

29

SEALED RULE 9 WARRANT (ALL)

IN THE SUPERIOR COURT OF THE STATE OF DELAWARE

STATE OF DELAWARE

V.

INDICTMENT BY THE GRAND JURY

CHRISTOPHER ANDERSON)	I.D. # 1710006708
DAMON ANDERSON)	I.D. # 1710006710
CHANDEL BETHEA)	I.D. # 1710006712
IRA BROWN)	I.D. # 1710006715
JEFFREY BULLOCK)	I.D. # 1710006717
MICHAEL CARPENTER)	I.D. # 1710006718
CLARENCE CHARLES)	I.D. # 1710006719
JERMAINE DOLLARD)	I.D. # 1710006721
HAROLD ELLINGTON)	I.D. # 1710006723
RICHARD ELLINGTON)	I.D. # 1710006726
TYRON FRIEND)	I.D. # 1710006727
EDWARD GATLIN)	I.D. # 1710006728
ALIA GRIER)	I.D. # 1710006731
ST. CLAIRE JACKSON)	I.D. # 1710006732
LEBRON JONES)	I.D. # 1710006735
NAKISHA JONES)	I.D. # 1710006737
ERIC LLOYD)	I.D. # 1710006739
SHERISH MILLER)	I.D. # 1710006747
LEROY MITCHELL)	I.D. # 1710006887
TRAMONT MITCHELL)	I.D. # 1710006743
APRIL PRITCHETT)	I.D. # 1710006748
MICHAEL PRITCHETT)	I.D. # 1710006749
JEROME PRITCHETT)	I.D. # 1710006752
MARK PURNELL)	I.D. # 1710006755
TYRONE ROANE)	I.D. # 1710006758
DAMIEN ROBINSON)	I.D. # 1710006760
CHARMAINE SANDERS)	I.D. # 1710006763
QUINTON TURNER)	I.D. # 1710006764
DWAYNE WHITE)	I.D. # 1710006768
NYEESHA WHITE a/k/a)	
NYEESHA RINGGOLD)	I.D. # 1710006778
RASHEED WHITE)	I.D. # 1710006781
XAVIER WILSON)	I.D. # 1710006785
WILLIAM WISHER)	I.D. # 1710006788
MICHAEL WOODLEN)	I.D. # 1710006790

2017 OCT 15 PM 4:10

NEW CASTLE
PROthonary

The Grand Jury charges CHRISTOPHER ANDERSON, DAMON ANDERSON,
CHANDEL BETHEA, IRA BROWN, JEFFREY BULLOCK, MICHAEL

CARPENTER, CLARENCE CHARLES, JERMAINE DOLLARD, HAROLD ELLINGTON, RICHARD ELLINGTON, TYRON FRIEND, EDWARD GATLIN, ALIA GRIER, ST. CLAIRE JACKSON, LEBRON JONES, NAKISHA JONES, ERIC LLOYD, LEROY MITCHELL, TRAMONT MITCHELL, APRIL PRITCHETT, MICHAEL PRITCHETT, JEROME PRITCHETT, MARK PURNELL, TYRONE ROANE, DAMIEN ROBINSON, CHARMAINE SANDERS, QUINTON TURNER, DWAYNE WHITE, NYEESHA WHITE a/k/a NYEESHA RINGGOLD, RASHEED WHITE, XAVIER WILSON, WILLIAM WISHER, and MICHAEL WOODLEN, with the following offenses:

COUNT ONE. A FELONY

#N _____

CRIMINAL RACKETEERING in violation of Title 11, Section 1503(a) of the Delaware Code.

DWAYNE WHITE, on or between the 1st day of January, 2015, and the 15th day of October, 2017, in the County of New Castle, State of Delaware, did associate with an enterprise to conduct, or participate in the conduct of the affairs of the enterprise, through a pattern of racketeering activity, or collection of unlawful debts, by facilitating the sale or distribution of controlled substances as referenced in this Count, or by facilitating the transfer of monies relevant to the sale or distribution of said controlled substances, or by participating in the activities of drug dealing, or in furtherance of the sale or distribution of said controlled substances, or by tampering with evidence or witnesses. The specific acts referenced in this Count are as follows:

1. DWAYNE WHITE; on or between the 1st day of January, 2015 and the 15th day of October, 2017, did deliver or possess with intent to deliver more than 4 grams of a morphine, opium, any salt, isomer or salt of an isomer thereof, or heroin as described in 16 Del. Code § 4714, or any mixture containing any such controlled substance,

thereby engaging in conduct constituting Drug Dealing Heroin, Tier 4 or higher, in violation of 16 Del. Code Section 4752(1).

