UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

INDICTMENT FOR VIOLATIONS OF THE RACKETEER INFLUENCED CORRUPT ORGANIZATION ACT, THE FEDERAL GUN CONTROL ACT, THE FEDERAL CONTROLLED SUBSTANCES ACT, AND FOR THE COMMISSION OF MURDER AND OTHER VIOLENT CRIMES IN AID OF RACKETEERING

SEALED

UNITED STATES OF AMERICA	*	**CRIMINAL NO:**
v.	*	**SECTION:**
DELOYD JONES	*	**VIOLATION: 18 U.S.C. § 1962(d)**
a/k/a "Puggy"		**18 U.S.C. § 1959**
BYRON JONES	*	**18 U.S.C. § 924(c)(1)(A)**
a/k/a "Big Baby"		**18 U.S.C. § 924(j)**
TRE CLEMENTS	*	**18 U.S.C. § 924(o)**
ERVIN SPOONER		**18 U.S.C. § 2**
a/k/a "Nerky"	*	**21 U.S.C. § 846**
ROMALIS PARKER		**21 U.S.C. § 841(a)(1)**
a/k/a "Ro Ro"	*	**21 U.S.C. § 841(b)(1)(A)**
NYSON JONES		
a/k/a "Nycie"	*	
SIDNEY PATTERSON		
a/k/a "Duda Man"	*	
ANDREALIE LEWIS		
a/k/a "Noot"	*	
MORRIS SUMMERS		
TYONE BURTON	*	
a/k/a "Peanut"		
TYRONE BURTON	*	
a/k/a "Man Man"		
PERRY WILSON	*	
a/k/a "Yummy"		
*	*	*

The Grand Jury charges that:

COUNT 1

(Racketeer Influenced and Corrupt Organizations Conspiracy)

General Allegations

1. At all relevant times, defendants **DELOYD JONES**, a/k/a "Puggy," **BYRON JONES**, a/k/a "Big Baby," and **SIDNEY PATTERSON**, a/k/a "Duda Man," and others known and unknown to the Grand Jury, were members and associates of a criminal enterprise referred to as "Ride or Die" or "ROD" (herein referred to as "ROD"), an organization engaged in, among other things, conspiracy to distribute controlled substances, distribution of controlled substances, murder, conspiracy to commit murder, and attempted murder. At all relevant times, "ROD" operated in the Eastern District of Louisiana.

2. This organization has historically encompassed an area in the Eighth Ward of New Orleans, Louisiana and operates or operated primarily in this specified area. The boundaries of this area generally comprise North Miro Street on the north, St. Claude Avenue on the south, Elysian Fields Avenue on the west, and Franklin Avenue on the east.

The Racketeering Enterprise

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

Purposes of the Enterprise

4. The purposes of the enterprise include, but are not limited to, the following:

a. Enriching the members and associates of the enterprise through, among other things, the control of and participation in the distribution of controlled substances in the territory controlled by the enterprise;

b. Preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, and threats of violence, including aggravated assault, robbery and murder;

c. Keeping victims, potential victims, and witnesses in fear of the enterprise and in fear of its members and associates through violence and threats of violence;

d. Providing information to members and associates of the enterprise, including those who were incarcerated for committing acts of violence, robbery, distribution of controlled substances, and other offenses; and

e. 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

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

a. Members of the enterprise and their associates conspired to, committed, attempted to, and threatened to commit shootings, various firearms offenses, and violent acts, including but not limited to murder, attempted murder, armed robbery, aggravated battery, illegal possession of firearms, 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;

b. Members of the enterprise and their associates promoted a climate of fear through violence and threats of violence and sought retribution on anyone who showed them or the enterprise any disrespect;

c. Members of the enterprise and their associates engaged in the distribution of controlled substances as a means to generate income. Members have been arrested repeatedly with crack cocaine, marijuana and heroin;

