

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

SUPERSEDING INDICTMENT FOR VIOLATIONS OF THE RACKETEER
INFLUENCED CORRUPT ORGANIZATION ACT, THE VIOLENT CRIME IN AID OF
RACKETEERING ACT, THE FEDERAL CONTROLLED SUBSTANCES ACT AND
THE FEDERAL GUN CONTROL ACT

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 09-398
v.	*	SECTION: "F"
MICHAEL ANDERSON	*	VIOLATIONS: 18 U.S.C. § 1962(d)
a/k/a "Mike-Mike"		18 U.S.C. § 1959
	*	18 U.S.C. § 922(g)(1)
HAROLD JONES		18 U.S.C. § 924(c)(1)(A)
a/k/a "Dooley," a/k/a "Doody"	*	18 U.S.C. § 924(j)(1)
		18 U.S.C. § 924(o)
THERON JONES	*	18 U.S.C. § 2
a/k/a "T.J."		21 U.S.C. § 846
	*	21 U.S.C. § 841(a)(1)
JEREMIAH MILLRO		21 U.S.C. § 841(b)(1)(A)
a/k/a "Jerry"	*	21 U.S.C. § 841(b)(1)(C)
		21 U.S.C. § 841(b)(1)(D)
COREY OLIVER	*	
	*	
DARRYL SHIELDS	*	
a/k/a "Snook," a/k/a "Black"		
	*	
JEROME SIMMONS	*	
a/k/a "Buddy"		
	*	
TONY SIMMONS	*	
a/k/a "Yay-Yo"		

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The Grand Jury charges that:

GENERAL ALLEGATIONS

1. At all relevant times, defendants **MICHAEL ANDERSON, a/k/a “Mike-Mike,” HAROLD JONES, a/k/a “Dooley,” a/k/a “Doody,” THERON JONES, a/k/a “T.J.,” JEREMIAH MILLRO, a/k/a “Jerry,” COREY OLIVER, DARRYL SHIELDS, a/k/a “Snook,” a/k/a “Black,” JEROME SIMMONS, a/k/a “Buddy,” and TONY SIMMONS, a/k/a “Yay-Yo,”** and others known and unknown to the Grand Jury, were members and associates of an organization engaged in, among other things, conspiracy to distribute controlled substances, distribution of controlled substances, murder, conspiracy to commit murder, and attempted murder. At all relevant times, this organization, sometimes referred to as the “Josephine Dog Pound,” operated in the Eastern District of Louisiana.

2. This organization has historically encompassed two areas of New Orleans, Louisiana, and operates or operated primarily in this specified area. The boundaries of area one include Washington Avenue to the East, Danneel Street to the North, Sixth Street to the West and Baronne Street to the South. The boundaries of area two include Josephine Street to the East, Claiborne Avenue to the North, Jackson Avenue to the West and Baronne Street to the South.

COUNT 1

(Racketeer Influenced and Corrupt Organizations Conspiracy)

The Racketeering Enterprise

3. The organization, including its leadership, membership, and associates, constitutes an “enterprise,” as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise engaged in, and its activities affected, interstate and

foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

4. The purposes of the enterprise include, but are not limited to, the following:
 - a. Enriching the members and associates of the enterprise through, among other things, the control of and participation in the distribution of controlled substances in the territory controlled by the enterprise;
 - b. Enriching the members and associates of the enterprise through, among other things, violence and threats of violence, assault, robbery and murder;
 - c. Preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, threats of violence, assault, robbery and murder;
 - d. Promoting and enhancing the activities and authority of the enterprise and its members and associates;
 - e. Keeping victims, potential victims, and witnesses in fear of the enterprise and in fear of its members and associates through violence and threats of violence;
 - f. Providing financial support and information to members of the enterprise, including those who were incarcerated for committing acts of violence, robbery, distribution of controlled substances and other offenses; and
 - g. Providing assistance to members of the enterprise who committed crimes for and on behalf of the enterprise in order to hinder, obstruct and prevent law

enforcement officers from identifying the offender or offenders, apprehending the offender or offenders, and prosecuting and punishing the offender or offenders.

Means and Methods of the Enterprise

5. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise, included but were not limited to, the following:

- a. Members of the enterprise and their associates committed, attempted and threatened to commit acts of violence, including murder and robbery, to protect and expand the criminal operations of the enterprise.
- b. Members of the enterprise and their associates promoted a climate of fear through violence and threats of violence.
- c. Members of the enterprise and their associates used and threatened to use physical violence against various individuals.
- d. Members of the enterprise and their associates engaged in the distribution of controlled substances as a means to generate income.
- e. Members of the enterprise possessed and utilized firearms to prevent competition from other drug dealers in and around the geographic area used and controlled by the enterprise.
- f. Members of the enterprise possessed and utilized firearms in order to protect their business of distributing in controlled substances.

