

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**THIRD SUPERSEDING INDICTMENT FOR VIOLATIONS OF THE FEDERAL GUN
CONTROL ACT, THE FEDERAL CONTROLLED SUBSTANCES ACT
AND FOR VIOLENT CRIMES IN AID OF RACKETEERING**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 13-227
v.	*	SECTION: "B"(1)
TRAVIS SCOTT	*	VIOLATIONS: 21 U.S.C. § 846
a/k/a "Trap," a/k/a "Slim"		21 U.S.C. § 841(a)
STANLEY SCOTT	*	21 U.S.C. § 841(b)(1)(A)
a/k/a "Stizzle"		21 U.S.C. § 841(b)(1)(C)
SHAWN SCOTT	*	18 U.S.C. § 924(c)
a/k/a "Shizzle"		18 U.S.C. § 924(o)
AKEIN SCOTT	*	18 U.S.C. § 922(g)(1)
a/k/a "Keemy"		18 U.S.C. § 924(a)(2)
JEREMIAH JACKSON	*	18 U.S.C. § 1512(b)(3)
a/k/a "Rocky"		18 U.S.C. § 1952(a)(3)
BRIAN BENSON	*	18 U.S.C. § 1959(a)(3)
a/k/a "Dub," a/k/a "Dubba"		18 U.S.C. § 1962(d)
	*	*

The Grand Jury charges that:

COUNT 1
(Racketeer Influenced and Corrupt Organizations Conspiracy)

The Enterprise

1. At all relevant times, defendants **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," **STANLEY SCOTT**, a/k/a "Stizzle," **SHAWN SCOTT**, a/k/a "Shizzle," **AKEIN SCOTT**, a/k/a

“Keemy,” **JEREMIAH JACKSON**, a/k/a “Rocky,” and **BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” and others known and unknown to the Grand Jury, were members and associates of an organization known as “Frenchmen/Derbigny” (hereinafter “FnD”). FnD engaged in, among other things, conspiracy to distribute controlled substances, distribution of controlled substances, acts involving murder, assault with firearms, obstruction of justice, interstate travel in furtherance of racketeering, and other offenses. At all relevant times, FnD operated principally in the Seventh Ward of New Orleans, within the jurisdiction of the Eastern District of Louisiana.

2. FnD, including its leadership, membership and associates, constituted an “enterprise,” as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise was engaged in, and its activities affected, interstate and foreign commerce.

3. Beginning in 2001, FnD operated mainly near the intersection of Frenchmen Street and North Derbigny Street in the Seventh Ward. At that time, FnD’s members primarily sold cocaine base (“crack”), and FnD’s drug distribution territory, or “turf,” was bounded generally by North Claiborne Avenue, Touro Street, North Roman Street, and Elysian Fields Avenue.

4. In 2001, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” became a member of FnD, and began selling cocaine base (“crack”) in FnD’s turf. Around 2004, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” began taking a leadership role in FnD, and in doing so he expanded FnD’s narcotics operations to include heroin sales.

5. In or around 2004, FnD endeavored to expand its turf, and in doing so came into conflict with other rival drug gangs. One such drug gang was the St. Anthony gang, whose members also sold heroin and cocaine base (“crack”) in the Seventh Ward neighborhood.

6. In or around 2006, FnD began using violence in order to assert its authority over its turf. From 2006 and through 2014, **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” **JEREMIAH JACKSON**, a/k/a “Rocky,” and **BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” joined FnD as members in order to further its drug distribution and violence towards rival gangs.

7. In or around 2008, FnD members began to use the store located at 1641 Frenchmen Street for FnD’s narcotics distribution operation. At that time, the store operated under the name F&D Groceries. F&D Groceries was granted a Food Stamp Program license, which permitted it to sell qualified food items in return for food stamps administered by the Food and Nutrition Service (herein “FNS”) of the United States Department of Agriculture (herein “USDA”). FnD members initially used threats of violence and intimidation in order to coerce the owners of F&D Groceries to permit FnD members to use the store for drug dealing.

8. Beginning in 2011, the store changed ownership and began operating as Frenchmen Meat Market, LLC. The owners and employees of the Frenchmen Meat Market, including T.M., E.T., and K.T., engaged in food stamp fraud for their own benefit. Employees of the store would permit customers to use their Electronic Benefits Transfer (“EBT”) food stamp card to make fraudulent transactions in order to receive U.S. currency. Employees of the store would keep a portion of the fraudulently obtained proceeds as a “fee” for the transaction.

