

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

FILED
U.S. DISTRICT COURT
SAVANNAH, GA.

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CLERK *[Signature]*
SO. DIST. OF GA.

UNITED STATES OF AMERICA)
)
)
)
v.)
)
)
WILLIE CLINTON LOVETT,)
)
)
RANDALL WAYNE ROACH,)
AKA "Red")
)
RANDALL WAYNE ROACH, JR.,)
AKA "Randy")
)
KENNY AMOS BLOUNT,)
)
Defendants.)

SUPERSEDING INDICTMENT
CR 414-143

VIO: 18 U.S.C. § 1955
Commercial Gambling

18 U.S.C. § 1951
Extortion

18 U.S.C. § 1511
Conspiracy to Obstruct
Enforcement of State Criminal
Laws

Forfeiture Allegation

THE GRAND JURY CHARGES THAT:

Introduction

At all times relevant to this Indictment:

1. Defendant **Willie Clinton Lovett** was a Major and then the Chief of the Savannah-Chatham Metropolitan Police Department (SCMPD), formerly the Savannah Police Department (SPD). Savannah and Chatham County are political subdivisions of the State of Georgia.
2. Defendants **Randall Wayne Roach, aka "Red," Randall Wayne Roach, Jr.,**

aka "Randy," Kenny Amos Blount, aided and abetted by each other, by Defendant Lovett, and by others, conducted an illegal gambling business. The illegal gambling business was conducted in southeast Georgia and in South Carolina, which included numerous yearly stops in Savannah and Chatham County.

3. Since in or around 2004, Defendant **Willie Clinton Lovett** extorted cash payments from Defendant **Randall Wayne Roach, aka "Red,"** and others, and in return provided protection to the illegal gambling business against enforcement of Georgia gambling laws.

COUNT ONE

Commercial Gambling

18 U.S.C. § 1955

4. Paragraphs 1 through 3 of the Indictment are incorporated by reference as if fully set forth herein.

5. Beginning not later than June 5, 2009, and continuously thereafter up to and including May 8, 2014, in Chatham County, Georgia, within the Southern District of Georgia, and elsewhere, the Defendants **Randall Wayne Roach, AKA "Red," Randall Wayne Roach, Jr., AKA "Randy," and Kenny Amos Blount, aided and abetted by each other, by Defendant Willie Clinton Lovett, and by others, did knowingly conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, that is: a gambling business which involved playing and betting for money and other things of value in games played with dice, balls and cards, and which involved the solicitation of others to gamble with an intent to defraud and deceive, in violation of the laws of the State of Georgia; which illegal gambling business**

involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part thereof; and which illegal gambling business remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000 in any single day.

All done in violation of Title 18, United States Code, Sections 1955 and 2.

COUNT TWO

Conspiracy to Obstruct Enforcement of State Criminal Laws

18 U.S.C. § 1511

6. Paragraphs 1 through 5 of the Indictment are incorporated by reference as if fully set forth herein.

7. From a date no later than on or about March 16, 2004, and continuing through on or about September 27, 2013, in Chatham County, within the Southern District of Georgia, and elsewhere, Defendants **Willie Clinton Lovett, Randall Wayne Roach, aka "Red," and Kenny Amos Blount**, unlawfully did combine, conspire, confederate and agree with each other and others to obstruct the enforcement of the criminal laws of the State of Georgia, with the intent to facilitate an illegal gambling business.

8. At all times during the course of the conspiracy, the Defendant **Willie Clinton Lovett** was an official or employee of the State of Georgia or a political subdivision thereof, that is, a sworn law enforcement officer with SCMPD or SPD.

9. At all times during the course of the conspiracy, Defendants **Randall Wayne Roach, aka "Red," Kenny Amos Blount**, and others conducted, financed, managed, supervised, directed, and owned all or part of an illegal gambling business.

10. At all times during the course of the conspiracy, the said illegal gambling business

was a violation of the criminal gambling laws of the State of Georgia; involved five or more persons who conducted, financed, managed, supervised, directed and owned all of part of said business; and remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue in excess of \$2,000 in a single day.

Manner and Means of the Conspiracy

11. It was part of the conspiracy that Defendants **Randall Wayne Roach, aka "Red," Kenny Amos Blount** and others would set up an illegal gambling business in downtown Savannah around various holiday celebrations, such as Saint Patrick's Day, New Year's Day and Martin Luther King Day.

12. It was further part of the conspiracy that Defendants **Randall Wayne Roach, aka "Red," Kenny Amos Blount** and others would set up an illegal gambling business at other locations in Savannah and throughout Chatham County separate and apart from various holiday celebrations.

13. It was further part of the conspiracy that Defendant **Willie Clinton Lovett**, a Major with SPD and SCMPD, and then the Chief of SCMPD, would not enforce, and prevent the enforcement of the criminal gambling laws of the State of Georgia, in exchange for cash payments from Defendant **Randall Wayne Roach, aka "Red," Kenny Amos Blount** and others.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the following acts, among others, were committed:

14. On or about March 13, 2013, Defendant **Randall Wayne Roach, aka "Red,"** paid cash to Defendant **Willie Clinton Lovett** for protection against the enforcement of the

criminal gambling laws of the State of Georgia, which cash payment represented some of the proceeds of the illegal gambling business.

15. On or about March 15, 2013, Defendant **Randall Wayne Roach, aka "Red,"** paid cash to Defendant **Willie Clinton Lovett** for protection against the enforcement of the criminal gambling laws of the State of Georgia, which cash payment represented some of the proceeds of the illegal gambling business.

