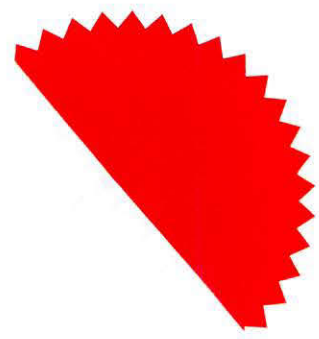


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AT GREENBELT  
 CLERK, U.S. DISTRICT COURT  
 DISTRICT OF MARYLAND UNITED STATES DISTRICT COURT  
 BY *BB* DEPUTY  
 FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

CRIMINAL NO.

RWT 13 CR 0282

DON JUAN CAMPBELL,  
 a/k/a "Flav,"  
 a/k/a "Flava Flav,"  
 a/k/a "Flay,"

(Conspiracy to Distribute and Possess  
 With Intent to Distribute Controlled  
 Substances, 21 U.S.C. § 846; Forfeiture,  
 21 U.S.C. § 853)

ANDRE T. LYONS,  
 a/k/a "Dre,"  
 MICHAEL C. MCCREE,  
 a/k/a "Cuz"  
 a/k/a "Layhoo,"

LORENZO B. JACKSON,  
 a/k/a "B.J.,"  
 MICHAEL I. WALLER,  
 a/k/a "Butters,"  
 a/k/a "Mike Mike," and  
 MARCUS R. MOSS,

**Defendants**

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**INDICTMENT**

**COUNT ONE**

The Grand Jury for the District of Maryland charges that:

**The Conspiracy**

1. From a time unknown to the Grand Jury but beginning prior to 2005, until at least in or about June 2013, the exact dates being unknown to the Grand Jury, in the District of Maryland and elsewhere, the defendants,

**DON JUAN CAMPBELL,**  
a/k/a "Flav,"  
a/k/a "Flava Flav,"  
a/k/a "Flay,"

**ANDRE T. LYONS,**  
a/k/a "Dre,"  
**MICHAEL C. MCCREE,**  
a/k/a "Cuz"  
a/k/a "Layhoo,"

**LORENZO B. JACKSON,**  
a/k/a "B.J.,"  
**MICHAEL I. WALLER,**  
a/k/a "Butters,"  
a/k/a "Mike Mike," and  
**MARCUS R. MOSS,**

did knowingly combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury to distribute and to possess with intent to distribute (1) one kilogram or more of a mixture and substance containing a detectable amount of phencyclidine, (2) five kilograms or more of a mixture and substance containing a detectable amount of cocaine, and (3) 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, which are Schedule II controlled substances, in violation of 21 U.S.C. § 841.

**Goals of the Conspiracy**

2. It was the principal goal of the conspiracy that, in order to obtain as much money and other things of value as possible, the defendants and co-conspirators acquired, sold, and re-distributed quantities of cocaine, crack cocaine, and PCP in the District of Maryland and elsewhere.

3. It was a further goal of the conspiracy to create, maintain, and control market places for the distribution of controlled substances; to collect money owed to members of the conspiracy; to protect the conspiracy and its members from detection, apprehension, and prosecution by law enforcement; and to promote and enhance the reputation and standing of members of the conspiracy.

**Ways, Manner and Means**

4. Among the manner and means used by the defendants and co-conspirators to achieve the objects of the conspiracy, were the following:

a. It was part of the conspiracy that **DON JUAN CAMPBELL, a/k/a “Flav,” a/k/a “Flava Flav,” a/k/a “Flay” (“CAMPBELL”)** purchased large quantities of cocaine and PCP from sources in the District of Maryland and elsewhere.

b. It was further part of the conspiracy that **CAMPBELL** distributed large quantities of cocaine and PCP to other defendants and co-conspirators for further redistribution.

c. It was further part of the conspiracy that the defendants and co-conspirators “cooked” the cocaine into crack cocaine.

d. It was further part of the conspiracy that the defendants and co-conspirators distributed crack cocaine and PCP at various locations in and around Riverdale, Prince George’s County, Maryland.

e. It was further part of the conspiracy that the defendants and co-conspirators collected the proceeds of those narcotics transactions.

f. It was further part of the conspiracy that the defendants and co-conspirators obtained and utilized cellular telephones in the names of other individuals and/or

entities in order to facilitate communication among members of the conspiracy without detection by law enforcement officers.

g. It was further part of the conspiracy that the defendants and co-conspirators distributed cocaine base to two cooperating witnesses known to the Grand Jury (hereafter "CW #1" and "CW #2").

