

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

SUPERSEDING INDICTMENT FOR VIOLATIONS OF THE FEDERAL
CONTROLLED SUBSTANCES ACT AND THE FEDERAL GUN CONTROL ACT

UNITED STATES OF AMERICA

*

CRIMINAL DOCKET NO:

*

v.

*

SECTION:

LANGUNDO FLOWERS

*

VIOLATIONS: 21 U.S.C. § 846

a/k/a "Gonzo"

21 U.S.C. § 841(a)(1)

ODELL WELLS

*

21 U.S.C. § 841(b)(1)(A)

a/k/a "Tiger"

21 U.S.C. § 841(b)(1)(C)

DENNIS C. MORGAN

*

21 U.S.C. § 843(b)

a/k/a "D"

18 U.S.C. § 922(g)

WALTRELL R. KNOX

*

18 U.S.C. § 2

a/k/a "Yella"

a/k/a "Red"

*

JONATHAN C. MARTIN

*

a/k/a "Jon Jon"

JOSEPH LEWIS

*

a/k/a "Joe"

CARY J. BRYANT

*

a/k/a "Mal"

DARREN L. WILLIAMS

*

a/k/a "Pop"

RICHARD GARRETT

*

a/k/a "Lil Rich"

ALCEE JONES

*

a/k/a "LC"

RYAN MAGEE

*

a/k/a "Lil Ron"

CLYDE MITCHELL

*

a/k/a "Mule"

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The Grand Jury charges that:

COUNT 1

Beginning on a date unknown, but not later than September 1, 2012, and continuing until on or about June 13, 2013, in the Eastern District of Louisiana, and elsewhere, the defendants, **LANGUNDO FLOWERS, a/k/a "Gonzo," ODELL WELLS, a/k/a "Tiger," DENNIS C. MORGAN, a/k/a "D," WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red," JONATHAN C. MARTIN, a/k/a "Jon Jon," JOSEPH LEWIS, a/k/a "Joe," CARY J. BRYANT, a/k/a "Mal," DARREN L. WILLIAMS, a/k/a "Pop," RICHARD GARRETT, a/k/a "Lil Rich," ALCEE JONES, a/k/a "LC," RYAN MAGEE, a/k/a "Lil Ron," and CLYDE MITCHELL, a/k/a "Mule,"** did knowingly and intentionally combine, conspire, confederate and agree with each other, and other persons known and unknown to the Grand Jury to distribute and to possess with the intent to distribute 280 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

COUNT 2

On or about September 28, 2012, in the Eastern District of Louisiana, the defendant, **RYAN MAGEE, a/k/a "Lil Ron,"** did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

On or about October 19, 2012, in the Eastern District of Louisiana, the defendant, **JONATHAN C. MARTIN, a/k/a "Jon Jon,"** did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 4

On or about October 24, 2012, in the Eastern District of Louisiana, the defendant, **ALCEE JONES, a/k/a "LC,"** did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 5

On or about November 7, 2012, in the Eastern District of Louisiana, the defendant, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red,"** did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6

On or about November 15, 2012, in the Eastern District of Louisiana, the defendant, **RYAN MAGEE, a/k/a "Lil Ron,"** did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 7

On or about December 11, 2012, in the Eastern District of Louisiana, the defendant, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red,"** did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 8

On or about January 18, 2013, in the Eastern District of Louisiana, the defendant, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red,"** did knowingly and intentionally distribute a

quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 9

On or about March 4, 2013, in the Eastern District of Louisiana, the defendants, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red,"** and **JONATHAN C. MARTIN, a/k/a "Jon Jon"**, did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 10

On or about March 6, 2013, in the Eastern District of Louisiana, the defendant, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red,"** did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 11

On or about March 6, 2013, in the Eastern District of Louisiana, the defendants, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red," DENNIS C. MORGAN, a/k/a "D,"** and **LANGUNDO FLOWERS, a/k/a "Gonzo,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 12

On or about March 6, 2013, in the Eastern District of Louisiana, the defendants, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red,"** and **RYAN MAGEE, a/k/a "Lil Ron,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 13

On or about March 9, 2013, in the Eastern District of Louisiana, the defendants, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red,"** and **DENNIS C. MORGAN, a/k/a "D,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 14

On or about March 11, 2013, in the Eastern District of Louisiana, the defendants, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red,"** and **ALCEE JONES, a/k/a "LC,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 15

On or about March 14, 2013, in the Eastern District of Louisiana, the defendants, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red,"** and **RICHARD GARRETT, a/k/a "Lil Rich,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 16

On or about March 19, 2013, in the Eastern District of Louisiana, the defendants, **WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red," DENNIS C. MORGAN, a/k/a "D,"** and **LANGUNDO FLOWERS, a/k/a "Gonzo,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 17

On or about April 25, 2013, in the Eastern District of Louisiana, the defendant, **RYAN MAGEE, a/k/a "Lil Ron,"** did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 18

On or about April 30, 2013, in the Eastern District of Louisiana, the defendant, **LANGUNDO FLOWERS, a/k/a "Gonzo,"** did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 19

On or about May 2, 2013, in the Eastern District of Louisiana, the defendant, **CARY J. BRYANT, a/k/a "Mal,"** did knowingly and intentionally possess with the intent to distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 20

On or about May 23, 2013, in the Eastern District of Louisiana, the defendant, **LANGUNDO FLOWERS, a/k/a "Gonzo,"** did knowingly and intentionally distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 21

On or about June 2, 2013, in the Eastern District of Louisiana, the defendants, **LANGUNDO FLOWERS, a/k/a "Gonzo,"** and **CARY J. BRYANT, a/k/a "Mal,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 22

