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6 Attorneys for Plaintiff
United States of America
7

8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 JAMAINE DONTAE BARNES,
also known as "Twin," "Twin Rich," "Rych
15 Twyn," and "Jamaine Daboss,"
16 JAMAR DEONTAE BARNES,
KAVIEO DAESHAUN LEE WILEY,
also known as "Clout,"
17 VINCENT ISALIAH PATTERSON,
KADRENA LATRICE WATTS,
18 CHEVELE BERNARD RICHARDSON,
also known as "Flipp," or "Flip," and
19 LAMONT MONTEZ THIBODEAUX,
20 Defendants.
21

CASE NO. 2:19-CR-00091-MCE

21 U.S.C. § 848 – Continuing Criminal Enterprise; 21
U.S.C. §§ 846, 841(a)(1) – Conspiracy to
Manufacture, Distribute, and Possess with Intent to
Distribute Fentanyl, Methamphetamine, Heroin, and
U-47700; 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy
to Manufacture, Distribute, and Possess with Intent to
Distribute *N*-ethylpentylone and U-47700; 21 U.S.C.
§ 841(a)(1) – Distribution of Fentanyl; 21 U.S.C.
§ 841(a)(1) – Possession with Intent to Distribute
Methamphetamine (5 Counts);
21 U.S.C. § 841(a)(1) – Distribution of
Methamphetamine (2 Counts); 21 U.S.C. § 860a –
Possession with Intent to Distribute
Methamphetamine on a Premises where Children are
Present; 18 U.S.C. § 924(c)(1)(A) – Possession of a
Firearm in Furtherance of a Drug Trafficking Crime
(3 Counts); 21 U.S.C. § 841(a)(1) – Manufacture of
Methamphetamine; 21 U.S.C. § 860a – Manufacture
of Methamphetamine on a Premises where Children
Reside; 18 U.S.C. § 922(g)(1) – Felon in Possession
of Firearm (3 Counts); 18 U.S.C. § 1956(a)(2)(A) –
Money Laundering (4 Counts); 21 U.S.C. §§ 846,
841(a)(1) – Attempt to Possess with Intent to
Distribute a Controlled Substance; 21 U.S.C. § 843(b)
- Use of a Communication Facility to Facilitate a
Drug Trafficking Offense (2 Counts); 21 U.S.C. §
853(a), 18 U.S.C. §§ 924(d)(1), 982(a)(1) and 28
U.S.C. § 2461(c) – Criminal Forfeiture

27 SUPERSEDING INDICTMENT
28

1
2 COUNT ONE: [21 U.S.C. § 848 – Continuing Criminal Enterprise]

3 The Grand Jury charges: T H A T

4 JAMAINE DONTAE BARNES,
5 defendant herein, as follows:

6 1. Beginning on a date unknown to the Grand Jury, but no later than on or about September
7 27, 2015, and continuing through on or about May 16, 2019, in the County of San Joaquin, State and
8 Eastern District of California, and elsewhere, JAMAINE DONTAE BARNES did engage in a
9 continuing criminal enterprise, in that he did knowingly and intentionally violate Title 21, United States
10 Code, Sections 841(a)(1), 846, and 860a, including, but not limited to, the violations set forth in Counts
11 Two through Ten and Fourteen through Fifteen of this Superseding Indictment.

12 2. The above violations were part of a continuing series of violations undertaken by
13 JAMAINE DONTAE BARNES.

14 3. JAMAINE DONTAE BARNES undertook this continuing series of violations in concert
15 with five or more other persons with respect to whom JAMAINE DONTAE BARNES occupied a
16 position of organizer, supervisor, and manager.

17 4. JAMAINE DONTAE BARNES obtained substantial income and resources from this
18 continuing series of violations.

19 All in violation of Title 21, United States Code, Section 848.

20 COUNT TWO: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Manufacture, Distribute and Possess with
21 Intent to Distribute Fentanyl, Methamphetamine, Heroin, and U-47700]

22 The Grand Jury further charges: T H A T

23 JAMAINE DONTAE BARNES,
24 JAMAR DEONTAE BARNES,
25 KAVIEO DAESHAUN LEE WILEY,
26 VINCENT ISAIAH PATTERSON,
27 KADRENA LATRICE WATTS, and
28 CHEVELE BERNARD RICHARDSON,
defendants herein, beginning on a date unknown to the Grand Jury, but no later than September 27,
2015, and continuing through on or about May 16, 2019, in the County of San Joaquin, State and
Eastern District of California, and elsewhere, did conspire and agree with each other and with persons

1 known and unknown to the Grand Jury to knowingly and intentionally manufacture, distribute, and
2 possess with intent to distribute controlled substances, including but not limited to the following:
3 fentanyl, a Schedule II Controlled Substance; at least 500 grams of a mixture or substance containing a
4 detectable amount of methamphetamine, a Schedule II Controlled Substance; heroin, a Schedule I
5 Controlled Substance; and U-47700 (a synthetic opioid), a Schedule I Controlled Substance, in violation
6 of Title 21, United States Code, Sections 846 and 841(a)(1).

