

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL DOCKET NO. 12-051

v. * SECTION: "K"

TYRONNE STEVENSON *
aka "Duke" *

* * *

FACTUAL BASIS

Should this matter proceed to trial, the United States will prove beyond a reasonable doubt, through credible testimony and the production of reliable evidence, the following facts:

Counts 1, 2, and 3:

In late 2010, federal agents with the United States Bureau of Alcohol, Tobacco, Firearms, and Explosives (A.T.F.) started investigating several acts of violence that had taken place in the Carrollton Area of the City of New Orleans. During the course of this investigation the agents reviewed numerous police reports, 911 calls, recorded telephone calls, and have spoken to several cooperating witnesses. Based on this investigation agents have determined that **TYRONNE STEVENSON**, aka "Duke", **CAREY JONES**, aka "Bean", **THERON GOLSTON**, aka "Thema", **RYAN CARROLL**, aka "Ronnie Boo", **BERNELL WILLIAMS** aka "Bussy", **WALTER CONLEY**, aka "Ike Neezy", **NORMAN RATCLIFF**, aka "Turk", **MARK GLENN**, aka "Mark", and **CHINA STEWART**, aka "Ms. China", aka "Mom", and other known individuals were members and associates of an organization engaged in, among other things, conspiracy to distribute controlled substances, the distribution of controlled substances, murder, conspiracy to commit murder, attempted murder, and obstruction of justice in the Hollygrove area

FS MEX
JCT

of the City of New Orleans from 2006 to the present. This organization, 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 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. As such, the members of this enterprise possessed, used, carried, and discharged numerous firearms in furtherance of their drug trafficking activities in an effort to protect their drug turf, to retaliate against other rival neighborhood drug groups, such as "Hell City", and for the purpose of maintaining and increasing their position in the enterprise.

Agents have identified some of the members and associates of "Hell City" as B.C, J.G., C.M., G.B., L.W., J.S., D.H. G.S., and G.S. During the last several years, numerous shooting have taken place between these two rival groups.

In August 2007, Ryan Carroll, a member of the Hollygrove group, broke into a house belonging to B.C., who was a drug dealer and an associate of the "Hell City" group. While in B.C.'s house Ryan Carroll stole drug money (approximately \$7,000.00) and other items from B.C. Shortly thereafter, Ryan Carroll was arrested by law enforcement authorities for this crime but was released from jail on a bond. In an effort to get B.C. to drop the charges, Ryan Carroll had his uncle, who was also a known drug dealer, speak to B.C. on his behalf.

On December 24, 2007, Ryan Carroll, at the direction of his uncle, went to the "Hell City" neighborhood in order to speak with B.C. concerning the burglary from August 2007. **Tyronne Stevenson**, Walter Conley, Norman Ratcliff, Carey Jones, and Theron Golston dropped Ryan Carroll off in the neighborhood so that he could speak to B.C. While in the area, **Tyronne Stevenson**, Walter

MSJ
JCT

TS

Conley, Norman Ratcliff, Carey Jones, and others decided to rob several members of the "Hell City" group that were participating in a dice game in the 1700 block of Cambronne Street of their drugs and money. Prior to this date, **Stevenson** and the others had been told by another associate, known as "Tiger", that B.C. had put a "hit" (contract to kill) out on **Stevenson**, Jones and Carroll after the burglary of his residence by Carroll.

During this confrontation, L.W., who was associated with the members of "Hell City" was shot while running from the scene. Members of "Hell City" also returned fire and Norman Ratcliff, who is a co-conspirator and member of the "Hollygrove" group, was struck in the leg. NOPD responded to the scene and located thirteen (13) 7.62 caliber casings, which were all discharged from an assault weapon that was fired by Carey Jones. **Stevenson** acknowledges that he participated in this shooting to maintain the respect of his associates.

Immediately following the incident, **Tyronne Stevenson**, Walter Conley, Norman Ratcliff, and Carey Jones, went back to the Hollygrove area. A cooperating witness ("CW") saw Jones, Conley, Ratcliff, and **Stevenson** at this location with guns. Since Norman Ratcliff was shot, it was decided that he needed medical attention and he was brought to the hospital by Theron Golston and Walter Conley. NOPD interviewed Norman Ratcliff at Ochsner Hospital. Norman Ratcliff lied and told the police that he was shot at General Ogden and Olive Streets. He also told police that he had been brought to the hospital by Theron Golston and Walter Conley. Conley was also interviewed by the police at the hospital, but denied any knowledge of the shooting. Golston left the hospital before he could be interviewed. NOPD went to General Ogden and Olive Streets and found no evidence of a shooting at that location.

MEJ
JCT

TS

Two days later, on December 26, 2007, NOPD officers responded to a 911 call of a shooting that took place in the 8800 block of Olive Street. When officers arrived on the scene they found Walter Conley, aka "Ike Neezy", suffering from a gunshot wound to the head. Conley was alert and told the police he was riding bikes with a friend and was shot in a "drive by" by an unknown person in a white SUV. It should be noted that at the time of the shooting Walter Conley was wearing a shirt that belonged to Tyronne Stevenson.

