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U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

SUPERSEDING INDICTMENT FOR CONSPIRACY, CARJACKING AND VIOLATIONS OF THE FEDERAL GUN CONTROL ACT

UNITED STATES OF AMERICA

* CRIMINAL NO. 22-037

v.

* SECTION: "A"

TYRESE HARRIS
a/k/a "TEEZO"

* VIOLATIONS: 18 U.S.C. § 2119(1) & (2)
18 U.S.C. § 924(c)(1)(A)(ii)
* 18 U.S.C. § 371
* 18 U.S.C. § 2

* * *

The Grand Jury charges that:

COUNT 1
(Conspiracy to Commit Carjacking)

A. THE CONSPIRACY:

From on or about August 19, 2021, and continuing until on or about February 1, 2022, in the Eastern District of Louisiana, the defendant, **TYRESE HARRIS, a/k/a "TEEZO,"** with persons known and unknown to the grand jury, did knowingly and willfully conspire and agree together and with each other to take motor vehicles that have been transported, shipped, and received in interstate commerce from persons or within their presence by force, violence, and

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intimidation, with the intent to cause death and serious bodily harm, in violation of Title 18, United States Code, Sections 2119.

B. MANNER AND MEANS:

It was part of the conspiracy that the defendant and others would plan and conspire to steal vehicles by use of force or intimidation from individuals who appeared to be otherwise distracted. The defendant and others would obtain firearms and stolen vehicles to commit the carjackings.

C. OVERT ACTS:

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, the following overt acts, among others, were performed in the Eastern District of Louisiana:

On or about August 19, 2021:

1. Defendant **TYRESE HARRIS, a/k/a “TEEZO,”** along with two co-conspirators, approached Victim #1, who was unloading items from his vehicle in the 600 block of Washington Avenue, while armed with at least one firearm.
2. Defendant **TYRESE HARRIS, a/k/a “TEEZO,”** brandished a matte, silver colored handgun, and demanded that Victim #1 turnover his keys.
3. Defendant **TYRESE HARRIS, a/k/a “TEEZO,”** and his co-conspirators, additionally grabbed Victim #1’s cellular telephone.
4. Defendant **TYRESE HARRIS, a/k/a “TEEZO,”** and his two co-conspirators, left in Victim #1’s silver Toyota Camry.

On or about January 18, 2022:

5. Defendant **TYRESE HARRIS, a/k/a “TEEZO,”** and two co-conspirators, secured a stolen vehicle, a 2020 Volkswagen Atlas, and drove to the gas station located at 704 Howard Avenue, New Orleans, Louisiana.

6. Defendant **TYRESE HARRIS, a/k/a "TEEZO,"** and his co-conspirators parked the 2020 Volkswagen next to a Dodge Journey, while Victim #2 was pumping gas into the car.

7. A conspirator entered Victim #2's Dodge Journey from the passenger side with the intent of taking the car.

8. Defendant **TYRESE HARRIS, a/k/a "TEEZO,"** brandished and discharged a firearm at Victim #2, when Victim #2 pulled his personal firearm out for protection.

9. Defendant **TYRESE HARRIS, a/k/a "TEEZO,"** and his co-conspirators fled the scene toward Carondelet Street in the stolen Volkswagen Atlas and on foot, without successfully obtaining Victim #2's Dodge Journey.

10. Defendant **TYRESE HARRIS, a/k/a "TEEZO,"** dropped his cellular telephone on the scene.

On or about January 31, 2022:

11. Defendant **TYRESE HARRIS, a/k/a "TEEZO,"** and his co-conspirators, secured a stolen vehicle, a 2017 Nissan Pathfinder, and drove to Costco located at 3800 Carrollton Avenue, New Orleans, Louisiana.

12. Defendant **TYRESE HARRIS, a/k/a "TEEZO,"** and his co-conspirators, pulled into the Costco gas pumping area next to Victim #3's vehicle, a 2020 Mercedes Benz, while Victim #3 was preparing to pump gas into the car.

13. Defendant **TYRESE HARRIS, a/k/a "TEEZO,"** exited the Pathfinder and entered Victim #3's car, however, Victim #3 prevented **HARRIS** from taking her car or anything else from it.

14. **TYRESE HARRIS, a/k/a "TEEZO,"** and his co-conspirators, fled in the stolen Nissan Pathfinder.

On or about February 1, 2022:

15. Defendant **TYRESE HARRIS, a/k/a “TEEZO,”** and several co-conspirators, again drove the stolen Nissan Pathfinder to Costco at 3800 Carrollton Avenue, New Orleans, Louisiana.

16. Defendant **TYRESE HARRIS, a/k/a “TEEZO,”** and his co-conspirators pulled into the Costco gas pumping area next to Victim #4’s 2022 Mercedes Benz, while Victim #4 was pumping gas into the car.

17. A co-conspirator exited the front passenger seat of the Pathfinder, entered the driver seat of the Mercedes Benz, and began to drive it away.

18. Defendant **TYRESE HARRIS, a/k/a “TEEZO,”** and his co-conspirators, who still remained in the Pathfinder, followed behind the Mercedes Benz as their co-conspirator drove it away.

