

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

2014 OCT 16 AM 11:13

WILLIAMSON, LA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

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

UNITED STATES OF AMERICA

\* CRIMINAL NO. 13-227

v.

\* SECTION: "B"(1)

TRAVIS SCOTT

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

\* VIOLATION: 21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

STANLEY SCOTT

a/k/a "Stizzle"

\* 21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(C)

SHAWN SCOTT

a/k/a "Shizzle"

\* 18 U.S.C. § 2

18 U.S.C. § 922(g)(1)

AKEIN SCOTT

a/k/a "Keemy"

\* 18 U.S.C. § 924(a)(2)

18 U.S.C. § 924(e)(1)(A)(i)

JEREMIAH JACKSON

a/k/a "Rocky"

\* 18 U.S.C. § 924(e)(1)(A)(iii)

18 U.S.C. § 924(o)

BRIAN BENSON

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

\*

CRYSTAL SCOTT

a/k/a "Chris"

\*

\* \* \*

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Distribute Controlled Substances)**

Beginning on a date unknown, but prior to March 11, 2005, and continuing to on or about March 10, 2014, in the Eastern District of Louisiana and elsewhere, the defendants, **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," **STANLEY SCOTT**, a/k/a "Stizzle," **SHAWN SCOTT**, a/k/a "Shizzle," **AKEIN SCOTT**, a/k/a "Keemy," **JEREMIAH JACKSON**, a/k/a "Rocky,"

Fee \_\_\_\_\_  
Process \_\_\_\_\_  
 Dkt'd \_\_\_\_\_  
Ct/Rmd/Dep \_\_\_\_\_  
Doc. No. \_\_\_\_\_

**BRIAN BENSON**, a/k/a “Dub,” a/k/a “Dubba,” 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**

**(Conspiracy to Use and Possess Firearms in Furtherance of a Drug Trafficking Crime)**

Beginning on a date unknown, but prior to March 11, 2005, and continuing to on or about March 10, 2014, in the Eastern District of Louisiana and elsewhere, the defendants, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” and **JEREMIAH JACKSON**, a/k/a “Rocky,” did knowingly and intentionally combine, conspire, confederate, and agree with other persons known and unknown to the Grand Jury, to use and carry firearms during and in relation to and to possess firearms in furtherance of a 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 Second 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**

**(Felon in Possession of Ammunition)**

On or about May 15, 2009, in the Eastern District of Louisiana, the defendant, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on July 27, 2004, in case

number 446-787 "L" in the Criminal District Court for the Parish of Orleans, State of Louisiana, for Distribution of Heroin, in violation of La. R.S. 40:966(A)(1) and 40:966(B)(1), did knowingly possess in and affecting interstate commerce ammunition, to wit: one hundred Remington .40-caliber pistol cartridges, forty-one Federal .45-caliber pistol cartridges, thirty CCI .40-caliber pistol cartridges, twenty-six Winchester .45-caliber pistol cartridges, three Blazer 9mm caliber Luger pistol cartridges, and one Winchester .40-caliber pistol cartridge; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT 4**

**(Discharge of a Firearm in Furtherance of Drug Trafficking)**

On or about March 22, 2012, in the Eastern District of Louisiana, the defendants, **STANLEY SCOTT**, a/k/a "Stizzle," **AKEIN SCOTT**, a/k/a "Keemy," and **JEREMIAH JACKSON**, a/k/a "Rocky," did knowingly and intentionally use and carry firearms 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 Second Superseding Indictment, and possessed the firearms in furtherance of said crime, and said firearms were brandished and discharged; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

**COUNT 5**

**(Discharge of a Firearm in Furtherance of Drug Trafficking)**

On or about March 25, 2012, in the Eastern District of Louisiana, the defendants, **TRAVIS SCOTT**, a/k/a "Trap," a/k/a "Slim," and **AKEIN SCOTT**, a/k/a "Keemy," did knowingly and intentionally use and carry firearms 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 Second Superseding Indictment, and possessed the firearms in furtherance of said crime, and said firearms were brandished and discharged; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

**COUNT 6**

**(Discharge of a Firearm in Furtherance of Drug Trafficking)**

On or about July 16, 2012, in the Eastern District of Louisiana, the defendants, **STANLEY SCOTT**, a/k/a "Stizzle," and **AKEIN SCOTT**, a/k/a "Keemy," did knowingly and intentionally use and carry firearms 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 Second Superseding Indictment, and possessed the firearms in furtherance of said crime, and said firearms were brandished and discharged; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

**COUNT 7**

**(Discharge of a Firearm in Furtherance of Drug Trafficking)**

On or about August 4, 2012, in the Eastern District of Louisiana, the defendants, **STANLEY SCOTT**, a/k/a "Stizzle," **SHAWN SCOTT**, a/k/a "Shizzle," and **AKEIN SCOTT**, a/k/a "Keemy," did knowingly and intentionally use and carry firearms 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 Second Superseding Indictment, and possessed the firearms in furtherance of said crime, and said firearms were brandished and discharged; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