2. DWAYNE WHITE, on or between the 1st day of January, 2015 and the 15th day of October, 2017, did possess more than 5 grams of a morphine, opium, any salt, isomer or salt of an isomer thereof, or heroin as described in 16 Del. Code § 4714, or any mixture containing any such controlled substance, thereby engaging in conduct constituting Aggravated Possession of Heroin, Tier 5 or higher, in violation of 16 Del. Code Section 4752(3).
3. DWAYNE WHITE, on or between the 1st day of February and the 7th day of September, 2017, did manufacture, or possess with intent to manufacture 20 grams or more of a Schedule II controlled substance, cocaine or crack cocaine, or a mixture containing cocaine, thereby engaging in conduct constituting Drug Dealing Cocaine, in violation of 16 Del. Code Section 4752(1).
4. DWAYNE WHITE, on or between the 1st day of January, 2015 and the 15th day of October, 2017, did knowingly acquire or maintain an interest in, conceal, possess, transfer, or transport the proceeds of criminal activity, or did knowingly conduct, supervise, or facilitate a transaction involving the proceeds of criminal activity, thereby engaging in conduct constituting the offense of Money Laundering, in violation of 11, Del. Code Section 951.
5. DWAYNE WHITE, on or about the 27th day of August, 2017, when intending that another person engage in conduct constituting a class A felony, did solicit, request, command, importune or otherwise attempt to cause another person, Ira Brown, to engage in conduct which would constitute the felony or an attempt to commit the felony, or which would establish the other's complicity in its commission or attempted commission, thereby engaging in conduct constituting Criminal Solicitation, in violation of 11, Del. Code Section 503.
6. DWAYNE WHITE, on or about the 22nd and 23rd days of June, 2017, did knowingly offer, confer, or agree to confer any benefit upon a witness or a person about to be called as a witness in any official proceeding upon agreement or understanding that the testimony of the witness will thereby be influenced, thereby engaging in conduct constituting Bribing a Witness, in violation of 11 Del. Code Section 1261.
7. DWAYNE WHITE, on or about the 5th day of September, 2017, did agree with William Wisher to commit the offenses of Drug Dealing Heroin Tier 4 or higher, Aggravated Possession of Heroin Tier 5 or higher, and Possession of a Firearm During the Commission of a Felony or by a Person Prohibited, and one, the other or each of them engaged in conduct constituting the felony or felonies, by committing an over act in furtherance of the conspiracy, thereby engaging in conduct constituting the felony of Conspiracy in the Second Degree in violation of 11 Del. Code Section 512.
8. DWAYNE WHITE, on or about the 14th day of March, 2017, did agree with Xavier Wilson to commit the offenses of Drug Dealing Heroin Tier 4 or higher, or Aggravated Possession of Heroin Tier 5 or higher, and one, the other or each of them engaged in conduct constituting the felony or felonies, by committing an over act in furtherance of the conspiracy, thereby engaging in conduct constituting the felony of Conspiracy in the Second Degree, in violation of 11 Del. Code Section 512.
9. DWAYNE WHITE, on or about the 19th day of April, 2017, did agree with Tyrone Roane to commit the offenses of Drug Dealing Cocaine Tier 4 or higher, or Aggravated Possession of Cocaine Tier 5 or higher, and one, the other or each of them engaged in conduct constituting the felony or felonies, by committing an over