- g. Members of the enterprise possessed and utilized firearms to maintain and advance the goals of the enterprise.
- h. Members of the enterprise purchased, maintained and circulated a collection of firearms for use in criminal activity by the enterprise members.

The RICO Conspiracy Charge

6. Beginning on a date unknown, but prior to January 2003, and continuing to the date of this Superseding Indictment, in the Eastern District of Louisiana and elsewhere, defendants **MICHAEL ANDERSON, a/k/a "Mike-Mike," HAROLD JONES, a/k/a "Dooley," a/k/a "Doody," THERON JONES, a/k/a "T.J.," COREY OLIVER, DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black," JEROME SIMMONS, a/k/a "Buddy," and TONY SIMMONS, a/k/a "Yay-Yo,"** and others known and unknown to the Grand Jury, being persons employed by and associated with the criminal enterprise, as described in paragraphs 1 and 2 of the General Allegations, paragraphs 3 through 5 of this Count, and sub-paragraphs 1 through 55 of the Overt Acts section of this Count, which are realleged and incorporated herein, which enterprise engaged in and the activities of which affected interstate and foreign commerce, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts chargeable under the following provisions of state law:

- a. Murder, in violation of Title 14, Louisiana Revised Statutes, Sections 24 (Principals), 26 (Criminal Conspiracy), 27 (Attempt), and 30.1 (Second

Degree Murder);

- b. Robbery, in violation of Title 14, Louisiana Revised Statutes, Sections 64 and 65, and;
- c. Acts involving conspiracy to distribute controlled substances, distribution of controlled substances, and possession with the intent to distribute controlled substances, including cocaine base (crack cocaine), cocaine hydrochloride (powder cocaine), heroin, and marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

7. It was a further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

Roles of the Defendants

8. The members of the enterprise would and did occupy the following roles, among others, in the enterprise:

- a. Defendant **MICHAEL ANDERSON, a/k/a "Mike-Mike,"** acted as a leader, a distributor of controlled substances and gunman for the enterprise.
- b. Defendant **HAROLD JONES, a/k/a "Dooley," a/k/a "Doody,"** acted as a leader and principal supplier for the enterprise, and as a distributor of controlled substances and gunman for the enterprise.
- c. Defendants **THERON JONES, a/k/a "T.J.," JEREMIAH MILLRO, a/k/a "Jerry," COREY OLIVER, DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black," JEROME SIMMONS, a/k/a "Buddy,"** and **TONY SIMMONS,**

a/k/a “Yay-Yo,” acted as distributors of controlled substances and as gunmen for the enterprise.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, defendants **MICHAEL ANDERSON**, a/k/a “Mike-Mike,” **HAROLD JONES**, a/k/a “Dooley,” a/k/a “Doody,” **THERON JONES**, a/k/a “T.J.,” **COREY OLIVER**, **DARRYL SHIELDS**, a/k/a “Snook,” a/k/a “Black,” **JEROME SIMMONS**, a/k/a “Buddy,” and **TONY SIMMONS**, a/k/a “Yay-Yo,” and others known and unknown to the Grand Jury, committed various overt acts, on or about the following times and dates, in the Eastern District of Louisiana, including but not limited to the following:

(1) On or about June 17, 2003, the defendant **HAROLD JONES** possessed a quantity of cocaine base (crack cocaine).

(2) On or about July 29, 2003, defendant **HAROLD JONES** possessed and distributed a quantity of cocaine base (crack cocaine).

(3) On or about August 13, 2003, defendant **HAROLD JONES** distributed a quantity of marijuana.

(4) On or about October 28, 2003, a co-conspirator possessed a quantity of cocaine base (crack cocaine).

(5) On or about November 18, 2003, defendant **MICHAEL ANDERSON** possessed a quantity of cocaine base (crack cocaine).

(6) On or about December 9, 2003, defendant **MICHAEL ANDERSON** possessed a quantity of cocaine base (crack cocaine).

(7) On or about January 2, 2004, defendant **HAROLD JONES** possessed and distributed a quantity of cocaine base (crack cocaine).

(8) On or about January 2, 2004, a co-conspirator possessed a firearm and a quantity of cocaine base (crack cocaine).

(9) On or about January 12, 2004, defendant **HAROLD JONES** possessed a quantity of cocaine base (crack cocaine).

(10) On or about January 21, 2004, a co-conspirator possessed a quantity of cocaine base (crack cocaine).

(11) On or about February 14, 2004, defendant **JEROME SIMMONS** possessed a quantity of powder cocaine.

(12) On or about February 17, 2004, defendant **MICHAEL ANDERSON** possessed and distributed a quantity of cocaine base (crack cocaine).

(13) On or about March 23, 2004, defendant **HAROLD JONES** shot and killed Elwood Pleasant.