7 The Grand Jury further charges: T H A T

8 JAMAR DEONTAE BARNES,

9 defendant herein, committed this offense after a prior conviction for a serious drug felony had become
10 final, specifically, Possession with Intent to Distribute MDMA, in violation of 21 U.S.C. § 841(a)(1), on
11 or about March 31, 2008, in the Northern District of California, for which defendant served a term of
12 imprisonment of more than 12 months, and for which defendant's release from any term of
13 imprisonment, on or about April 24, 2011, was within 15 years of the commencement of the instant
14 offense.

15 COUNT THREE: [21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Manufacture, Distribute and Possess
16 with Intent to Distribute *N*-ethylpentylone and U-47700]

17 The Grand Jury further charges: T H A T

18 JAMAINE DONTAE BARNES,

19 defendants herein beginning on a date unknown to the Grand Jury, but no later than September 27, 2015,
20 and continuing through on or about June 12, 2018, in the County of San Joaquin, State and Eastern
21 District of California, and elsewhere, did conspire and agree with persons known and unknown to the
22 Grand Jury to knowingly and intentionally manufacture, distribute, and possess with intent to distribute
23 *N*-ethylpentylone, a controlled substance analogue as defined in 21 U.S.C. § 802(32), with intent for
24 human consumption as provided in 21 U.S.C. § 813, and U-47700, a controlled substance analogue as
25 defined in 21 U.S.C. § 802(32), with intent for human consumption as provided in 21 U.S.C. § 813, in
26 violation of Title 21, United States Code, Sections 846 and 841(a)(1).

27 COUNT FOUR: [21 U.S.C. § 841(a)(1) – Distribution of Fentanyl]

28 The Grand Jury further charges: T H A T

JAMAINE DONTAE BARNES,

1 defendant herein, on or about October 19, 2018, in the County of San Joaquin, State and Eastern District
2 of California, did knowingly and intentionally distribute fentanyl, a Schedule II Controlled Substance, in
3 violation of Title 21, United States Code, Section 841(a)(1).

4 COUNT FIVE: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

5 The Grand Jury further charges: T H A T

6 JAMAINE DONTAE BARNES,

7 defendant herein, on or about April 26, 2019, in the County of San Joaquin, State and Eastern District of
8 California, did knowingly and intentionally possess with intent to distribute at least 50 grams of a
9 mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled
10 Substance, in violation of Title 21, United States Code, Section 841(a)(1).

11 COUNT SIX: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

12 The Grand Jury further charges: T H A T

13 JAMAINE DONTAE BARNES, and
14 VINCENT ISALIAH PATTERSON, and

15 defendants herein, on or about May 8, 2019, in the County of San Joaquin, State and Eastern District of
16 California, and elsewhere, did knowingly and intentionally attempt to distribute at least 50 grams of a
17 mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled
18 Substance, in violation of Title 21, United States Code, Section 841(a)(1).

19 COUNT SEVEN: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine]

20 The Grand Jury further charges: T H A T

21 JAMAINE DONTAE BARNES, and
22 KAVIEO DAESHAUN LEE WILEY,

23 defendants herein, on or about May 9, 2019, in the County of San Joaquin, State and Eastern District of
24 California, did knowingly and intentionally distribute at least 50 grams of a mixture or substance
25 containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of
26 Title 21, United States Code, Section 841(a)(1).

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1 COUNT EIGHT: [21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine]

2 The Grand Jury further charges: T H A T

3 JAMAINE DONTAE BARNES, and
4 KAVIEO DAESHAUN LEE WILEY,

5 defendants herein, on or about May 14, 2019, in the County of San Joaquin, State and Eastern District of
6 California, did knowingly and intentionally distribute at least 500 grams of a mixture or substance
7 containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of
8 Title 21, United States Code, Section 841(a)(1).