Based on a follow-up investigation, it was determined that this was a retaliatory shooting by members of "Hell City" for the shooting two days earlier at the dice game.¹ Within hours of this shooting Carey Jones, Bernell Williams, Norman Ratcliff and **Tyronne Stevenson**, who happened to be on the West Bank in Jefferson Parish, received a phone call telling them that Walter Conley had been shot. **Stevenson**, Ratcliff, Jones, Williams, and others got into a black, four door Pontiac Grand Prix, which was driven by **Tyronne Stevenson**, and headed back towards the East Bank with the intent to retaliate against any member of "Hell City". While driving on the Westbank Expressway, **Stevenson** was involved in a two car accident, in which the vehicle that he was driving caught on fire. After the vehicle accident, all of the occupants fled the scene but were eventually apprehended by police. In extinguishing the fire, the fire department and the police on the scene discovered three firearms secreted beneath the hood of the vehicle. Subsequent ballistics examination confirmed that the Norinco, MAK-90, 7.62 caliber assault rifle recovered from the scene of the accident was the firearm used by Jones, Conley, Ratcliff and **Stevenson** during the shooting of L.W. on December 24, 2007.

¹ Additionally, during this investigation federal agents were able to locate a telephone call that was made on March 28, 2009 by Walter Conley from the Orleans Parish Prison. During this call, Conley spoke with J. G., a member of "Hell City" and indicated that he knew that it was J. G. who had shot him in the head back in December 2007 and that he was going to retaliate further. During this call Conley also brags to others in the background about his intent to retaliate. This phone call is additional proof that the feud between these two groups of individuals continued for several years and is an example of how the defendants continued to commit crimes of violence in an effort to maintain or increase their position in the enterprise.

MEJ
JCT
TS

On April 17, 2008, an NOPD undercover officer made contact with **Tyronne Stevenson** at 8841 Olive Street. The officer provided **Stevenson** with twenty dollars and received two (2) pieces of crack cocaine in exchange. **Stevenson** was subsequently arrested, found in possession of the previously recorded buy money, and booked into the Orleans Parish Prison.

During a follow-up investigation into this matter, federal ATF agents obtained recorded telephone conversations made by **Stevenson** after his arrest to his mother, China Stewart and Norman Ratcliff. In a phone call made on April 17, 2008 at approximately 1:55 PM, **Stevenson** calls Stewart and directs her to retrieve drugs that he had had secreted behind a washer. Stewart, along with the assistance of Norman Ratcliff, locates and retrieves the crack cocaine. **Stevenson** then instructs Norman Ratcliff to “*get off that for me*” or sell the drugs for **Stevenson**. In call 1208-545-509, made on April 18, 2008, at 2:03 pm, **Stevenson** calls and speaks to J.R. about contacting Carey Jones to try and get \$500 to put toward his bail. **Stevenson**, who is angry because he doesn’t believe Jones and the others are doing enough to help him, says “*Man, that n***** ain’t tryin’ to do shit, man! My Mom hustle harder than them dumb ass bitches and they about six deep!*” referring to the fact that he believes his mother is working harder selling drugs to get him out of jail than his six friends. In another call, made on April 18, 2008, at 8:29 pm, **Stevenson** speaks to both Norman Ratcliff and Bernell Williams. **Stevenson** tells Norman Ratcliff that “*we gotta watch out for ... that distribution shit*”, meaning he and his associates need to be careful when selling their drugs or they could get arrested for distribution of narcotics. In another part of this call, **Stevenson** speaks to Williams and **Stevenson** tells Williams that at the time of his arrest, he ran from the police because he was in possession of a “burner” referring to a firearm.

On **July 9, 2008**, several of the defendants and their un-indicted co-conspirators, including **Tyrone Stevenson**, aka “Duke”, Ryan Carroll, aka “Ronnie Boo”, L.S., B.T., Walter Conley, aka “Ike

me
JCT

TS

Neezy”, Norman Ratcliff, aka “Turk”, and Bernell Williams, aka “Bussy” and others, got into a stolen white van with numerous firearms and drove through the area controlled by “Hell City” looking to retaliate against the members of “Hell City”. Ryan Carroll was armed with a handgun, **Tyrone Stevenson** had an assault weapon and other individuals inside the van had several other firearms. As the van approached 1726 Monroe Street, it slowed down and several individuals in the van produced firearms and attempted to shoot and kill C.M, who was a known member of “Hell City”. At least 25 shots were fired from the van from five different firearms that were used in this drive by shooting, including but not limited to an AK-47 assault rifle, a 9mm semi-automatic handgun, a .45 caliber handgun, a .40 caliber handgun, and a .223 assault rifle. C.M. had just exited his car and was walking to his friend’s house at 1726 Monroe Street, when the shots were fired. C.M. fled into the alley next to the house and discovered that he had been shot in the leg. Several cars that were parked on the street and other residences were also hit by the gunfire.