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 maintained and circulated a collection of firearms for use in criminal activity by other co-conspirators;

f. Members of the enterprise and their associates used stolen vehicles in their efforts to avoid detection by law enforcement officers, distribute controlled substances, illegally possess firearms, perform violent acts, and intimidate witnesses;

g. Members of the enterprise and their associates used telephones, even while in jail, to give direction and advice to each other in an effort to circumvent the criminal justice system, distribute controlled substances, illegally possess firearms, perform violent acts, and intimidate witnesses; and

h. Members of the enterprise and their associates bragged about their illegal activity, such as their possession and use of firearms, to each other and made videos and took pictures of themselves posing with firearms and money in an effort to intimidate others in the community and to maintain or increase their position inside the enterprise.

Roles of the Defendants

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

a. Defendant **DELOYD JONES**, a/k/a "Puggy," acted as a leader, a distributor of controlled substances and gunman for the enterprise.

b. Defendants **BYRON JONES**, a/k/a "Big Baby," and **SIDNEY PATTERSON**, a/k/a "Duda Man," acted as distributors of controlled substances and gunmen for the enterprise.

The RICO Conspiracy Charge

7. Beginning in or about 2007, and continuing to on or about the date of the return of this Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **DELOYD JONES**, a/k/a "Puggy," **BYRON JONES**, a/k/a "Big Baby," and **SIDNEY PATTERSON**, a/k/a "Duda Man," and others known and unknown to the Grand Jury, each being persons

employed by and associated with the criminal enterprise, as described in paragraphs 1 through 6 of this Count, which are realleged and incorporated herein, which enterprise engaged in and the activities of which affected interstate and foreign commerce, did knowingly and intentionally, combine, conspire, confederate and agree 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 Statute 30.1 (Second Degree Murder);

b. Robbery, in violation of Title 14, Louisiana Revised Statute, Sections 64 and 64.1;

c. Dealing controlled substances, in violation of Title 40, Louisiana Revised Statutes, Sections 966 and 967; and multiple acts involving narcotics trafficking in violation of the following federal offenses:

d. narcotics trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

8. 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

9. In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, the defendants **DELOYD JONES**, a/k/a "Puggy," **BYRON JONES**, a/k/a "Big Baby," and

SIDNEY PATTERSON, a/k/a "Duda Man," and others known and unknown to the Grand Jury, committed various overt acts, on or about the following times and dates, in the Eastern District of Louisiana, and elsewhere including but not limited to the following:

1. On or about June 2, 2007, defendant **DELOYD JONES**, a/k/a "Puggy," committed a robbery.
2. On or about November 1, 2007, defendant **DELOYD JONES**, a/k/a "Puggy," possessed a firearm.
3. On or about December 5, 2007, defendant **DELOYD JONES**, a/k/a "Puggy," possessed a firearm.
4. On or about December 22, 2007, defendant **BYRON JONES,** a/k/a "Big Baby," possessed a firearm.
5. On or about March 1, 2008, defendant **SIDNEY PATTERSON**, a/k/a "Duda Man," possessed with intent to distribute a quantity of marijuana.
6. On or about March 30, 2008, defendant **SIDNEY PATTERSON**, a/k/a "Duda Man," possessed with intent to distribute a quantity of cocaine base ("crack cocaine").
7. On or about April 18, 2008, Tre Clements possessed with intent to distribute a quantity of cocaine base ("crack cocaine") and illegally possessed a firearm.
8. On or about November 11, 2008, Ervin Spooner, a/k/a "Nerky," possessed with intent to distribute a quantity of marijuana.
9. On or about December 27, 2008, defendant **BYRON JONES**, a/k/a "Big Baby," possessed with intent to distribute a quantity of marijuana and possessed a firearm.

10. On or about February 23, 2009, Tre Clements and Nyson Jones, a/k/a "Nycie," possessed with intent to distribute a quantity of marijuana.