9 COUNT NINE: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

10 The Grand Jury further charges: T H A T

11 JAMAINE DONTAE BARNES,
12 KAVIEO DAESHAUN LEE WILEY, and
13 VINCENT ISALIAH PATTERSON

14 defendants herein, on or about May 16, 2019, at 4410 N. Pershing Avenue, Suite C-24, in the City of
15 Stockton, County of San Joaquin, State and Eastern District of California, did knowingly and
16 intentionally possess with intent to distribute at least 500 grams of a mixture or substance containing a
17 detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21,
18 United States Code, Section 841(a)(1).

18 COUNT TEN: [21 U.S.C. § 860a – Possession with Intent to Distribute Methamphetamine on a
19 Premises where Children are Present]

20 The Grand Jury further charges: T H A T

21 JAMAINE DONTAE BARNES, and
22 KAVIEO DAESHAUN LEE WILEY,

23 defendants herein, on or about May 16, 2019, at 4410 N. Pershing Avenue, Suite C-24, in the City of
24 Stockton, County of San Joaquin, State and Eastern District of California, did knowingly and
25 intentionally possess with intent to distribute methamphetamine, a Schedule II Controlled Substance, as
26 alleged in Count Nine of this Superseding Indictment, on premises in which an individual who was
27 under the age of 18 years was present, in violation of Title 21, United States Code, Section 860a.

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1 COUNT ELEVEN: [18 U.S.C. § 924(c)(1)(A) – Possession of a Firearm in Furtherance of a Drug
2 Trafficking Crime]

3 The Grand Jury further charges: T H A T

4 JAMAINE DONTAE BARNES,
5 KAVIEO DAESHAUN LEE WILEY, and
6 VINCENT ISAAH PATTERSON,

7 defendants herein, on or about May 16, 2019, at 4410 N. Pershing Avenue, Suite C-24, in the City of
8 Stockton, County of San Joaquin, State and Eastern District of California, did, in furtherance of a drug
9 trafficking crime that can be prosecuted in a Court of the United States, specifically, possession with
10 intent to distribute methamphetamine, as alleged in Count Nine of this Superseding Indictment,
11 knowingly possess a firearm, specifically, a .40 caliber Ruger P94 handgun, with serial number 341-
12 45374, and a PLR-16 5.56mm KEL-TEC CNC INC, with serial number PB590, in violation of Title 18,
13 United States Code, Section 924(c)(1)(A).

14 COUNT TWELVE: [18 U.S.C. § 924(c)(1)(A) – Possession of a Firearm in Furtherance of a Drug
15 Trafficking Crime]

16 The Grand Jury further charges: T H A T

17 JAMAINE DONTAE BARNES,

18 defendant herein, on or about May 16, 2019, at 4410 N. Pershing Avenue, Suite C-24, in the City of
19 Stockton, County of San Joaquin, State and Eastern District of California, did, in furtherance of a drug
20 trafficking crime that can be prosecuted in a Court of the United States, specifically, engaging in a
21 continuing criminal enterprise, as alleged in Count One of this Superseding Indictment, and conspiracy
22 to manufacture, distribute and possess with intent to distribute fentanyl, methamphetamine, heroin, and
23 U-47700, as alleged in Count Two of this Superseding Indictment, knowingly possess a firearm,
24 specifically, a BERSA Thunder .380 caliber handgun, with serial number 809050, in violation of Title
25 18, United States Code, Section 924(c)(1)(A).

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1 COUNT THIRTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

2 The Grand Jury further charges: T H A T

3 JAMAR DEONTAE BARNES,

4 defendant herein, on or about May 16, 2019, at 723 Bedlow Drive, in the City of Stockton, County of
5 San Joaquin, State and Eastern District of California, did knowingly and intentionally possess with
6 intent to distribute at least 500 grams of a mixture or substance containing a detectable amount of
7 methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code,
8 Section 841(a)(1).

9 The Grand Jury further charges: T H A T

10 JAMAR DEONTAE BARNES,

11 defendant herein, committed this offense after a prior conviction for a serious drug felony had become
12 final, specifically, Possession with Intent to Distribute MDMA, in violation of 21 U.S.C. § 841(a)(1), on
13 or about March 31, 2008, in the Northern District of California, for which defendant served a term of
14 imprisonment of more than 12 months, and for which defendant's release from any term of
15 imprisonment, on or about April 24, 2011, was within 15 years of the commencement of the instant
16 offense.