9. The food stamp fraud perpetrated by employees of Frenchmen Meat Market provided additional benefits to FnD members. Specifically, customers who obtained cash

through a fraudulent food stamp transaction could then use that currency immediately to purchase heroin, cocaine base (“crack”), marijuana, and other controlled substances from FnD members inside the store.

10. Over the course of the conspiracy, FnD operated from the Frenchmen Meat Market, where FnD members distributed controlled substances to customers and stored firearms in a secure location away from police detection. Members of FnD profited through illegal drug sales. Through a pattern of violence, FnD successfully expanded its turf in order to further its drug distribution activities. By 2014, the boundaries of the organization’s territory were North Claiborne Avenue, St. Anthony Street, the I-10 Interstate, North Johnson Street, and Elysian Fields Avenue. Furthermore, FnD entered into informal alliances with other drug distribution gangs, including the Frenchmen/Villere gang that operates south of North Claiborne Avenue in the vicinity of Frenchmen Street and North Villere Street, New Orleans, Louisiana.

Purposes of the Enterprise

11. 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 illegal distribution of controlled substances in the territory controlled by the enterprise;
 - b. Preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, and threats of violence, including murder, attempted murder, assault and robbery;
 - c. Promoting and enhancing the activities and authority of the enterprise and its members and associates;

- d. Keeping rivals, victims, and witnesses in fear of the enterprise and in fear of its members and associates through violence and threats of violence;
- e. Providing financial support and information to members and associates of the enterprise, including those who were incarcerated for committing acts of violence, robbery, illegal distribution of controlled substances, and other offenses; and,
- f. Providing assistance to members and associates 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

12. 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 engaged in the illegal distribution of controlled dangerous substances, including but not limited to, heroin, cocaine base (“crack”), and marijuana.
- b. Members and associates of the enterprise committed, conspired to commit, and attempted to commit acts of violence to protect and expand the enterprise’s criminal operations, and in connection with rivalries with members of other New Orleans street gangs.
- c. Members of the enterprise and their associates benefitted from fraudulent electronic benefit transfer (“EBT”) card transactions, whereby customers would

use those illegally obtained funds to purchase heroin, cocaine base (“crack”), marijuana, and other controlled substances from members and associates of the enterprise.

- d. Members of the enterprise and their associates possessed and utilized firearms to prevent competition from other drug dealers in and around the geographic area utilized and controlled by the conspirators.
- e. Members of the enterprise and their associates possessed and utilized firearms in order to protect their illegal drug trafficking in and around the geographic area utilized and controlled by the conspirators.
- f. Members of the enterprise and their associates committed shootings, various firearms offenses, and violent acts, including but not limited to attempted murder, robbery, aggravated battery, illegal possession of a firearm, and aggravated assault in order to maintain and advance the goals of the enterprise, the individual conspirator’s role within the enterprise and to control the specific geographic area utilized and controlled by the conspirators.
- g. Members of the enterprise and their associates promoted a climate of fear throughout the area of its operations and adjoining neighborhoods through violence and threats of violence.
- h. Members of the enterprise and their associates committed, attempted, and threatened to commit acts of violence, in an effort to obstruct justice and thwart police investigations.
- i. Members of the enterprise and their associates maintained and circulated a collection of firearms for use in criminal activity by other conspirators.

- j. Members of the enterprise and their associates used telephones, even while in jail, to give directions and advice to each other in an effort to circumvent the criminal justice system, to obstruct justice, to distribute controlled substances, to illegally possess firearms, to intimidate witnesses, and to impose discipline on members of the conspiracy who may have acted in a reckless manner by bringing unwanted attention by law enforcement officials to the members of the conspiracy.
- k. Members of the enterprise and their associates bragged about their illegal activity to each other and to others outside of the enterprise.
- l. Members of the enterprise and their associates targeted and retaliated against members of rival drug groups, in order to preserve the operations and the reputation of the enterprise and to protect the enterprise's "turf" in the Seventh Ward of New Orleans.

