

FILED
DISTRICT COURT
INDIANA TERRA HAUTE DIVISION
2019 DEC 17 PM 3:23
SOUTHERN DISTRICT
OF INDIANA
TERRE HAUTE DIVISION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
TERRE HAUTE DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	CAUSE NO. 2:19-cr-030-JMS-CMM
)	
TAVARES HUTCHERSON,)	-01
aka "T,")	
TIMOTHY STEFANATOS,)	-02
BROCK MATHEWS,)	-03
aka "PeeWee,")	
DEENA ROSHEL,)	-04
aka "Kelly,")	
KYRA GRINDLE,)	-05
BRAD W. JONES,)	-06
TRAVIS EYRE,)	-07
ROBERT COX,)	-08
ZACHARY CARSON,)	-09
)	
Defendants.)	

SUPERSEDING INDICTMENT

COUNT 1

[Conspiracy to Possess with Intent to Distribute and to Distribute 50 Grams or More of Methamphetamine – 21 U.S.C. § 846]

The Grand Jury charges that:

Beginning in or around May 2019, and continuing until on or about December 10, 2019, in the Southern District of Indiana, Terre Haute Division, and elsewhere, TAVARES HUTCHERSON, aka "T," TIMOTHY STEFANATOS, BROCK MATHEWS, aka "PeeWee," DEENA ROSHEL, aka "Kelly," BRAD W. JONES, TRAVIS EYRE, ROBERT COX, and ZACHARY CARSON, the defendants herein, did knowingly and intentionally conspire together

and with other persons known and unknown to the Grand Jury to possess with intent to distribute and to distribute 50 grams or more of (actual) methamphetamine, a Schedule II, non-narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

MANNER AND MEANS

The charged conspiracy operated in the following manner:

1. JONES, a resident of Indianapolis, Indiana, supplied methamphetamine to HUTCHERSON for re-distribution.
2. STEFANATOS, a resident of Indianapolis, acted as a middle-man for JONES and supplied methamphetamine to HUTCHERSON for re-distribution.
3. HUTCHERSON and MATHEWS, residents of Terre Haute, Indiana, distributed methamphetamine to each other and other individuals in the Terre Haute area.
4. EYRE, a resident of Terre Haute, worked with HUTCHERSON to distribute methamphetamine in the Terre Haute area. EYRE assisted HUTCHERSON by delivering methamphetamine and collecting proceeds from drug sales.
5. COX, a resident of Terre Haute, distributed methamphetamine that he obtained from HUTCHERSON in the Terre Haute area. COX and HUTCHERSON also worked together to secure sources of methamphetamine supply.
6. ROSHEL, a resident of Terre Haute, distributed methamphetamine that she obtained from HUTCHERSON and MATHEWS in the Terre Haute area.
7. CARSON, a resident of Terre Haute, distributed methamphetamine that he obtained from HUTCHERSON in the Terre Haute area.
8. HUTCHERSON, MATHEWS, and JONES possessed firearms to protect themselves, their drugs, and their drug proceeds.

OVERT ACTS

In furtherance of the conspiracy and to accomplish the objects of the conspiracy, that is to possess with intent to distribute and to distribute methamphetamine, the members of the conspiracy did commit, among others, the following overt acts:

1. On or about May 23, 2019, ROSHEL sold approximately 49.0 grams of (actual) methamphetamine to D.M. (an individual known to the Grand Jury) in Terre Haute, Indiana.
2. On or about July 30, 2019, MATHEWS sold approximately 25.4 grams of (actual) methamphetamine to J.B. (an individual known to the Grand Jury) in Brazil, Indiana.
3. On or about August 12, 2019, STEFANATOS and HUTCHERSON discussed meeting with one another to conduct a drug transaction. They also discussed how much STEFANATOS would charge HUTCHERSON for approximately 11 ounces of methamphetamine.
4. On or about August 24, 2019, MATHEWS possessed approximately 218 grams of a mixture or substance containing methamphetamine and firearms at his then-residence on South 8th Street in Terre Haute. On or about that same date, MATHEWS enlisted the help of ROSHEL, HUTCHERSON, and others to attempt to recover those drugs and firearms after they were taken by Kyra Grindle.
5. On or about August 26, 2019, ROSHEL sold approximately 55.2 grams of (actual) methamphetamine to a confidential source in Terre Haute.
6. On or about September 14, 2019, EYRE collected drug proceeds for HUTCHERSON and delivered the money to HUTCHERSON's residence in Terre Haute.
7. On or about September 15, 2019, CARSON called HUTCHERSON and asked HUTCHERSON to sell him four ounces of methamphetamine for re-distribution.

HUTCHERSON indicated that he would sell two ounces of methamphetamine to CARSON.

Shortly thereafter, HUTCHERSON and CARSON met one another in Terre Haute to conduct the drug transaction.

8. On or about September 19, 2019, JONES transported approximately 1.4 kilograms of a mixture or substance containing methamphetamine to Terre Haute for distribution to HUTCHERSON. During the transport, JONES possessed two firearms and ammunition.