- act in furtherance of the conspiracy, thereby engaging in conduct constituting the felony of Conspiracy in the Second Degree, in violation of 11 Del. Code Section 512.
10. DWAYNE WHITE, on or about the 28th day of August, 2017, did agree with Charmaine SANDERS to commit the offenses of Drug Dealing Heroin Tier 4 or higher, Aggravated Possession of Heroin Tier 5 or higher, Drug Dealing Cocaine Tier 4 or higher, or Aggravated Possession of Cocaine Tier 5 or higher, and one, the other or each of them engaged in conduct constituting the felony or felonies, by committing an over act in furtherance of the conspiracy, thereby engaging in conduct constituting the felony of Conspiracy in the Second Degree, in violation of 11 Del. Code Section 512.
 11. DWAYNE WHITE, on or about the 23rd day of June, 2017, did agree with Tramont Mitchell to commit the offenses of Drug Dealing Heroin Tier 4 or higher, or Aggravated Possession of Heroin Tier 5 or higher, and one, the other or each of them engaged in conduct constituting the felony or felonies, by committing an over act in furtherance of the conspiracy, thereby engaging in conduct constituting the felony of Conspiracy in the Second Degree, in violation of 11 Del. C. Section 512.
 12. DWAYNE WHITE, on or between the 25th and 27th days of August, 2017, did threaten to commit a crime likely to cause death or serious physical injury to another, and then did intentionally cause damage to tangible property of another person, thereby engaging in conduct constituting Terroristic Threatening and Criminal Mischief in violation of 11 Del. Code Sections 621 and 811.
 13. DWAYNE WHITE, on or about the 7th day of September, 2017, did illegally possess a controlled substance, promethazine with codeine, a controlled substance as described in 16 Del. Code Section 4722, thereby engaging in conduct constituting Illegal Possession of a Controlled Substance in violation of 11 Del. Code Section 4763(a).
 14. DWAYNE WHITE, on or between the 1st day of January, 2015 and the 15th day of October, 2017, did willfully attempt to evade or defeat any tax imposed by Title 4 or by Title 30 of the Delaware Code or the payment thereof, other than Section 3002 and Chapters 51 and 52 of Title 30, thereby engaging in conduct constituting Attempt to Evade or Defeat tax, in violation of 30 Del. Code Section 571.

COUNT TWO. A FELONY

#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
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#N _____	#N _____	#N _____
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	#N _____	

CONSPIRACY TO COMMIT RACKETEERING in violation of Title 11, Section 1503 of the Delaware Code..

CHRISTOPHER ANDERSON, DAMON ANDERSON, CHANDEL BETHEA, IRA BROWN, JEFFREY BULLOCK, MICHAEL CARPENTER, CLARENCE CHARLES, JERMAINE DOLLARD, HAROLD ELLINGTON, RICHARD ELLINGTON, TYRON FRIEND, EDWARD GATLIN, ALIA GRIER, ST. CLAIRE JACKSON, LEBRON JONES, NAKISHA JONES, ERIC LLOYD, SHERISH MILLER, LEROY MITCHELL, TRAMONT MITCHELL, APRIL PRITCHETT, MICHAEL PRITCHETT, JEROME PRITCHETT, MARK PURNELL, TYRONE ROANE, DAMIEN ROBINSON, CHARMAINE SANDERS, QUINTON TURNER, DWAYNE WHITE, NYEESHA WHITE, RASHEED WHITE, XAVIER WILSON, WILLIAM WISHER, and MICHAEL WOODLEN between the 1st day of January, 2015, and the 15th day of October, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the affairs of the enterprise referred to in Count 1 of this Indictment, herein incorporated by reference, did agree with one, the other, or all, that one, the other, or all of them would engage in conduct constituting the felony of Criminal Racketeering,

as defined by Title 11, Section 1503(a) of the Delaware Code, and that one or the other, or each of them, did commit an over act in furtherance of the conspiracy, as set forth in paragraphs 1 through 14 of Count I of this Indictment.

COUNT THREE. A FELONY

#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
#N _____	#N _____	#N _____
	#N _____	

DRUG DEALING HEROIN in violation of Title 16, Section 4752(1) of the Delaware Code.

CHRISTOPHER ANDERSON, DAMON ANDERSON, JEFFREY BULLOCK, MICHAEL CARPENTER, CLARENCE CHARLES, JERMAINE DOLLARD, RICHARD ELLINGTON, HAROLD ELLINGTON, TYRON FRIEND, EDWARD GATLIN, ST. CLAIRE JACKSON, JEROME PRITCHETT, TYRONE ROANE, QUINTON TURNER, DWAYNE WHITE, RASHEED WHITE, WILLIAM WISHER, MICHAEL WOODLEN, on or between the 1st day of January, 2015 and the 15th day of October, 2017, in the County of New Castle, State of Delaware, did knowingly deliver or possess with intent to deliver 4 grams or more of morphine, opium, any salt, isomer or salt of an isomer thereof, or heroin as described in 16 Del. Code § 4714, or any mixture containing any such controlled substance.