Roles of the Defendants

- 13. The members of the enterprise would and did occupy the following roles, among others, in the enterprise:
 - a. Defendant **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," acted as the leader of FnD. He assisted members as the main supplier, processor and distributor of heroin to the other members of the enterprise and to retail customers. He provided advice to other members of the enterprise regarding sales of illegal drugs. He also maintained discipline among members of the enterprise and directed members of the enterprise to commit violent acts in order to preserve the turf controlled by the enterprise. He further advised and assisted members of the enterprise in avoiding detection by law enforcement officials.

- b. Defendant **BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” acted as a lieutenant in FnD, supervising the drug distribution activity for **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” while **TRAVIS SCOTT** was outside of New Orleans. **BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” maintained custody of **TRAVIS SCOTT**’s cellular phone in order to continue servicing FnD’s heroin customers while **TRAVIS SCOTT** was outside of New Orleans.
- c. Defendants **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” **JEREMIAH JACKSON**, a/k/a “Rocky,” acted as drug distributors and as gunmen for the enterprise. These individuals acted as enforcers by using violence against rival gang members.

The Racketeering Conspiracy

14. Beginning on a date unknown, but not later than June 26, 2006, and continuing to on or about March 10, 2014, in the Eastern District of Louisiana and elsewhere, the defendants, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” **JEREMIAH JACKSON**, a/k/a “Rocky,” and **BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” and other persons known and unknown to the Grand Jury, being persons employed by and associated with FnD, an enterprise, which engaged in, and the activities of which affected interstate commerce, knowingly and intentionally combined, conspired 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 involving:

- a. Murder, in violation of Title 14, Louisiana Revised Statutes, Sections 26, 27, and 30.1;
- b. Robbery, in violation of Title 14, Louisiana Revised Statutes, Section 65; and multiple acts indictable under:
 - i. The illegal distribution of controlled substances, including heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841, 843, and 846;
 - ii. Tampering with a witness, in violation of Title 18, United States Code, Section 1512(b)(3);
 - iii. Interstate travel in aid of racketeering, in violation of Title 18, United States Code, Section 1952(a)(3).

15. 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.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, defendants **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” **JEREMIAH JACKSON**, a/k/a “Rocky,” and **BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” and others known and unknown to the Grand Jury, committed and caused to be committed various overt acts, on or about the following dates, in the Eastern District of Louisiana and elsewhere, including but not limited to the following:

- (1) From June 26, 2006, and continuing to on or about March 10, 2014, defendants **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” **JEREMIAH JACKSON**, a/k/a “Rocky,” and **BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” distributed heroin, a Schedule I drug controlled substance, and cocaine base (crack cocaine), a Schedule II drug controlled substance.
- (2) On or about May 15, 2009, at or near 7005 Lawrence Rd., Apt. 322, New Orleans, Louisiana, defendant **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” possessed over 200 rounds of ammunition and drug distribution paraphernalia.
- (3) On or about April 16, 2011, **JEREMIAH JACKSON**, a/k/a “Rocky,” attempted to murder D.A. by shooting at him with a firearm.
- (4) On or about March 22, 2012, **STANLEY SCOTT**, a/k/a “Stizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” and **JEREMIAH JACKSON**, a/k/a “Rocky,” attempted to murder C.L., L.W., and T.L. by shooting at them with firearms.
- (5) On or about March 25, 2012, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” and **AKEIN SCOTT**, a/k/a “Keemy,” attempted to murder R.W. by shooting at him with firearms.
- (6) On or about July 16, 2012, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” attempted to murder C.L., T.H., and S.G. by shooting at them with firearms.

- (7) On or about August 4, 2012, at or near 1641 Frenchmen Street, New Orleans, Louisiana, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” robbed R.C. of a firearm.
- (8) On or about August 4, 2012, at or near 1641 Frenchmen Street, New Orleans, Louisiana **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” attempted to murder R.C. and J.B. by shooting at them with firearms.
- (9) On or about March 5, 2013, at or near 1641 Frenchmen Street, New Orleans, Louisiana, defendant **AKEIN SCOTT**, a/k/a “Keemy,” possessed a firearm.
- (10) On or about March 28, 2013, defendant **AKEIN SCOTT**, a/k/a “Keemy,” made a phone call from the Orleans Parish Prison to conspirator D.B., during which **AKEIN SCOTT** discussed the commission of violent acts against rival drug gang members.
- (11) On or about April 19, 2013, at or near the intersection of South Roman and Delachaise Streets, New Orleans, Louisiana, defendant **SHAWN SCOTT**, a/k/a “Shizzle,” possessed with the intent to distribute heroin, a Schedule I drug controlled substance.
- (12) On or about May 3, 2013, defendant **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” traveled in interstate commerce from Kansas City, Missouri, to New Orleans, Louisiana, to manage and carry on an unlawful activity, specifically a business enterprise that engaged in the distribution of heroin, a Schedule I drug

controlled substance, and cocaine base (“crack”), a Schedule II drug controlled substance.

