

STATE OF TENNESSEE) CRIMINAL COURT OF SHELBY COUNTY
)
SHELBY COUNTY) MARCH TERM, 2016

Count 1

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

JERMAINE EDWARDS,
"TRELL"
DERRICK BOND, "D"
MELVIN SCOTT, "CHA CHI"
GEORGE TATE,
JOHN LEWIS, "JON JON"
CARL DOUGLAS, "C-DUB"
DAVID REED, "BIG DAVE"

JOHNNY DUNN,
"J-DOLLARS"
FREDERICK BROWN
ANTONIO BEAN,
MICHAEL MCGEE,
MASTER ROY JEFFERSON,
VERNON CHISEM,
MARCO BILLINGTON,

LAQUITA BEAN,
ROBERT SEYMORE, "C-MO"
TRAVIS DORMAYER,
"TRAVO"
RYAN STURM,
SUNNY KIMBRELL

between the dates of May 12, 2015, and March 5, 2016, in Shelby County, Tennessee, and before the finding of this indictment, did unlawfully and knowingly associate, agree and participate in a group of individuals, that did engage in a conspiracy to possess with intent to sell a controlled substance, to wit: heroin, a schedule I narcotic as classified in Tenn. Code Ann. § 39-17-406, in an amount greater than 150 grams as prohibited by Tenn. Code Ann. 39-17-417 and Tenn. Code Ann. § 39-12-103. Moreover, These offenses occurred within 1000 feet of Klondike Elementary School, Caldwell Elementary, and Northside High School in violation of Tenn. Code Ann. § 39-17-432

This conspiracy was primarily operated by Jermaine Edwards, Melvin Scott and Derrick Bond, who, in furtherance of the conspiracy, did conspire and agree with each other and with others, both known and unknown, to acquire heroin in an amount greater than 150 grams with intent to sell to others in the Drug Trafficking Organization(DTO).

In furtherance of this illicit heroin trafficking, the respective members of this conspiracy did commit the following overt acts:


- a. JERMAINE EDWARDS aka "TRELL": Over the course of the conspiratorial time period, JERMAINE EDWARDS, "TRELL" acquired heroin from Chicago, Illinois, in an amount greater than 150 grams, to other members of the Drug Trafficking Organization in Shelby County and Memphis Tennessee, by delivering it to DERRICK BOND, "D" and others for distribution;
- b. DERRICK BOND aka "D": Over the course of the conspiratorial time period, DERRICK BOND, "D" would contribute funds to JERMAINE EDWARDS aka "TRELL" for the acquisition of heroin in an amount greater than 150 grams. DERRICK BOND aka "D" would then receive his portion of heroin from JERMAINE EDWARDS aka "TRELL" upon JERMAINE EDWARDS aka "TRELL's" return from Chicago. BOND would then distribute heroin to his various customers for re-distribution and/or use;
- c. MELVIN SCOTT aka "CHA CHI": Over the course of the conspiratorial time period MELVIN SCOTT aka "CHA CHI" would contribute funds to JERMAINE EDWARDS aka "TRELL" for the acquisition of heroin in an amount greater than 150 grams. DERRICK BOND aka "D" would then receive his portion of

heroin from JERMAINE EDWARDS aka "TRELL" upon JERMAINE EDWARDS aka "TRELL's" return from Chicago. SCOTT would then distribute heroin to his various customers for re-distribution and/or use;

- d. GEORGE TATE: Over the course of the conspiratorial time period GEORGE TATE would acquire heroin from either DERRICK BOND or JERMAINE EDWARDS for re-distribution;
- e. JOHN LEWIS: Over the course of the conspiratorial time period JOHN LEWIS would serve as a middle-man between JERMAINE EDWARDS and the supplier(s) in Chicago, Illinois. Furthermore, on at least one occasion LEWIS allowed the exchange of heroin for currency to occur at his residence in Chicago;
- f. CARL DOUGLAS: Over the course of the conspiratorial time period CARL DOUGLAS would travel to Chicago, Illinois in order to transport heroin back to Shelby County, Tennessee primarily at the request of JERMAINE EDWARDS;
- g. DAVID REED aka "BIG DAVE": Over the course of the conspiratorial time period DAVID REED aka "BIG DAVE" travelled to Chicago, Illinois where he retrieved heroin in an amount greater than 150 grams from JERMAINE EDWARDS and transported the heroin to Shelby County, Tennessee via bus;
- h. JOHNNY DUNN aka "J-DOLLAR": Over the course of the conspiratorial time period JOHNNY DUNN aka "J-DOLLAR" would, at JERMAINE EDWARDS direction, store and distribute heroin from his residence within the above-described drug free zones;
- i. FREDERICK BROWN: Over the course of the conspiratorial time period FREDERICK BROWN would purchase heroin from JERMAINE EDWARDS which he would then re-distribute to his customers;
- j. ANTONIO BEAN: Over the course of the conspiratorial time period ANTONIO BEAN would acquire heroin from JERMAINE EDWARDS for redistribution to other distributors and consumers;
- k. MICHAEL MCGEE: Over the course of the conspiratorial time period MICHAEL MCGEE would acquire heroin from DERRICK BOND, MELVIN SCOTT and JERMAINE EDWARDS for re-distribution to his respective consumers;
- l. MASTER ROY JEFFERSON: Over the course of the conspiratorial time period MASTER ROY JEFFERSON served the DTO as a mid-level distributor whereby he would purchase heroin from DERRICK BOND and would re-distribute heroin from his residence to other distributors and consumers from his residence which is within a drug free zone described above;
- m. VERNON CHISEM aka "PIMP": Over the course of the conspiratorial time period VERNON CHISEM worked within the DTO as a street-level distributor of heroin he obtained from DERRICK BOND and JERMAINE EDWARDS to consumers;
- n. MARCO BILLINGTON aka "RICO": Over the course of the conspiratorial time period MARCO BILLINGTON worked within the DTO as a street-level distributor of heroin he obtained from DERRICK BOND;
- o. LEQUITA BEAN: Over the course of the conspiratorial time period LEQUITA BEAN would assist MARCO BILLINGTON in obtaining heroin from DERRICK BOND and in the distribution of heroin to consumers;