17 COUNT FOURTEEN: [21 U.S.C. § 841(a)(1) – Manufacture of Methamphetamine]

18 The Grand Jury further charges: T H A T

19 JAMAINE DONTAE BARNES, and
20 KADRENA LATRICE WATTS,

21 defendants herein, beginning no later than on or about April 20, 2019, and continuing through on or
22 about May 16, 2019, at 1139 Parma Road, in the City of Stockton, County of San Joaquin, State and
23 Eastern District of California, did knowingly and intentionally manufacture methamphetamine, a
24 Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

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1 COUNT FIFTEEN: [21 U.S.C. § 860a – Manufacture of Methamphetamine on a Premises where
2 Children Reside]

3 The Grand Jury further charges: T H A T

4 JAMAINE DONTAE BARNES, and
5 KADRENA LATRICE WATTS,

6 defendants herein, beginning no later than on or about April 20, 2019, and continuing through on or
7 about May 16, 2019, at 1139 Parma Road, in the City of Stockton, County of San Joaquin, State and
8 Eastern District of California, did knowingly and intentionally manufacture methamphetamine, a
9 Schedule II Controlled Substance, on premises in which an individual who was under the age of 18
10 years resided, in violation of Title 21, United States Code, Section 860a.

11 COUNT SIXTEEN: [21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine]

12 The Grand Jury further charges: T H A T

13 CHEVELE BERNARD RICHARDSON,

14 defendant herein, on or about May 16, 2019, at 411 S. Stanislaus, Apartment J205, in the City of
15 Stockton, County of San Joaquin, State and Eastern District of California, did knowingly and
16 intentionally possess with intent to distribute at least 50 grams of a mixture or substance containing a
17 detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21,
18 United States Code, Section 841(a)(1).

19 COUNT SEVENTEEN: [18 U.S.C. § 924(c)(1)(A) – Possession of a Firearm in Furtherance of a Drug
20 Trafficking Crime]

21 The Grand Jury further charges: T H A T

22 CHEVELE BERNARD RICHARDSON,

23 defendant herein, on or about May 16, 2019, at 411 S. Stanislaus, Apartment J205, in the City of
24 Stockton, County of San Joaquin, State and Eastern District of California, did, in furtherance of a drug
25 trafficking crime that can be prosecuted in a Court of the United States, specifically, possession with
26 intent to distribute methamphetamine, as alleged in Count Sixteen of this Superseding Indictment,
27 knowingly possess a firearm, specifically, a Glock Model 17 with serial number BDKD685, in violation
28 of Title 18, United States Code, Section 924(c)(1)(A).

1 COUNT EIGHTEEN: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

2 The Grand Jury further charges: T H A T

3 JAMAINE DONTAE BARNES,

4 defendant herein, on or about May 16, 2019, in the County of San Joaquin, State and Eastern District of
5 California, knowing that he had been convicted of a crime punishable by a term of imprisonment
6 exceeding one year, specifically:

7 (1) Possession of a Controlled Substance, in violation of California Health and Safety Code
8 Section 11350, on or about September 3, 2003, in San Mateo County, California;

9 (2) Transportation or Sale of a Controlled Substance, in violation of California Health and Safety
10 Code Section 11352, on or about June 7, 2005, in San Mateo County, California;

11 (3) Possession or Purchase of Cocaine Base for Sale, in violation of California Health and Safety
12 Code Section 11351.5, on or about June 7, 2005, in San Mateo County, California;

13 (4) Grand Theft, in violation of California Penal Code Section 487, on or about November 10,
14 2005, in Santa Clara County, California;

15 (5) Prohibited Person Owning Ammunition, in violation of California Penal Code Section 12316,
16 on or about February 9, 2011, in Solano County, California;

17 (6) Perjury, in violation of 18 U.S.C. § 1623, on or about April 12, 2010, in the Northern District
18 of California;

19 (7) Concealing a Person from Arrest, in violation of 18 U.S.C. § 1071, on or about June 14,
20 2010, in the Northern District of California; and

21 (8) Possession or Purchase for Sale of a Controlled Substance, in violation of California Health
22 and Safety Code Section 11351, on or about August 30, 2010, in Alameda County, California;

23 did knowingly possess a firearm, specifically:

24 (1) a .40 caliber Ruger P94 handgun, with serial number 341-45374;

25 (2) a PLR-16 5.56mm KEL-TEC CNC INC, with serial number PB590; and

26 (3) a BERSA Thunder .380 caliber handgun, with serial number 809050;

27 in and affecting commerce, in that said firearm had previously been transported in interstate and foreign
28 commerce, in violation of Title 18, United States Code, Section 922(g)(1).