- (13) On or about May 12, 2013, at or near 1413 Frenchmen Street, New Orleans, Louisiana, defendants **SHAWN SCOTT**, a/k/a “Shizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” attempted to murder J.T., A.L., C.W., L.P., C.W., L.E., D.C., H.B., J.W., K.A., K.B., L.R., M.H., R.P., T.M., T.J., T.R., V.G., W.H., and D.C. by shooting at them with firearms while they were walking in a Mother’s Day second-line parade.
- (14) On or about May 16, 2013, at or near 9702 Haynes Boulevard, New Orleans, Louisiana, defendant **SHAWN SCOTT**, a/k/a “Shizzle,” possessed with intent to distribute heroin, a Schedule I drug controlled substance.
- (15) On or about May 18, 2013, in the State of Missouri, defendant **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” threatened a witness, N.Y., with the intent to prevent the communication to a law enforcement officer of information relating to the attempted murder that was committed by **SHAWN SCOTT**, a/k/a “Shizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” on May 12, 2013.
- (16) On or about July 6, 2013, in New Orleans, Louisiana, defendant **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” threatened a witness, B.H., with the intent to prevent the communication to a law enforcement officer of information relating to the attempted murder that was committed by **SHAWN SCOTT**, a/k/a “Shizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” on May 12, 2013.

(17) On or about August 5, 2013, the defendant **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” traveled in interstate commerce from Kansas City, Missouri, to New Orleans, Louisiana, to manage and carry on an unlawful activity, specifically a business enterprise that engaged in the distribution of heroin, a Schedule I drug controlled substance, and cocaine base (“crack”), a Schedule II drug controlled substance.

(18) On or about August 20, 2013, **JEREMIAH JACKSON**, a/k/a “Rocky,” possessed a firearm.

Special Sentencing Allegations

The Grand Jury further alleges that:

16. Beginning on a date unknown, but prior to June 26, 2006, and continuing to on or about March 10, 2014, in the Eastern District of Louisiana and elsewhere, the defendants, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” **JEREMIAH JACKSON**, a/k/a “Rocky,” and **BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury to distribute and possess with the intent to distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I drug controlled substance, and 280 grams or more of a substance containing a detectable amount of cocaine base (crack cocaine), a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a), 841(b)(1)(A), and 846.

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

COUNT 2
(Conspiracy to Distribute Controlled Substances)

Beginning on a date unknown, but prior to June 26, 2006, and continuing to on or about March 10, 2014, in the Eastern District of Louisiana and elsewhere, the defendants, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” **JEREMIAH JACKSON**, a/k/a “Rocky,” and **BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury to distribute and possess with the intent to distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I drug controlled substance, and 280 grams or more of a substance containing a detectable amount of cocaine base (crack cocaine), a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a), 841(b)(1)(A), and 846.

COUNT 3
**(Conspiracy to Use and Possess Firearms During and In Relation to,
and in Furtherance of, a Crime of Violence and a Drug Trafficking Crime)**

Beginning on a date unknown, but prior to June 26, 2006, and continuing to on or about March 10, 2014, in the Eastern District of Louisiana and elsewhere, the defendants, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” and **JEREMIAH JACKSON**, a/k/a “Rocky,” did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury, to use and carry firearms during and in relation to and to possess firearms in furtherance of a crime of violence and a drug trafficking crime, to wit: the racketeering conspiracy charged in Count 1 of this Third Superseding Indictment and the drug distribution conspiracy charged in Count 2 of this Third Superseding Indictment, in violation of

Title 18, United States Code, Section 924(c); all in violation of Title 18, United States Code, Section 924(o).