16. On or about March 17, 2013, at about 1:00 a.m., Defendant **Randall Wayne Roach, aka "Red,"** paid cash to Defendant **Willie Clinton Lovett** for protection against the enforcement of the criminal gambling laws of the State of Georgia, which cash payment represented some of the proceeds of the illegal gambling business.

17. On or about March 17, 2013, at about 4:00 p.m., Defendant **Randall Wayne Roach, aka "Red,"** paid cash to Defendant **Willie Clinton Lovett** for protection against the enforcement of the criminal gambling laws of the State of Georgia, which cash payment represented some of the proceeds of the illegal gambling business.

18. Between on or about May 3 and May 12, 2013, Defendant **Randall Wayne Roach, aka "Red,"** paid cash to Defendant **Willie Clinton Lovett** for protection against the enforcement of the criminal gambling laws of the State of Georgia, which cash payment represented some of the proceeds of the illegal gambling business.

All done in violation of Title 18, United States Code, Section 1511.

COUNT THREE

Extortion

18 U.S.C. § 1951

19. Paragraphs 1 through 18 of the Indictment are incorporated by reference as if

fully set forth herein.

20. On or about March 13, 2013, in Chatham County, within the Southern District of Georgia, Defendant Willie Clinton Lovett, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant Lovett, in his capacity as the Chief of SCMPD, obtained and attempted to obtain cash money from Randall Wayne Roach, Jr., with that individual's consent, which was induced by the wrongful use of threatened fear of economic harm, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

COUNT FOUR

Extortion

18 U.S.C. § 1951

21. Paragraphs 1 through 20 of the Indictment are incorporated by reference as if fully set forth herein.

22. On or about March 15, 2013, in Chatham County, within the Southern District of Georgia, Defendant Willie Clinton Lovett, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant Lovett, in his capacity as the Chief of SCMPD, obtained and attempted to obtain cash money from Randall Wayne Roach, Jr., with that individual's consent, which was induced by the wrongful use of threatened fear of economic harm, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

COUNT FIVE

Extortion

18 U.S.C. § 1951

23. Paragraphs 1 through 22 of the Indictment are incorporated by reference as if fully set forth herein.

24. On or about March 17, 2013, at approximately 1:00 a.m., in Chatham County, within the Southern District of Georgia, Defendant **Willie Clinton Lovett**, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant Lovett, in his capacity as the Chief of SCMPD, obtained and attempted to obtain cash money from Randall Wayne Roach, Jr., with that individual's consent, which was induced by the wrongful use of threatened fear of economic harm, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

COUNT SIX

Extortion

18 U.S.C. § 1951

25. Paragraphs 1 through 24 of the Indictment are incorporated by reference as if fully set forth herein.

26. On or about March 17, 2013, at approximately 4:00 p.m., in Chatham County, within the Southern District of Georgia, Defendant **Willie Clinton Lovett**, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant Lovett, in his capacity as the Chief of SCMPD, obtained and attempted to obtain cash money from Randall Wayne Roach, Jr.,

with that individual's consent, which was induced by the wrongful use of threatened fear of economic harm, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

COUNT SEVEN

Extortion

18 U.S.C. § 1951

27. Paragraphs 1 through 26 of the Indictment are incorporated by reference as if fully set forth herein.

28. Between on or about May 3 and May 12, 2013, in Chatham County, within the Southern District of Georgia, Defendant **Willie Clinton Lovett**, did knowingly obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, and attempted to do so, by extortion, in that Defendant **Lovett**, in his capacity as the Chief of SCMPD, obtained and attempted to obtain cash money from **Randall Wayne Roach, Jr.**, with that individual's consent, which was induced by the wrongful use of threatened fear of economic harm, and under color of official right.

All done in violation of Title 18, United States Code, Section 1951.

FORFEITURE ALLEGATION

1. The allegations contained in Counts One through Seven of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 981(d), and 1955(d), Title 19, United States Code, Sections 1607 through 1609, and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of Title 18, United States Code, Section 1955, set forth in Count One of this Indictment, the Defendants **Randall Wayne Roach**,

AKA "Red," Randall Wayne Roach, Jr., AKA "Randy," Kenny Amos Blount and Willie Clinton Lovett shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense and, pursuant to Title 18, United States Code, Section 1955(d) and Title 28, United States Code, Section 2461(c), any property, including money, used in violation of the offense. The property to be forfeited includes, but is not limited to, the following:

**A white box trailer, Maine license plate number 0321284; and,
4849 Highway 84 East, Ludowici, Georgia 31316.**

3. Upon conviction of an offense in violation of Title 18, United States Code, Section 1511, set forth in Count Two of this Indictment, the Defendants **Randall Wayne Roach, AKA "Red," Kenny Amos Bloant and Willie Clinton Lovett shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.**

4. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1951, set forth in Counts Three through Seven of this Indictment, the Defendant **Willie Clinton Lovett shall forfeit to the United States of America, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.**

5. If any of the property described above, as a result of any act or omission of the Defendants:

- 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,

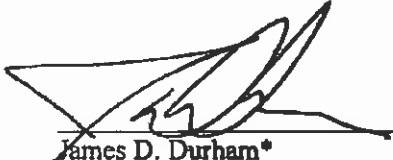
the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461.

A TRUE BILL.

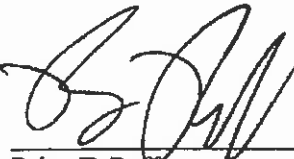
Foreperson



Edward J. Tarver
United States Attorney



James D. Durham*
First Assistant United States Attorney



Brian T. Raftery
Assistant United States Attorney
Criminal Division Chief



R. Brian Tanner*
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