1 COUNT NINETEEN: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

2 The Grand Jury further charges: T H A T

3 KAVIEO DAESHAUN LEE WILEY,

4 defendant herein, on or about May 16, 2019, in the County of San Joaquin, State and Eastern District of
5 California, knowing that he had been convicted of a crime punishable by a term of imprisonment
6 exceeding one year, specifically, Possession of a Stolen Vehicle, in violation of California Penal Code
7 Section 496d, on or about March 19, 2015, in San Joaquin County, California, did knowingly possess a
8 firearm, specifically:

9 (1) a .40 caliber Ruger P94 handgun, with serial number 341-45374; and

10 (2) a PLR-16 5.56mm KEL-TEC CNC INC, with serial number PB590;

11 in and affecting commerce, in that said firearm had previously been transported in interstate and foreign
12 commerce, in violation of Title 18, United States Code, Section 922(g)(1).

13 COUNT TWENTY: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

14 The Grand Jury further charges: T H A T

15 CHEVELE BERNARD RICHARDSON,

16 defendant herein, on or about May 16, 2019, in the County of San Joaquin, State and Eastern District of
17 California, knowing that he had been convicted of a crime punishable by a term of imprisonment
18 exceeding one year, specifically:

19 (1) Second Degree Robbery, in violation of California Penal Code Section 211, on or about May
20 22, 2006, in Alameda County, California; and

21 (2) Prohibited Person Owning Ammunition, in violation of California Penal Code Section
22 30305(a)(1), on or about December 18, 2012, in Alameda County, California;

23 did knowingly possess a firearm, specifically, a Glock Model 17 with serial number BDKD685, in and
24 affecting commerce, in that said firearm had previously been transported in interstate and foreign
25 commerce, in violation of Title 18, United States Code, Section 922(g)(1).

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COUNTS TWENTY-ONE THROUGH TWENTY-FOUR: [18 U.S.C. § 1956(a)(2)(A) – Money Laundering]

The Grand Jury further charges: T H A T

JAMAINE DONTAE BARNES,

defendant herein, on or about the dates set forth below, in the County of San Joaquin, State and Eastern District of California, did knowingly and intentionally transmit and transfer funds from a place in the United States to or through a place outside the United States with the intent to promote the carrying on of specified unlawful activity, specifically, engaging in a continuing criminal enterprise, in violation of Title 21, United States Code, Section 848, as alleged in Count One of this Superseding Indictment, Conspiracy to Manufacture, Distribute and Possess with Intent to Distribute Fentanyl, Methamphetamine, Heroin, and U-47700, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged in Count Two of this Superseding Indictment, and Conspiracy to Manufacture, Distribute and Possess with Intent to Distribute *N*-ethylpentylone and U-47700, in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged in Count Three of this Superseding Indictment, as follows:

Count	Date	Amount	Western Union Payment Number	Origin	Destination
21	September 27, 2015	\$595	5460400281	United States	China
22	November 10, 2015	\$1,300	4043338446	United States	China
23	April 7, 2016	\$350	6258970363	United States	China
24	April 18, 2016	\$1,800	7187700496	United States	China

All in violation of Title 18, United States Code, Sections 2 and 1956(a)(2)(A).

COUNT TWENTY-FIVE: [21 U.S.C. §§ 846, 841(a)(1) – Attempt to Possess with Intent to Distribute a Controlled Substance]

The Grand Jury further charges: T H A T

LAMONT MONTEZ THIBODEAUX,

defendant herein, on or about May 8, 2019, in San Joaquin County, State and Eastern District of California, did attempt to possess with intent to knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

1 The Grand Jury further charges: T H A T

2 LAMONT MONTEZ THIBODEAUX,

3 defendant herein, committed this offense after he had been convicted of a felony drug offense that had
4 become final, specifically:

5 (1) Manufacture or Delivery of a Controlled Substance, in violation of Texas Health and Safety
6 Code § 481.112(b), on or about June 5, 2003; and

7 (2) Manufacture or Delivery of a Controlled Substance, in violation of Texas Health and Safety
8 Code § 481.112(d), on or about December 22, 2008.