COUNT FOUR. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

QUINTON TURNER and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT FIVE. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

CHRISTOPHER ANDERSON and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT SIX. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

EDWARD GATLIN and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is

incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT SEVEN. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

RICHARD ELLINGTON and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT EIGHT. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

JEFFREY BULLOCK and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct

constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT NINE. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

CLARENCE CHARLES and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT TEN. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

MICHAEL WOODLEN and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT ELEVEN. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

JEROME PRITCHETT and DWAYNE WHITE, on or between the 8th day of August and the 23rd day of August, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT TWELVE. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

TYRONE ROANE and DWAYNE WHITE, on or between the 1st day of January and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT THIRTEEN. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

TYRON FRIEND and DWAYNE WHITE, on or between the 1st day of January 2015 and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT FOURTEEN. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

MICHAEL CARPENTER and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT FIFTEEN. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

HAROLD ELLINGTON and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT SIXTEEN. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

RASHEED WHITE and DWAYNE WHITE, on or between the 1st day of January 2015 and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT SEVENTEEN. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

CHARMAINE SANDERS and DWAYNE WHITE, on or about the 28th day of August, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT EIGHTEEN. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

TRAMONT MITCHELL and DWAYNE WHITE, on or about the 23rd day of June, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Three, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT NINETEEN. A FELONY

#N _____ #N _____ #N _____
#N _____ #N _____

AGGRAVATED POSSESSION OF HEROIN in violation of Title 16, Section 4752(3)
of the Delaware Code.

CHANDEL BETHEA, JEROME PRITCHETT, TYRONE ROANE, DWAYNE WHITE,
and WILLIAM WISHER on or between the 1st day of January, 2015 and the 15th day of October,
2017, did knowingly possess 5 grams or more of a morphine, opium, any salt, isomer or salt of
an isomer thereof, or heroin as described in 16 Del. Code § 4714, or any mixture containing any
such controlled substance.

COUNT TWENTY. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the
Delaware Code.

CHANDEL BETHEA and DWAYNE WHITE, on or about the 6th day of September,
2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate
the commission of Aggravated Possession as set forth in Count Nineteen, which is incorporated
herein by reference, did agree with each other to commit said crime and one or more of them did
commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said
felony or attempt to commit said felony by committing some other overt step in pursuance of the
conspiracy.

COUNT TWENTY ONE. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

JEROME PRITCHETT and DWAYNE WHITE, on or about the 23rd day of August, 2017 in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Aggravated Possession as set forth in Count Nineteen, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT TWENTY TWO. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

TYRONE ROANE and DWAYNE WHITE, on or between the 27th day of January and the 11th day of October, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Aggravated Possession as set forth in Count Nineteen, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT TWENTY THREE. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

WILLIAM WISHER and DWAYNE WHITE, on or about the 5th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Aggravated Possession as set forth in Count Nineteen, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT TWENTY FOUR. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title. 11, Section 512 of the Delaware Code.

CHARMAINE SANDERS and DWAYNE WHITE, on or about the 28th day of August, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Aggravated Possession as set forth in Count Nineteen, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT TWENTY FIVE. A FELONY

#N _____ #N _____ #N _____
#N _____ #N _____ #N _____

DRUG DEALING COCAINE in violation of Title 16, Section 4752(1) of the Delaware Code.

CLARENCE CHARLES, JERMAINE DOLLARD, TYRONE ROANE, HAROLD ELLINGTON, DWAYNE WHITE, and WILLIAM WISHER on or between the 1st day of January, 2015 and the 15th day of October, 2017, in the County of New Castle, State of Delaware, did knowingly deliver or possess with intent to deliver 20 grams or more of cocaine or any mixture containing cocaine, a controlled substance as described in 16 Del. Code § 4716(b)(4), or did knowingly manufacture or possess with intent to manufacture or deliver 20 grams or more of cocaine or a mixture containing cocaine.