COUNT 4
(Felon in Possession of Ammunition)

On or about May 15, 2009, in the Eastern District of Louisiana, the defendant, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on July 27, 2004, in case number 446-787 “L” in the Criminal District Court for the Parish of Orleans, State of Louisiana, for Distribution of Heroin, in violation of La. R.S. 40:966(A)(1) and 40:966(B)(1), did knowingly possess in and affecting interstate commerce ammunition, to wit: one hundred Remington .40 caliber pistol cartridges, forty-one Federal .45 caliber pistol cartridges, thirty CCI .40 caliber pistol cartridges, twenty-six Winchester .45 caliber pistol cartridges, three Blazer 9mm caliber Luger pistol cartridges, and one Winchester .40 caliber pistol cartridge; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 5
(Assault with a Dangerous Weapon in Furtherance of Racketeering)

1. At all times relevant to this Third Superseding Indictment, the enterprise as more fully described in Paragraphs 1 through 13 of Count 1 of this Third Superseding Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined by 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 Third 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 26, 27, and 30.1, and robbery, in violation of Title 14, Louisiana Revised Statutes, Section 65; and acts indictable for tampering with a witness, in violation of Title 18, United States Code, Section 1512, and interstate travel in aid of racketeering, in violation of Title 18, United States Code, Section 1952; and acts involving violations of Title 21, United States Code, Sections 841, 843, and 846.

3. On or about April 16, 2011, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **JEREMIAH JACKSON**, a/k/a “Rocky,” did assault D.A. with a dangerous weapon, to wit: a firearm, in violation of laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Section 37.4; all in violation of Title 18, United States Code, Section 1959(a)(3).

COUNT 6
**(Discharge of a Firearm During and in Relation to a
Crime of Violence and a Drug-Trafficking Crime)**

On or about April 16, 2011, in the Eastern District of Louisiana, the defendant, **JEREMIAH JACKSON**, a/k/a “Rocky,” did knowingly and intentionally use, carry, brandish, and discharge a firearm during and in relation to a crime of violence and a drug-trafficking crime for which he may be prosecuted in a court of the United States, to wit: the racketeering conspiracy charged in Count 1 of this Third Superseding Indictment and the drug distribution conspiracy charged in Count 2 of this Third Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

COUNT 7

(Assault with Dangerous Weapons in Furtherance of Racketeering)

1. Paragraphs 1 and 2 of Count 5 are realleged and incorporated by reference as though fully set forth herein.

2. On or about March 22, 2012, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **STANLEY SCOTT**, a/k/a “Stizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” and **JEREMIAH JACKSON**, a/k/a “Rocky,” did assault C.L., L.W., and T.L. with dangerous weapons, to wit: firearms, in violation of laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 8

**(Discharge of Firearms During and in Relation to a
Crime of Violence and a Drug-Trafficking Crime)**

On or about March 22, 2012, in the Eastern District of Louisiana, the defendants, **STANLEY SCOTT**, a/k/a “Stizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” and **JEREMIAH JACKSON**, a/k/a “Rocky,” did knowingly and intentionally use, carry, brandish, and discharge firearms during and in relation to a crime of violence and a drug-trafficking crime for which they may be prosecuted in a court of the United States, to wit: the racketeering conspiracy charged in Count 1 of this Third Superseding Indictment and the drug distribution conspiracy charged in Count 2 of this Third Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

COUNT 9

(Assault with Dangerous Weapons in Furtherance of Racketeering)

1. Paragraphs 1 and 2 of Count 5 are realleged and incorporated by reference as though fully set forth herein.

2. On or about March 25, 2012, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” and **AKEIN SCOTT**, a/k/a “Keemy,” did assault R.W. with dangerous weapons, to wit: firearms, in violation of laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 10

**(Discharge of Firearms During and in Relation to a
Crime of Violence and a Drug-Trafficking Crime)**

On or about March 25, 2012, in the Eastern District of Louisiana, the defendants, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” and **AKEIN SCOTT**, a/k/a “Keemy,” did knowingly and intentionally use, carry, brandish, and discharge firearms during and in relation to a crime of violence and a drug-trafficking crime for which they may be prosecuted in a court of the United States, to wit: the racketeering conspiracy charged in Count 1 of this Third Superseding Indictment and the drug distribution conspiracy charged in Count 2 of this Third Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