**COUNT 8**

**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

On or about March 5, 2013, in the Eastern District of Louisiana, the defendant, **AKEIN SCOTT**, a/k/a “Keemy,” did knowingly and intentionally use and carry a firearm during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possession with intent to distribute a quantity of a substance containing a detectable amount of heroin, a Schedule I drug controlled substance, in violation of Title 18, United States Code, Section 841(a)(1) and 841(b)(1)(C), and possessed the firearm in furtherance of said crime; all in violation of Title 18, United States Code, Section 924(c)(1)(A), 924(c)(1)(A)(i), and 2.

**COUNT 9**

**(Possession with Intent to Distribute Heroin)**

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

**COUNT 10**

**(Discharge of a Firearm in Furtherance of Drug Trafficking)**

On or about May 12, 2013, in the Eastern District of Louisiana, the defendants, **SHAWN SCOTT**, a/k/a “Shizzle,” and **AKEIN SCOTT**, a/k/a “Keemy,” did knowingly and intentionally use and carry firearms 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 Second

Superseding Indictment, and possessed the firearms in furtherance of said crime, and said firearms were brandished and discharged; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(iii), and 2.

**COUNT 11**

**(Possession with Intent to Distribute Heroin)**

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

**COUNT 12**

**(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

On or about August 20, 2013, in the Eastern District of Louisiana, the defendant, **JEREMIAH JACKSON**, a/k/a "Rocky," did knowingly and intentionally use and carry a firearm during and in relation to a 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 Second Superseding Indictment, and possessed the firearm in furtherance of said crime; all in violation of Title 18, United States Code, Sections 924(c)(1)(A), 924(c)(1)(A)(i), and 2.

**NOTICE OF DRUG FORFEITURE**

1. The allegations of Counts 1, 9, and 11 of this Second 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, 9, and 11, 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," **BRIAN BENSON**, a/k/a "Dub," a/k/a "Dubba," 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, 9, and 11 of this Second 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, 5, 6, 7, 8, 10, and 12 of this Second 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, 5, 6, 7, 8, 10, and 12, the defendants, **TRAVIS SCOTT**, a/k/a “Trap,” a/k/a “Slim,” **STANLEY SCOTT**, a/k/a “Stizzle,” **SHAWN SCOTT**, a/k/a “Shizzle,” **AKEIN SCOTT**, a/k/a “Keemy,” and **JEREMIAH JACKSON**, a/k/a “Rocky,” shall forfeit to the United States pursuant to Title 18, United States Code, Sections 922(g) 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, 5, 6, 7, 8, 10, and 12 of this Second 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;

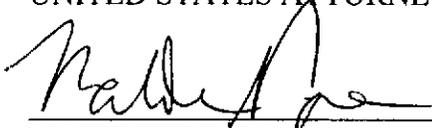
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

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 ✓

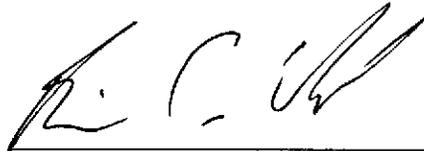
FOREPERSON'S SIGNATURE  
HAS BEEN REDACTED

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY



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



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BRIAN C. EBARB  
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La Bar Roll No. 29846

New Orleans, Louisiana  
October 16, 2014

No. 13-227 "B"(1)

**UNITED STATES DISTRICT COURT**

Eastern District of Louisiana  
Criminal Division

**THE UNITED STATES OF AMERICA**

vs.

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"  
BRIAN BENSON, a/k/a "Dub," a/k/a "Dubba"  
CRYSTAL SCOTT, a/k/a "Chris"

**SUPERSEDING INDICTMENT**

FOR

**VIOLATIONS OF THE FEDERAL GUN CONTROL ACT  
AND THE FEDERAL CONTROLLED SUBSTANCES ACT**

- VIOLATIONS:
- 21 U.S.C. § 846
  - 21 U.S.C. § 841(a)(1)
  - 21 U.S.C. § 841(b)(1)(A)
  - 21 U.S.C. § 841(b)(1)(C)
  - 18 U.S.C. § 2
  - 21 U.S.C. § 922(g)(1)
  - 18 U.S.C. § 924(a)(2)
  - 18 U.S.C. § 924(c)(1)(A)(i)
  - 18 U.S.C. § 924(c)(1)(A)(iii)
  - ~~18 U.S.C. § 924(o)~~

**FOREPERSON'S SIGNATURE  
HAS BEEN REDACTED**

*A true bill.*

*Filed in op*

*Clerk*

Bail, \$

  
MATTHEW R. PAYNE

Assistant United States Attorney