As the van fled down the street, an NOPD officer happened to be driving by and witnessed the shooting. This officer turned and chased the white van as it fled towards the river. The van came to a stop at the intersection of Joliet and Leake streets, where all occupants fled on foot into the neighborhood. The NOPD Officer approached the van and observed several guns and shell casings inside the van. A perimeter was set up around the neighborhood and a search was conducted. **Tyrone Stevenson**, aka “Duke”, Ryan Carroll, aka “Ronnie Boo”, L.S., B.T., and Bernell Williams, aka “Bussy” were eventually apprehended hiding under different houses in the area. The other individuals in the van at the time of the shooting, including Norman Ratcliff and Walter Conley, were able to elude police.

MEJ
JCT

TS

During the apprehension of these subjects, C.M. was transported to the hospital so that he could be treated for his injuries. However, he would not identify his assailants and was uncooperative with the police investigation.

During a follow-up investigation into this matter, federal ATF agents obtained recorded telephone conversations from the subjects while they were in jail. Based on these phone calls, agents were able to determine that Norman Ratcliff, aka "Turk" and Walter Conley, aka "Ike Neezy" were also in the van that day during the shooting. Since neither Ratcliff nor Conley were arrested by the police that day, the other suspects called them from jail numerous times. During these calls the defendants bragged about their roles in this shooting in an effort to maintain the respect of their associates. **Tyronne Stevenson** also admits that he was grazed in the back by someone shooting over his shoulder. He also speaks to his mother (co-defendant China Stewart) and asks for her help to come up with an alibi so that he will have a defense in court. **Stevenson** also calls his girlfriend and warns her and his mother (China Stewart) to watch out for "the pretty bitches", which is code that he uses when he refers to the members of "Hell City". He goes so far as to describe the cars that the members of "Hell City" drive. He also speaks to Conley ("Ike") and Ratcliff and they tell **Stevenson** that they are going to get their "issue" (firearms) from "Bean" (Carey Jones) and "Block" (another known co-conspirator). On several occasions during the calls, China Stewart tells **Stevenson** that he should not be talking like that on the phones because the police know all the coded words used by **Stevenson** and his associates when speaking about their criminal activities.

Bernell Williams, aka "Bussy" also called Norman Ratcliff and Walter Conley, aka "Ike", on several occasions. During these calls they talk about the specifics of the incident and how Williams was hiding under the house and trying to escape from the police perimeter. Conley and Ratcliff talk about how they were also hiding under a house and stayed there all night until the police left the area. They also

me
JCT
TS

tell Williams that they are going back to take care of business (retaliate against "Hell City"), that they now have additional guns, and how they all need to work together to get the members of "Hell City" when everyone gets out of jail.

Ryan Carroll, aka "Ronnie Boo", also called Norman Ratcliff, aka "Turk" and Walter Conley, aka "Ike", on several occasions. Ryan Carroll also spoke to other individuals and admitted that he had a gun in the van and that his prints might be found on the gun but that he did not fire the weapon at the time of the shooting. In another call, Ratcliff tries to see if Ryan Carroll used his (Ratcliff's) firearm during the shooting. They refer to the guns as "hoes". Ryan Carroll also talks to his friends about coming up with an alibi, such as going to see some girls who live nearby, so that they could have a legitimate reason why they were in the "Hell City" area. Ryan Carroll also discusses how **Stevenson** ("Duke") got grazed by one of them during the drive-by shooting as they were shooting over **Stevenson's** shoulder.

It should be noted that the victim, C.M., is a known drug dealer and member of "Hell City". He is currently in state custody serving a sentence on a drug charges.

During the ATF follow-up investigation federal agents also located several recorded telephone calls that took place between September 9, 2008 and September 14, 2008. During call 1220-964-186, which was recorded on September 9, 2008, at 7:42pm, **Tyronne Stevenson** ("Duke") calls Norman Ratcliff and also talks to Carey Jones ("Bean"). During the conversation they talk about guns and how "Black" (Arthur Harris, another unindicted co-conspirator) was able to get guns for them. In call 1221-095-422, which was recorded on September 10, 2008, at 8:09pm, **Stevenson** ("Duke") calls Norman Ratcliff and talks about their group as a whole. In call 1221-426-922, which was recorded on September 14, 2008, at 4:14pm, **Stevenson** ("Duke") calls China Stewart, who places a three way call to Jones ("Bean"). During the call, Jones tells Stevenson, "*I been coming through all day, son*", meaning that he

MEJ
JCT
TS

had been selling drugs. Jones then tell Stevenson that "*Ike had just made two more, we just brung that to her*", referring to the fact that they had made two hundred dollars from selling drugs and brought the money to Ms. China. They also talk about a recent shooting in which they were involved on September 14, 2008 in Jefferson Parish.

In calls 1221-427-887, which was recorded on September 14, 2008, at 4:30pm, and call 1221-433-388, which was recorded on September 14, 2008, at 6:02pm, **Stevenson** ("Duke") calls his girlfriend. She says that China Stewart is sending all of the members of the group out on the street to sell "ice cream" (crack cocaine) in an effort to raise money to bond him (Stevenson) out of jail. She also says that China Stewart wanted to give her some "ice cream" to sell, but she said she did not want to because she did not know how to do it correctly (sell crack cocaine).

In call 1221-444-144, which was recorded on September 14, 2008, at 9:01pm, Bernell Williams ("Bussy") calls J.R. She tells him that "*all your partners are working off something*" (selling crack cocaine) in an effort to raise money for a bond. She also tells them that Norman Ratcliff "had a party" (participated in a shooting) in Jefferson Parish.