COUNT TWENTY SIX. A FELONY

#N _____
#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

CLARENCE CHARLES and DWAYNE WHITE, on or between the 12th day of August and the 2nd day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Twenty Five, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT TWENTY SEVEN. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

TYRONE ROANE and DWAYNE WHITE, on or between the 27th day of January and the 11th day of October, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Twenty Five, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT TWENTY EIGHT. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

JERMAINE DOLLARD and DWAYNE WHITE, on or between the 24th day of August and the 5th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Twenty Five, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT TWENTY NINE. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the

Delaware Code.

HAROLD ELLINGTON and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Twenty Five, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT THIRTY. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the

Delaware Code.

WILLIAM WISHER and DWAYNE WHITE, on or about the 5th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Twenty Five, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT THIRTY ONE. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the

Delaware Code.

CHARMAINE SANDERS and DWAYNE WHITE, on or about the 28th day of August, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Drug Dealing as set forth in Count Twenty Five, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT THIRTY TWO. A FELONY

#N _____

#N _____

#N _____

#N _____

#N _____

#N _____

#N _____

#N _____

#N _____

#N _____

MONEY LAUNDERING in violation of Title 11, Section 951 of the Delaware Code.

DAMON ANDERSON, JERMAINE DOLLARD, HAROLD ELLINGTON, EDWARD GATLIN, ERIC LLOYD, DWAYNE WHITE, NYEESHA WHITE, RASHEED WHITE, and WILLIAM WISHER, on or between the 1st day of January, 2015 and the 15th day of October, 2017, did knowingly acquire or maintain an interest in, conceal, possess, transfer, or transport the proceeds of criminal activity, or did knowingly conduct, supervise, or facilitate a transaction involving the proceeds of criminal activity.

COUNT THIRTY THREE. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the
Delaware Code.

DAMON ANDERSON and DWAYNE WHITE, on or between the 8th day of August and 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Money Laundering as set forth in Count Thirty Two, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT THIRTY FOUR. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the
Delaware Code.

JERMAINE DOLLARD and DWAYNE WHITE, on or between the 8th day of August, 2017 and 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Money Laundering as set forth in Count Thirty Two, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT THIRTY FIVE. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

HAROLD ELLINGTON and DWAYNE WHITE, on or between the 8th day of August, 2017 and 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Money Laundering as set forth in Count Thirty Two, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT THIRTY SIX. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the Delaware Code.

EDWARD GATLIN and DWAYNE WHITE, on or between the 8th day of August and the 7th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Money Laundering as set forth in Count Thirty Two, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT THIRTY SEVEN. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the

Delaware Code.

ERIC LLOYD and DWAYNE WHITE, on or between the 1st day of January, 2015 and the 15th day of October, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Money Laundering as set forth in Count Thirty Two, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT THIRTY EIGHT. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the

Delaware Code.

NYEESHA WHITE and DWAYNE WHITE, on or between the 1st day of January, 2015 and the 15th day of October, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Money Laundering as set forth in Count Thirty Two, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT THIRTY NINE. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the
Delaware Code.

WILLIAM WISHER and DWAYNE WHITE, on or between the 1st day of March and the 5th day of September, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Money Laundering as set forth in Count Thirty Two, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT FORTY. A FELONY

#N _____

#N _____

CONSPIRACY SECOND DEGREE in violation of Title 11, Section 512 of the
Delaware Code.

RASHEED WHITE and DWAYNE WHITE, on or between the 1st day of January, 2015 and the 15th day of October, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of Money Laundering as set forth in Count Thirty Two, which is incorporated herein by reference, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy by engaging in conduct constituting said felony or attempt to commit said felony by committing some other overt step in pursuance of the conspiracy.

COUNT FORTY ONE. A FELONY

#N _____
#N _____

CRIMINAL SOLICITATION in violation of Title 11, Section 503 of the Delaware Code.

IRA BROWN and DWAYNE WHITE, on or about the 27th day of August, 2017, when intending that another person engage in conduct constituting a class A felony, did solicit, request, command, importune or otherwise attempt to cause another person, Ira Brown, to engage in conduct which would constitute the felony or an attempt to commit the felony, or which would establish the other's complicity in its commission or attempted commission.