9. On or about September 20, 2019, following the arrest of JONES, HUTCHERSON and COX discussed finding new sources of methamphetamine supply and using third-parties to assist with transporting drugs in the future.

10. On or about October 2, 2019, in Brazil, HUTCHERSON possessed approximately 545 grams of a mixture or substance containing methamphetamine, which he intended for re-distribution in and around Terre Haute.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

[Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance Containing Methamphetamine – 21 U.S.C. § 841(a)(1) and (b)(1)(B)]

The Grand Jury further charges that:

Between on or about August 24, 2019, and on or about August 25, 2019, in the Southern District of Indiana, Terre Haute Division, Defendant KYRA GRINDLE did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II, non-narcotic controlled substance, 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).

COUNT 3

[Distribution of 50 Grams or More of Methamphetamine –
21 U.S.C. § 841(a)(1) and (b)(1)(A)]

The Grand Jury further charges that:

On or about August 26, 2019, in the Southern District of Indiana, Terre Haute Division, Defendant DEENA ROSHEL, aka “Kelly,” did knowingly and intentionally distribute 50 grams or more of (actual) methamphetamine, a Schedule II, non-narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(A).

COUNT 4

[Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance Containing Methamphetamine – 21 U.S.C. § 841(a)(1) and (b)(1)(A)]

The Grand Jury further charges that:

Between on or about September 19, 2019, in the Southern District of Indiana, Terre Haute Division, Defendant BRAD W. JONES did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II, non-narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(A).

COUNT 5

[Possession of Firearms in Furtherance of a Drug Trafficking Crime –
18 U.S.C. § 924(c)(1)(A)(i)]

The Grand Jury further charges that:

Between on or about September 19, 2019, in the Southern District of Indiana, Terre Haute Division, Defendant BRAD W. JONES did knowingly possess firearms, to wit: a Smith & Wesson, Model 642, .38 caliber revolver, serial number CAW5506, and a Taurus International,

Model Curve, .380 caliber pistol, serial number 1D145460, in furtherance of a drug trafficking crime for which said defendant may be prosecuted in a court of the United States, to wit: Possession with Intent to Distribute 500 Grams or More of a Mixture or Substance Containing Methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1), as charged in Count 4 of the Superseding Indictment,

All in violation of Title 18, United States Code, Section 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 6

[Convicted Felon in Possession of Firearms – 18 U.S.C. § 922(g)(1)]

The Grand Jury further charges that:

Between on or about September 19, 2019, in the Southern District of Indiana, Terre Haute Division, Defendant BRAD W. JONES, knowing that he had been previously convicted of a crime punishable by a term of imprisonment exceeding one year:

To wit: Robbery, in Grant County, Indiana, Superior Court, on or about August 18, 2003, did knowingly possess one or more firearms, to wit: a Smith & Wesson, Model 642, .38 caliber revolver, serial number CAW5506, and a Taurus International, Model Curve, .380 caliber pistol, serial number 1D145460, said firearms having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 7

[Possession with Intent to Distribute 50 Grams or More of a Mixture or Substance Containing Methamphetamine – 21 U.S.C. § 841(a)(1) and (b)(1)(B)]

The Grand Jury further charges that:

On or about October 2, 2019, in the Southern District of Indiana, Terre Haute Division, Defendant TAVARES HUTCHERSON, aka "T," did knowingly and intentionally possess with intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of

methamphetamine, a Schedule II, non-narcotic controlled substance, 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).

COUNT 8

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about August 12, 2019, in the Southern District of Indiana, Indianapolis Division, and elsewhere, Defendants TAVARES HUTCHERSON, aka “T,” and TIMOTHY STEFANATOS did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances Act, to wit: HUTCHERSON and STEFANATOS communicated via cellular telephone and discussed how much STEFANATOS would charge HUTCHERSON for 11 ounces of methamphetamine that HUTCHERSON intended to re-distribute, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 9

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about August 22, 2019, in the Southern District of Indiana, Terre Haute Division, and elsewhere, Defendants BROCK MATHEWS, aka “PeeWee,” and DEENA ROSHEL, aka “Kelly,” did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances Act, to wit: MATHEWS and ROSHEL communicated via cellular telephone and discussed how much

MATHEWS would charge ROSHEL for methamphetamine that ROSHEL intended to re-distribute, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 10

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about August 24, 2019, in the Southern District of Indiana, Terre Haute Division, and elsewhere, Defendants TAVARES HUTCHERSON, aka “T,” and DEENA ROSHEL, aka “Kelly,” did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances Act, to wit: HUTCHERSON and ROSHEL communicated via cellular telephone and discussed ROSHEL buying methamphetamine for re-distribution from HUTCHERSON as well as Brock Mathews, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 11

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about August 24, 2019, in the Southern District of Indiana, Terre Haute Division, and elsewhere, Defendants TAVARES HUTCHERSON, aka “T,” and BROCK MATHEWS, aka “PeeWee,” did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances Act, to wit: HUTCHERSON and MATHEWS communicated via cellular telephone and discussed MATHEWS’ desire to obtain firearms and retaliate against whoever had stolen

methamphetamine from him, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

All in violation of Title 21, United States Code, Section 843(b).