On September 13, 2008, at approximately 10:30 PM, JPSO officers responded to an aggravated battery by shooting of J.J., J.B., and D.S., in the 2333 Alex Kornman Drive, Harvey, Louisiana. At the time of the incident, Norman Ratcliff was living with his mother at 2321 Alex Kornman Drive. These three individuals suffered non-lethal gunshot wounds to their bodies. Through a follow-up investigation, ATF agents were able to pull telephone calls from the Orleans Parish Prison. In call 1221-359-799, made on September 13, 2008, at 9:35 PM, **Tyronne Stevenson** ("Duke") calls to the residence of Norman Ratcliff ("Turk") and speaks first to Walter Conley ("Ike") and then Norman Ratcliff. Conley tells **Stevenson** that Ratcliff had gotten into a verbal altercation with another individual from the area.

MEJ
JCT
TS

Stevenson then speaks directly with Ratcliff who identifies that he had been disrespected by someone in the area and this same individual had called him names and embarrassed him in front of a group of people. During the call, Ratcliff can be heard answering another phone and identifying the caller as "Bean" (Carey Jones). Ratcliff confirms with Jones that Jones is on his way to the Alex Kornman address.

According to a cooperating witness, Carey Jones ("Bean") and Theron Golston rode over to the Alex Kornman location to bring firearms to Norman Ratcliff, specifically an MAK-90, 7.62 caliber assault rifle and a handgun. When they arrived, Ratcliff took the assault rifle and went to look for his target. After initially being unable to locate him, Ratcliff later returned outside and found the target and began shooting at him, along with Golston who used the handgun. Immediately following the shooting, and before the police arrived to investigate, Ratcliff, Conley, Jones, and Golston all left the area and returned to Hollygrove.

In call 1221-426-922, made on September 14, 2008, at 4:14, **Tyronne Stevenson** ("Duke") calls from Orleans Parish Prison and speaks to Carey Jones ("Bean"). Jones tells **Stevenson** that they "*had a whole party last night*", referring to the shooting. **Stevenson** asks if it occurred "*on the other side of the river*", referring to Jefferson Parish and Jones confirms that that was where the shooting happened.

On September 14, 2008, NOPD officers responded to an aggravated battery by shooting of Paul May, who later died from his injuries. While on the scene, officers were approached by witnesses who told officers that the shooter fled to 3526 Hollygrove Street, which is the residence of Ryan Carroll and Carey Jones and is located within half of a block from the murder scene. Officers went to that location and met with Hallet Ann Carroll (the mother of Ryan Carroll and Carey Jones) who signed a consent to search form for her residence. Ann Carroll told officers that her son, Carey Jones, aka "Bean" and his friends had been in and out all night. Other witnesses had told officers that many firearms were kept at or

MEJ
JCT
TS

under this same residence. While checking the room of Carey Jones, officers observed rounds of ammunition and drug paraphernalia (mirror with cocaine residue, a razor blade, baggies, boxes of baggies, and a scale, all of which are commonly used in the packaging of crack cocaine for retail sale). In securing the rear yard of the house, officers met with Walter Conley, aka "Ike Neezy" who had a marijuana cigarette in his hand. Officers also found a 9mm Tec-9 semi-automatic handgun on the ground near Conley. As Conley was being escorted from the house, one of the witnesses told officers that Conley was the one who shot the victim (Paul May). Officers looked under the house and saw a cache of firearms. They obtained a search warrant and recovered the following: a Norinco, Sporter MAK-90, 7.63 Assault Rifle, SN 9342623; an Armalite, M16A2, .223 Assault Rifle, SN US112179; an Astra Model A-80, .45 caliber pistol, SN J3650; an AR-15 magazine with 24 rounds of .223 MAK-90 magazine with 20 7.62 rounds; 14 9mm rounds of ammunition; an empty box of .45 caliber rounds; a MAK-90 magazine and two 7.62 rounds; 9 Remington rounds; a Handgun magazine; an Intratec, Tec 9, 9mm pistol, SN 26496; and one 30 round 9mm magazine with 24 rounds of ammunition. Note: a Ruger, P95, 9mm pistol, SN 316-43940 was also recovered from inside the residence. Hallet Ann Carroll claimed ownership of this weapon.

Arthur Harris, aka "Black", aka "Raymine", was inside the residence with Carey Jones, aka "Bean", when the police arrived. Both were placed under arrest for illegal possession of firearms and drug paraphernalia.

A cooperating defendant has stated that at the time of the shooting, Conley, Harris and Jones were walking from a local bar in the Hollygrove area when they encountered the victim, Paul May. Conley asked Paul May, "*How much you got?*" Paul May responded that he did not have anything, indicating that he did not want to buy any crack cocaine from Conley. Conley became angry and pulled out a .45

MEJ
JCT
TS

caliber firearm and pointed it at the victim. The victim began to run at which point Conley shot Paul May several times. After the first shot, Arthur Harris and Carey Jones fled down the street to Jones' house. Conley shot Paul May a few more times and then fled to Jones' house as well, arriving within a few minutes, where he discarded the murder weapon under the back of the house. Later that night Paul May was pronounced dead. According to the autopsy protocol Paul May was the victim of a homicide, which resulted from being shot several times by a firearm. Note: the .45 caliber semi-automatic handgun that was located under the house has been ballistically matched by ballistics experts at the N.O.P.D. Crime Lab to the casings at the scene of the murder of Paul May. In short, it is the murder weapon.

