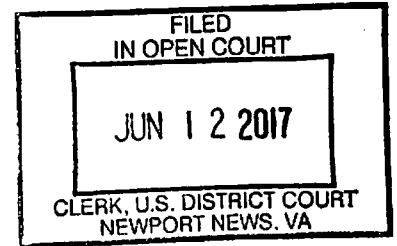


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division



UNITED STATES OF AMERICA)

v.)

WILLIAM ARTHUR JOE,)
a/k/a "Pops", "Unc", "Rudy K")
(Counts 1, 2, 3, 4, 9, 10, 15)

MARCUS LAWRENCE JOE)
a/k/a "Mark", "Lil Cuzo")
(Counts 1, 2, 3, 5, 10))

LOUIS SEAN MCBRIDE)
a/k/a "Lou")
(Counts 2, 3, 6, 12))

MICHAEL PAUL JONES)
a/k/a "Mike", "Homeboy")
(Counts 2, 3))

PHILLIP HENDERSON JOE)
a/k/a "Fat Boy", "Phil")
(Counts 2, 3, 11))

ANTHONY RAY STUBBS)
A/K/A "Butch")
(Counts 2, 3, 7, 13))

ARNOLD BURGESS)
a/k/a "True", "Nephew", "T")
(Counts 2, 3))

MICHAEL DWAYNE BODDIE)
a/k/a "Vick")
(Counts 2, 3, 14))

JOSEPH EDWARD MASSIE)
a/k/a "Fat Joe", "J")
(Counts 2, 3, 8))

CRIMINAL NO. 4:17cr(15)

21 U.S.C. §§ 848
Continuing Criminal Enterprise
(Count 1)

21 U.S.C. §§ 846 and 841
Conspiracy to Distribute and Possess with
Intent to Distribute Heroin
(Count 2)

18 U.S.C. § 1956(h)
Conspiracy to Launder Money
(Count 3)

21 U.S.C. § 841(a)(1)
Distribute Heroin
(Counts 4, 5, 6, 7, 8)

21 U.S.C. § 856
Maintain Drug Involved Premises
(Count 9)

21 U.S.C. § 843
Use of a Communication Facility
(Counts 10, 11, 12, 13, 14)

18 U.S.C. § 924(c)
Possess Firearm During Drug Trafficking
(Count 15)

21 U.S.C. § 853
Forfeiture Allegation

SEALED

EDWARD HENRY LATIMER, III)
a/k/a "Eddie")
(Counts 2, 3))
)
CANDACE FAITH WHITE)
a/k/a "Candy")
(Counts 2, 3, 4, 9))
)
KATHY LEE HORSLEY)
a/k/a "Kath")
(Counts 2, 3))
)
<i>Defendants.</i>)

INDICTMENT

June 2017 Term - at Newport News, Virginia

COUNT ONE

THE GRAND JURY CHARGES THAT:

Between 2014 and 2017, within the Eastern District of Virginia and elsewhere, the defendants, **WILLIAM ARTHUR JOE and MARCUS LAWRENCE JOE**, did engage in a continuing criminal enterprise by committing a continuing series of felony violations of Title 21, United States Code Section 841(a)(1), which continuing series of violations was undertaken by defendant in concert with at least five other persons with respect to whom defendant occupied a position as organizer, a supervisory position, and some other position of management, and from which continuing series of violations defendant obtained substantial income and resources. The continuing series of violations undertaken by defendants **WILLIAM ARTHUR JOE and MARCUS LAWRENCE JOE** included but was not limited to the conduct in Count Two of this indictment which is incorporated by reference in this count.

(In violation of Title 21, United States Code, Section 848.)

COUNT TWO

THE GRAND JURY CHARGES THAT:

On or about or between January 2014 and May 2017, in the Eastern District of Virginia and elsewhere, the defendants, **WILLIAM ARTHUR JOE, MARCUS LAWRENCE JOE, LOUIS SEAN MCBRIDE, MICHAEL PAUL JONES, PHILLIP HENDERSON JOE, ANTHONY RAY STUBBS, ARNOLD BURGESS, MICHAEL DWAYNE BODDIE, JOSEPH EDWARD MASSIE, EDWARD HENRY LATIMER, III, CANDACE FAITH WHITE, KATHY LEE HORSLEY**, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree together with other persons known and unknown to the grand jury to commit the following offenses against the United States:

1. Distribute 1000 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

2. Possess with intent to distribute 1000 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

(All in violation of Title 21, United States Code, Sections 846, 841(a)(1) and 841(b)(1)(A)).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

Beginning in or about August 2014 through May 2017, in the Eastern District of Virginia and elsewhere, **WILLIAM ARTHUR JOE, MARCUS LAWRENCE JOE, LOUIS SEAN MCBRIDE, MICHAEL PAUL JONES, PHILLIP HENDERSON JOE, ANTHONY RAY STUBBS, ARNOLD BURGESS, MICHAEL DWAYNE BODDIE, JOSEPH EDWARD MASSIE, EDWARD HENRY LATIMER, III, CANDACE FAITH WHITE, and KATHY LEE HORSLEY**, the defendants herein, did knowingly, willfully, and unlawfully combine conspire, confederate and agree with each other and other persons, both known and unknown, to knowingly, willfully, and unlawfully conduct, attempt to conduct, and cause to be conducted financial transactions affecting interstate commerce, which transactions involved the proceeds of specified unlawful activity, that is, conspiracy to distribute heroin, in violation of Title 21, United States Code, Section 846, with the intent to promote the carrying on of specified unlawful activity, that is, conspiracy to distribute heroin in violation of Title 21, United States Code, Section 846, and that, while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity.