(14) On or about March 23, 2004, a co-conspirator shot and killed Elwood Pleasant.

(15) On or about April 17, 2004, defendant **MICHAEL ANDERSON** shot at a New Orleans Police Officer with a firearm.

(16) On or about June 5, 2004, defendant **DARRYL SHIELDS** possessed a quantity of cocaine base (crack cocaine).

(17) On or about August 13, 2004, defendant **HAROLD JONES**, while armed with a firearm, robbed Hibernia National Bank located at 3540 Saint Charles Avenue.

(18) On or about August 13, 2004, defendant **HAROLD JONES** discharged a firearm while

robbing Hibernia National Bank located at 3540 Saint Charles Avenue.

(19) On or about August 13, 2004, a co-conspirator disguised himself with a mask and gloves while he robbed Hibernia National Bank located at 3540 Saint Charles Avenue.

(20) On or about August 13, 2004, a co-conspirator forcibly took money from a teller's station, while his co-conspirator, defendant **HAROLD JONES**, brandished a semi-automatic pistol.

(21) On or about June 24, 2004, defendant **DARRYL SHIELDS** possessed a quantity of cocaine base (crack cocaine).

(22) On or about November 5, 2004, defendant **TONY SIMMONS** possessed a quantity of cocaine base (crack cocaine).

(23) On or about February 17, 2005, defendant **JEROME SIMMONS** possessed powder cocaine.

(24) On or about June 30, 2005, defendant **MICHAEL ANDERSON** possessed a quantity of heroin.

(25) On or about July 12, 2005, defendant **MICHAEL ANDERSON** robbed Ronnie Meade of a bicycle while armed with a firearm.

(26) On or about July 13, 2005, defendant **MICHAEL ANDERSON**, who was incarcerated on an armed robbery charge, telephoned **DARRYL SHIELDS**.

(27) On or about July 13, 2005, defendant **DARRYL SHIELDS** facilitated a conversation by cellular telephone between defendant **MICHAEL ANDERSON**, who was incarcerated at the time, and Ronnie Meade.

(28) On or about July 14, 2005, defendant **DARRYL SHIELDS** helped defendant **TONY SIMMONS** obtain a firearm.

(29) On or about July 14, 2005, defendant **TONY SIMMONS** fatally shot Ronnie Meade.

(30) On or about July 16, 2005, defendant **TONY SIMMONS** possessed and discharged a firearm.

(31) On or about March 27, 2006, defendant **MICHAEL ANDERSON** possessed a quantity of heroin.

(32) On or about May 19, 2006, defendant **DARRYL SHIELDS** possessed a quantity of cocaine base (crack cocaine).

(33) On or about June 2, 2006, defendant **MICHAEL ANDERSON** shot at J.T. and K.M.

(34) On or about June 22, 2006, defendant **COREY OLIVER** possessed a quantity of cocaine base (crack cocaine) and a quantity of heroin.

(35) On or about September 4, 2006, defendants **COREY OLIVER, THERON JONES** and **DARRYL SHIELDS** rode on bicycles to Washington Street and Dryades Street.

(36) On or about September 4, 2006, defendant **DARRYL SHIELDS** shot C.A.

(37) On or about September 4, 2006, defendant **DARRYL SHIELDS** shot J.Y.

(38) On or about September 4, 2006, defendant **DARRYL SHIELDS** shot and killed Herbert Lane.

(39) On or about December 7, 2006, defendant **DARRYL SHIELDS** possessed and distributed a quantity of cocaine base (crack cocaine).

(40) On or about January 4, 2006, defendant **DARRYL SHIELDS** shot and killed Kevin Williams.

(41) On or about January 6, 2006, defendant **DARRYL SHIELDS** possessed a firearm.

(42) Sometime between January 2005 and July 2006, defendant **MICHAEL ANDERSON** robbed J.S. of drug proceeds at gunpoint.

(43) On or about April 17, 2007, defendant **COREY OLIVER** possessed a firearm and a quantity of marijuana.

(44) On or about August 2007, defendants **TONY SIMMONS, DARRYL SHIELDS**, and another member of the enterprise, were riding together in a car.

(45) On or about August 2007, defendant **TONY SIMMONS** possessed a firearm while discussing his intent to kill two rival gang members.

(46) On or about August 2007, defendant **DARRYL SHIELDS** possessed a firearm while discussing his intent to kill two rival gang members.

(47) On or about August 2007, another member of the enterprise possessed a firearm while discussing his intent to kill two rival gang members.

(48) On or about September 3, 2007, defendant **THERON JONES** possessed a firearm.

(49) On or about November 2, 2007, defendant **TONY SIMMONS** possessed a firearm.

(50) Sometime between November 2007 and November 2008, defendant **THERON JONES** threatened a witness to testify falsely at defendant **TONY SIMMONS'** trial on November 18, 2008.

