

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
12-60027-CR-COHN/SELTZER
CASE NO. _____

18 U.S.C. § 1951(a)
21 U.S.C. § 846
18 U.S.C. § 924(o)
18 U.S.C. § 924(c)(1)(A)
18 U.S.C. § 924(d)(1)

UNITED STATES OF AMERICA

vs.

TRAVIS MCGHEE,
DARELLE FULLER,
QUINCY TAYLOR, and
ANDREW KINSEY,

Defendants.

_____ /

INDICTMENT

The Grand Jury charges that:

COUNT 1

From on or about December 14, 2011, through on or about February 1, 2012, in Miami-Dade and Broward Counties, in the Southern District of Florida, the defendants,

**TRAVIS MCGHEE,
DARELLE FULLER,
QUINCY TAYLOR, and
ANDREW KINSEY,**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and persons known and unknown to the Grand Jury, to obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, Sections 1951(b)(1) and

(b)(3), in that the defendants did unlawfully plan to take personal property from an individual, against said individual's will, by means of actual and threatened force, violence, and fear of injury to said individual; in violation of Title 18, United States Code, Section 1951(a).

COUNT 2

From on or about December 14, 2011, through on or about February 1, 2012, in Miami-Dade and Broward Counties, in the Southern District of Florida, the defendants,

**TRAVIS MCGHEE,
DARELLE FULLER,
QUINCY TAYLOR, and
ANDREW KINSEY,**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and persons known and unknown to the Grand Jury to possess with intent to distribute a controlled substance, that is, five (5) kilograms or more of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

COUNT 3

On or about February 1, 2012, in Broward County, in the Southern District of Florida, the defendants,

**TRAVIS MCGHEE,
DARELLE FULLER,
QUINCY TAYLOR, and
ANDREW KINSEY,**

did knowingly and intentionally attempt to possess with intent to distribute a controlled substance, that is, five (5) kilograms or more of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

COUNT 4

From on or about December 14, 2011, through on or about February 1, 2012, in Miami-Dade and Broward Counties, in the Southern District of Florida, the defendants,

**TRAVIS MCGHEE,
DARELLE FULLER,
QUINCY TAYLOR, and
ANDREW KINSEY,**

did knowingly and intentionally combine, conspire, confederate, and agree with each other to use and carry a firearm during and in relation to a crime of violence, that is, a violation of Title 18, United States Code, Section 1951(a), as set forth in Count 1 of this Indictment, and during and in relation to a drug trafficking crime, that is, a violation of Title 21, United States Code, Section 846, as set forth in Counts 2 and 3 of this Indictment, which are felonies prosecutable in a court of the United States, and to possess said firearm in furtherance of such crimes, in violation of Title 18, United States Code, Section 924(c)(1)(A); all in violation of Title 18, United States Code, Section 924(o).

It is further alleged that the firearm is:

- (a) a Bersa, model Mini Firestorm, .40 caliber pistol, bearing serial number 642645;
- (b) a Sig Sauer, model P229, .40 caliber pistol, bearing serial number AE 40301; and
- (c) a Romarm/Cugir, model Wasr, 7.62 caliber rifle, bearing no serial number.

COUNT 5

On or about February 1, 2012, in Broward County, in the Southern District of Florida, the defendants,

**TRAVIS MCGHEE,
DARELLE FULLER,
QUINCY TAYLOR, and
ANDREW KINSEY,**

did knowingly carry a firearm during and in relation to a crime of violence, that is, a violation of Title 18, United States Code, Section 1951(a), as set forth in Count 1 of this Indictment, and during and in relation to a drug trafficking crime, that is, a violation of Title 21, United States Code, Section 846, as set forth in Counts 2 and 3 of this Indictment, which are felonies prosecutable in a court of the United States, and did possess said firearm in furtherance of such crimes; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

It is further alleged that the firearm is:

- (a) a Bersa, model Mini Firestorm, .40 caliber pistol, bearing serial number 642645;
- (b) a Sig Sauer, model P229, .40 caliber pistol, bearing serial number AE 40301; and
- (c) a Romarm/Cugir, model Wasr, 7.62 caliber rifle, bearing no serial number.

FORFEITURE

1. The allegations of Counts 4 and 5 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 28, United States Code, Section 2461, Title 18, United States Code, Section 924(d)(1), and the procedures outlined at Title 21, United States Code, Section 853.


2. Upon the conviction of any violation of this indictment, the defendants shall forfeit to the United States any firearm or ammunition involved in or used in the commission of said violation.

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

- (a) a Bersa, model Mini Firestorm, .40 caliber pistol, bearing serial number 642645;
- (b) a Sig Sauer, model P229, .40 caliber pistol, bearing serial number AE 40301;
- (c) a Romarm/Cugir, model Wasr, 7.62 caliber rifle, bearing no serial number;
- (d) approximately ten (10) rounds of .40 caliber ammunition;
- (e) approximately six (6) rounds of .40 caliber ammunition;
- (f) approximately sixteen (16) rounds of 7.62 caliber ammunition.

All pursuant to Title 28, United States Code, Section 2461, Title 18, United States Code, Section 924(d)(1), and Title 21, United States Code, Section 853(a)(2).

A TRUE BILL


WIFREDO A. FERRER
UNITED STATES ATTORNEY


RICHARD D. BROWN
ASSISTANT UNITED STATES ATTORNEY

UNITED STATES OF AMERICA

CASE NO. _____

vs.

CERTIFICATE OF TRIAL ATTORNEY*

TRAVIS MCGHEE,
 DARELLE FULLER,
 QUINCY TAYLOR, and
 ANDREW KINSEY,
 Defendants.