COUNT 12

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about September 14, 2019, in the Southern District of Indiana, Terre Haute Division, and elsewhere, Defendants TAVARES HUTCHERSON, aka “T,” and TRAVIS EYRE did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances Act, to wit: HUTCHERSON and EYRE communicated via cellular telephone and discussed EYRE delivering approximately one ounce of methamphetamine to and picking up money from Individuals #1 and 2 (identities known to the Grand Jury) for HUTCHERSON, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 13

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about September 15, 2019, in the Southern District of Indiana, Terre Haute Division, and elsewhere, Defendants TAVARES HUTCHERSON, aka “T,” and ZACHARY CARSON did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances Act, to wit: HUTCHERSON and CARSON communicated via cellular telephone and discussed how much HUTCHERSON would charge CARSON for approximately two ounces of methamphetamine

that CARSON intended to re-distribute, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 14

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about September 18, 2019, in the Southern District of Indiana, Terre Haute Division, and elsewhere, Defendants TAVARES HUTCHERSON, aka "T," and BRAD W. JONES did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances Act, to wit: HUTCHERSON and JONES communicated via cellular telephone and discussed how much JONES would charge HUTCHERSON for approximately three pounds of methamphetamine that HUTCHERSON intended to re-distribute, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 15

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about September 19, 2019, in the Southern District of Indiana, Terre Haute Division, and elsewhere, Defendants TAVARES HUTCHERSON, aka "T," and ROBERT COX did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances Act, to wit: HUTCHERSON and COX communicated via cellular telephone and discussed the quality of methamphetamine that

they had sold and the anticipated arrival of a methamphetamine delivery, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 16

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about September 20, 2019, in the Southern District of Indiana, Terre Haute Division, and elsewhere, Defendants TAVARES HUTCHERSON, aka “T,” and ROBERT COX did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances Act, to wit: HUTCHERSON and COX communicated via cellular telephone and discussed finding new sources of methamphetamine supply and using third-parties to assist with transporting drugs in the future, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

COUNT 17

[Unlawful Use of Communication Facility – 21 U.S.C. § 843(b)]

The Grand Jury further charges that:

On or about October 1, 2019, in the Southern District of Indiana, Terre Haute Division, and elsewhere, Defendants TAVARES HUTCHERSON, aka “T,” and TRAVIS EYRE did knowingly and intentionally use a communication facility in facilitating the commission of an act constituting a felony under the Controlled Substances Act, to wit: HUTCHERSON and EYRE communicated via cellular telephone and discussed EYRE helping HUTCHERSON collect proceeds from past drug sales, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE

1. Pursuant to Federal Rule of Criminal Procedure 32.2, the United States hereby gives the defendants notice that the United States will seek forfeiture of property, criminally and/or civilly, pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), as part of any sentence imposed.

2. Pursuant to Title 18, United States Code, Section 924(d), if convicted of one or more of the offenses set forth in Counts 1 through 17 of this Superseding Indictment, the defendant(s) shall forfeit to the United States "any firearm or ammunition involved in" the offense(s).

3. Pursuant to Title 21, United States Code, Section 853, if convicted of one or more of the offenses set forth in Counts 1 through 17 of this Superseding Indictment, the defendant(s) shall forfeit to the United States any and all property constituting or derived from any proceeds the defendant(s) obtained directly or indirectly as a result of the offense, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense.

4. The property subject to forfeiture includes, but is not necessarily limited to, the following:

- a. A Colt Diamondback, .38 Special revolver, serial number D70453;
- b. A Winchester, Model 37A, 12 gauge shotgun, serial number 605316;
- c. A Taurus, Model PT-101 AF, .40 caliber pistol, serial number SOB44464;
- d. A Smith and Wesson, Model 642, .38 caliber revolver, serial number CAW5506;

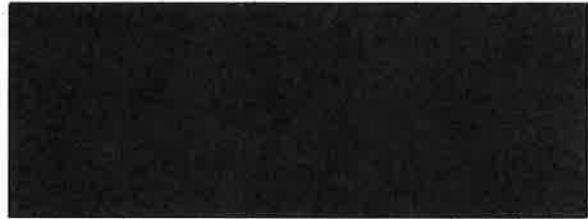
- e. A Taurus International, Model Curve, .380 caliber pistol, serial number 1D145460;
- f. A Kimber, Model Micro 9, 9mm pistol, serial number PB0104718; and,
- g. Approximately \$1,085 in U.S. Currency seized on or about September 19, 2019, in Terre Haute, Indiana.

5. The United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and as incorporated by Title 28, United States Code, Section 2461(c), if any of the property described above in paragraph 4, as a result of any act or omission of the defendant(s):

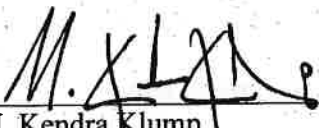
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot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

6. In addition, the United States may seek civil forfeiture of the property described above in paragraph 4 pursuant to Title 18, United States Code, Section 924(d), Title 21, United States Code, Section 881(a), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:



JOSH J. MINKLER
United States Attorney

By: 
M. Kendra Klump
Assistant United States Attorney