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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**INDICTMENT FOR VIOLATIONS OF  
THE FEDERAL CONTROLLED SUBSTANCES ACT  
AND THE FEDERAL GUN CONTROL ACT**

**UNITED STATES OF AMERICA**

**v.**

**JERMAINE WINCHESTER  
a/k/a "Stutter"  
CLYDE PEREZ  
CALVINA McDOWELL  
KEVIN COLLINS  
a/k/a "Big Daddy"  
KAVEN LANE, JR.  
JONATHAN JOSEPH  
CYRIL DEGREE  
MARLON JONES  
QUANTIES DAVIS  
TERRELL WINCHESTER  
BURNELL WILSON**

**\* CRIMINAL DOCKET No:**

**08 - 231**

**\* SECTION: " "**

**SECT. L MAG. 1**

**\* VIOLATION: 21 U.S.C. § 841(a)(1)  
21 U.S.C. § 846  
18 U.S.C. § 924(o)**

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The Grand Jury charges that:

**COUNT 1**

Beginning at a time unknown but on or before July 15, 2007, and continuing until on or about November 9, 2007, in the Eastern District of Louisiana, and elsewhere, the defendants, **JERMAINE WINCHESTER a/k/a "Stutter," CLYDE PEREZ, CALVINA McDOWELL, KEVIN COLLINS a/k/a "Big Daddy," KAVEN LANE, JR., JONATHAN JOSEPH, CYRIL DEGREE, MARLON JONES, QUANTIES DAVIS, TERRELL WINCHESTER, and BURNELL WILSON**, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute 50 grams or more of cocaine base ("crack") and a quantity of cocaine hydrochloride, both Schedule II narcotic drug controlled substances, and a quantity of marijuana, a Schedule I narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), and 841(b)(1)(D); all in violation of Title 21, United States Code, Section 846.

**COUNT 2**

Beginning at a time unknown but on or before October 18, 2007, and continuing until on or about November 5, 2007, in the Eastern District of Louisiana and elsewhere, the defendants, **JERMAINE WINCHESTER a/k/a "Stutter," KAVEN LANE, JR., and JONATHAN JOSEPH**, did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, during and in relation to a drug trafficking crime, to use and carry firearms, and possess firearms in furtherance of the drug trafficking crime, to wit: a conspiracy to distribute and possess with the intent to distribute narcotic drug controlled

substances, as outlined in Count 1 of this Indictment; all in violation of Title 18, United States Code, Section 924(o).

**COUNT 3**

On or about July 16, 2007, in the Eastern District of Louisiana, the defendants, **JERMAINE WINCHESTER a/k/a “Stutter,”** and **CLYDE PEREZ,** did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 4**

On or about July 23, 2007, in the Eastern District of Louisiana, the defendants, **JERMAINE WINCHESTER a/k/a “Stutter,”** and **CLYDE PEREZ,** did knowingly and intentionally distribute a quantity of cocaine hydrochloride, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 5**

On or about July 24, 2007, in the Eastern District of Louisiana, the defendant, **JERMAINE WINCHESTER a/k/a “Stutter,”** did knowingly and intentionally distribute 50 grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 6**

On or about July 31, 2007, in the Eastern District of Louisiana, the defendants, **JERMAINE WINCHESTER a/k/a “Stutter,”** and **CLYDE PEREZ,** did knowingly and intentionally distribute five (5) grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**COUNT 7**

On or about September 5, 2007, in the Eastern District of Louisiana, the defendant, **JERMAINE WINCHESTER a/k/a “Stutter,”** did knowingly and intentionally distribute 50 grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 8**

On or about October 17, 2007, in the Eastern District of Louisiana, the defendant, **JERMAINE WINCHESTER a/k/a “Stutter,”** did knowingly and intentionally distribute 50 grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

**COUNT 9**

On or about November 5, 2007, in the Eastern District of Louisiana, the defendants, **JERMAINE WINCHESTER a/k/a “Stutter,”** and **CALVINA McDOWELL,** did knowingly and intentionally possess with intent to distribute 50 grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**NOTICE OF FORFEITURE**

1. The allegations of Counts 1, and 3 through 9 of this indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1, and 3 through 9, the defendants, **JERMAINE WINCHESTER a/k/a “Stutter,”** **CLYDE PEREZ,** **CALVINA McDOWELL,**

KEVIN COLLINS a/k/a "Big Daddy," KAVEN LANE, JR., JONATHAN JOSEPH, CYRIL DEGREE, MARLON JONES, QUANTIES DAVIS, TERRELL WINCHESTER, and BURNELL WILSON, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 1, and 3 through 9 of this indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

#### **NOTICE OF FORFEITURE**

1. The allegation of Count 2 of this Indictment is realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States

of America pursuant to the provisions of Title 18, United States Code, Section 924 (d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged in Count 2, the defendants, **JERMAINE WINCHESTER a/k/a "Stutter," KAVEN LANE, JR.,** and **JONATHAN JOSEPH,** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code, Section 2461, any firearm or ammunition, which was involved in or used in a knowing violation of Title 18, United States Code, Section 924(o), as alleged in Count 2 of the Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 924(o) and 924(d)(1).

A TRUE BILL:

*Manuel Pottier*  
FOREPERSON

*[Signature]*  
JIM LETTEN #8517  
UNITED STATES ATTORNEY

*Jan Maselli Mann*  
JAN MASELLI MANN #9020  
First Assistant United States Attorney  
Chief, Criminal Division

*[Signature]*  
KEVIN G. BOITMANN #26203  
Assistant United States Attorney

New Orleans, Louisiana  
August 21, 2008

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