11. On or about March 25, 2009, Ervin Spooner, a/k/a "Nerky," Tre Clements and Morris Summers possessed two firearms.

12. On or about March 28, 2009, Nyson Jones, a/k/a "Nycie," made a telephone call from Orleans Parish Prison in furtherance of the criminal enterprise known as "ROD" to Andrealie Lewis, a/k/a "Noot," and defendant **DELOYD JONES**, a/k/a "Puggy."

13. On or about May 6, 2009, defendant **DELOYD JONES**, a/k/a "Puggy," possessed and discharged a firearm injuring S.W.

14. Beginning on or about May 16, 2009, and continuing through May 22, 2009, defendant **DELOYD JONES**, a/k/a "Puggy," completed multiple telephone calls from the Orleans Parish Prison to defendant **BYRON JONES**, a/k/a "Big Baby," and Andrealie Lewis, a/k/a "Noot," and discussed the criminal activity of the enterprise.

15. On or about June 22, 2009, an unindicted co-conspirator A.A. possessed and discharged a firearm injuring S.W.

16. On or about July 18, 2009, defendant **DELOYD JONES**, a/k/a "Puggy," possessed and discharged a firearm injuring T.G.

17. On or about July 18, 2009, defendants **DELOYD JONES**, a/k/a "Puggy," and **BYRON JONES**, a/k/a "Big Baby," possessed firearms while in a stolen vehicle.

18. On or about February 24, 2010, defendants **BYRON JONES**, a/k/a "Big Baby," **SIDNEY PATTERSON**, a/k/a "Duda Man," and other associates, possessed and discharged firearms injuring I.R. and killing Travis Arnold.

19. On or about March 17, 2010, Tre Clements possessed a firearm while in a stolen vehicle.

20. On or about March 22, 2010, defendant **DELOYD JONES**, a/k/a "Puggy," in a call from the Orleans Parish Prison discussed a firearm possessed by Romalis Parker, a/k/a "Ro Ro."

21. On or about March 23, 2010, Romalis Parker, a/k/a "Ro Ro," possessed a firearm.

22. On or about March 23, 2010, Romalis Parker, a/k/a "Ro Ro," possessed a firearm while in possession of marijuana.

23. Beginning on or about March 24, 2010, and continuing through April 1, 2010, defendants **DELOYD JONES**, a/k/a "Puggy," and **BYRON JONES**, a/k/a/ "Big Baby," along with Romalis Parker, a/k/a "Ro Ro," completed multiple telephone calls from the Orleans Parish Prison to known individuals and discussed the criminal activity of the enterprise.

24. On or about April 2, 2010, defendant **SIDNEY PATTERSON**, a/k/a "Duda Man," possessed and discharged a firearm, injuring A.H.

25. On or about April 2, 2010, defendant **DELOYD JONES**, a/k/a "Puggy," completed a call and discussed the shooting of A.H.

26. Beginning on or about April 3, 2010, and continuing through April 9, 2010, defendant **DELOYD JONES**, a/k/a "Puggy," and Romalis Parker, a/k/a "Ro Ro," completed numerous telephone calls from the Orleans Parish Prison to known individuals and discussed the criminal activity of the enterprise.

27. On or about April 29, 2010, defendant **BYRON JONES**, a/k/a "Big Baby," possessed and discharged a firearm injuring E.A.

28. On or about May 10, 2010, defendant **BYRON JONES**, a/k/a "Big Baby," possessed a firearm.

29. On or about May 26, 2010, defendant **SIDNEY PATTERSON**, a/k/a "Duda Man," possessed a firearm.

30. On or about September 17, 2010, Tyone Burton, a/k/a "Peanut," possessed a firearm.

31. On or about November 9, 2010, defendant **DELOYD JONES**, a/k/a "Puggy," possessed and discharged a firearm, killing Rodney Coleman.

32. On or about January 6, 2011, defendants **DELOYD JONES**, a/k/a "Puggy," and **SIDNEY PATTERSON**, a/k/a "Duda Man," possessed and discharged a firearm, injuring J.J. and M.C.

