

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO. <u>3:26-cr-00572</u>
)	
)	18 U.S.C. § 1343
)	18 U.S.C. § 1346
vs.)	18 U.S.C. § 1349
)	18 U.S.C. § 981(a)(1)(C)
)	28 U.S.C. § 2461(c)
)	
LOWANDA ATKINSON)	
JASON BROWN)	
a/k/a AJ)	
CHRISTOPHER HICKMAN)	<u>INFORMATION</u>
ADRIANNA CONYERS)	
a/k/a Danielle Conyers)	
a/k/a Danielle Bethea)	
MARY ANN HICKMAN BROWN)	

COUNT ONE

(Honest Services Wire Fraud Conspiracy)

THE UNITED STATES ATTORNEY CHARGES:

At all times relevant to this Information:

1. **LOWANDA ATKINSON** resided in Kershaw County, South Carolina. From in or around February 2007 through in or around May 2023, **LOWANDA ATKINSON**, served as a Correctional Officer (“CO”) with the South Carolina Department of Corrections (“SCDC”), the South Carolina state prison system. She was assigned to Lee Correctional Institution (“Lee”), and at the time of her resignation on September 7, 2023, held the rank of Corporal.

2. **JASON BROWN, a/k/a “AJ,”** resided as an SCDC inmate at Lee Correctional Institution in Lee County, South Carolina from January 2008 through March 2020, at Evans Correctional Institution in Marlboro County, South Carolina from March 2020 through March

2021, and at Turbeville Correctional Institution in Clarendon County, South Carolina from July 2021 through the balance of the scheme.

3. **CHRISTOPHER HICKMAN** resided in Richland County, South Carolina. He is **JASON BROWN, a/k/a “AJ’s”** brother.

4. **ADRIANNA CONYERS, a/k/a “Danielle Conyers,” a/k/a “Danielle Bethea,”** resided in Sumter County, South Carolina. She is **JASON BROWN, a/k/a “AJ’s”** nephew’s mother.

5. **MARY ANN BROWN** resided in Clarendon County, South Carolina. She is **JASON BROWN, a/k/a “AJ’s,”** mother.

6. Co-Conspirator 1 (charged elsewhere) resided as an SCDC inmate at Lee in Lee County, South Carolina from in or around August 2008 through in or around January 2024, and during the entirety of the scheme alleged below.

7. Co-Conspirator 2 (charged elsewhere) resided in Sumter County, South Carolina. She was an acquaintance of **JASON BROWN, a/k/a “AJ.”**

THE SCHEME

8. Beginning in or around August 3, 2018, and continuing through in or around May 31, 2023, in the District of South Carolina and elsewhere, the Defendants, **LOWANDA ATKINSON, JASON BROWN, a/k/a “AJ,” CHRISTOPHER HICKMAN, ADRIANNA CONYERS, a/k/a “Danielle Conyers,” a/k/a “Danielle Bethea,”** and **MARY ANN HICKMAN BROWN** knowingly did conspire and agree with each other and others, both known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud and deprive South Carolina and its citizens of the right to the honest and faithful services of **LOWANDA ATKINSON** through bribery and to knowingly and intentionally transmit and cause

to be transmitted by means of wire communications in interstate commerce signals, signs, and sounds for the purpose of executing such a scheme and artifice.

MANNER AND MEANS

It was part of the scheme that:

9. **LOWANDA ATKINSON** used her position as CO and assignment in the property room at Lee to smuggle contraband, including illicit narcotics, into the facility in exchange for cash bribes and bribes sent through peer-to-peer payment platforms from inmates and others on behalf of inmates. In doing so, **LOWANDA ATKINSON** violated SCDC contraband policy, violated state bribery law, and violated her duty to render the honest and faithful services owed to the public.

10. In or around 2010, **LOWANDA ATKINSON** sought out a position at Lee in the contraband unit where she was responsible for enforcing contraband law and SCDC contraband policy. Following her time in the contraband unit, **LOWANDA ATKINSON** worked in the property room at Lee for about ten years. As a CO in the property room, **LOWANDA ATKINSON** was entrusted with maintaining inmate property at the facility and searching inmate property for prohibited items. Taken together, **LOWANDA ATKINSON** spent more than thirteen years as a CO entrusted to discover, document, and deter the introduction of contraband within Lee.

11. **LOWANDA ATKINSON** held personal checking account number x0859 at Bank 1 and account number x0986 at Bank 2. **LOWANDA ATKINSON** also operated a Cash App account, a peer-to-peer payment platform, at the time of the charged conduct.

12. At all times while **LOWANDA ATKINSON** was employed as a CO, SCDC maintained a policy that employees maintain professional relationships with inmates and that COs

conduct themselves in a way that would avoid situations that “compromise their professional integrity, compromise security, or cause embarrassment to the Department of Corrections.” SCDC policy also prohibited COs from entering into any kind of personal relationship with inmates, including romantic or business relationships. COs were also prohibited from engaging in services not in keeping with SCDC operations or from receiving gifts from inmates or inmate family members. SCDC policy further prohibited COs from receiving or accepting money from anyone other than the state for the performance of their official duties, from using official facilities for private gain, and from receiving a thing of value that could be viewed as being for the purpose of influencing official action by the CO.

13. State law also prohibited COs from accepting bribes in exchange for performing or failing to perform acts within the CO’s official responsibilities, including under S.C. Code Ann. § 8-13-705(A) and (B) and S.C. Code Ann. § 16-9-220.