9 COUNT TWENTY-SIX: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug
10 Trafficking Offense]

11 The Grand Jury further charges: T H A T

12 LAMONT MONTEZ THIBODEAUX,

13 defendant herein, on or about May 2, 2019, at approximately 8:19 p.m., in the State and Eastern District
14 of California, and elsewhere, did knowingly and intentionally use a communication facility in
15 committing, causing, and facilitating the commission of the felony offense alleged in Count Six of this
16 Superseding Indictment, in violation of Title 21, United States Code, Section 843(b).

17 COUNT TWENTY-SEVEN: [21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a
18 Drug Trafficking Offense]

19 The Grand Jury further charges: T H A T

20 LAMONT MONTEZ THIBODEAUX,

21 defendant herein, on or about May 3, 2019, at approximately 3:16 a.m., in the State and Eastern District
22 of California, and elsewhere, did knowingly and intentionally use a communication facility in
23 committing, causing, and facilitating the commission of the felony offense alleged in Count Six of this
24 Superseding Indictment, in violation of Title 21, United States Code, Section 843(b).

25 FORFEITURE ALLEGATION: [21 U.S.C. § 853(a), 18 U.S.C. §§ 924(d)(1), 982(a)(1), and 28 U.S.C.
26 § 2461(c) - Criminal Forfeiture]

27 1. Upon conviction of one or more of the offenses alleged in Counts One through Ten,
28 Thirteen through Sixteen, and Twenty-Five through Twenty-Seven of this Superseding Indictment,
defendants JAMAINE DONTAE BARNES, JAMAR DEONTAE BARNES, KAVIEO DAESHAUN
LEE WILEY, VINCENT ISAAH PATTERSON, KADRENA LATRICE WATTS, CHEVELE

1 BERNARD RICHARDSON, and LAMONT MONTEZ THIBODEAUX shall forfeit to the United
2 States pursuant to Title 21, United States Code, Section 853(a), the following property:

3 a. All right, title, and interest in any and all property involved in violations of Title
4 21, United States Code, Sections 841(a)(1), 843(b), and 860a, or conspiracy to commit such offenses,
5 for which defendants are convicted, and all property traceable to such property, including the following:
6 all real or personal property, which constitutes or is derived from proceeds obtained, directly or
7 indirectly, as a result of such offenses; and all property used, or intended to be used, in any manner or
8 part to commit or to facilitate the commission of the offenses.

9 b. A sum of money equal to the total amount of proceeds obtained as a result of the
10 offenses, or conspiracy to commit such offenses, for which defendants are convicted.

11 2. Upon conviction of one or more of the offenses alleged in Counts Eleven, Twelve, and
12 Seventeen through Twenty of this Superseding Indictment, defendants JAMAINE DONTAE BARNES,
13 KAVIEO DAESHAUN LEE WILEY, VINCENT ISAAH PATTERSON, and CHEVELE BERNARD
14 RICHARDSON shall forfeit to the United States pursuant to Title 18, United States Code, Section
15 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in
16 or used in the knowing commission of the offenses.

17 3. Upon conviction of one or more of the offenses alleged in Counts Twenty-One through
18 Twenty-Four of this Superseding Indictment, defendant JAMAINE DONTAE BARNES, shall forfeit to
19 the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and
20 personal, involved in such offenses, and any property traceable to such property, including but not
21 limited to the following:

22 a. A sum of money equal to the amount of money involved in the offenses, for
23 which defendant is convicted.

24 4. If any property subject to forfeiture, as a result of the offenses alleged in Counts One
25 through Twenty-Seven of this Superseding Indictment, for which defendants are convicted:

26 a. cannot be located upon the exercise of due diligence;

27 b. has been transferred or sold to, or deposited with, a third party;


28 c. has been placed beyond the jurisdiction of the Court;

- 1 d. has been substantially diminished in value; or
2 e. has been commingled with other property which cannot be divided without
3 difficulty;

4 it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), Title 21,
5 United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture
6 of any other property of defendants, up to the value of the property subject to forfeiture.

7
8 A TRUE BILL.