19. **TYRESE HARRIS’S** co-conspirator continued to drive the Mercedes Benz, while Victim #4 hung onto the side of her car, eventually falling off and hitting her head on the ground, rendering her unconscious.

20. Immediately following the carjacking, the defendant **TYRESE HARRIS, a/k/a “TEEZO,”** exited the rear of the Pathfinder and closed the front passenger door, previously left open by his co-conspirator driving the Mercedes Benz.

All in violation of Title 18, United States Code, Section 371.

COUNT 2
(Carjacking)

On or about August 19, 2021, in the Eastern District of Louisiana, the defendant, **TYRESE HARRIS, a/k/a “TEEZO,”** aided and abetted by others known and unknown to the grand jury, took a motor vehicle, that is, a 2002, silver in color, Toyota Camry, bearing Louisiana license plate

██████████ Vehicle Identification Number (VIN) ██████████ that had been transported, shipped, and received in interstate commerce from the person and presence of ██████████ by force, violence, and intimidation, with the intent to cause death and serious bodily harm, in violation of Title 18, United States Code, Sections 2119(1) and 2.

COUNT 3

(Brandishing a Firearm During the Commission of Crime of Violence)

On or about August 19, 2021, in the Eastern District of Louisiana, the defendant, **TYRESE HARRIS, a/k/a “TEEZO,”** aided and abetted by and others known and unknown to the grand jury, did knowingly brandish, carry, and use a firearm, that is, a handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, carjacking, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT 4

(Attempted Carjacking)

On or about January 18, 2022, in the Eastern District of Louisiana, the defendant, **TYRESE HARRIS, a/k/a “TEEZO,”** aided and abetted by others known and unknown to the grand jury, attempted to take a motor vehicle, that is, a 2017, white in color, Dodge Journey, bearing Louisiana license plate ██████████ Vehicle Identification Number (VIN) ██████████ that had been transported, shipped, and received in interstate commerce from the person and presence of ██████████ by force, violence, and intimidation, with the intent to cause death and serious bodily harm, in violation of Title 18, United States Code, Sections 2119(1) and 2.

COUNT 5

(Carjacking Resulting in Serious Bodily Injury)

On or about February 1, 2022, in the Eastern District of Louisiana, the defendant, **TYRESE HARRIS, a/k/a “TEEZO,”** aided and abetted by others known and unknown to the grand jury, with the intent to cause death and serious bodily harm, took a motor vehicle, that is, a 2022, black

in color, Mercedes-Benz GLE 350, bearing Louisiana license plate [REDACTED] Vehicle Identification Number (VIN) [REDACTED] that had been transported, shipped, and received in interstate commerce from the person and presence of [REDACTED] by force, violence, and intimidation, resulting in serious bodily injury that caused a substantial risk of death and extreme physical pain to [REDACTED] in violation of Title 18, United States Code, Sections 2119(2) and 2.

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 5 of this Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offenses alleged in Counts 1, 2, 4, and 5 the defendant, **TYRESE HARRIS, a/k/a "TEEZO,"** shall forfeit to the United States pursuant to Title 18, United States Code, Section 982(a)(5), any property, real or personal, involved in said offenses, and any property traceable to such property.

3. As a result of the offense alleged in Count 3, the defendant, **TYRESE HARRIS, a/k/a "TEEZO,"** 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(c), any firearm or ammunition involved in or used in the commission of said offense, including but not limited to any of the following:

Smith & Wesson, model M & P Shield, 9mm caliber, semi-automatic pistol, bearing serial number [REDACTED] loaded with ammunition;

Glock, model 23, .40 caliber, semi-automatic pistol, bearing serial number [REDACTED]

Smith and Wesson, .38 caliber, revolver, bearing serial number [REDACTED]

Lone Wolf R&D, LLC, Model TWC3, 9mm caliber semiautomatic pistol, bearing serial number [REDACTED]

Ruger SR40C Caliber Pistol, bearing serial number [REDACTED] with magazine and ammunition;

DPMS Panther Arms 5.56 caliber rifle, bearing serial number [REDACTED] with magazine and ammunition;

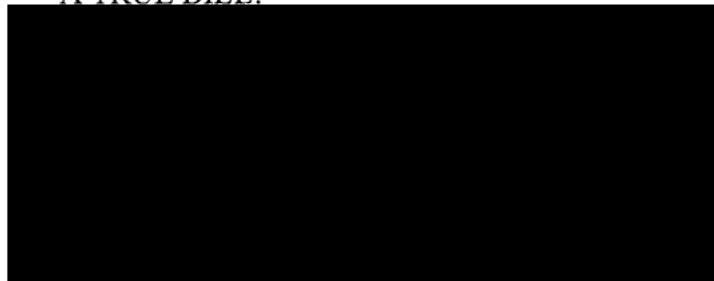
Maverick Arms Model 88, 12-gauge shotgun, bearing serial number [REDACTED] with five (5) live shotgun rounds;

Sixty-two (62) .22 caliber live rounds of ammunition.

4. If any of the above-described property, as a result of any act or omission of the defendant:
- 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;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendant up to the value of said property.

A TRUE BILL:



DUANE A. EVANS
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'Inga Petrovich', written over a horizontal line.

INGA PETROVICH
Assistant United States Attorney

New Orleans, Louisiana
November 10, 2022