33. On or about January 15, 2011, defendant **DELOYD JONES**, a/k/a "Puggy," and his associates possessed and discharged two firearms, injuring Q.B.

34. On or about January 17, 2011, defendant **DELOYD JONES**, a/k/a "Puggy," and other associates possessed and discharged two firearms, injuring V.G. and killing Devon Hutton.

35. On or about January 18, 2011, defendants **DELOYD JONES**, a/k/a "Puggy," and **SIDNEY PATTERSON**, a/k/a "Duda Man," possessed and discharged firearms killing Corey Blue.

36. On or about January 24, 2011, Tre Clements possessed two firearms.

37. Beginning on or about February 7, 2011, and continuing through February 21, 2011, defendant **DELOYD JONES**, a/k/a "Puggy," and Tre Clements completed numerous telephone calls from the Orleans Parish Prison to known individuals and discussed the criminal activity of the enterprise.

38. On or about February 15, 2011, defendant **DELOYD JONES**, a/k/a "Puggy," possessed a firearm.

39. On or about March 20, 2011, defendant **SIDNEY PATTERSON**, a/k/a "Duda Man," Tyone Burton, a/k/a "Peanut," and Tyron Burton, a/k/a "Man Man," were in a stolen automobile with a firearm.

40. On or about March 25, 2011, Ervin Spooner, a/k/a "Nerky," possessed with intent to distribute a quantity of heroin.

41. On or about April 7, 2011, defendant **SIDNEY PATTERSON**, a/k/a "Duda Man," completed a telephone call from the Orleans Parish Prison, and discussed the presence of Tyone Burton, a/k/a "Peanut," and Tyron Burton, a/k/a "Man Man," in a stolen vehicle with him.

42. On or about April 8, 2011, defendant **SIDNEY PATTERSON**, a/k/a "Duda Man," completed a telephone call from the Orleans Parish Prison, and discussed criminal activity.

43. On or about July 17, 2011, defendant Romalis Parker, a/k/a "Ro Ro," possessed with intent to distribute a quantity of cocaine base ("crack cocaine").

44. On or about September 15, 2011, defendant **SIDNEY PATTERSON**, a/k/a "Duda Man," possessed with intent to distribute a quantity of marijuana and cocaine base ("crack cocaine").

45. Beginning on or about September 15, 2011, and continuing through September 16, 2011, defendant **SIDNEY PATTERSON**, a/k/a "Duda Man," completed multiple telephone calls from the Orleans Parish Prison to known individuals and discussed the criminal activity of the enterprise.

46. On or about December 26, 2011, Perry Wilson, a/k/a/ "Yummy," possessed a firearm.

47. On or about January 26, 2012, Tyone Burton, a/k/a "Peanut," possessed a firearm.

48. On or about July 30, 2012, Nyson Jones, a/k/a "Nycie," possessed a firearm.

49. On or about, July 31, 2012, Perry Wilson, a/k/a/ "Yummy," possessed a firearm with an obliterated serial number.

50. On or about September 13, 2012, Tyron Burton, a/k/a "Man Man," possessed a firearm.

51. On or about January 30, 2013, Perry Wilson, a/k/a/ "Yummy," possessed with intent to distribute a quantity of marijuana.

52. On or about April 10, 2013, Tyron Burton, a/k/a "Man Man," possessed a firearm.

SPECIAL SENTENCING ALLEGATIONS

The Grand Jury further alleges that:

1. Beginning in or about 2007, and continuing to on or about the date of the return of this Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **DELOYD JONES**, a/k/a "Puggy," **BYRON JONES**, a/k/a "Big Baby," and **SIDNEY PATTERSON**, a/k/a "Duda Man," and others known and unknown to the Grand Jury, combined, conspired, confederated and agreed with each other to knowingly and intentionally distribute 280 grams or more of cocaine base ("crack cocaine"), a Schedule II narcotic in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

2. On February 24, 2010, in the Eastern District of Louisiana and elsewhere, defendants **BYRON JONES**, a/k/a "Big Baby," and **SIDNEY PATTERSON** a/k/a "Duda Man," with the specific intent to kill and inflict great bodily harm, did kill Travis Arnold, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.