(All in violation of Title 18, United States Code, Section 1956(h))

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 15, 2015, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendants, **WILLIAM ARTHUR JOE and CANDACE FAITH WHITE**, did unlawfully, knowingly and intentionally distribute a substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 11, 2015, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **MARCUS LAWRENCE JOE**, did unlawfully, knowingly and intentionally distribute more than 100 grams of a substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 18, 2016, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **LOUIS SEAN MCBRIDE** did unlawfully, knowingly and intentionally distribute a substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 30, 2014, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **ANTHONY RAY STUBBS**, did unlawfully, knowingly and intentionally distribute a substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 10, 2015, in Hampton, Virginia, in the Eastern District of Virginia and elsewhere, the defendant, **JOSEPH EDWARD MASSIE** did unlawfully, knowingly and intentionally distribute a substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance.

(All in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT NINE

THE GRAND JURY FURTHER CHARGES

On or about or between September 2015 and December 2016, within the Eastern District of Virginia, **WILLIAM ARTHUR JOE and CANDACE FAITH WHITE**, the defendants herein, did knowingly and intentionally manage and control the following buildings and locations as owner, renter and mortgagee, for the purpose of unlawfully storing, and distributing, Schedule I narcotic controlled substances: 8 Rebel Street and 1128 Quash Street, Hampton, Virginia.

(In violation of Title 21, United States Code, Section 856 (a)(2), and Title 18, United States Code, Section 2.)

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 2, 2016, in the Eastern District of Virginia and elsewhere, the defendants, **WILLIAM ARTHUR JOE and MARCUS LAWRENCE JOE** did unlawfully, knowingly and intentionally use a communication facility, to wit: a telephone, in facilitating the commission of a crime, to wit: conspiracy to possess with intent to distribute and distribution of heroin, a Schedule I controlled substance.

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

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 13, 2016, in the Eastern District of Virginia and elsewhere, the defendant, **PHILLIP HENDERSON JOE** did unlawfully, knowingly and intentionally use a communication facility, to wit: a telephone, in facilitating the commission of a crime, to wit: conspiracy to possess with intent to distribute and distribution of heroin, a Schedule I controlled substance.

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

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 4, 2016, in the Eastern District of Virginia and elsewhere, the defendant, **LOUIS SEAN MCBRIDE** did unlawfully, knowingly and intentionally use a communication facility, to wit: a telephone, in facilitating the commission of a crime, to wit: conspiracy to possess with intent to distribute and distribution of heroin, a Schedule I controlled substance.

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

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 20, 2016, in the Eastern District of Virginia and elsewhere, the defendant, **ANTHONY RAY STUBBS** did unlawfully, knowingly and intentionally use a communication facility, to wit: a telephone, in facilitating the commission of a crime, to wit: conspiracy to possess with intent to distribute and distribution of heroin, a Schedule I controlled substance.

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

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 13, 2016, in the Eastern District of Virginia and elsewhere, the defendant, **MICHAEL DWAYNE BODDIE** did unlawfully, knowingly and intentionally use a communication facility, to wit: a telephone, in facilitating the commission of a crime, to wit: conspiracy to possess with intent to distribute and distribution of heroin, a Schedule I controlled substance.

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

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 15, 2016, in Hampton, Virginia, within the Eastern District of Virginia, the defendant, **WILLIAM ARTHUR JOE**, unlawfully and knowingly possessed a firearm, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute heroin, a Schedule I controlled substance.

(In violation of Title 18, United States Code, Section 924(c)(1)(A)).

FORFEITURE ALLEGATION

A. The defendants, **WILLIAM ARTHUR JOE, MARCUS LAWRENCE JOE, LOUIS SEAN MCBRIDE, MICHAEL PAUL JONES, PHILLIP HENDERSON JOE, ANTHONY RAY STUBBS, ARNOLD BURGESS, MICHAEL DWAYNE BODDIE, JOSEPH EDWARD MASSIE, EDWARD HENRY LATIMER, III, CANDACE FAITH WHITE, and KATHY LEE HORSLEY**, if convicted of any of the violations alleged in Counts One through Fourteen of this Indictment, as part of the sentencing of the defendants pursuant to F.R.Cr.P. 32.2 and 21 U.S.C. § 853, shall forfeit to the United States:

1. Any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violation; and

2. Any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

3. If any property that is subject to forfeiture above, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, 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 that cannot be subdivided without difficulty; it is the intent of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

(All in accordance with Title 21, United States Code, Section 853)

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

UNITED STATES V. WILLIAM ARTHUR JOE, ET AL. 4:17CR 605

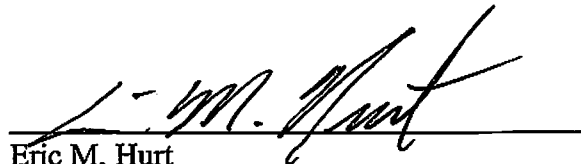
A TRUE BILL:

Redacted

FOREPERSON

DANA J. BOENTE
UNITED STATES ATTORNEY

By:



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