14. Despite her oath to serve as a CO, in which capacity the public entrusted her to detect and deter contraband schemes at Lee, **LOWANDA ATKINSON** accepted numerous bribes to allow contraband to move through the property room she operated. **LOWANDA ATKINSON** later purchased contraband in coordination with **JASON BROWN, a/k/a “AJ.”** She also accepted contraband at her personal residence from **CHRISTOPHER HICKMAN** and others for transport and introduction into Lee.

15. It was further part of the scheme that the contraband smuggled into Lee by **LOWANDA ATKINSON** was sold by **JASON BROWN, a/k/a “AJ,”** and Co-Conspirator 1. The proceeds of the contraband sales were split between **JASON BROWN, a/k/a “AJ,”** Co-Conspirator 1, and **LOWANDA ATKINSON.**

16. In total, **LOWANDA ATKINSON** accepted more than \$550,000 in bribes from **JASON BROWN, a/k/a “AJ,” CHRISTOPHER HICKMAN, ADRIANNA CONYERS, a/k/a “Danielle Conyers,” a/k/a “Danielle Bethea,” MARY ANN HICKMAN BROWN,** Co-Conspirator 1, Co-Conspirator 2 and others, including:

- a. More than \$250,000 in cash payments, which typically originated from proceeds from the contraband **LOWANDA ATKINSON** smuggled into Lee;
- b. More than \$150,000 in Cash App payments linked to inmates and inmate family members;
- c. More than \$40,000 in Cash App payments to accounts associated with **LOWANDA ATKINSON**'s children; and
- d. Approximately \$4,000 in payments through other peer-to-peer payment methods such as Zelle and Apple Cash.

17. **JASON BROWN, a/k/a “AJ,”** sent more than \$150,000 in bribes through Cash App to **LOWANDA ATKINSON,** including a \$1,000 transfer from one of his Cash App accounts to a Cash App account owned by **LOWANDA ATKINSON** on July 8, 2021. He also directed **CHRISTOPHER HICKMAN, ADRIANNA CONYERS, a/k/a “Danielle Conyers,” a/k/a “Danielle Bethea,”** and **MARY ANN HICKMAN BROWN** to pay bribes to **LOWANDA ATKINSON** on his behalf.

18. **MARY ANN HICKMAN BROWN** sent more than \$95,000 in bribes through Cash App to **LOWANDA ATKINSON** and coordinated delivery of contraband to **LOWANDA ATKINSON** for introduction and sale at Lee. For example, **MARY ANN HICKMAN BROWN** engaged in a text message conversation with **JASON BROWN, a/k/a “AJ”** on July 29, 2022, in which **MARY ANN HICKMAN BROWN** acknowledged that **CHRISTOPHER HICKMAN** would pick up a package of cash from her for delivery to **LOWANDA ATKINSON.**

19. **CHRISTOPHER HICKMAN** sent more than \$40,000 in bribes through Cash App to **LOWANDA ATKINSON** including a \$1,450 transfer from his Cash App account to a Cash App account owned by **LOWANDA ATKINSON** on July 23, 2021.

20. **ADRIANNA CONYERS, a/k/a “Danielle Conyers,” a/k/a “Danielle Bethea,”** sent more than \$6,500 in bribes through Cash App to **LOWANDA ATKINSON** including a \$3,000 transfer from a Cash App account controlled by **ADRIANNA CONYERS, a/k/a “Danielle Conyers,” a/k/a “Danielle Bethea,”** to a Cash App account owned by **LOWANDA ATKINSON**’s son on March 1, 2022.

21. In exchange for the bribes, **LOWANDA ATKINSON** obtained contraband for inmates, including cell phones, cell phone accessories, tobacco, and controlled substances. She then smuggled the contraband into the prison and caused it to be delivered to the inmates. In the process, she engaged in certain acts and failed to perform certain acts in violation of her job responsibilities, SCDC policy, state bribery law, and her duty to the public to provide honest and faithful services.

22. It was further part of the scheme to conceal the bribes and introduction of contraband into Lee. In doing so, **LOWANDA ATKINSON** hid the contraband, including in potato chips bags, to smuggle into the Lee property room on the weekends. Additionally, **JASON BROWN, a/k/a “AJ,” MARY ANN HICKMAN BROWN,** and Co-Conspirator 1 used Cash App accounts with business names, names other than their own, and a stolen identity to disguise the bribes as legitimate transactions.

23. **LOWANDA ATKINSON** transferred the bribery proceeds to accounts in her name held at Bank 1 and Bank 2, spent the proceeds, and enriched herself in the process. For example, **LOWANDA ATKINSON** spent over \$50,000 in bribes at high-end designer stores, an

amount more than her annual salary. **LOWANDA ATKINSON** also used the bribes to pay for a luxury vehicle and thousands of dollars in cosmetic procedures.

All in violation of Title 18, United States Code, Section 1343, 1346, and 1349.

FITSNNEWS

FORFEITURE

WIRE FRAUD:

As a result of the foregoing violation of 18 U.S.C. § 1343, as charged in this Information, upon conviction, Defendant **LOWANDA ATKINSON**, shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant individually obtained directly or indirectly as a result of such offenses.

PROPERTY:

Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), the property which is subject to forfeiture upon conviction of Defendant for the violation charged in this Information includes, but is not limited to, the following:

Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendant individually obtained, directly or indirectly, from the offenses charged in this Information, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to his or her violation of 18 U.S.C. § 1343.

SUBSTITUTE ASSETS:

If any of the property described above, as a result of any act or omission of a Defendant-

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) to seek forfeiture of any other property of the said Defendant up to the value of the forfeitable property described above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

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