- p. ROBERT SEYMORE aka "C-MO": Over the course of the conspiratorial time period ROBERT SEYMORE worked within the DTO as a street-level distributor of heroin he obtained from DERRICK BOND;
- q. TRAVIS DORMAYER aka "TRAVO": Over the course of the conspiratorial time period TRAVIS DORMAYER aka "TRAVO" worked within the DTO by maintaining a residence for storing and distributing heroin at the direction of DERRICK BOND and would distribute heroin for BOND;
- r. RYAN STURM and SUNNY KIMBRELL: Over the course of the conspiratorial time period both RYAN STURM and SUNNY KIMBRELL worked within the DTO as street level distributors and users of heroin;

This conspiracy and the overt acts that facilitated its commission constitute a violation of Tenn. Code Ann. § 39-17-417, Tenn. Code Ann. § 39-12-103, and Tenn. Code Ann. § 39-17-432 and are against the peace and dignity of the State of Tennessee.



Amy P. Weirich
District Attorney General
30th Judicial District

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Count 2

THE GRAND JURORS of the State of Tennessee, duly selected, empaneled, sworn and charged to inquire for the body of the county of Shelby, Tennessee, upon their oath, present that:

JERMAINE EDWARDS,
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MELVIN SCOTT, "CHA CHI"
GEORGE TATE,
JOHN LEWIS, "JON JON"
CARL DOUGLAS, "C-DUB"
DAVID REED, "BIG DAVE"

JOHNNY DUNN,
"J-DOLLARS"
FREDERICK BROWN
ANTONIO BEAN,
MICHAEL MCGEE,
MASTER ROY JEFFERSON,
VERNON CHISEM,
MARCO BILLINGTON,

LAQUITA BEAN,
ROBERT SEYMORE, "C-MO"
TRAVIS DORMAYER,
"TRAVO"
RYAN STURM,
SUNNY KIMBRELL

between the dates of May 12, 2015, and March 5, 2016, in Shelby County, Tennessee, and before the finding of this indictment, did unlawfully and knowingly associate, agree and participate in a group of individuals, that did engage in a conspiracy to possess with intent to deliver a controlled substance, to wit: heroin, a schedule I narcotic as classified in Tenn. Code Ann. § 39-17-406, in an amount greater than 150 grams as prohibited by Tenn. Code Ann. 39-17-417 and Tenn. Code Ann. § 39-12-103. Moreover, These offenses occurred within 1000 feet of Klondike Elementary School, Caldwell Elementary, and Northside High School in violation of Tenn. Code Ann. § 39-17-432

This conspiracy was primarily operated by Jermaine Edwards, Melvin Scott and Derrick Bond, who, in furtherance of the conspiracy, did conspire and agree with each other and with others, both known and unknown, to acquire heroin in an amount greater than 150 grams with intent to sell to others in the Drug Trafficking Organization(DTO).

In furtherance of this illicit heroin trafficking, the respective members of this conspiracy did commit the following overt acts:

- a. JERMAINE EDWARDS aka "TRELL": Over the course of the conspiratorial time period, JERMAINE EDWARDS, "TRELL" acquired heroin from Chicago, Illinois, in an amount greater than 150 grams, to other members of the Drug Trafficking Organization in Shelby County and Memphis Tennessee, by delivering it to DERRICK BOND, "D" and others for distribution;
- b. DERRICK BOND aka "D": Over the course of the conspiratorial time period, DERRICK BOND, "D" would contribute funds to JERMAINE EDWARDS aka "TRELL" for the acquisition of heroin in an amount greater than 150 grams. DERRICK BOND aka "D" would then receive his portion of heroin from JERMAINE EDWARDS aka "TRELL" upon JERMAINE EDWARDS aka "TRELL's" return from Chicago. BOND would then distribute heroin to his various customers for re-distribution and/or use;
- c. MELVIN SCOTT aka "CHA CHI": Over the course of the conspiratorial time period MELVIN SCOTT aka "CHA CHI" would contribute funds to JERMAINE EDWARDS aka "TRELL" for the acquisition of heroin in an amount greater than 150 grams. DERRICK BOND aka "D" would then receive his portion of heroin from JERMAINE EDWARDS aka "TRELL" upon JERMAINE EDWARDS aka "TRELL's"

return from Chicago. SCOTT would then distribute heroin to his various customers for re-distribution and/or use;