COUNT FORTY TWO. A FELONY

#N _____
#N _____

CONSPIRACY FIRST DEGREE in violation of Title 11, Section 513 of the Delaware Code.

IRA BROWN and DWAYNE WHITE, on or about the 27th day of August, 2017, in the County of New Castle, State of Delaware, when intending to promote or facilitate the commission of a Class A Felony to a witness against Michael Pritchett, did agree with each other to commit said crime and one or more of them did commit and overt act in pursuance of said conspiracy.

COUNT FORTY THREE. A FELONY

#N _____
#N _____
#N _____
#N _____

AGGRAVATED ACT OF INTIMIDATION in violation of Title 11, Section 3533 of the Delaware Code.

LEROY MITCHELL, MICHAEL PRITCHETT, MARK PURNELL, and DWAYNE WHITE on or between the 9th day of June and the 27th day of August, 2017, in the County of

New Castle, State of Delaware, did knowingly and with malice attempt to prevent or dissuade a witness or victim from attending or giving testimony in any trial, proceeding or inquiry authorized by law, and did so accompanied by an express or implied threat of force or violence upon a victim or a witness, or did so in furtherance of a conspiracy as set forth in Count Two of this indictment.

COUNT FORTY FOUR. A FELONY

#N _____

BRIBING A WITNESS in violation of Title 11, Section 1261 of the Delaware Code.

DWAYNE WHITE, on or about the 22nd and 23rd days of June, 2017, did knowingly offer, confer, or agree to confer any benefit upon a witness or a person about to be called as a witness in any official proceeding upon agreement or understanding that the testimony of the witness will thereby be influenced.

COUNT FORTY FIVE. A MISDEMEANOR

#N _____

TERRORISTIC THREATENING in violation of Title 11, Section 621 of the Delaware Code.

DWAYNE WHITE, on or between the 25th and 27th days of August, 2017, did threaten to commit a crime likely to cause death or serious physical injury to another.

COUNT FORTY SIX. A MISDEMEANOR

#N _____

#N _____

CRIMINAL MISCHIEF in violation of Title 11, Section 811 of the Delaware Code.

DAMIEN ROBINSON and DWAYNE WHITE, on or between the 25th and 27th days of August, 2017, did intentionally cause damage to tangible property of another person.

COUNT FORTY SEVEN. A MISDEMEANOR

#N _____

ILLEGAL POSSESSION OF A CONTROLLED SUBSTANCE in violation of Title 16, Section 4763(a) of the Delaware Code.

DWAYNE WHITE, on or about the 7th day of September, 2017, did illegally possess a controlled substance, promethazine with codeine, a controlled substance as described in 16 Del. Code Section 4722.

COUNT FORTY EIGHT. A FELONY

#N _____

#N _____

ATTEMPT TO EVADE OR DEFEAT TAX in violation of Title 30, Section 571 of the Delaware Code.

DWAYNE WHITE and NYEESHA WHITE, on or between the 1st day of January, 2015 and the 15th day of October, 2017, did willfully attempt to evade or defeat any tax imposed by Title 4 or by Title 30 of the Delaware Code or the payment thereof, other than Section 3002 and Chapters 51 and 52 of Title 30.

COUNT FORTY NINE. A FELONY

#N _____ #N _____ #N _____

TAMPERING WITH PHYSICAL EVIDENCE in violation of Title 11, Section 1269 of the Delaware Code.

CHANDEL BETHEA, SHERISH MILLER, and DWAYNE WHITE on or about 6th day of September, 2017, in the County of New Castle, State of Delaware, believing that certain physical evidence, heroin, was about to be produced or used in a prospective official proceeding and intending to prevent its production, or use, did knowingly and unlawfully attempt to suppress it in an act of concealment, alteration, or destruction, by throwing it out a vehicle window.

COUNT FIFTY. A FELONY

#N _____

TAMPERING WITH PHYSICAL EVIDENCE in violation of Title 11, Section 1269 of the Delaware Code.

CLARENCE CHARLES on or about 21st day of August, 2017, in the County of New Castle, State of Delaware, believing that certain physical evidence, heroin, was about to be produced or used in a prospective official proceeding and intending to prevent its production, or use, did knowingly and unlawfully attempt to suppress it in an act of concealment, alteration, or destruction, by throwing it out a vehicle window.