Case Information:

Court Division: (Select One)

New Defendant(s) Yes _____ No _____
 Number of New Defendants _____
 Total number of counts _____

_____ Miami _____ Key West
X FTL _____ WPB _____ FTP

I do hereby certify that:

- I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
- I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.

3. Interpreter: (Yes or No) No
 List language and/or dialect _____

4. This case will take 5 days for the parties to try.

5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I 0 to 5 days <u>X</u>	Petty _____
II 6 to 10 days _____	Minor _____
III 11 to 20 days _____	Misdem. _____
IV 21 to 60 days _____	Felony <u>X</u>
V 61 days and over _____	

6. Has this case been previously filed in this District Court? (Yes or No) No

If yes:
 Judge: _____ Case No. _____

(Attach copy of dispositive order)
 Has a complaint been filed in this matter? (Yes or No) YES

If yes:
 Magistrate Case No. 12-6040-RSR
 Related Miscellaneous numbers: _____
 Defendant(s) in federal custody as of 2/1/12
 Defendant(s) in state custody as of _____
 Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Northern Region of the U.S. Attorney's Office prior to October 14, 2003? _____ Yes X No

8. Does this case originate from a matter pending in the Narcotics Section (Miami) prior to September 1, 2007? _____ Yes X No


 RICHARD O.T. BROWN
 ASSISTANT UNITED STATES ATTORNEY
 Court Number A5500257

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Travis McGhee

Case No: _____

Count #: 1

Hobbs Act Robbery

18 U.S.C. § 1951(a)

* Max. Penalty: 20 years' imprisonment; \$250,000 fine; 3 years' supervised release

Counts #: 2 and 3

Conspiracy to and Attempt to possess with intent to distribute cocaine

21 U.S.C. §§ 846 and 841(b)(1)(A)

* Max. Penalty: Life (mandatory minimum 10 years') imprisonment; \$10,000,000 fine; at least 5 years' to life supervised release

Count #: 4

Conspiracy to use a firearm during the commission of a crime of violence/Drug Trafficking Crime

18 U.S.C. § 924 (o)

*Max. Penalty: 20 years' imprisonment; \$250,000 fine; 3 years' supervised release

Count #: 5

Use a firearm during the commission of a crime of violence/Drug Trafficking Crime

18 U.S.C. § 924(c)(1)(A)

*Max. Penalty: Life (mandatory minimum 5 years' consecutive) imprisonment; \$250,000 fine; 5 years' supervised release

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Darelle Fuller

Case No: _____

Count #: 1

Hobbs Act Robbery

18 U.S.C. § 1951(a)

* Max. Penalty: 20 years' imprisonment; \$250,000 fine; 3 years' supervised release

Counts #: 2 and 3

Conspiracy to and Attempt to possess with intent to distribute cocaine

21 U.S.C. §§ 846 and 841(b)(1)(A)

* Max. Penalty: Life (mandatory minimum 10 years') imprisonment; \$10,000,000 fine; at least 5 years' to life supervised release

Count #: 4

Conspiracy to use a firearm during the commission of a crime of violence/Drug Trafficking Crime

18 U.S.C. § 924 (o)

*Max. Penalty: 20 years' imprisonment; \$250,000 fine; 3 years' supervised release

Count #: 5

Use a firearm during the commission of a crime of violence/Drug Trafficking Crime

18 U.S.C. § 924(c)(1)(A)

*Max. Penalty: Life (mandatory minimum 5 years' consecutive) imprisonment; \$250,000 fine; 5 years' supervised release

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Quincy Taylor

Case No: _____

Count #: 1

Hobbs Act Robbery

18 U.S.C. § 1951(a)

* Max. Penalty: 20 years' imprisonment; \$250,000 fine; 3 years' supervised release

Counts #: 2 and 3

Conspiracy to and Attempt to possess with intent to distribute cocaine

21 U.S.C. §§ 846 and 841(b)(1)(A)

* Max. Penalty: Life (mandatory minimum 10 years') imprisonment; \$10,000,000 fine; at least 5 years' to life supervised release

Count #: 4

Conspiracy to use a firearm during the commission of a crime of violence/Drug Trafficking Crime

18 U.S.C. § 924 (o)

*Max. Penalty: 20 years' imprisonment; \$250,000 fine; 3 years' supervised release

Count #: 5

Use a firearm during the commission of a crime of violence/Drug Trafficking Crime

18 U.S.C. § 924(c)(1)(A)

*Max. Penalty: Life (mandatory minimum 5 years' consecutive) imprisonment; \$250,000 fine; 5 years' supervised release

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Andrew Kinsey

Case No: _____

Count #: 1

Hobbs Act Robbery

18 U.S.C. § 1951(a)

* Max. Penalty: 20 years' imprisonment; \$250,000 fine; 3 years' supervised release

Counts #: 2 and 3

Conspiracy to and Attempt to possess with intent to distribute cocaine

21 U.S.C. §§ 846 and 841(b)(1)(A)

* Max. Penalty: Life (mandatory minimum 10 years') imprisonment; \$10,000,000 fine; at least 5 years' to life supervised release

Count #: 4

Conspiracy to use a firearm during the commission of a crime of violence/Drug Trafficking Crime

18 U.S.C. § 924 (o)

*Max. Penalty: 20 years' imprisonment; \$250,000 fine; 3 years' supervised release

Count #: 5

Use a firearm during the commission of a crime of violence/Drug Trafficking Crime

18 U.S.C. § 924(c)(1)(A)

*Max. Penalty: Life (mandatory minimum 5 years' consecutive) imprisonment; \$250,000 fine; 5 years' supervised release

*Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.