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SUPPRESSED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) No.
)
 CHAZ ALEXANDER BAKER,)
 ERVIN J. THOMPSON, a/k/a "Chrome")
 MARTEZ D. JONES, a/k/a "Tez",)
 DARYL L. JONES, a/k/a "D.J.",)
 DUAN DRAYTON, a/k/a "Hooch" and "Taco",)
 MARLOWE PARSONS, a/k/a "Low Low",)
 and KEVIN RAGLAND, a/k/a "KK")
)
 Defendants.)

FILED
FEB - 8 2012
U. S. DISTRICT COURT
E. DIST. OF MO.
ST. LOUIS

4 : 12 CR 00046 JAR

INDICTMENT
COUNT ONE

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, and continuing up to and including the date of this indictment, with the exact dates unknown to the Grand Jury, within the Eastern District of Missouri and elsewhere,

**CHAZ ALEXANDER BAKER,
ERVIN J. THOMPSON, a/k/a "Chrome",
MARTEZ D. JONES, a/k/a "Tez", and
DARYL L. JONES, a/k/a "D.J.",**

the defendants herein, and others known and unknown to the Grand Jury, did knowingly and willfully conspire, combine, confederate and agree to commit an offense against the United States; to wit: to distribute in excess of 280 grams of a mixture or substance containing a detectable amount of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Sections 841(a)(1) and 846, and punishable under Title 21, United States Code, Section 841(b)(1)(A)(iii).

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COUNT TWO

The Grand Jury further charges that:

On or about August 18, 2010, in the County of St. Louis, within the Eastern District of Missouri,

CHAZ ALEXANDER BAKER,

the defendant herein, did knowingly and intentionally distribute a quantity of heroin, a schedule I controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT THREE

The Grand Jury further charges that:

On or about August 19, 2010, in the County of St. Louis, within the Eastern District of Missouri,

CHAZ ALEXANDER BAKER,

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT FOUR

The Grand Jury further charges that:

On or about September 14, 2010, in the County of St. Louis, within the Eastern District of Missouri,

CHAZ ALEXANDER BAKER,

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base

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(crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT FIVE

The Grand Jury further charges that:

On or about October 5, 2010, in the County of St. Louis, within the Eastern District of Missouri,

CHAZ ALEXANDER BAKER,

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT SIX

The Grand Jury further charges that:

On or about October 26, 2010, in the City of St. Louis, within the Eastern District of Missouri,

CHAZ ALEXANDER BAKER,

the defendant herein, did knowingly and intentionally possess with intent to distribute in excess of 28 grams of a mixture or substance containing a detectible amount of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B)(iii).

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COUNT SEVEN

The Grand Jury further charges that:

On or about September 7, 2010, in the County of St. Louis, within the Eastern District of Missouri,

ERVIN J. THOMPSON, a/k/a "Chrome",

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT EIGHT

The Grand Jury further charges that:

On or about September 7, 2010, in the County of St. Louis, within the Eastern District of Missouri,

ERVIN J. THOMPSON, a/k/a "Chrome",

the defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a Court of the United States; to wit: distribution of cocaine base (crack), as charged in Count Seven herein.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT NINE

The Grand Jury further charges that:

On or about September 15, 2010, in the County of St. Louis, within the Eastern District of Missouri,

ERVIN J. THOMPSON, a/k/a "Chrome",

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base

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(crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT TEN

The Grand Jury further charges that:

On or about October 4, 2010, in the County of St. Louis, within the Eastern District of Missouri,

ERVIN J. THOMPSON, a/k/a "Chrome",

the defendant herein, did knowingly and intentionally distribute in excess of 28 grams of a mixture or substance containing a detectible amount of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B)(iii).

COUNT ELEVEN

The Grand Jury further charges that:

On or about September 9, 2010, in the County of St. Louis, within the Eastern District of Missouri,

**MARTEZ D. JONES, a/k/a "Tez", and
DARYL L. JONES, a/k/a "D.J.",**

the defendants herein, acting together, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2, and punishable under Title 21, United States Code, Section 841(b)(1)(C).

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the defendant herein, did knowingly and intentionally possess with intent to distribute in excess of 28 grams of a mixture or substance containing a detectible amount of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B)(iii).

COUNT FIFTEEN

The Grand Jury further charges that:

On or about October 14, 2010, in the County of St. Louis, within the Eastern District of Missouri,

DARYL L. JONES, a/k/a "D.J.",

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT SIXTEEN

The Grand Jury further charges that:

Beginning at a time unknown to the Grand Jury, and continuing up to and including the date of this indictment, with the exact dates unknown to the Grand Jury, within the Eastern District of Missouri and elsewhere,

DUAN DRAYTON, a/k/a "Hooch" and "Taco",

the defendant herein, and others known and unknown to the Grand Jury, did knowingly and willfully conspire, combine, confederate and agree to commit an offense against the United States; to wit: to distribute in excess of 28 grams of a mixture or substance containing a detectable amount of cocaine base (crack), a schedule II narcotic controlled substance drug.

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In violation of Title 21, United States Code, Sections 841(a)(1) and 846, and punishable under Title 21, United States Code, Section 841(b)(1)(B)(iii).