(51) Sometime between November 2007 and November 2008, defendant **TONY SIMMONS** asked an individual to sign an affidavit providing false information as to Simmons' November 2, 2007, firearm arrest.

(52) On or about December 27, 2007, defendant **DARRYL SHIELDS** shot B.P.

(53) On or about December 27, 2007, defendant **JEROME SIMMONS** shot B.P.

(54) On March 28, 2010, defendant **THERON JONES** possessed a firearm.

(55) On April 7, 2010, defendant **THERON JONES** possessed a firearm and a quantity of cocaine base (crack cocaine) and marijuana.

SPECIAL SENTENCING ALLEGATIONS

The Grand Jury further alleges that:

1. Beginning on a date unknown, but prior to January 2003, and continuing to on or about the date of this Superseding Indictment, in the Eastern District of Louisiana and elsewhere, defendants **MICHAEL ANDERSON, a/k/a "Mike-Mike," HAROLD JONES, a/k/a "Dooley," a/k/a "Doody," THERON JONES, a/k/a "T.J.," COREY OLIVER, DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black," JEROME SIMMONS, a/k/a "Buddy," and TONY SIMMONS, a/k/a "Yay-Yo,"** and others known and unknown to the Grand Jury, combined, conspired, confederated and agreed with each other to knowingly and intentionally distribute 280 grams or more of cocaine base (crack 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.

2. On March 23, 2004, in the Eastern District of Louisiana and elsewhere, defendant **HAROLD JONES, a/k/a "Dooley," a/k/a "Doody,"** committed an act involving murder, to wit, with the specific intent to kill and inflict great bodily harm, he and others known to the Grand Jury, did kill Elwood Pleasant, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1 and 24.

3. On July 14, 2005, in the Eastern District of Louisiana and elsewhere, defendants **MICHAEL ANDERSON, a/k/a "Mike-Mike," DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** and **TONY SIMMONS, a/k/a "Yay-Yo,"** committed an act involving murder, to wit, with

the specific intent to kill and inflict great bodily harm, did kill Ronnie Meade, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1 and 24.

4. On September 4, 2006, in the Eastern District of Louisiana and elsewhere, defendant **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** along with others known and unknown to the Grand Jury, committed an act involving murder, to wit, with the specific intent to kill and inflict great bodily harm, did kill Herbert Lane, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1 and 24.

5. On January 4, 2007, in the Eastern district of Louisiana and elsewhere, defendant **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** committed an act involving murder, to wit, with the specific intent to kill and inflict great bodily harm, did kill Kevin Williams, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1 and 24.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT 2

(Conspiracy to Distribute Controlled Substances)

THE CONSPIRACY:

Beginning on a date unknown, but prior to January 2003, and continuing to on or about the date of this Superseding Indictment, in the Eastern District of Louisiana, the defendants **MICHAEL ANDERSON, a/k/a "Mike-Mike," HAROLD JONES, a/k/a "Dooley," a/k/a "Doody," THERON JONES, a/k/a "T.J.," COREY OLIVER, DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black," JEROME SIMMONS, a/k/a "Buddy,"** and **TONY SIMMONS, a/k/a "Yay-Yo,"** knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons known and unknown to the Grand Jury, to distribute 280 grams or more of cocaine

base (“crack cocaine”) and a quantity of cocaine hydrochloride, both Schedule II narcotic drug controlled substances, and a quantity of heroin and a quantity of marijuana, both Schedule I drug controlled substances; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), and 841(b)(1)(D); all in violation of Title 21, United States Code, Section 846.

COUNT 3

(Conspiracy to Possess Firearms)

Beginning on a date unknown, but prior to January 2003, and continuing to on or about the date of this Superseding Indictment, in the Eastern District of Louisiana, the defendants, **MICHAEL ANDERSON, a/k/a “Mike-Mike,” HAROLD JONES, a/k/a “Dooley,” a/k/a “Doody,” THERON JONES, a/k/a “T.J.,” COREY OLIVER, DARRYL SHIELDS, a/k/a “Snook,” a/k/a “Black,” JEROME SIMMONS, a/k/a “Buddy,” and TONY SIMMONS, a/k/a “Yay-Yo,”** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, during and in relation to a crime of violence and a drug trafficking crime, to use and carry firearms, and possess firearms in furtherance of a crime of violence and a drug trafficking crime as alleged in Counts 1 and 2, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances; all in violation of Title 18, United States Code, Section 924(o).