3. On November 9, 2010, in the Eastern District of Louisiana and elsewhere, defendant **DELOYD JONES**, a/k/a "Puggy," with the specific intent to kill and inflict great bodily harm, did kill Rodney Coleman, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.

4. On January 17, 2011, in the Eastern District of Louisiana and elsewhere, defendant **DELOYD JONES**, a/k/a "Puggy," with the specific intent to kill and inflict great bodily harm, did kill Devin Hutton, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.

5. On January 18, 2011, in the Eastern District of Louisiana and elsewhere, defendants **DELOYD JONES**, a/k/a "Puggy" and **SIDNEY PATTERSON**, a/k/a "Duda Man," with the specific intent to kill and inflict great bodily harm, did kill Corey Blue, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.

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

COUNT 2
(Conspiracy to Distribute Controlled Substances)

Beginning in or about 2008, and continuing to on or about the date of this Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **DELOYD JONES**, a/k/a "Puggy," **BYRON JONES**, a/k/a "Big Baby," **TRE CLEMENTS**, **ERVIN SPOONER**, a/k/a "Nerky," **ROMALIS PARKER**, a/k/a "Ro Ro," **NYSON JONES**, a/k/a "Nycie," **SIDNEY PATTERSON**, a/k/a "Duda Man," **ANDREALIE LEWIS**, a/k/a "Noot," **MORRIS SUMMERS**, **TYONE BURTON,** a/k/a "Peanut," **TYRON BURTON**, a/k/a "Man Man," and **PERRY WILSON**, a/k/a/ "Yummy," did knowingly and intentionally combine, conspire,

confederate and agree with each other and with other persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute 280 grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack cocaine"), a Schedule II narcotic drug controlled substance and quantities of heroin and marijuana, both Schedule I drug controlled substances; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), and 841(b)(1)(D); all in violation of Title 21, United States Code, Section 846.

COUNT 3
(Conspiracy to Possess Firearms)

Beginning in or about 2007, and continuing to on or about the date of this Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **DELOYD JONES**, a/k/a "Puggy," **BYRON JONES**, a/k/a "Big Baby," **TRE CLEMENTS**, **ERVIN SPOONER**, a/k/a "Nerky," **ROMALIS PARKER**, a/k/a "Ro Ro," **NYSON JONES**, a/k/a "Nycie," **SIDNEY PATTERSON**, a/k/a "Duda Man," **ANDREALIE LEWIS**, a/k/a "Noot," **MORRIS SUMMERS**, **TYONE BURTON**, a/k/a "Peanut," **TYRON BURTON**, a/k/a "Man Man," and **PERRY WILSON**, a/k/a/ "Yummy," did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, during and in relation to a crime of violence and drug trafficking crimes, to use and carry firearms, and possess firearms in furtherance of a crimes of violence and drug trafficking crimes as alleged in Counts 1 and 2, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances; all in violation of Title 18, United States Code, Section 924(o).

COUNT 4
(Possession with Intent to Distribute a Controlled Substance)

On or about November 11, 2008, in the Eastern District of Louisiana, the defendant **ERVIN SPOONER**, a/k/a "Nerky," did knowingly and intentionally possess with intent to distribute a quantity of marijuana, a Schedule I drug controlled substance in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 5
(Murder in Aid of Racketeering)

1. At all times relevant to this Indictment, the enterprise as more fully described in Paragraphs 1 through 5 of Count 1 of this 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 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, Section 30.1(A)(1); robbery, in violation of Title 14, Louisiana Revised Statutes, Sections 64 and 64.1; and the distribution and possession with the intent to distribute controlled substances, in violation of the laws of the State of Louisiana (Title 40, Louisiana Revised Statutes, Sections 966 and 967), and in violation of Federal Criminal Law (Title 21, United States Code, Sections 841 and 846).