During the follow-up investigation of this incident, ATF agents were able to locate numerous recorded telephone calls from the defendants. In call 1221-475-564, which was recorded on September 15, 2008 at 5:45am, Carey Jones ("Bean") calls Norman Ratcliff. Jones tells Ratcliff that "*they are hit*" meaning the police found all of their guns and ammunition. Jones and Conley also talk to Theron Golston ("Thema") about the incident. Golston then speaks to Conley and they discuss a "crackhead" who may be "ratting" (speaking to the police) about the murder.

In call 1221-496-595, which was recorded on September 15, 2008 at 11:35am, **Tyronne Stevenson** ("Duke") calls J.R. and talks to China Stewart about the murder. China Stewart tells him about everything that happened including what she saw and heard at the scene of the murder. She also talks to him about losing money that "Bean" (Carey Jones) and "Ike" (Walter Conley) were supposed to be bringing her from selling drugs because now they are in jail.

In call 1221-497-521, which was recorded on September 15, 2008 at 11:51am, **Stevenson** ("Duke") calls J.R. J.R. then calls Ratcliff's number and Theron Golston answers. Golston tries to tell **Stevenson** who the victim was and identifies Paul May as a crackhead that had owed **Stevenson** money

MEF
JCT
15

for a prior drug deal. Golston explains how he and **Stevenson** had gone to the victim's trailer on Hamilton where he lived to try and collect the drug debt. Golston also tells **Stevenson** that it's just him (Golston) and Ratcliff out on the street and that they are working on getting them out.

In call 1221-503-796, which was recorded on September 15, 2008 at 1:35pm, Bernell Williams ("Bussy") calls J.R. and she calls Norman Ratcliff on a three-way. During the call Williams also talks to Theron Golston. During the call Golston tells him that they are getting bond money for **Stevenson** ("Duke") and Williams ("Bussy"). He says, "*we makin' some cake for you and Duke*", "*Miss China got a cake bakery, ya heard me.*" In this call he refers to selling crack cocaine as "makin' cake" and indicates that Ms. China has a "cake bakery" which identifies that she is the one supplying/making the crack cocaine.

In call 1221-510-741, which was recorded on September 15, 2008 at 3:31pm, Ryan Carroll, aka "Ronnie Boo" called his mother, Ms. Hallet Ann Carroll. She tells him that she saw Walter Conley ("Ike") shoot Paul May and describes the shooting in detail down to how Paul May screamed out after each shot.

In call 1221-512-485, which was recorded on September 15, 2008 at 4:00pm, Ryan Carroll, aka "Ronnie Boo" called his mother, Miss Hallet Ann Carroll. During the call she tells Carroll to "read between the lines". Then she tells him that in addition to what happened yesterday (the murder of Paul May), they (Conley, Ratcliff, Arthur Harris, Jones and Golston) had gotten involved in something (a shooting) the night before across the river (in Jefferson Parish) and that all of those charges could be put on Jones ("Bean") also. It is obvious that she is very upset and she says, "*There is so much, I can't even talk about it!*" Note: the casings that were collected from the Jefferson Parish shooting under JPSO Item #I-19465-08, on September 13, 2008, were found to ballistically match one of the firearms recovered as a

MEJ
JCT
15

result of the Paul May homicide investigation.

In call 1221-584-270, which was recorded on September 16, 2008 at 11:56am, **Stevenson** ("Duke") calls his girlfriend, J.R. J.R. tells him that Golston is selling drugs for China Stewart. She says that China Stewart tried to give her drugs to sell but that she doesn't know how to sell drugs on the street.

In call 1221-587-855, which was recorded on September 16, 2008 at 12:56 pm, **Stevenson** ("Duke") calls J.R. They talk about drugs and China Stewart ("Ms. China") asking J.R. if she wanted any crack cocaine. **Stevenson** ("Duke") tells J.R. to take the drugs and hold onto them so he'll have something to sell when he "gets home" (gets out of jail).

In call 1222-192-323, which was recorded on September 23, 2008 at 12:51pm, Walter Conley ("Ike") calls J.R. and talks to **Tyronne Stevenson** ("Duke") who was just released from jail. Conley tells him that when they were first arrested and arrived at the jail, Jones was trying to get Conley to admit to the police that he had killed Paul May. However, Conley then identifies that Jones later told him not to admit to anything. Conley talks about what happened the night before the shooting. He also refers back to the van shooting where C.M was shot, identifying that incident and the arrest of Ryan Carroll as the reason why "Ms. Ann" doesn't like any of them.