COUNT 4

(Murder in Aid of Racketeering)

1. At all times relevant to this Superseding Indictment, the enterprise as more fully described in Paragraphs 1 through 5, 8 and the Overt Acts section of Count 1 of this Superseding Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a

group of individuals associated in fact which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Superseding Indictment, the above-described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, in violation of Title 14, Louisiana Revised Statutes, Sections 24, 26, 27, and 30.1; robbery, in violation of Title 14, Louisiana Revised Statutes, Sections 64 and 65; and the distribution of controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

3. On or about March 23, 2004, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing their position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **HAROLD JONES, a/k/a "Dooley," a/k/a "Doody,"** and **JEREMIAH MILLRO, a/k/a "Jerry,"** with others known and unknown to the Grand Jury, did murder Elwood Pleasant, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 5

(Causing Death Through the Use of a Firearm)

On or about March 23, 2004, in the Eastern District of Louisiana, the defendants, **HAROLD JONES, a/k/a "Dooley," a/k/a "Doody,"** and **JEREMIAH MILLRO, a/k/a "Jerry,"** did

knowingly use and carry a firearm during and in relation to a crime of violence and drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances, as set forth in Counts 1 and 2 of this Superseding Indictment; and in the course thereof caused the death of Elwood Pleasant through the use of a firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111, in that defendants willfully, deliberately, maliciously and with malice aforethought, unlawfully killed and caused the death of Elwood Pleasant; all in violation of Title 18, United States Code, Sections 924(j)(1) and 2.

COUNT 6
(Murder of in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.

2. On or about July 14, 2005, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing their position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **MICHAEL ANDERSON, a/k/a "Mike-Mike," DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** and **TONY SIMMONS, a/k/a "Yay-Yo,"** with others known and unknown to the Grand Jury, did murder Ronnie Meade, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 7

(Causing Death Through the Use of a Firearm)

On or about July 14, 2005, in the Eastern District of Louisiana, the defendants, **MICHAEL ANDERSON, a/k/a "Mike-Mike," DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** and **TONY SIMMONS, a/k/a "Yay-Yo,"** did knowingly use and carry a firearm during and in relation to a crime of violence and drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances, as set forth in Counts 1 and 2 of this Superseding Indictment; and in the course thereof caused the death of Ronnie Meade through the use of a firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111, in that defendants willfully, deliberately, maliciously and with malice aforethought, unlawfully killed and caused the death of Ronnie Meade; all in violation of Title 18, United States Code, Sections 924(j)(1) and 2.

COUNT 8

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.
2. On or about September 4, 2006, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** with others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon on C.A., in violation of the laws of the

State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 9

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.

2. On or about September 4, 2006, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** with others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon J.Y., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 10

(Attempted Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.

2. On or about September 4, 2006, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** with others known and unknown to the

Grand Jury, did attempt to murder C.A., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1, 27 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT 11

(Attempted Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.

2. On or about September 4, 2006, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** with others known and unknown to the Grand Jury, did attempt to murder J.Y, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1, 27 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT 12

(Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.

2. On or about September 4, 2006, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise engaged in racketeering activity, the defendant,

DARRYL SHIELDS, a/k/a “Snook,” a/k/a “Black,” with others known and unknown to the Grand Jury, did murder Herbert Lane, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 13

(Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime)

On or about September 4, 2006, in the Eastern District of Louisiana, the defendant, **DARRYL SHIELDS, a/k/a “Snook,” a/k/a “Black,”** with others known and unknown to the Grand Jury, did knowingly carry and use a firearm during and in relation to a crime of violence and a drug trafficking crime, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances, as set forth in Counts 1 and 2 of this Superseding Indictment, which are incorporated herein; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 14

(Causing Death Through the Use of a Firearm)

On or about September 4, 2006, in the Eastern District of Louisiana, the defendant, **DARRYL SHIELDS, a/k/a “Snook,” a/k/a “Black,”** did knowingly use and carry a firearm during and in relation to a crime of violence and drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances, as set forth in Counts 1 and 2 of this Superseding Indictment; and in the course thereof caused the death of Herbert Lane through the use of a firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111, in that defendant

willfully, deliberately, maliciously and with malice aforethought, unlawfully killed and caused the death of Herbert Lane; all in violation of Title 18, United States Code, Sections 924(j)(1) and 2.

COUNT 15

(Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.

2. On or about January 4, 2007, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** with others known and unknown to the Grand Jury, did murder Kevin Williams, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 16

(Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime)

On or about January 4, 2007, in the Eastern District of Louisiana, the defendant, **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** with others known and unknown to the Grand Jury, did knowingly carry and use a firearm during and in relation to a crime of violence and a drug trafficking crime, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances, as set forth in Counts 1 and 2 of this Superseding Indictment, which are incorporated herein; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 17

(Causing Death Through the Use of a Firearm)

On or about January 4, 2007, in the Eastern District of Louisiana, the defendant, **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** did knowingly use and carry a firearm during and in relation to a crime of violence and drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances, as set forth in Counts 1 and 2 of this Superseding Indictment; and in the course thereof caused the death of Kevin Williams through the use of a firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111, in that defendant willfully, deliberately, maliciously and with malice aforethought, unlawfully killed and caused the death of Kevin Williams; all in violation of Title 18, United States Code, Sections 924(j)(1) and 2.