3. On or about February 24, 2010, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in ROD, an enterprise engaged in racketeering activity, the defendants, **BYRON JONES**, a/k/a "Big Baby," and **SIDNEY PATTERSON** a/k/a "Duda Man," and others known and unknown to the Grand Jury, did murder Travis Arnold, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 6

(Causing Death Through the Use of a Firearm)

On or about February 24, 2010, in the Eastern District of Louisiana, the defendants, **BYRON JONES**, a/k/a "Big Baby," and **SIDNEY PATTERSON** a/k/a "Duda Man," and others known and unknown to the Grand Jury, did knowingly discharge an unknown firearm, during and in relation to a crime of violence, to wit: conspiracy to violate RICO, as charged in Count 1, and drug trafficking crimes to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack cocaine"), heroin, and marijuana, as set forth in Count 2 of this Indictment; and in the course thereof caused the death of Travis Arnold through the use of a firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 7

(Assault with a Dangerous Weapon 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 February 24, 2010, in the Eastern District of Louisiana, for the

purpose of gaining entrance to and maintaining and increasing position in ROD, an enterprise engaged in racketeering activity, the defendants, **BYRON JONES**, a/k/a "Big Baby," and **SIDNEY PATTERSON** a/k/a "Duda Man," and others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon I.R., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 8
(Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime)

On or about February 24, 2010, in the Eastern District of Louisiana, the defendants, **BYRON JONES**, a/k/a "Big Baby," and **SIDNEY PATTERSON** a/k/a "Duda Man," and others known and unknown to the Grand Jury, did knowingly discharge an unknown firearm, during and in relation to, and in furtherance of:

1. a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Indictment; and

2. drug trafficking crimes, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack cocaine"), heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of the Indictment for which they may be prosecuted in a court of the United States; all in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT 9
(Assault with a Dangerous Weapon 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 April 29, 2010, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in ROD, an enterprise engaged in racketeering activity, the defendant, **BYRON JONES**, a/k/a "Big Baby," did commit an assault with a dangerous weapon upon E.A., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 10
(Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime)

On or about April 29, 2010, in the Eastern District of Louisiana, the defendant, **BYRON JONES**, a/k/a "Big Baby," did knowingly discharge an unknown firearm, during and in relation to, and in furtherance of:

1. a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Indictment; and

2. drug trafficking crimes, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack cocaine"), heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of the Indictment for which he may be prosecuted in a court of the United States; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 11
(Murder 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 November 9, 2010, 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, **DELOYD JONES**, a/k/a "Puggy," and others known and unknown to the Grand Jury, did murder Rodney Coleman, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1(A)(1) and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 12
(Causing Death Through the Use of a Firearm)

On or about November 9, 2010, in the Eastern District of Louisiana, the defendant, **DELOYD JONES**, a/k/a "Puggy," did knowingly discharge an unknown firearm, during and in relation to a crime of violence, to wit: conspiracy to violate RICO, as charged in Count 1, and drug trafficking crimes to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack cocaine"), heroin, and marijuana, as set forth in Count 2 of this Indictment; and in the course thereof caused the death of Rodney Coleman through the use of a firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 13
(Assault with a Dangerous Weapon 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 January 6, 2011, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in ROD, an enterprise engaged in racketeering activity, the defendants, **DELOYD JONES**, a/k/a "Puggy," and **SIDNEY PATTERSON**, a/k/a "Duda Man," did commit an assault with a dangerous weapon upon J.J.

and M.C., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 14
(Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime)

On or about January 6, 2011, in the Eastern District of Louisiana, the defendants, **DELOYD JONES**, a/k/a "Puggy" and **SIDNEY PATTERSON**, a/k/a "Duda Man," did knowingly discharge a known firearm, to wit; a Sig Sauer Model P229, .40 caliber handgun, serial number AD30373, during and in relation to, and in furtherance of:

1. a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Indictment; and

2. drug trafficking crimes, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack cocaine"), heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of the Indictment for which they may be prosecuted in a court of the United States; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 15
(Murder 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 January 17, 2011, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in ROD, an enterprise engaged in racketeering activity, the defendant, **DELOYD JONES**, a/k/a "Puggy," and others known and

unknown to the Grand Jury, did murder Devin Hutton, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1(A)(1) and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 16
(Causing Death Through the Use of a Firearm)

On or about January 17, 2011, in the Eastern District of Louisiana, the defendant, **DELOYD JONES**, a/k/a "Puggy," and others known and unknown to the Grand Jury, did knowingly discharge two unknown firearms and one known firearm, to wit; a Sig Sauer Model P229, .40 caliber semi-automatic handgun, serial number AD30373, during and in relation to a crime of violence, to wit: conspiracy to violate RICO, as charged in Count 1, and drug trafficking crimes to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack cocaine"), heroin, and marijuana, as set forth in Count 2 of this Indictment; and in the course thereof caused the death of Devin Hutton through the use of a firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 17
(Assault with a Dangerous Weapon 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 January 17, 2011, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in ROD, an enterprise engaged in racketeering activity, the defendant, **DELOYD JONES**, a/k/a "Puggy," and others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon V.G. and

K.C., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 18
(Use and Carrying of a Firearm During and in Relation to a Crime of Violence and a Drug Trafficking Crime)

On or about January 17, 2011, in the Eastern District of Louisiana, the defendant, **DELOYD JONES**, a/k/a "Puggy," and others known and unknown to the Grand Jury, did knowingly discharge two unknown firearms and one known firearm, to wit; a Sig Sauer Model P229, .40 caliber semi-automatic handgun, serial number AD30373, during and in relation to, and in furtherance of:

1. a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Indictment; and

2. drug trafficking crimes, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack cocaine"), heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of the Indictment for which they may be prosecuted in a court of the United States; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 19
(Murder 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 January 18, 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 defendants, **DELOYD JONES**, a/k/a "Puggy," and **SIDNEY PATTERSON**, a/k/a "Duda Man," did murder Corey Blue, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1(A)(1) and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 20

(Causing Death Through the Use of a Firearm)

On or about January 18, 2011, in the Eastern District of Louisiana, the defendants, **DELOYD JONES**, a/k/a "Puggy," and **SIDNEY PATTERSON**, a/k/a "Duda Man," did knowingly discharge an unknown firearm and a known firearm, to wit; a Sig Sauer Model P229, .40 caliber semi-automatic handgun, serial number AD30373, during and in relation to, a crime of violence, to wit: conspiracy to violate RICO, as charged in Count 1, and drug trafficking crimes to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack cocaine"), heroin, and marijuana, as set forth in Count 2 of this Indictment; and in the course thereof caused the death of Corey Blue through the use of a firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111; all in violation of Title 18, United States Code, Sections 924(j) and 2.

NOTICE OF RICO FORFEITURE

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 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, **DELOYD**

JONES, a/k/a "Puggy," **BYRON JONES,** a/k/a "Big Baby," and **SIDNEY PATTERSON,** a/k/a "Duda Man," shall forfeit to the United States of America:

a. any interest acquired or maintained in violation of section 1962;

b. any interest in, security of, claim against, and/or property and contractual rights of any kind affording a source of influence over any enterprise which the defendants established, operated, controlled, conducted, or participated in the conduct of, in violation of section 1962; 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 Count 2 of this 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 25, United States Code, Section 853.