9
10 **/s/ Signature on file w/AUSA**
11 **FOREPERSON**

11 

12 McGREGOR W. SCOTT
13 United States Attorney

United States v. Jamaine Dontae Barnes, et al.
Penalties for Superseding Indictment

Defendants

JAMAINE DONTAE BARNES,
JAMAR DEONTAE BARNES,
KAVIEO DAESHAUN LEE WILEY,
VINCENT ISAAH PATTERSON,
KADRENA LATRICE WATTS,
CHEVELE BERNARD RICHARDSON,
LAMONT MONTEZ THIBODEAUX

COUNT 1: **Jamaine BARNES**

VIOLATION: 21 U.S.C. § 848 – Continuing Criminal Enterprise

PENALTIES: Mandatory minimum of 20 years in prison and a maximum of up to life in
prison; or
Fine of up to \$2,000,000; or both fine and imprisonment
Supervised release of up to five years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 2: **Jamaine BARNES, Jamar BARNES, Kavieo WILEY, Vincent
PATTERSON, Kadrena WATTS, Chevele RICHARDSON**

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Manufacture, Distribute, and
Possess with Intent to Distribute Fentanyl, at least 500 grams of a mixture or
substance containing Methamphetamine, Heroin, and U-47700

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in
prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 3: Jamaine BARNES

VIOLATION: 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Manufacture, Distribute, and Possess with Intent to *N*-ethylpentylone and U-47700

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 4: Jamaine BARNES

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of Fentanyl

PENALTIES: Up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 5: Jamaine BARNES

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at least 50 grams of a Mixture or Substance Containing Methamphetamine

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 6: Jamaine BARNES, Vincent PATTERSON

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at least 50 grams of a Mixture or Substance Containing Methamphetamine

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 7: Jamaine BARNES, Kavieo WILEY

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 50 grams of a Mixture or Substance Containing Methamphetamine

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 8: Jamaine BARNES, Kavieo WILEY

VIOLATION: 21 U.S.C. § 841(a)(1) – Distribution of at least 500 grams of a Mixture or Substance Containing Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 9: Jamaine BARNES, Kavieo WILEY, Vincent PATTERSON

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at least 500 grams of a Mixture or Substance Containing Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 10: Jamaine BARNES, Kavieo WILEY

VIOLATION: 21 U.S.C. § 860a - Possession with Intent to Distribute Methamphetamine on a Premises where Children Reside

PENALTIES: Not more than 20 years in prison, but any prison term will run consecutive to any other sentence imposed; or
Fine of up to \$250,000; or both fine and imprisonment
A three-year term of supervised release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 11: Jamaine BARNES, Kavieo WILEY, Vincent PATTERSON

VIOLATION: 18 U.S.C. §§ 924(c)(1)(A) – Possession of a Firearm in Furtherance of a Drug Trafficking Crime

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to life in prison, and any sentence imposed for a violation of this section shall run consecutively to any other term of imprisonment imposed;
Fine of up to \$250,000, or both fine and imprisonment;
Term of Supervised release of up to five years.

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 12: Jamaine BARNES

VIOLATION: 18 U.S.C. §§ 924(c)(1)(A) – Possession of a Firearm in Furtherance of a Drug Trafficking Crime

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to life in prison, and any sentence imposed for a violation of this section shall run consecutively to any other term of imprisonment imposed;
Fine of up to \$250,000, or both fine and imprisonment;
Term of Supervised release of up to five years.

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 13: Jamar BARNES

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at least 500 grams of a Mixture or Substance Containing Methamphetamine

PENALTIES: Mandatory minimum of 10 years in prison and a maximum of up to life in prison; or
Fine of up to \$10,000,000; or both fine and imprisonment
Supervised release of at least 5 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 14: Jamaine BARNES, Kadrena WATTS

VIOLATION: 21 U.S.C. § 841(a)(1) – Manufacture of Methamphetamine

PENALTIES: Up to 20 years in prison; or
Fine of up to \$1,000,000; or both fine and imprisonment
Supervised release of at least 3 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 15: **Jamaine BARNES, Kadrena WATTS**

VIOLATION: 21 U.S.C. § 860a – Manufacture of Methamphetamine on a Premises where Children Reside

PENALTIES: Not more than 20 years in prison, but any prison term will run consecutive to any other sentence imposed; or
Fine of up to \$250,000; or both fine and imprisonment
A three-year term of supervised release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 16: **Chevele RICHARDSON**

VIOLATION: 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute at least 50 grams of a Mixture or Substance Containing Methamphetamine

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to 40 years in prison; or
Fine of up to \$5,000,000; or both fine and imprisonment
Supervised release of at least 4 years up to life

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 17: **Chevele RICHARDSON**

VIOLATION: 18 U.S.C. §§ 924(c)(1)(A) – Possession of a Firearm in Furtherance of a Drug Trafficking Crime

PENALTIES: Mandatory minimum of 5 years in prison and a maximum of up to life in prison, and any sentence imposed for a violation of this section shall run consecutively to any other term of imprisonment imposed;
Fine of up to \$250,000, or both fine and imprisonment;
Term of Supervised release of up to five years.

