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WILLIAM W. BLEWETT
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

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

UNITED STATES OF AMERICA

* CRIMINAL DOCKET NO. 13-227

v.

* SECTION: "B"(1)

TRAVIS SCOTT

* VIOLATIONS: 21 U.S.C. § 846

a/k/a "Trap," a/k/a "Slim"

21 U.S.C. § 841(a)

STANLEY SCOTT

*

21 U.S.C. § 841(b)(1)(A)

a/k/a "Stizzle"

21 U.S.C. § 841(b)(1)(C)

SHAWN SCOTT

*

21 U.S.C. § 924(c)

a/k/a "Shizzle"

18 U.S.C. § 924(o)

AKEIN SCOTT

*

18 U.S.C. § 924(g)(1)

a/k/a "Keemy"

18 U.S.C. § 924(a)(2)

JEREMIAH JACKSON

*

a/k/a "Rocky"

GRALEN BENSON

*

a/k/a "Dooley"

BRIAN BENSON

*

a/k/a "Dub," a/k/a "Dubba"

RICHMOND SMITH

*

a/k/a "Ace"

CRYSTAL SCOTT

*

a/k/a "Chris"

* * *

The Grand Jury charges that:

COUNT 1

Fee USA
 Process _____
 Dktd _____
CtRmDep _____
Doc. No. _____

Beginning at a time unknown, but prior to June 26, 2006, and continuing to on or about
December 31, 2013, in the Eastern District of Louisiana and elsewhere, the defendants, TRAVIS

SCOTT, a/k/a "Trap," a/k/a "Slim," **STANLEY SCOTT**, a/k/a "Stizzle," **SHAWN SCOTT**, a/k/a "Shizzle," **AKEIN SCOTT**, a/k/a "Keemy," **JEREMIAH JACKSON**, a/k/a "Rocky," **GRALEN BENSON**, a/k/a "Dooley," **BRIAN BENSON**, a/k/a "Dub," a/k/a "Dubba," **RICHMOND SMITH**, a/k/a "Ace," and **CRYSTAL SCOTT**, a/k/a "Chris," did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury to distribute and possess with the intent to distribute 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I drug controlled substance, and 280 grams or more of a substance containing a detectable amount of cocaine base (crack cocaine), a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a), 841(b)(1)(A), and 846.

COUNT 2

Beginning at a time unknown, but prior to June 26, 2006, and continuing to on or about December 31, 2013, in the Eastern District of Louisiana and elsewhere, the defendants, **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," **STANLEY SCOTT**, a/k/a "Stizzle," **SHAWN SCOTT**, a/k/a "Shizzle," **AKEIN SCOTT**, a/k/a "Keemy," **JEREMIAH JACKSON**, a/k/a "Rocky," **GRALEN BENSON**, a/k/a "Dooley," and **RICHMOND SMITH**, a/k/a "Ace," did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury, to use and carry firearms during and in relation to and to possess firearms in furtherance of a drug-trafficking crime, to wit: conspiracy to distribute and possess with intent to distribute heroin and cocaine base (crack cocaine), as charged in Count 1 of this Superseding Indictment, in violation of Title 18, United States Code, Section 924(c); all in violation of Title 18, United States Code, Section 924(o).

COUNT 3

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

COUNT 4

On or about March 5, 2013, in the Eastern District of Louisiana, the defendant, **AKEIN SCOTT**, a/k/a "Keemy," did knowingly possess a firearm in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with intent to distribute heroin and cocaine base (crack cocaine), as charged in Count 1 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 5

On or about April 19, 2013, in the Eastern District of Louisiana, the defendant, **SHAWN SCOTT**, a/k/a "Shizzle," did knowingly and intentionally possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of heroin, a Schedule I drug

controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 6

On or about May 12, 2013, in the Eastern District of Louisiana, the defendants, **SHAWN SCOTT**, a/k/a "Shizzle," and **AKEIN SCOTT**, a/k/a "Keemy," did knowingly use and carry a firearm during and in relation to a drug-trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with intent to distribute heroin and cocaine base (crack cocaine), as charged in Count 1 of this Superseding Indictment; and, such firearms were discharged; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

COUNT 7

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

NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 1, 5, and 7 of this Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1, 5, and 7, the defendants, **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," **STANLEY SCOTT**, a/k/a "Stizzle," **SHAWN SCOTT**,

a/k/a "Shizzle," AKEIN SCOTT, a/k/a "Keemy," JEREMIAH JACKSON, a/k/a "Rocky," GRALEN BENSON, a/k/a "Dooley," BRIAN BENSON, a/k/a "Dub," a/k/a "Dubba," RICHMOND SMITH, a/k/a "Ace," and CRYSTAL SCOTT, a/k/a "Chris," shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 1, 5, and 7 of this Superseding Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

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

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

NOTICE OF FIREARM FORFEITURE

1. The allegations of Counts 2, 3, 4 and 6 of this Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 922(g) and 924(d)(1), made applicable through Title 28, United States Code, Section 2461.

2. As a result of the offenses alleged in Counts 2, 3, 4, and 6, the defendants, **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," **STANLEY SCOTT**, a/k/a "Stizzle," **SHAWN SCOTT**, a/k/a "Shizzle," **AKEIN SCOTT**, a/k/a "Keemy," **JEREMIAH JACKSON**, a/k/a "Rocky," **GRALEN BENSON**, a/k/a "Dooley," and **RICHMOND SMITH**, a/k/a "Ace," shall forfeit to the United States pursuant to Title 18, United States Code, Sections 922(g) and 924(d)(1), made applicable through Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in a knowing violation as alleged in Counts 2, 3, 4 and 6 of this Superseding Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

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

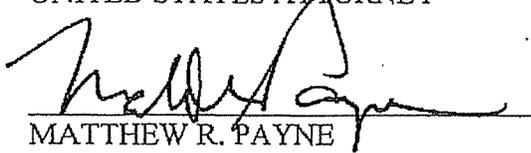
All in violation of Title 18, United States Code, Sections 922(g) and 924(d)(1), made applicable through Title 28, United States Code, Section 2461.

A TRUE BILL:

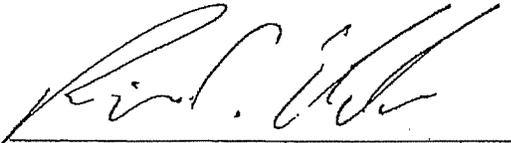


FOREPERSON

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New Orleans, Louisiana
February 27, 2014