2. As a result of the offenses alleged in Count 2 of this Indictment, the defendants, **DELOYD JONES,** a/k/a "Puggy," **BYRON JONES,** a/k/a "Big Baby," **TRE CLEMENTS, ERVIN SPOONER,** a/k/a "Nerky," **ROMALIS PARKER,** a/k/a "Ro Ro," **NYSON JONES,** a/k/a "Nycie," **SIDNEY PATTERSON**, a/k/a "Duda Man," **ANDREALIE LEWIS,** a/k/a "Noot," **MORRIS SUMMERS, TYONE BURTON,** a/k/a "Peanut," **TYRON BURTON,** a/k/a "Man Man," and **PERRY WILSON**, a/k/a/ "Yummy," 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 Count 2 of this 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 GUN FORFEITURE

1. The allegations of Counts 6, 8, 10, 12, 14, 16, 18 and 20 of this 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) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 6, 8, 10, 12, 14, 16, 18 and 20 of this Indictment, the defendants, **DELOYD JONES**, a/k/a "Puggy," **BYRON JONES**, a/k/a "Big Baby," **TRE CLEMENTS**, **ERVIN SPOONER**, a/k/a "Nerky," **ROMALIS PARKER**, a/k/a "Ro Ro," **NYSON JONES**, a/k/a "Nycie," **SIDNEY PATTERSON**, a/k/a "Duda Man," **ANDREALIE LEWIS**, a/k/a "Noot," **MORRIS SUMMERS**, **TYONE BURTON,** a/k/a "Peanut," **TYRON BURTON**, a/k/a "Man Man," and **PERRY WILSON**, a/k/a/ "Yummy," 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, Sections 924(o), 924(j), 924(c)(1)(A) and 922(g)(1), as alleged in Counts 6, 8, 10, 12, 14, 16, 18 and 20 of the 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 924(o), 924(j), 924(c)(1)(A) and 922(g)(1).

NOTICE OF SPECIAL FINDINGS

1. The Grand Jury incorporates by reference and realleges the allegations contained in Counts 5, 6, 11, 12, 15, 16, 19 and 20 and makes the following special findings:

2. As to Counts 5 and 6, defendants **BYRON JONES**, a/k/a "Big Baby" and **SIDNEY PATTERSON** a/k/a "Duda Man,"

a. were 18 years of age or older at the time of the offense;

b. intentionally killed Travis Arnold (18 U.S.C. § 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of Travis Arnold; (18 USC § 3591(a)(2)(B));

d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Travis Arnold died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));

e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Travis Arnold died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));

f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592 (c)(5));

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

h. the defendants intentionally killed or attempted to kill more than one person in a single criminal episode (18 U.S.C. § 3592(c)(16)).

3. As to Counts 11 and 12, defendant **DELOYD JONES**, a/k/a "Puggy,"

a. was 18 years of age or older at the time of the offenses;

b. intentionally killed Rodney Coleman (18 U.S.C. § 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of Rodney Coleman (18 U.S.C. § 3591(a)(2)(B));

d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Rodney Coleman died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));

e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Rodney Coleman died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));

f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592 (c)(5)); and

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

4. As to Counts 15 and 16, defendant **DELOYD JONES**, a/k/a "Puggy"

a. was 18 years of age or older at the time of the offenses;

b. intentionally killed Devin Hutton (18 U.S.C. § 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of Devin Hutton (18 U.S.C. § 3591(a)(2)(B));

d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Devin Hutton died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));

e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants

in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Devin Hutton died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));

f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592(c)(5));

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

h. intentionally killed or attempted to kill more than one person in a single criminal episode (18 U.S.C. § 3592(c)(16)).

5. As to Counts 19 and 20, defendants **DELOYD JONES**, a/k/a "Puggy" and **SIDNEY PATTERSON**, a/k/a "Duda Man,"

a. were 18 years of age or older at the time of the offenses;

b. intentionally killed Corey Blue (18 U.S.C. § 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the death of Corey Blue (18 U.S.C. § 3591(a)(2)(B));

d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Corey Blue died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));

e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Corey Blue died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));

f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592(c)(5)); and

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

A TRUE BILL:

_____
FOREPERSON

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First Assistant United States Attorney
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New Orleans, Louisiana
September 19, 2013