COUNT FIFTY ONE. A FELONY

#N _____

#N _____

#N _____

DRUG DEALING CODEINE in violation of Title 16, Section 4754 of the Delaware Code.

HAROLD ELLINGTON, ST. CLAIRE JACKSON, and NAKISHA JONES, on or between the 1st day of January, 2015 and the 15th day of October, 2017, in the County of New Castle, State of Delaware, did knowingly deliver or possess with intent to deliver a promethazine with codeine, or any of its salts, or dihydrocodeine, ethylmorphine, or atropine sulfate, in excess of the amounts set forth under 16 Del. Code Section 4722(b).

COUNT FIFTY TWO. A FELONY

#N

HINDERING PROSECUTION in violation of Title 11, Section 1244 of the Delaware

Code.

NYEESHA WHITE, on or between the 17th day of August and the 4th day of September, 2017, in the County of New Castle, State of Delaware, with intent to prevent, hinder or delay the discovery or apprehension of, or the lodging of a criminal charge against, a person whom the person accused of hindering prosecution knows has committed acts constituting a crime, did warn the person of impending discovery or apprehension or did suppress, by an act of concealment, alteration or destruction, any physical evidence which might aid in the discovery or apprehension of the person or in the lodging of a criminal charge against the person.

COUNT FIFTY THREE. A FELONY

#N

HINDERING PROSECUTION in violation of Title 11, Section 1244 of the Delaware

Code.

APRIL PRITCHETT, on or between the 7th day of June and 27th day of June, 2017, in the County of New Castle, State of Delaware, with intent to prevent, hinder or delay the discovery or apprehension of, or the lodging of a criminal charge against, a person whom the person accused of hindering prosecution knows has committed acts constituting a crime, did warn the person of impending discovery or apprehension or did suppress, by an act of concealment, alteration or destruction, any physical evidence which might aid in the discovery or apprehension of the person or in the lodging of a criminal charge against the person.

COUNT FIFTY FOUR. A FELONY

#N _____ #N _____ #N _____
#N _____ #N _____

POSSESSION OF A FIREARM DURING THE COMMISSION OF A FELONY in violation of Title 11, Section 1447A of the Delaware Code.

CHANDEL BETHEA, JEROME PRITCHETT, DWAYNE WHITE, NYEESHA WHITE and WILLIAM WISHER on or between the 1st day of January, 2015 and the 5th day of September, 2017, in the County of New Castle, State of Delaware, did knowingly possess a firearm, as defined by Title 11, Section 222 of the Delaware Code of 1974, as amended, during the commission of Criminal Racketeering as set forth in 11 Del. Code Section 1503, or Drug Dealing, as set forth in 16 Del. Code Section , a felony, as set forth in Count 2 of this indictment, which is incorporated herein by reference.

COUNT FIFTY FIVE. A FELONY

#N _____

ATTEMPTED STRUCTURING in violation of Title 11, Section 531 of the Delaware Code.

LEBRON JONES, on or about the 6th day of September, in the County of New Castle, State of Delaware, did with the purpose of evading a transaction reporting requirement of this State or of 31 U.S.C. § 5311 et seq. or 31 C.F.R. § 103 et seq., or any rules or regulations adopted under those chapters and sections, caused or attempt to caused a financial institution, including a video lottery facility, foreign or domestic money transmitter or an authorized delegate thereof, check casher, person engaged in a trade or business or any other individual or entity required by state or federal law to file a report regarding currency transactions or suspicious transactions to fail to file a report, or did attempt to structure or assist in structuring, any transaction with one or more financial institutions, including a video lottery facility, foreign

or domestic money transmitters or an authorized delegate thereof, check cashers, persons engaged in a trade or business or any other individuals or entities required by state or federal law to file a report regarding currency transactions or suspicious transactions, which acts, under the circumstances as he believed them to be, constituted a substantial step in a course of conduct planned to culminate in the commission of Structuring, in violation of 11 Del. Code Section 951(f)(3)-(g).

A TRUE BILL


(FOREPERSON)

MATTHEW P. DENN
ATTORNEY GENERAL


DEPUTY ATTORNEY GENERAL