On or about June 3, 2013, in the Eastern District of Louisiana, the defendants, **LANGUNDO FLOWERS, a/k/a "Gonzo,"** and **JOSEPH LEWIS, a/k/a "Joe,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 23

On or about June 3, 2013, in the Eastern District of Louisiana, the defendant, **JOSEPH LEWIS, a/k/a "Joe,"** did knowingly and intentionally possess with the intent to distribute cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 24

On or about June 3, 2013, in the Eastern District of Louisiana, the defendants, **LANGUNDO FLOWERS, a/k/a "Gonzo,"** and **ODELL WELLS, a/k/a "Tiger,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 25

On or about June 4, 2013, in the Eastern District of Louisiana, the defendants, **LANGUNDO FLOWERS, a/k/a "Gonzo," and ODELL WELLS, a/k/a "Tiger,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 26

On or about June 4, 2013, in the Eastern District of Louisiana, the defendants, **LANGUNDO FLOWERS, a/k/a "Gonzo," and DARREN WILLIAMS, a/k/a "Pop,"** did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and to possess with the intent to distribute cocaine base, a Schedule II narcotic drug controlled substance; all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 27

On or about June 5, 2013, in the Eastern District of Louisiana, the defendants, **LANGUNDO FLOWERS, a/k/a "Gonzo," and CLYDE MITCHELL, a/k/a "Mule,"** each aiding and abetting the other, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 28

On or about June 13, 2013, in the Eastern District of Louisiana, the defendant, **LANGUNDO FLOWERS, a/k/a "Gonzo,"** having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: a conviction on or about September 24, 1997, in case number 974630, in the 24th Judicial District Court, Jefferson Parish, Louisiana, for possession of cocaine, and a conviction on or about March 30, 2004, in case number 037516, in the 24th Judicial District Court, Jefferson Parish, Louisiana, for attempt or conspiracy to possess cocaine and possession of hydrocodone; did knowingly possess in and affecting commerce, a firearm, to wit: a Springfield Armory 9mm semi-automatic handgun; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 29

On or about June 13, 2013, in the Eastern District of Louisiana, the defendant, **LANGUNDO FLOWERS, a/k/a "Gonzo,"** having been previously convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: a conviction on or about September 24, 1997, in case number 974630, in the 24th Judicial District Court, Jefferson Parish, Louisiana, for possession of cocaine, and a conviction on or about March 30, 2004, in case number 037516, in the 24th Judicial District Court, Jefferson Parish, Louisiana, for attempt or conspiracy to possess cocaine and possession of hydrocodone; did knowingly possess in and affecting commerce, ammunition, to wit: PMC Bronze, 9mm ammunition; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 30

On or about June 13, 2013, in the Eastern District of Louisiana, the defendant, **ODELL WELLS, a/k/a "Tiger,"** having been previously convicted of crimes punishable by imprisonment

for a term exceeding one year, to wit: a conviction on or about November 7, 2003, in case number 030503, in the 24th Judicial District Court, Jefferson Parish, Louisiana, for possession with the intent to distribute cocaine, a conviction on or about March 1, 2007, in case number 064427, in the 24th Judicial District Court, Jefferson Parish, Louisiana, for possession of cocaine, and a conviction on or about July 23, 2012, in case number 122999, in the 24th Judicial District Court, Jefferson Parish, Louisiana, for possession of marijuana 2nd offense; did knowingly possess in and affecting commerce, ammunition, to wit: Super Velocity Luger 9mm ammunition and Winchester .40 caliber ammunition; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF DRUG FORFEITURE

1. The allegation of Counts 1-27 of this superseding indictment are re-alleged 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 offense alleged in Counts 1-27, the defendants, **LANGUNDO FLOWERS, a/k/a "Gonzo," ODELL WELLS, a/k/a "Tiger," DENNIS C. MORGAN, a/k/a "D," WALTRELL R. KNOX, a/k/a "Yella," a/k/a "Red," JONATHAN C. MARTIN, a/k/a "Jon Jon," JOSEPH LEWIS, a/k/a "Joe," CARY J. BRYANT, a/k/a "Mal," DARREN L. WILLIAMS, a/k/a "Pop," RICHARD GARRETT, a/k/a "Lil Rich," ALCEE JONES, a/k/a "LC," RYAN MAGEE, a/k/a "Lil Ron," and CLYDE MITCHELL, a/k/a "Mule,"** 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 violation 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 violation alleged in Counts 1-27 of this superseding indictment.

3. If any of the above-described forfeitable property, 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 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 GUN FORFEITURE

1. The allegations of Counts 28, 29 and 30 of this superseding indictment are re-alleged 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) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 28, 29 and 30, the defendants, **LANGUNDO FLOWERS, a/k/a "Gonzo," and ODELL WELLS, a/k/a "Tiger,"** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in a knowing violation of Title 18, United States Code, Section 922(g).

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;

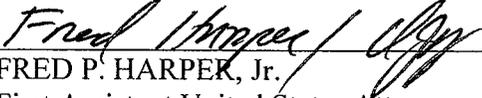
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(d)(1).

A TRUE BILL:

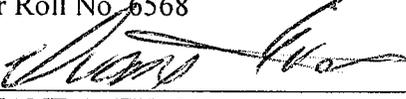
FOREPERSON



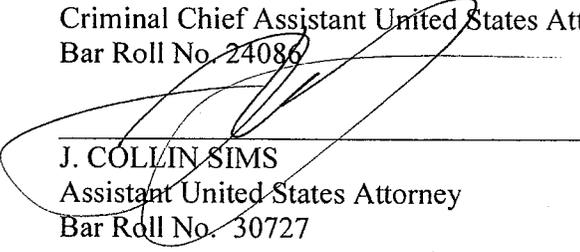
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New Orleans, Louisiana
July 18, 2013