

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. \_\_\_\_\_

21 U.S.C. § 846  
21 U.S.C. § 841(a)(1)  
18 U.S.C. § 924(c)(1)(A)  
21 U.S.C. § 853  
18 U.S.C. § 924(d)(1)

UNITED STATES OF AMERICA

vs.

MARVIN LORENZO CONEY,  
a/k/a "Cone Head,"  
MICHAEL RENARDO JOHNSON,  
a/k/a "Jay,"  
CHRISTOPHER NICHOLSON,  
MICHAEL TYRONE WEST,  
ERNEST PERNELL SHAW,  
a/k/a "Toochie,"  
MICHAEL ANTHONY KING,  
ANTONIO L. ROBERTS,  
EDWIN ALEXANDER,  
a/k/a "Cook,"  
JAPTALIAN EVANS,  
a/k/a "Nephew,"  
COREY REED-ROGERS,  
CARNELL DEMON SUMNER,  
ANTWAIN ANDRE MCDUFFIE,  
ANTIONETT LASONIA CARTER,  
MICHAEL MCKNIGHT,  
a/k/a "Mike Sykes,"  
ANTWUN IVORY WILSON,  
DORIS LEE TRAPP,  
KIMBERLY PASCHAL,  
ANNETTE SMITH,  
a/k/a "Malibu," and  
GLENN ROBERTS,

Defendants.

\_\_\_\_\_  
INDICTMENT

The Grand Jury charges that:

**COUNT 1**

Beginning in or about February 2008, and continuing through in or about April 2008, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a "Cone Head,"  
MICHAEL RENARDO JOHNSON,  
a/k/a "Jay,"  
CHRISTOPHER NICHOLSON,  
MICHAEL TYRONE WEST,  
ERNEST PERNELL SHAW,  
a/k/a "Toochie,"  
MICHAEL ANTHONY KING,  
ANTONIO L. ROBERTS,  
and  
EDWIN ALEXANDER,  
a/k/a "Cook,"**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A)(ii), it is further alleged that this violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A)(iii), it is further alleged that this violation involved 50 grams or more of a mixture and substance containing a detectable amount of cocaine base.

**COUNT 2**

Beginning in or about February 2008, and continuing through in or about April 2008, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”  
and  
JAPTALIAN EVANS,  
a/k/a “Nephew,”**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A)(iii), it is further alleged that this violation involved 50 grams or more of a mixture and substance containing a detectable amount of cocaine base.

**COUNT 3**

On or about March 27, 2008, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”  
and**

**JAPTALIAN EVANS,  
a/k/a “Nephew,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved 5 grams or more of a mixture and substance containing a detectable amount of cocaine base.

**COUNT 4**

In or about February 2008, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”  
COREY REED-ROGERS,  
and  
CARNELL DEMON SUMNER,**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A)(ii), it is further alleged that this violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 5**

On or about February 22, 2008, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a "Cone Head,"  
COREY REED-ROGERS,  
and  
CARNELL DEMON SUMNER,**

did knowingly and intentionally attempt to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine.

**COUNT 6**

On or about February 22, 2008, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**COREY REED-ROGERS,  
and  
CARNELL DEMON SUMNER,**

did knowingly carry a firearm during and in relation to a drug trafficking crime, and did knowingly possess a firearm in furtherance of a drug trafficking crime, for which crime the defendants may be prosecuted in a court of the United States, specifically, a violation of Title 21, United States Code, Section 846, as set forth in Counts 4 and 5 of this Indictment; in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

**COUNT 7**

Beginning in or about February 2008, and continuing through in or about April 2008, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”  
and  
ANTWAIN ANDRE MCDUFFIE,**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

**COUNT 8**

On or about March 9, 2008, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”  
and  
ANTWAIN ANDRE MCDUFFIE,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

**COUNT 9**

Beginning in or about February 2008, and continuing through in or about April 2008, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a "Cone Head,"  
and  
ANTIONETT LASONIA CARTER,**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A)(ii), it is further alleged that this violation involved 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A)(iii), it is further alleged that this violation involved 50 grams or more of a mixture and substance containing a detectable amount of cocaine base.

**COUNT 10**

On or about April 15, 2008, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a "Cone Head,"  
and  
ANTIONETT LASONIA CARTER,**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base.

### **COUNT 11**

Beginning in or about February 2008, and continuing through in or about April 2008, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”  
and  
MICHAEL MCKNIGHT,  
a/k/a “Mike Sykes,”**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine.



**COUNT 12**

Beginning in or about February 2008, and continuing through in or about April 2008, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”  
and  
ANTWUN IVORY WILSON,**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

**COUNT 13**

Beginning in or about February 2008, and continuing through in or about April 2008, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”  
and  
DORIS LEE TRAPP,**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title

21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

**COUNT 14**

Beginning in or about February 2008, and continuing through in or about April 2008, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”  
KIMBERLY PASCHAL,  
and  
ANNETTE SMITH,  
a/k/a “Malibu,”**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(ii), it is further alleged that this violation involved 500 grams or more of a mixture and substance containing a detectable amount of cocaine.

### **COUNT 15**

Beginning in or about March 2008, and continuing through in or about April 2008, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, the defendants,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”  
and  
GLENN ROBERTS,**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 21, United States Code, Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(iii), it is further alleged that this violation involved 5 grams or more of a mixture and substance containing a detectable amount of cocaine base.

### **COUNT 16**

On or about November 16, 2007, in Miami-Dade County, in the Southern District of Florida, the defendant,

**MARVIN LORENZO CONEY,  
a/k/a “Cone Head,”**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A)(iii), it is further alleged that this violation involved 50 grams or more of a mixture and substance containing a detectable amount of cocaine base.

## COUNT 17

On or about December 12, 2007, in Miami-Dade County, in the Southern District of Florida,  
the defendant,

**MARVIN LORENZO CONEY,  
a/k/a "Cone Head,"**

did knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(A)(iii), it is further alleged that this violation involved 50 grams or more of a mixture and substance containing a detectable amount of cocaine base.

## FORFEITURE

1. The allegations of Counts 1 through 17 of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America of property in which the defendants have an interest pursuant to the provisions of Title 21, United States Code, Section 853, Title 18, United States Code, Sections 981(a)(1)(C) and (F) and Title 18, United States Code, Section 924(d)(1), as incorporated by Title 28, United States Code, Section 2461(c), and the procedures outlined at Title 21, United States Code, Section 853.

2. Upon conviction of any violation of Title 21, United States Code, Sections 846 and 841, as alleged in Counts 1-5 and 7-17 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds which the defendants obtained, directly or indirectly, as the result of such violation and any property which the defendants used or intended to be used in any manner or part

to commit or to facilitate the commission of such violation.

3. Upon conviction of any violation of Title 18, United States Code, Section 924, as alleged in Count 6 of this Indictment, or any violation of any other federal criminal law, as alleged in Counts 4-5 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), as incorporated by Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in the commission of said violation.

5. The property subject to forfeiture includes, but is not limited to:

- (a) approximately \$24,330 in U.S. currency; and
- (b) one Glock Model 19 9mm pistol.

All pursuant to Title 28, United States Code, Section 2461(c), Title 18, United States Code, Sections 981(a)(1)(C) and (F), Title 18, United States Code, Section 924(d)(1), and Title 21, United States Code, Section 853.

A TRUE BILL

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FOREPERSON

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R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY

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JAMES M. KOUKIOS  
ASSISTANT UNITED STATES ATTORNEY

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MICHAEL E. SOFIA  
ASSISTANT UNITED STATES ATTORNEY