COUNT 18

(Felon in Possession of a Firearm)

On or about November 2, 2007, in the Eastern District of Louisiana, the defendant, **TONY SIMMONS, a/k/a "Yay-Yo,"** having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a felony conviction on January 28, 2005, in Orleans Parish Criminal District Court, Case No. 454-083 "A," for possession with intent to distribute crack cocaine, in violation of La-R.S. 40:967(B)(1); did knowingly possess in and affecting foreign and interstate commerce, a firearm, to wit: a Beretta Model 92FS, 9mm caliber semi-automatic pistol bearing serial number BER450379Z; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 19

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.

2. On or about December 27, 2007, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** and **JEROME SIMMONS, a/k/a "Buddy,"** with others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon B.P., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 20

(Attempted Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.

2. On or about December 27, 2007, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing his position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black,"** and **JEROME SIMMONS, a/k/a "Buddy,"** with others known and unknown to the Grand Jury, did attempt to murder B.P., in violation of the

laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1, 27 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(5) and 2.

COUNT 21

(Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime)

On or about December 27, 2007, in the Eastern District of Louisiana, the defendants, **DARRYL SHIELDS, a/k/a “Snook,” a/k/a “Black,”** and **JEROME SIMMONS, a/k/a “Buddy,”** with others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to a crime of violence and a drug trafficking crime, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances, as set forth in Counts 1 and 2 of this Superseding Indictment, which are incorporated herein; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 22

(Felon in Possession of a Firearm)

On or about December 27, 2007, in the Eastern District of Louisiana, the defendant, **DARRYL SHIELDS, a/k/a “Snook,” a/k/a “Black,”** having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on March 15, 2007, in Orleans Parish Criminal District Court, Section G, Case No. 466-711, for possession of cocaine, in violation of LA-R.S. 40:967(C)(2), knowingly and intentionally possessed in and affecting foreign and interstate commerce, a firearm; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 23

(Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime)

On or about March 28, 2010, in the Eastern District of Louisiana, the defendant, **THERON JONES, a/k/a "T.J.,"** with others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to a crime of violence and a drug trafficking crime, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances, as set forth in Counts 1 and 2 of this Superseding Indictment, which are incorporated herein; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 24

(Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime)

On or about April 7, 2010, in the Eastern District of Louisiana, the defendant, **THERON JONES, a/k/a "T.J.,"** with others known and unknown to the Grand Jury, did knowingly use and carry a firearm during and in relation to a crime of violence and a drug trafficking crime, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances, as set forth in Counts 1 and 2 of this Superseding Indictment, which are incorporated herein; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

NOTICE OF RICO FORFEITURE

1. The allegations contained in Count 1 of this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 1963.

2. Pursuant to Title 18, United States Code, Section 1963, upon conviction of an offense in violation of Title 18, United States Code, Section 1962, the defendants, **MICHAEL**

ANDERSON, a/k/a "Mike-Mike," HAROLD JONES, a/k/a "Dooley," a/k/a "Doody,"
THERON JONES, a/k/a "T.J.," COREY OLIVER, DARRYL SHIELDS, a/k/a "Snook,"
a/k/a "Black," JEROME SIMMONS, a/k/a "Buddy," and TONY SIMMONS, a/k/a "Yay-
Yo," shall forfeit to the United States of America:

- a. any interest acquired or maintained in violation of section 1962;
- b. any interest in, security of, claim against, and/or property and contractual rights of any kind affording a source of influence over any enterprise which the defendants established, operated, controlled, conducted, or participated in the conduct of, in violation of section 1962;
- c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of 1962; and
- d. Additionally, the properties to be forfeited as involved in the aforesaid violations of Section 1962 which include, but are not limited to:

Universal Model M1, .38 caliber rifle,
Serial Number 336548;

Manurhin, Model International,
PPK/s, .380 caliber semi-automatic
pistol, Serial Number 2621138;

Berretta Model 92FS, 9mm caliber
semi-automatic pistol, Serial Number
BER2427342;

Browning Hi Power 9mm caliber
pistol, Serial Number 72C52537;

Jimenez Arms 9mm caliber pistol,
Serial Number 010174;

Taurus, Model PT99, 9mm caliber semi
-automatic pistol, Serial Number L83311;

Norinco, Model SKS, 7.62 x 39 caliber
rifle, Serial Number 250000497C;

82 rounds of 9mm ammunition;

16 rounds of .38 caliber ammunition;

7 rounds of .30 caliber ammunition;

48 rounds of .45 caliber ammunition;

3. 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 18, United States Code, Section 1963(m).

All in violation of Title 18, United States Code, Section 1963.