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 18: **Jamaine BARNES**

VIOLATION: 18 U.S.C. § 922(g) - Felon in possession of firearm

PENALTIES: Not more than 120 months,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 19: **Kavieo WILEY**

VIOLATION: 18 U.S.C. § 922(g) - Felon in possession of firearm

PENALTIES: Not more than 120 months,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 20: **Chevele RICHARDSON**

VIOLATION: 18 U.S.C. § 922(g) - Felon in possession of firearm

PENALTIES: Not more than 120 months,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNTS 21-24: **Jamaine BARNES**

VIOLATION: 18 U.S.C. §§ 1956(a)(2)(A) – Money Laundering

PENALTIES: Up to 20 years in prison;
Fine of up to \$500,000 or twice the value of the monetary instrument or
funds involved, whichever is greater;
Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT 25: Lamont THIBODEAUX

VIOLATION: 21 U.S.C. §§ 841(a)(1) and 846 – Attempt to Possess with Intent to Distribute a Controlled Substance

PENALTIES: Up to 4 years in prison; or
Fine of up to \$200,000; or both fine and imprisonment
A one-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNTS 26-27: Lamont THIBODEAUX

VIOLATION: 21 U.S.C. § 843(b) - Use of Communication Facility to Facilitate a Drug Trafficking Offense

PENALTIES: Not more than 48 months,
Not more than \$100,000 fine or both
A one-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION: all Defendants

VIOLATION: 21 U.S.C. § 853(a), 18 U.S.C. §§ 924(d)(1), 982(a)(1), and 28 U.S.C. § 2461(c) – Criminal Forfeiture

PENALTIES: As stated in the charging document

No. 2:19-CR-0091 MCE

UNITED STATES DISTRICT COURT

*Eastern District of California
Criminal Division*

THE UNITED STATES OF AMERICA

vs.

NO PROCESS NECESSARY

*as to
Jamaine Barnes
Jamar Barnes
Kavio Wiley
Chevelle Richardsch*

JAMAINE DONTAE BARNES,
also known as "Twin," "Twin Rich," "Rych Twyn," and "Jamaine Daboss,"

JAMAR DEONTAE BARNES,
KAVIEO DAESHAUN LEE WILEY,
also known as "Clout,"

VINCENT ISAAH PATTERSON,
KADRENA LATRICE WATTS,
CHEVELE BERNARD RICHARDSON,
also known as "Flipp," or "Flip," and
LAMONT MONTEZ THIBODEAUX,

NO PROCESS NECESSARY

*as to
Vincent Patterson
Kadrena Watts*

NO BAIL WARRANT PENDING HEARING

*as to
Lamont Thibodeaux*

SUPERSEDED INDICTMENT

VIOLATION(S):

- 21 U.S.C. § 848 – Continuing Criminal Enterprise;
- 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Manufacture, Distribute, and Possess with Intent to Distribute Fentanyl, Methamphetamine, Heroin, and U-47700;
- 21 U.S.C. §§ 846, 841(a)(1) – Conspiracy to Manufacture, Distribute, and Possess with Intent to Distribute N-ethylpentylone and U-47700;
- 21 U.S.C. § 841(a)(1) – Distribution of Fentanyl;
- 21 U.S.C. § 841(a)(1) – Possession with Intent to Distribute Methamphetamine (5 Counts);
- 21 U.S.C. § 841(a)(1) – Distribution of Methamphetamine (2 Counts);
- 21 U.S.C. § 860a – Possession with Intent to Distribute Methamphetamine on a Premises where Children are Present and Reside (2 Counts);
- 18 U.S.C. § 924(c)(1)(A) – Possession of a Firearm in Furtherance of a Drug Trafficking Crime (3 Counts);
- 21 U.S.C. § 841(a)(1) – Manufacture of Methamphetamine;
- 18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm (3 Counts);
- 18 U.S.C. § 1956(a)(2)(A) – Money Laundering (4 Counts);
- 21 U.S.C. §§ 846, 841(a)(1) – Attempt to Possess with Intent to Distribute a Controlled Substance;
- 21 U.S.C. § 843(b) - Use of a Communication Facility to Facilitate a Drug Trafficking Offense (2 Counts);
- 21 U.S.C. § 853(a), 18 U.S.C. §§ 924(d)(1), 982(a)(1) and 28 U.S.C. § 2461(c) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this

24th

day

of

October

, A.D. 20

19

Clerk

Bail, \$