In call 1222-194-592, which was recorded on September 23, 2008 at 1:28 pm, Carey Jones ("Bean") calls **Tyronne Stevenson's** ("Duke") phone and talks to J.R., **Stevenson** ("Duke"), and Theron Golston. They talk about Conley ("Ike") and the events leading up to the shooting, including selling crack cocaine to get **Stevenson** ("Duke") out of jail. They talk about how "Ike was trippin'", and how "Ellis dimed them out" (told the police).

On November 21, 2008, NOPD pulled over a car driven by R.H. J.R. was the front passenger and **Tyronne Stevenson** was the rear passenger. **Stevenson**, who officers observed making suspicious

MEJ
JCT
TS

movements in the rear of the vehicle was initially arrested for Possession of an Open Alcoholic Beverage in a Motor Vehicle. However, subsequent investigation and interviews with the two women resulted in the recovery of a .40 caliber firearm from inside the vehicle's glove compartment. J.R. gave police a statement saying that as they were being pulled over by the police, **Stevenson** handed her a gun and ordered her to put it in the glove compartment and not say anything to police. J.R. told the officers that she complied because she knew of **Stevenson's** "street reputation" and was afraid of him. R.H. gave a similar statement to police. Both women also stated that they had received telephone calls during the course of the investigation from **Stevenson's** mother, China Stewart, telling them to "take the charge" and say the gun belonged to one of them.

During the follow-up investigation of this incident, ATF agents were able to locate numerous recorded telephone calls from the defendant. In call 1227-357-670, made on November 22, 2008, at 6:40 am, **Tyronne Stevenson** calls and speaks to Norman Ratcliff who is on another phone line with China Stewart. All three discuss how the girls would not take the gun charge for **Stevenson**. Norman Ratcliff tries to make a three-way call to R.H. In call 1227-391-114, made on November 22, 2008, **Stevenson** calls and talks to J.R. J.R. explains to **Stevenson** what happened the night of his arrest, how he did in fact give her the gun to secret in the glove box and how R.H. was crying and how J.R. believes that R.H. told the police what happened and where the firearm the located. In call 1227-459-172, made on November 23, 2008 at 10:51 am, **Tyronne Stevenson** talks to J.R. and tells her "*I'm gonna fuck that ho up though, real talk*" referring to how he going to harm R.H. if she doesn't keep her mouth shut about what happened.

On February 2, 2009, NOPD responded to the intersection of General Ogden and Olive Streets after receiving reports of shots fired. When they arrived they recovered five (5) .40 caliber casings and one (1) live .40 caliber round in the 8800 block of Olive Street. They were also told that a victim, Walter

MEJ
JCT

TS

Conley, was located at Ochsner Hospital. Conley told officers that upon leaving the grocery store at 8841 Olive Street, he heard gun fire and ran, injuring his thumb as he fell. Conley stated that he did not see the shooters, nor did he know who the target was.

Information received from a cooperating individual identified that Bernell Williams, Walter Conley and Norman Ratcliff had all been standing on the street outside the store prior to the shooting. Members of "Hell City" approached the store in a red, Dodge Charger and began shooting. Conley and Ratcliff returned fire. All three, including **Tyronne Stevenson**, had been hanging out together by the store but at the time of the shooting, **Stevenson** had left to purchase some marijuana. The shooting occurred as **Stevenson** was returning to the area, driving Ratcliff's burgundy Expedition. The red charger fled the area, past **Stevenson** and shot at him as well.

On February 8, 2009, at approximately 1:30 am, NOPD responded to the 9300 block of Apricot Street after receiving reports of shots fired. Officers recovered ten (10) 9mm spent casings and two (2) .40 caliber casings. Officers were also informed that a victim, S.F., had relocated to Oschner Hospital. The victim was interviewed and stated that she was the passenger in a car driven by her grandmother when they heard several gun shots. She realized she had been hit in the abdomen and was taken to the hospital. Neither she nor the others in the car could identify the shooters and/or targets.

On February 13, 2009, at approximately 1:45 pm, NOPD responded to the 8800 block of Olive Street after receiving reports of shots fired. When they arrived at that location they recovered twenty-five (25) 9mm casings and sixteen (16) .40 caliber casings. There were no victims or witnesses located and the only damage identified was to vehicles parked on the street.

Through subsequent investigation, it was learned that **Tyronne Stevenson**, Jones, Conley, and Norman Ratcliff were in the 8800 block of Olive Street when members of "Hell City" pulled up in a red,

MEJ
JCT
TS

Pontiac Sunfire occupied by the driver and at least one other person in the passenger seat. Someone from the Sunfire began firing at the group standing on the street. **Stevenson**, Jones, Conley, and Ratcliff all returned fire. **Tyronne Stevenson** was in possession of a Glock, .40 caliber pistol.

On February 13, 2009, sometime prior to 9:30 pm, NOPD received information from a concerned citizen identifying **Tyronne Stevenson** and Norman Ratcliff as the perpetrators of a number of shootings having recently occurred in the "Hollygrove" area. The caller stated that **Stevenson** and Ratcliff were driving around the area in a maroon Ford Expedition with a temporary tag. Officers located the vehicle and attempted to pull it over on Carrollton Avenue. As the car stopped, **Tyronne Stevenson** fled via the rear passenger door. Officers chased him and observed him throw a Glock, .40 caliber handgun onto the sidewalk. He was apprehended seconds later. Under the front passenger seat of the vehicle, where Ratcliff had been seated, officers recovered two additional handguns, a Jimenez 9mm and a Taurus, .40 caliber handgun. Officers identified Bernell Williams as the driver of the vehicle and Walter Conley as a second rear passenger.