NOTICE OF GUN FORFEITURE

1. The allegations of Counts 3, 5, 7, 13, 14, 16, 17, 18, 21, 22, 23 and 24 of this Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924(d)(1), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 3, 5, 7, 13, 14, 16, 17, 18, 21, 22, 23 and 24, defendants, **MICHAEL ANDERSON, a/k/a "Mike-Mike," HAROLD JONES, a/k/a "Dooley," a/k/a "Doody," THERON JONES, a/k/a "T.J.," JEREMIAH MILLRO, a/k/a "Jerry," COREY OLIVER, DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black," JEROME SIMMONS, a/k/a "Buddy," and TONY SIMMONS, a/k/a "Yay-Yo,"** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), made applicable through Title 28, United States Code, Section 2461(c), any firearm or ammunition, which was involved in or used in a knowing violation of Title 18, United States Code, Sections 922(g)(1), 924(c)(1)(A), 924(j)(1) and 924(o), as alleged in Counts 3, 5, 7, 13, 14, 16, 17, 18, 21, 22, 23 and 24, of this Superseding Indictment, including, but not limited to:

Universal Model M1, .38 caliber rifle,
Serial Number 336548;

Manurhin, Model International,
PPK/s, .380 caliber semi-automatic
pistol, Serial Number 2621138;

Berretta Model 92FS, 9mm caliber
semi-automatic pistol, Serial Number
BER2427342;

Browning Hi Power 9mm caliber
pistol, Serial Number: 72C52537;

Jimenez Arms 9mm caliber pistol,
Serial Number: 010174;

Taurus, Model PT99, 9mm caliber semi
-automatic pistol, Serial Number L83311;

Norinco, Model SKS, 7.62 x 39 caliber
rifle, Serial Number 250000497C;

82 rounds of 9mm ammunition;

16 rounds of .38 caliber ammunition;

7 rounds of .30 caliber ammunition;

48 rounds of .45 caliber ammunition;

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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 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 which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 924(d)(1), made applicable through Title 28, United States Code, Section 2461(c)

NOTICE OF DRUG FORFEITURE

1. The allegations of Count 2 of this Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offenses alleged in Count 2, the defendants, **MICHAEL ANDERSON, a/k/a "Mike-Mike," HAROLD JONES, a/k/a "Dooley," a/k/a "Doody," THERON JONES, a/k/a "T.J.," COREY OLIVER, DARRYL SHIELDS, a/k/a "Snook," a/k/a "Black," JEROME SIMMONS, a/k/a "Buddy," and TONY SIMMONS, a/k/a "Yay-Yo,"** shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Count 2 of this Superseding Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, 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 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 which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

NOTICE OF SPECIAL FINDINGS

1. The Grand Jury incorporates by reference and realleges the allegations contained in Counts 4, 5, 6, 7, 12, 14, 15, and 17, and makes the following special findings:

2. As to Counts 4 and 5, defendant **HAROLD JONES, a/k/a “Dooley,” a/k/a “Doody,”**

- a. was 18 years of age or older at the time of the offense;
- b. intentionally killed Elwood Pleasant (18 U.S.C. § 3591(a)(2)(A));
- c. intentionally inflicted serious bodily injury that resulted in the death of Elwood Pleasant;
- d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Elwood Pleasant died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));
- e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Elwood Pleasant died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));
- f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592 (c)(5)); and

- g. committed the offense after substantial planning and premeditation to cause the death of Elwood Pleasant (18 U.S.C. § 3592(c)(9)).

3. As to Counts 6 and 7, defendants **MICHAEL ANDERSON, a/k/a “Mike-Mike,”** and **DARRYL SHIELDS, a/k/a “Snook,” a/k/a “Black,”**

- a. were 18 years of age or older at the time of the offenses;
- b. intentionally killed Ronnie Meade (18 U.S.C. § 3591(a)(2)(A));
- c. intentionally inflicted serious bodily injury that resulted in the death of Ronnie Meade (18 U.S.C. § 3591(a)(2)(B));
- d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Ronnie Meade died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));
- e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Ronnie Meade died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));
- f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592 (c)(5)); and
- g. committed the offense after substantial planning and premeditation to cause the death of Ronnie Meade (18 U.S.C. § 3592(c)(9)).

4. As to Counts 12 and 14, **DARRYL SHIELDS, a/k/a “Snook,” a/k/a “Black,”**
defendant,
- a. was 18 years of age or older at the time of the offenses;
 - b. intentionally killed Herbert Lane (18 U.S.C. § 3591(a)(2)(A));
 - c. intentionally inflicted serious bodily injury that resulted in the death of Herbert Lane (18 U.S.C. § 3591(a)(2)(B));
 - d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Herbert Lane died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));
 - e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Herbert Lane died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));
 - f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592(c)(5)); and
 - g. committed the offense after substantial planning and premeditation to cause the death of Herbert Lane (18 U.S.C. § 3592(c)(9)).