COUNT 11

(Assault with Dangerous Weapons in Furtherance of Racketeering)

1. Paragraphs 1 and 2 of Count 5 are realleged and incorporated by reference as though fully set forth herein.

2. On or about July 16, 2012, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **STANLEY SCOTT**, a/k/a “Stizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” did assault C.L., T.H., and S.G. with dangerous weapons, to wit: firearms, in violation of laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 12

**(Discharge of Firearms During and in Relation to a
Crime of Violence and a Drug-Trafficking Crime)**

On or about July 16, 2012, in the Eastern District of Louisiana, the defendants, **STANLEY SCOTT**, a/k/a “Stizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” did knowingly and intentionally use, carry, brandish, and discharge firearms during and in relation to a crime of violence and a drug-trafficking crime for which they may be prosecuted in a court of the United States, to wit: the racketeering conspiracy charged in Count 1 of this Third Superseding Indictment and the drug distribution conspiracy charged in Count 2 of this Third Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

COUNT 13

(Assault with Dangerous Weapons in Furtherance of Racketeering)

1. Paragraphs 1 and 2 of Count 5 are realleged and incorporated by reference as though fully set forth herein.

2. On or about August 4, 2012, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” did assault R.C. and J.B. with dangerous weapons, to wit: firearms, in violation of laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 14

**(Discharge of Firearms During and in Relation to a
Crime of Violence and a Drug-Trafficking Crime)**

On or about August 4, 2012, in the Eastern District of Louisiana, the defendants, **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” did knowingly and intentionally use, carry, brandish, and discharge firearms during and in relation to a crime of violence and a drug-trafficking crime for which they may be prosecuted in a court of the United States, to wit: the racketeering conspiracy charged in Count 1 of this Third Superseding Indictment and the drug distribution conspiracy charged in Count 2 of this Third Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

COUNT 15
**(Use and Carrying of a Firearm During and in Relation
to a Crime of Violence and a Drug-Trafficking Crime)**

On or about March 5, 2013, in the Eastern District of Louisiana, the defendant, **AKEIN SCOTT**, a/k/a “Keemy,” did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence and a drug-trafficking crime for which he may be prosecuted in a court of the United States, to wit: the racketeering conspiracy charged in Count 1 of this Third Superseding Indictment and the drug distribution conspiracy charged in Count 2 of this Third Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(i), and 2.

COUNT 16
(Possession with Intent to Distribute Heroin)

On or about April 19, 2013, in the Eastern District of Louisiana, the defendant, **SHAWN SCOTT**, a/k/a “Shizzle,” did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 17
(Interstate Travel in Aid of Racketeering)

On or about May 3, 2013, in the Eastern District of Louisiana and elsewhere, the defendant **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” traveled in interstate commerce from the State of Missouri to the State of Louisiana, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, a business enterprise involving narcotics or controlled substances, namely the conspiracy to distribute heroin and cocaine base (“crack”) charged in Count 2 of this Third

Superseding Indictment, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity; in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT 18
(Assault with Dangerous Weapons in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 5 are realleged and incorporated by reference as though fully set forth herein.

2. On or about May 12, 2013, in the Eastern District of Louisiana, for the purpose of maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **SHAWN SCOTT**, a/k/a “Shizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” did assault J.T. with dangerous weapons, to wit: firearms, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 19
**(Discharge of Firearms During and in Relation to a
Crime of Violence and a Drug-Trafficking Crime)**

On or about May 12, 2013, in the Eastern District of Louisiana, the defendants, **SHAWN SCOTT**, a/k/a “Shizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” did knowingly and intentionally use, carry, brandish, and discharge firearms during and in relation to a crime of violence and a drug-trafficking crime for which they may be prosecuted in a court of the United States, to wit: the racketeering conspiracy charged in Count 1 of this Third Superseding Indictment and the drug distribution conspiracy charged in Count 2 of this Third Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

COUNT 20
(Possession with Intent to Distribute Heroin)

On or about May 16, 2013, in the Eastern District of Louisiana, the defendant, **SHAWN SCOTT**, a/k/a “Shizzle,” did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 21
(Tampering with a Witness)

On or about May 18, 2013, in the Eastern District of Louisiana and elsewhere, the defendant, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” did knowingly intimidate N.Y. by verbally threatening him/her, with the intent to prevent the communication to a law enforcement officer of information relating to the commission of a Federal offense, to wit: the assault and discharge of firearms on May 12, 2013, in furtherance of a drug distribution conspiracy and in furtherance of an enterprise engaged in racketeering; all in violation of Title 18, United States Code, Section 1512(b)(3).