- d. GEORGE TATE: Over the course of the conspiratorial time period GEORGE TATE would acquire heroin from either DERRICK BOND or JERMAINE EDWARDS for re-distribution;
- e. JOHN LEWIS: Over the course of the conspiratorial time period JOHN LEWIS would serve as a middle-man between JERMAINE EDWARDS and the supplier(s) in Chicago, Illinois. Furthermore, on at least one occasion LEWIS allowed the exchange of heroin for currency to occur at his residence in Chicago;
- f. CARL DOUGLAS: Over the course of the conspiratorial time period CARL DOUGLAS would travel to Chicago, Illinois in order to transport heroin back to Shelby County, Tennessee primarily at the request of JERMAINE EDWARDS;
- g. DAVID REED aka "BIG DAVE": Over the course of the conspiratorial time period DAVID REED aka "BIG DAVE" travelled to Chicago, Illinois where he retrieved heroin in an amount greater than 150 grams from JERMAINE EDWARDS and transported the heroin to Shelby County, Tennessee via bus;
- h. JOHNNY DUNN aka "J-DOLLAR": Over the course of the conspiratorial time period JOHNNY DUNN aka "J-DOLLAR" would, at JERMAINE EDWARDS direction, store and distribute heroin from his residence within the above-described drug free zones;
- i. FREDERICK BROWN: Over the course of the conspiratorial time period FREDERICK BROWN would purchase heroin from JERMAINE EDWARDS which he would then re-distribute to his customers;
- j. ANTONIO BEAN: Over the course of the conspiratorial time period ANTONIO BEAN would acquire heroin from JERMAINE EDWARDS for redistribution to other distributors and consumers;
- k. MICHAEL MCGEE: Over the course of the conspiratorial time period MICHAEL MCGEE would acquire heroin from DERRICK BOND, MELVIN SCOTT and JERMAINE EDWARDS for re-distribution to his respective consumers;
- l. MASTER ROY JEFFERSON: Over the course of the conspiratorial time period MASTER ROY JEFFERSON served the DTO as a mid-level distributor whereby he would purchase heroin from DERRICK BOND and would re-distribute heroin from his residence to other distributors and consumers from his residence which is within a drug free zone described above;
- m. VERNON CHISEM aka "PIMP": Over the course of the conspiratorial time period VERNON CHISEM worked within the DTO as a street-level distributor of heroin he obtained from DERRICK BOND and JERMAINE EDWARDS to consumers;
- n. MARCO BILLINGTON aka "RICO": Over the course of the conspiratorial time period MARCO BILLINGTON worked within the DTO as a street-level distributor of heroin he obtained from DERRICK BOND;
- o. LEQUITA BEAN: Over the course of the conspiratorial time period LEQUITA BEAN would assist MARCO BILLINGTON in obtaining heroin from DERRICK BOND and in the distribution of heroin to consumers;

- p. ROBERT SEYMORE aka "C-MO": Over the course of the conspiratorial time period ROBERT SEYMORE worked within the DTO as a street-level distributor of heroin he obtained from DERRICK BOND;
- q. TRAVIS DORMAYER aka "TRAVO": Over the course of the conspiratorial time period TRAVIS DORMAYER aka "TRAVO" worked within the DTO by maintaining a residence for storing and distributing heroin at the direction of DERRICK BOND and would distribute heroin for BOND;
- r. RYAN STURM and SUNNY KIMBRELL: Over the course of the conspiratorial time period both RYAN STURM and SUNNY KIMBRELL worked within the DTO as street level distributors and users of heroin;

This conspiracy and the overt acts that facilitated its commission constitute a violation of Tenn. Code Ann. § 39-17-417, Tenn. Code Ann. § 39-12-103, and Tenn. Code Ann. § 39-17-432 and are against the peace and dignity of the State of Tennessee.



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District Attorney General
30th Judicial District

No. 16 02994

STATE OF TENNESSEE

V.

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ANTONIO BEAN
MARCO BILLINGTON
JERMAINE EDWARDS "TRELL"
MELVIN SCOTT "CHA CHI"
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LEQUITA BEAN
TRAVIS DORMAYER "TRAVO"
RYAN STURM
SUNNY KIMBRELL

Indictment for

CONSPIRACY: UPCS 150G OR MORE TO SELL **DRUG FREE ZONE**
CONSPIRACY: UPCS 150G OR MORE TO DELIVER **DRUG FREE ZONE**

T.C.A. 39-12-103
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SCATS CODE -
SCATS CODE -

Witnesses:

Summon for the State

A.BARGER

SHELBY COUNTY NARCOTICS UNIT

A. BARGER
Prosecutor

A True Bill ✓



Foreperson of the Grand Jury

Date Indictment Returned: 4/28/16