COUNT SEVENTEEN

The Grand Jury further charges that:

On or about December 9, 2009, in the County of St. Louis, within the Eastern District of Missouri,

DUAN DRAYTON, a/k/a "Hooch" and "Taco",

the defendant herein, acting with another, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2, and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT EIGHTEEN

The Grand Jury further charges that:

On or about December 31, 2009, in the County of St. Louis, within the Eastern District of Missouri,

DUAN DRAYTON, a/k/a "Hooch" and "Taco",

the defendant herein, acting with another, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2, and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT NINETEEN

The Grand Jury further charges that:

On or about September 1, 2010, in the County of St. Louis, within the Eastern District of Missouri,

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MARLOWE PARSONS, a/k/a "Low Low",

the defendant herein, did knowingly and intentionally distribute a quantity of heroin, a schedule I controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWENTY

The Grand Jury further charges that:

On or about September 2, 2010, in the County of St. Louis, within the Eastern District of Missouri,

MARLOWE PARSONS, a/k/a "Low Low",

the defendant herein, did knowingly and intentionally distribute a quantity of heroin, a schedule I controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWENTY-ONE

The Grand Jury further charges that:

On or about September 14, 2010, in the County of St. Louis, within the Eastern District of Missouri,

MARLOWE PARSONS, a/k/a "Low Low",

the defendant herein, did knowingly and intentionally distribute a quantity of heroin, a schedule I controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWENTY-TWO

The Grand Jury further charges that:

On or about October 14, 2010, in the County of St. Louis, within the Eastern District of Missouri,

MARLOWE PARSONS, a/k/a "Low Low",

the defendant herein, did knowingly and intentionally distribute a quantity of heroin, a schedule I controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWENTY-THREE

The Grand Jury further charges that:

On or about October 18, 2010, in the County of St. Louis, within the Eastern District of Missouri,

MARLOWE PARSONS, a/k/a "Low Low",

the defendant herein, did knowingly open, use, and maintain the premises of 1619 Stockard, Richmond Heights, Missouri, for the purpose of manufacturing, distributing, and using heroin, a schedule I controlled substance drug.

In violation of Title 21, United States Code, Section 856(a)(1), and punishable under Title 21, United States Code, Section 856(b).

COUNT TWENTY-FOUR

The Grand Jury further charges that:

On or about October 18, 2010, in the County of St. Louis, within the Eastern District of Missouri,

MARLOWE PARSONS, a/k/a "Low Low",

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the defendant herein, did knowingly possess a firearm in furtherance of a drug trafficking crime which may be prosecuted in a Court of the United States; to wit: maintaining a drug involved premises, as charged in Count Twenty-Three herein.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT TWENTY-FIVE

The Grand Jury further charges that:

On or about July 22, 2010, in the County of St. Louis, within the Eastern District of Missouri,

KEVIN RAGLAND, a/k/a "KK",

the defendant herein, did knowingly and intentionally distribute a quantity of heroin, a schedule I controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWENTY-SIX

The Grand Jury further charges that:

On or about January 18, 2011, in the County of St. Louis, within the Eastern District of Missouri,

KEVIN RAGLAND, a/k/a "KK",

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

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COUNT TWENTY-SEVEN

The Grand Jury further charges that:

On or about January 19, 2011, in the County of St. Louis, within the Eastern District of Missouri,

KEVIN RAGLAND, a/k/a "KK",

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWENTY-EIGHT

The Grand Jury further charges that:

On or about January 31, 2011, in the County of St. Louis, within the Eastern District of Missouri,

KEVIN RAGLAND, a/k/a "KK",

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT TWENTY-NINE

The Grand Jury further charges that:

On or about February 7, 2011, in the County of St. Louis, within the Eastern District of Missouri,

KEVIN RAGLAND, a/k/a "KK",

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base

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COUNT TWELVE

The Grand Jury further charges that:

On or about September 16, 2010, in the County of St. Louis, within the Eastern District of Missouri,

MARTEZ D. JONES, a/k/a "Tez",

the defendant herein, did knowingly and intentionally distribute a quantity of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT THIRTEEN

The Grand Jury further charges that:

On or about October 13, 2010, in the County of St. Louis, within the Eastern District of Missouri,

MARTEZ D. JONES, a/k/a "Tez",

the defendant herein, did knowingly and intentionally distribute in excess of 28 grams of a mixture or substance containing a detectable amount of cocaine base (crack), a schedule II narcotic controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B)(iii).

COUNT FOURTEEN

The Grand Jury further charges that:

On or about November 10, 2010, in the County of St. Louis, within the Eastern District of Missouri,

MARTEZ D. JONES, a/k/a "Tez",

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(crack), a schedule II controlled substance drug.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

COUNT THIRTY

The Grand Jury further charges that:

On or about February 17, 2011, in the City of St. Louis, within the Eastern District of Missouri,

KEVIN RAGLAND, a/k/a "KK",

the defendant herein, did knowingly and intentionally possess with intent to distribute a quantity of cocaine base (crack), a schedule II narcotic controlled substance drug.

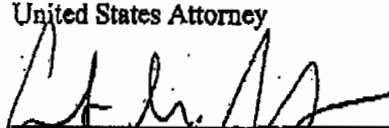
In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

A TRUE BILL.



FOREPERSON

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