COUNT 22
(Tampering with a Witness)

On or about July 6, 2013, in the Eastern District of Louisiana and elsewhere, the defendant, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” did knowingly intimidate B.H. by verbally threatening him/her, with the intent to prevent the communication to a law enforcement officer of information relating to the commission of a Federal offense, to wit: the assault and discharge of firearms on May 12, 2013, in furtherance of a drug distribution conspiracy and in furtherance of an enterprise engaged in racketeering; all in violation of Title 18, United States Code, Section 1512(b)(3).

COUNT 23

(Interstate Travel in Aid of Racketeering)

On or about August 5, 2013, in the Eastern District of Louisiana and elsewhere, the defendant, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” traveled in interstate commerce from the State of Missouri to the State of Louisiana, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, a business enterprise involving narcotics or controlled substances, namely the conspiracy to distribute heroin and cocaine base (“crack”) charged in Count 2 of this Third Superseding Indictment, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity; in violation of Title 18, United States Code, Section 1952(a)(3).

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 August 20, 2013, in the Eastern District of Louisiana, the defendant, **JEREMIAH JACKSON**, a/k/a “Rocky,” did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence and a drug-trafficking crime for which he may be prosecuted in a court of the United States, to wit: the racketeering conspiracy charged in Count 1 of this Third Superseding Indictment and the drug distribution conspiracy charged in Count 2 of this Third Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(i), and 2.

NOTICE OF RICO FORFEITURE

1. The allegations contained in Count 1 of this Third Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant Title 18, United States Code, Section 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, **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," **STANLEY SCOTT**, a/k/a "Stizzle," **SHAWN SCOTT**, a/k/a "Shizzle," **AKEIN SCOTT**, a/k/a "Keemy," **JEREMIAH JACKSON**, a/k/a "Rocky," and **BRIAN BENSON**, a/k/a "Dub," a/k/a "Dubba," 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 or property or contractual right 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; and
- c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of 1962.

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 DRUG FORFEITURE

1. The allegations of Counts 2, 16, and 20 of this Third 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 Counts 2, 16, and 20 the defendants, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” **JEREMIAH JACKSON**, a/k/a “Rocky,” and **BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” 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 defendants 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 Counts 2, 16, and 20 of this Third 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 FIREARM FORFEITURE

1. The allegations of Counts 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 18, 19, and 24 of this Third 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.

2. As a result of the offenses alleged in Counts 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 18, 19, and 24, the defendants, **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," **STANLEY SCOTT**, a/k/a "Stizzle," **SHAWN SCOTT**, a/k/a "Shizzle," **AKEIN SCOTT**, a/k/a "Keemy," and **JEREMIAH JACKSON**, a/k/a "Rocky," shall forfeit to the United States pursuant to Title 18, United States Code, Sections 922(g), 924(a)(1)(C) and 924(d)(1), made applicable through Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in a knowing violation as alleged in Counts 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 18, 19, and 24 of this Third 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 18, United States Code, Sections 922(g), 924(c)(1)(A) and 924(d)(1), made applicable through Title 28, United States Code, Section 2461.

**NOTICE OF INTERSTATE TRANSPORTATION
IN AID OF A RACKETING ENTERPRISE FORFEITURE**

1. The allegations of Counts 17 and 23 of this Third 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, Sections 1952 and 981(a)(1)(D), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 17 and 23, defendant, **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1952 and 981(a)(1)(D), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1952.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- 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 defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1952 and 981(a)(1)(D), made applicable through Title 28, United States Code, Section 2461(c).

NOTICE OF WITNESS TAMPERING FORFEITURE

1. The allegations of Counts 21 and 22 of this Third 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, Sections 1512 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 21 and 22, the defendant, **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1512.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- 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 defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 1512 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY



MATTHEW R. PAYNE
Assistant United States Attorney
La. Bar Roll No. 32631



BRIAN C. EBARB
Special Assistant United States Attorney
La. Bar Roll No. 29846

New Orleans, Louisiana
December 11, 2014