Subsequent ballistic examination has identified that three (3) .40 caliber casing recovered from the February 2, 2009 incident, one (1) .40 caliber casing recovered from the February 8, 2009 incident, and five (5) .40 caliber casings from the February 13, 2009 incident were determined to have been fired from the same weapon, specifically identified as the Taurus, Millennium, .40 caliber pistol recovered from under the front passenger seat of the vehicle they were stopped in on February 13, 2009. Additionally, two (2) .40 caliber casings recovered from the February 2, 2009 incident, one (1) .40 caliber casing recovered from the February 8, 2009 incident and eleven (11) casings recovered from the February 13, 2009 incident were determined to have been fired from the same weapon, specifically identified as the Glock, Model 23, .40 caliber pistol possessed by **Tyronne Stevenson** on the evening of February 13, 2009.

MEJ
JCT
TS

Count 18:

On March 17, 2009, at approximately 8:48 pm, J.G., and D.H., who are both associated with "Hell City", were sitting on the porch of 1726 Monroe Street when a white, Ford pickup truck, travelling southbound on Monroe opened fire on them from the front passenger window. When police arrived, J.G. was found in the middle of the street while D.H. was located in an alley next to 1726 Monroe. Officers later learned that, another victim, eight year old S.R., had been taken to the hospital by his mother. All three sustained gunshot wounds and were treated and later released from the hospital. J.G. was shot in the both the arm and the foot while D.H. was shot in the leg. Officers recovered both .40 caliber and 9mm casings from the scene. No arrests were made.

ATF agents received information from a cooperating individual who stated that Carey Jones and Dejean Pierce were together at Pierce's residence when **Tyronne Stevenson** and Bernell Williams arrived in a white, pickup truck which belonged to D.W. **Stevenson** and Williams told Jones and Pierce that they were about to go looking for "Hell City". **Stevenson** and Williams asked where the Desert Eagle, .40 caliber pistol was located and learned that the firearm was at an abandoned house on Olive Street. **Stevenson** and Williams left, retrieved the firearm, drove to "Hell City" and shot J.G., D.H. and S.R..

During the follow-up investigation of this incident, ATF agents were able to locate numerous recorded telephone calls regarding this incident. In call 1237-346-432, made on March 17, 2009, at 10:10 pm, Walter Conley calls and speaks to Bernell Williams ("Bussy"). During the call Williams admits to shooting two members of "Hell City" and identifies that he was "strapped" meaning armed with a firearm. Williams also admits that "they" passed through the neighborhood and found the victims standing on the porch. In call 1237-417-493, made on March 18, 2009, at 6:04 pm, Conley calls and

MEJ
JCT
TS

speaks to Williams. Williams says *"I got the one I wanted"*, specifying that he shot one of the victims in the leg and one of victims in the side. In call 1237-417-780, made on March 18, 2009, at 6:08 pm, Conley calls again and speaks to **Tyronne Stevenson**. **Stevenson** tells Conley, *"I was with him"*, referring to the fact that he was with Williams at the time of the shooting. **Stevenson** also states *"A-boogie had that bitch singing"* meaning that Williams ("A-boogie") shot many times at the victims. During these calls it is obvious that **Stevenson** and Williams are bragging about their participation in this shooting to gain and maintain the respect of their associates.

A subsequent ballistic examination has identified that the .40 caliber casings recovered during the investigation into the shooting of J.G., D.H. and S.R. were fired from a Desert Eagle, .40 caliber pistol which was recovered in May 2009, during the execution of a search warrant at the residence of D.P., an unindicted co-conspirator and member of "Hollygrove".

Counts 1, 2, 3 and additional relevant conduct:

On April, 6, 2009, at approximately 10:00 PM, NOPD officers were on routine patrol when they saw three individuals standing next to a maroon, Hyundai, SUV parked in the 2100 block of Philip Street. As the officers stopped to watch the three, they observed Bernell Williams quickly enter and exit the vehicle at which time the interior of the car burst into flames. The officers approached and the subjects fled. Bernell Williams and Norman Ratcliff were apprehended by officers, while Carey Jones escaped capture.

In call 1239-136-117, made on April 7, 2009, at 3:27 PM, Walter Conley ("Ike") calls and speaks to **Tyronne Stevenson** ("Duke"). **Stevenson** identifies that "Bean", "Turk" and "Bussy" (Jones, Ratcliff, and Williams) *"ran from the people ... last night"* (ran from the police) after *"burnin' D-Rock's car up"* (setting fire to Dejean Pierce's vehicle). **Stevenson** tells Conley that the three used a can of

MEJ
JCT
TS

air-freshener as an accelerant, lit the car on fire, ran from the police, and that only Williams and Ratcliff were caught. **Stevenson** explains how Carey Jones ("Bean") hid on the top of a house and hurt his foot while trying to escape.