#### Overt Acts

5. In furtherance of the conspiracy, and to effect the illegal objects thereof, the defendants and other co-conspirators performed, participated in and did the following acts, among others, in the District of Maryland and elsewhere:

a. On or about September 14, 2005, in Prince George's County, Maryland, **CAMPBELL** possessed with the intent to distribute a quantity of cocaine base.

b. On or about January 27, 2006, in Prince George's County, Maryland, defendant \_\_\_\_\_, possessed with the intent to distribute a quantity of cocaine base.

c. On or about July 7, 2006, in Cheverly, Maryland, **CAMPBELL** possessed with intent to distribute a quantity of PCP.

d. On or about November 9, 2006, in Prince George's County, Maryland, **LORENZO B. JACKSON, a/k/a "BJ" ("JACKSON")**, possessed with the intent to distribute a quantity of cocaine base and a quantity of PCP.

e. On or about July 19, 2007, in Prince George's County, Maryland, **MICHAEL C. MCCREE, a/k/a "Cuz," a/k/a "Layhoo," ("MCCREE")**, possessed with intent to distribute a quantity of cocaine base.

f. On or about May 2, 2008, in Bowie, Maryland, **CAMPBELL** and \_\_\_\_\_, possessed with intent to distribute a quantity of cocaine base and a quantity of PCP.

g. On or about September 30, 2011, **CAMPBELL** used a communication facility to arrange for the purchase of cocaine for further redistribution.

h. On or about November 27, 2011, in Riverdale, Maryland, **ANDRE T. LYONS, a/k/a "Dre" ("LYONS")**, possessed with intent to distribute a quantity of cocaine base and a quantity of PCP.

i. On or about March 22, 2012, in Riverdale, Maryland, **CAMPBELL** distributed a quantity of cocaine base to CW #1.

j. On or about March 27, 2012, in Hyattsville, Maryland, **LYONS** distributed a quantity of cocaine base to CW #1.

k. On or about March 29, 2012, in Riverdale, Maryland, **LYONS** distributed a quantity of cocaine base to CW #1.

l. On or about April 4, 2012, in Riverdale, Maryland, **CAMPBELL** distributed a quantity of cocaine base to CW #1.

m. On or about April 4, 2012, \_\_\_\_\_ possessed with intent to distribute approximately 20 grams of cocaine base.

n. On or about April 10, 2012, in Riverdale, Maryland, **LYONS** distributed a quantity of cocaine base to CW #1.

o. On or about April 17, 2012, in Riverdale, Maryland, **LYONS** distributed a quantity of cocaine base to CW #1.

p. On or about April 25, 2012, in Riverdale, Maryland, **JACKSON** and a co-conspirator distributed a quantity of cocaine base to CW #1.

q. On or about May 2, 2012, in Prince George's County, Maryland, **JACKSON** distributed a quantity of cocaine base to CW #1.

r. On or about June 1, 2012, in Prince George's County, Maryland, **CAMPBELL** distributed a quantity of cocaine base to CW #1.

s. On or about June 5, 2012, in Prince George's County, Maryland, **JACKSON** possessed with intent to distribute a quantity of PCP.

t. On or about June 27, 2012, in Landover Hills, Maryland, **MCCREE** distributed a quantity of cocaine base to CW #1.

u. On or about July 9, 2012, in Prince George's County, Maryland, distributed a quantity of cocaine base to CW #1.

v. On or about July 13, 2012, in Landover Hills, Maryland, **MICHAEL I. WALLER, a/k/a "Butters," a/k/a "Mike Mike" ("WALLER")**, distributed a quantity of cocaine base to CW #1.

w. On or about September 5, 2012, in Landover Hills, Maryland, **WALLER** distributed a quantity of cocaine base to CW #1.

x. On or about October 4, 2012, in Lanham, Maryland, **LYONS** distributed a quantity of cocaine base to CW #1. #2 B JH

y. On or about January 31, 2013, in Riverdale, Maryland, **MARCUS R. MOSS ("MOSS")**, distributed a quantity of cocaine base to CW #1.

On or about April 19, 2013, in Prince George's County, Maryland, **LYONS** distributed a quantity of cocaine base to CW #2.

z. On or about May 2, 2013, in Riverdale, Maryland, **WALLER** distributed a quantity of cocaine base to CW #1.

aa. On or about May 14, 2013, in Riverdale, Maryland, **MOSS** distributed a quantity of cocaine base to CW #1.

bb. On or about May 17, 2013, in Beltsville, Maryland, **WALLER** distributed a quantity of cocaine base to CW #1.

cc. On or about May 22, 2013, in Riverdale, Maryland, distributed a quantity of cocaine base to CW #1.

dd. On or about May 23, 2013, in Riverdale, Maryland, **CAMPBELL** distributed a quantity of cocaine base to CW #1.

21 U.S.C. § 846

**FORFEITURE ALLEGATIONS**

The Grand Jury for the District of Maryland further finds that:

1. As a result of the offense described in Count One of this Indictment, the defendants,

**DON JUAN CAMPBELL,  
a/k/a "Flav,"  
a/k/a "Flava Flav,"  
a/k/a "Flay,"**

**ANDRE T. LYONS,  
a/k/a "Dre,"  
MICHAEL C. MCCREE,  
a/k/a "Cuz"  
a/k/a "Layhoo,"**

**LORENZO B. JACKSON,  
a/k/a "B.J.,"  
MICHAEL I. WALLER,  
a/k/a "Butters,"  
a/k/a "Mike Mike," and  
MARCUS R. MOSS,**

shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the charged offense.

2. If, as a result of any act or omission of the defendants, any such property subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;



- 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 subdivided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

21 U.S.C. § 853

Rod J. Rosenstein / ses  
Rod J. Rosenstein  
United States Attorney

A TRUE BILL:

Dated: June 5, 2013

For person