5. As to Counts 15 and 17, **DARRYL SHIELDS, a/k/a “Snook,” a/k/a “Black,”**
defendant,

- a. was 18 years of age or older at the time of the offenses;
- b. intentionally killed Kevin Williams (18 U.S.C. § 3591(a)(2)(A));
- c. intentionally inflicted serious bodily injury that resulted in the death of Kevin Williams (18 U.S.C. § 3591(a)(2)(B));
- d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Kevin Williams died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));
- e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Kevin Williams died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));
- f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592(c)(5)); and

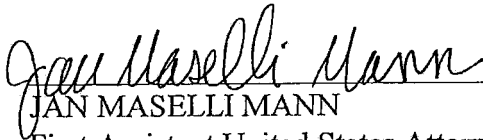
- g. committed the offense after substantial planning and premeditation to
cause the death of Kevin Williams (18 U.S.C. § 3592(c)(9)).

A TRUE BILL:


FOREPERSON


JIM LETTEN

United States Attorney
Louisiana Bar. Roll No. 8517


JAN MASELLI MANN

First Assistant United States Attorney
Louisiana Bar Roll No. 9020


ELIZABETH PRIVITERA

Assistant United States Attorney
Louisiana Bar Roll No. 27042

New Orleans, Louisiana
August 6, 2010

FACT SHEET

UNITED STATES V. MICHAEL ANDERSON ET AL

**SUPERSEDING INDICTMENT FOR VIOLATIONS OF THE RACKETEER
INFLUENCED CORRUPT ORGANIZATION ACT, THE VIOLENT CRIME IN AID OF
RACKETEERING ACT, THE FEDERAL CONTROLLED SUBSTANCES ACT AND
THE FEDERAL GUN CONTROL ACT**

COUNT	CHARGE	DEFENDANT	POSSIBLE MAXIMUM SENTENCE
1	Racketeer Influenced and Corrupt Organizations Conspiracy	MICHAEL ANDERSON, HAROLD JONES, THERON JONES, COREY OLIVER, DARRYL SHIELDS, JEROME SIMMONS and TONY SIMMONS	Life imprisonment \$4 million fine 3 years supervised release
2	Conspiracy to Distribute Controlled Substances	MICHAEL ANDERSON, HAROLD JONES, THERON JONES, COREY OLIVER, DARRYL SHIELDS, JEROME SIMMONS, TONY SIMMONS,	Life imprisonment \$4 million fine 3 years supervised release
3	Conspiracy to Possess Firearms	MICHAEL ANDERSON, HAROLD JONES, THERON JONES, COREY OLIVER, DARRYL SHIELDS, JEROME SIMMONS, TONY SIMMONS	20 years \$250,000 fine 3 years supervised release
4	Murder in Aid of Racketeering	HAROLD JONES, JEREMIAH MILLRO,	life imprisonment or death penalty
5	Causing Death Through the Use of a Firearm	HAROLD JONES, JEREMIAH MILLRO	life imprisonment or death penalty
6	Murder in Aid of Racketeering	MICHAEL ANDERSON DARRYL SHIELDS, TONY SIMMONS	life imprisonment or death penalty

7	Causing Death Through the Use of a Firearm	MICHAEL ANDERSON, DARRYL SHIELDS, TONY SIMMONS	life imprisonment or death penalty
8, 9	Assault with a Dangerous Weapon in Aid of Racketeering	DARRYL SHIELDS	20 years imprisonment \$250,000 fine 3 years supervised release
10, 11	Attempted Murder in Aid of Racketeering	DARRYL SHIELDS	30 years imprisonment \$250,000 fine 3 years supervised release
12, 15	Murder in Aid of Racketeering	DARRYL SHIELDS	life imprisonment or death penalty
13, 16	Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime	DARRYL SHIELDS	life imprisonment \$250,000 fine 5 years supervised release
14, 17	Causing Death Through the Use of a Firearm	DARRYL SHIELDS	life imprisonment or death penalty
18	Felon in Possession of a Firearm	TONY SIMMONS	10 years imprisonment \$250,000 fine 3 years supervised release
19	Assault with a Dangerous Weapon in Aid of Racketeering	DARRYL SHIELDS JEROME SIMMONS	20 years imprisonment \$250,000 fine 3 years supervised release
20	Attempted Murder in Aid of Racketeering	DARRYL SHIELDS JEROME SIMMONS	30 years imprisonment \$250,000 fine 3 years supervised release
21	Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime	DARRYL SHIELDS JEROME SIMMONS	life imprisonment \$250,000 fine 5 years supervised release
22	Felon in Possession of a Firearm	DARRYL SHIELDS	10 years \$250,000 fine 3 years supervised release
23, 24	Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime	THERON JONES	life imprisonment \$250,000 fine 5 years supervised release