Count 21:

On April 10, 2009, **Tyronne Stevenson**, Golston, and Ratcliff went to Carey Jones' house and asked him if he wanted to ride with them over into the "Hell City" Area. Jones told them "no" because his ankle was still injured from running from the police a few days earlier. **Stevenson**, Golston and Ratcliff then left in a stolen Dodge Intrepid.

Later that morning, police responded to a call in the 1700 block of Monroe Street where they found G. B., a member of "Hell City", suffering from multiple gunshot wounds. Evidence recovered from the scene identified seventeen (17) 7.62 caliber rifle casings and thirteen (13) 9mm casings. Ballistics examination further identified that all seventeen (17) rifle casings were fired from the same weapon and that the thirteen (13) 9mm casings were fired from three (3) different 9mm firearms. The victim, G. B., was transported to the hospital. During a follow-up investigation the victim was uncooperative and did not identify any of his assailants, despite his serious injuries.

Later that day, **Stevenson**, Golston, and Ratcliff spoke with Carey Jones and bragged to him that they had shot G. B., who was a member of the rival group, "Hell City".

On April 11, 2009, NOPD was dispatched to investigate a call of Illegal Use of Weapons in the 700 block of N. Prieur Street. When officers arrived they observed several bullet casings on the ground in the 700 block of N. Prieur, a blood stain and a Smith & Wesson, 9mm pistol, S/N RAN4590. Officers checked University Hospital for potential victims and located Norman Ratcliff, D.P (aka "DJ"), and two other victims. The four victims told police that while in the 700 block of N. Prieur, they were approached

MEJ
JCT
TS

by a black male, with dreadlocks who began shooting into the crowd. Subsequent investigation by ATF determined that Carey Jones (“Bean”), **Tyronne Stevenson** (“Duke”) and Mark Glen were also present at the time of the shooting.

Collected from the scene were a total of thirteen (13) 9mm casings as well as the Smith & Wesson handgun, loaded with a total of sixteen (16) live rounds. Officers also followed a blood trail to the steps of 2020 Dumaine Street. A Norinco, 7.62 x 39 mm caliber assault rifle was also recovered from inside 2020 Dumaine Street while a single live round of 9mm ammunition was recovered from the 2000 block of Dumaine. At the time of the incident, Norman Ratcliff was residing at 2020 Dumaine Street with his mother. A ballistic comparison positively identified both the Smith & Wesson, 9mm handgun, as well as the Norinco, 7.62 caliber assault rifle, as two of the firearms that were used the day before, on April 10, 2009, in the shooting of G. B.

Additional relevant conduct:

Additional witnesses would testify that **TYRONNE STEVENSON**, aka “Duke”, **CAREY JONES**, aka “Bean”, **THERON GOLSTON**, aka “Thema”, **RYAN CARROLL**, aka “Ronnie Boo”, **BERNELL WILLIAMS** aka “Bussy”, **WALTER CONLEY**, aka “Ike Neezy”, **NORMAN RATCLIFF**, aka “Turk”, and **MARK GLEN** were street level dealers of illegal narcotics and sold crack cocaine (and on occasion marijuana and heroin) on a daily basis from 2006 through 2012, while hanging out on the street corners in the Hollygrove neighborhood, when they were not in jail. These witnesses would also testify that **CHINA STEWART**, aka “Ms. China”, aka “Mom”, supplied these individuals with crack cocaine on occasion so that they could sell these drugs on the street in an effort to raise bond money to get their associates out of jail.

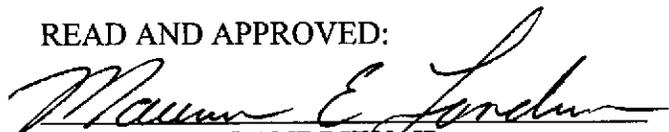
MEJ
JCT

The Government and the defendant **TYRONNE STEVENSON** agree and stipulate that for sentencing purposes the government could prove that the amount of cocaine base (“crack”) that was distributed and possessed with the intent to be distributed by members of this conspiracy during the course of this conspiracy was not less than 28 grams but not more than 196 grams of cocaine base (“crack”). The amounts of marijuana and heroin that was involved in this conspiracy were negligible for sentencing purposes.

Limited Nature of Factual Basis

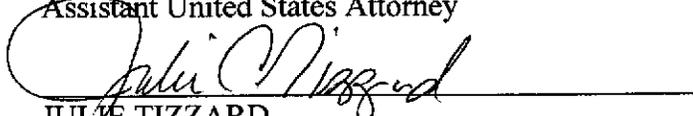
This proffer of evidence is not intended to constitute a complete statement of all facts known by **TYRONNE STEVENSON** and described by **TYRONNE STEVENSON** to the government, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for **TYRONNE STEVENSON’s** plea of guilty to the charged offenses in Counts 1, 2, 3, 18, and 21 of the Second Superseding Indictment.

READ AND APPROVED:


MAURICE E. LANDRIEU, JR.

Assistant United States Attorney

1/14/13 7/16/13
DATE


JULIE TIZZARD

Counsel for Tyrone Stevenson

7/14/13 7/16/13
DATE


TYRONNE STEVENSON
Defendant

1-4-13 7/16/13
DATE