

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

That JAMMIE EVERETTE THOMPSON did, in Richland County, on or about May 1, 2018, knowingly manufacture, distribute, dispense, deliver, purchase or aid, abet, or conspire to manufacture, distribute, dispense, deliver or purchase, or possess with intent

to manufacture, distribute, dispense, or deliver a quantity of marijuana, a controlled substance under provisions of § 44-53-110, *et. seq.*, Code of Laws 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.

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

That KENNETH EDWARD CLARK (A/K/A "RATCHET") did, in Richland County, on or about May 1, 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: CLARK did attempt to smuggle a quantity of marijuana to prisoners within the South Carolina Department of Corrections through the inmate services provided at the South Carolina State House grounds.

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

That JAMMIE EVERETTE THOMPSON did, in Richland County, on or about May 1, 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: THOMPSON did attempt to smuggle a quantity of marijuana to prisoners within the South Carolina Department of Corrections through the inmate services provided at the South Carolina State House grounds.

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

That KENNETH EDWARD CLARK (A/K/A "RATCHET") did, in Richland County, on or about May 1, 2018, 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.

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

That JAMMIE EVERETTE THOMPSON did, in Richland County, on or about May 1, 2018, 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.

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

That KENNETH EDWARD CLARK (A/K/A "RATCHET") did, in Richland County, on or about May 1, 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: CLARK did attempt to smuggle a quantity of cocaine base (crack) to prisoners within the South Carolina Department of Corrections through the inmate services provided at the South Carolina State House grounds.

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 THIRTY-ONE
FURNISHING OF CONTRABAND TO A PRISONER
S.C. Code Ann. § 24-3-950**

That JAMMIE EVERETTE THOMPSON did, in Richland County, on or about May 1, 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: THOMPSON did attempt to smuggle a quantity of cocaine base (crack) to prisoners within the South Carolina Department of Corrections through the inmate services provided at the South Carolina State House grounds.

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 THIRTY-TWO
TRAFFICKING COCAINE, 10-28 GRAMS
S.C. Code Ann. § 44-53-370(e)(2)(a)(1)**

That KENNETH EDWARD CLARK (A/K/A "RATCHET") did, in Richland County,

on or about May 1, 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, ten (10) grams or more of cocaine, 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.

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 THIRTY-THREE
TRAFFICKING COCAINE, 10-28 GRAMS
S.C. Code Ann. § 44-53-370(e)(2)(a)(1)**

That JAMMIE EVERETTE THOMPSON did, in Richland County, on or about May 1, 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, ten (10) grams or more of cocaine, 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.

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

That KENNETH EDWARD CLARK (A/K/A "RATCHET") did, in Richland County, on or about May 1, 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: CLARK did attempt to smuggle a quantity of cocaine to prisoners within the South Carolina Department of Corrections through the inmate services provided at the South Carolina State House grounds.

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

That JAMMIE EVERETTE THOMPSON did, in Richland County, on or about May 1, 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: THOMPSON did attempt to smuggle a quantity of cocaine to prisoners within the South Carolina Department of Corrections through the inmate services provided at the South Carolina State House grounds.

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 THIRTY-SIX
TRAFFICKING METHAMPHETAMINE, 28-100 GRAMS
S.C. Code Ann. § 44-53-375(C)(2)**

That KENNETH EDWARD CLARK (A/K/A "RATCHET") did, in Richland County, on or about May 1, 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, twenty-eight (28) 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 THIRTY-SEVEN
TRAFFICKING METHAMPHETAMINE, 28-100 GRAMS
S.C. Code Ann. § 44-53-375(C)(2)**

That JAMMIE EVERETTE THOMPSON did, in Richland County, on or about May 1, 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, twenty-eight (28) 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 THIRTY-EIGHT
FURNISHING OF CONTRABAND TO A PRISONER
S.C. Code Ann. § 24-3-950**

That KENNETH EDWARD CLARK (A/K/A "RATCHET") did, in Richland County, on or about May 1, 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: CLARK did attempt to smuggle a quantity of methamphetamine to prisoners within the South Carolina Department of Corrections through the inmate services provided at the South Carolina State House grounds.

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 THIRTY-NINE
FURNISHING OF CONTRABAND TO A PRISONER
S.C. Code Ann. § 24-3-950**

That JAMMIE EVERETTE THOMPSON did, in Richland County, on or about May 1, 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: THOMPSON did attempt to smuggle a quantity of methamphetamine to prisoners within the South Carolina Department of Corrections through the inmate services provided at the South Carolina State House grounds.

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 FORTY
CRIMINAL CONSPIRACY
S.C. Code Ann. § 16-17-410**

That JANITIA DESIARIE BOWERS, RICARDO LABRUCÉ JOSEPH, and other persons known and unknown to the Grand Jury, did, in Richland County, on or about March 19, 2019, unlawfully, willfully, and knowingly unite, combine, conspire, confederate, agree and have tacit understanding with one or more persons for the purpose of accomplishing an unlawful object, including but not limited to violations of § 24-3-950, to wit: BOWERS AND JOSEPH did conspire to smuggle contraband into the South Carolina Department of Corrections.

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 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.

A TRUE Bill



FOREMAN



A blue handwritten signature of Alan Wilson.

ALAN WILSON (scw)
ATTORNEY GENERAL