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U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

2015 JUN 12 PM 3: 52

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

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

UNITED STATES OF AMERICA

*

CRIMINAL NO:

15-154

v.

*

SECTION: ""

*

VIOLATION:

SECT. A MAG. 3

LEROY PRICE

aka "Lee"

18 U.S.C. § 1962(d)

ASHTON PRICE

aka "Pound"

18 U.S.C. § 1959

ALONZO PETERS

aka "Woo-die"

18 U.S.C. § 924(o)

JASMINE PERRY

aka "J-Real"

18 U.S.C. § 924(j)

aka "Rell"

18 U.S.C. § 924(c)(1)(A)

McCOY WALKER

aka "Rat"

21 U.S.C. § 841

TERRIOUES OWNEY

aka "T-Red"

21 U.S.C. § 846

EVANS LEWIS

aka "Easy"

18 U.S.C. § 1513(a)(1)(B)

CURTIS NEVILLE

aka "Pooney"

18 U.S.C. § 2

aka "Poonie"

RICO JACKSON

aka "Freaky"

TYRONE KNOCKUM

aka "T-Bone"

Fee USR
Process _____
x Dkt _____
CtRmDep _____
Doc No. _____

SOLOMON DOYLE

aka "Black

aka "Sol" *

WASHINGTON McCASKILL

aka "Big Wash"

DAMIAN BARNES

aka "AD" * * *

The Grand Jury charges that:

COUNT 1

(Racketeer Influenced and Corrupt Organizations Conspiracy)

General Allegations

1. At all relevant times, defendants, **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woo-dee," **JASMINE PERRY**, aka "J-Real," aka "Rell," **McCOY WALKER**, aka "Rat," **TERRIOUES OWNEY**, aka "T-Red," **EVANS LEWIS**, aka "Easy," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **RICO JACKSON**, aka "Freaky," **TYRONE KNOCKUM**, aka "T-Bone," **SOLOMON DOYLE**, aka "Black," aka "Sol," **WASHINGTON McCASKILL**, aka "Big Wash," **DAMIAN BARNES**, aka "AD," and others known and unknown to the Grand Jury, were members and associates of an organization engaged in, among other things, conspiracy to distribute controlled substances, distribution of controlled substances, murder, conspiracy to commit murder, attempted murder, and obstruction of justice. At all relevant times, this organization operated in the Eastern District of Louisiana.
2. This organization, known as the "39ers," was formed through an alliance between the "G-Strip gang," which operated in the Ninth Ward on Gallier Street, and the "3NG" gang, which operated on or near the corner of Third Street and Galvez Street in the City of New Orleans.

The 39ers controlled the drug trade in these areas and committed acts of violence against rival drug gangs throughout the City.

The Racketeering Enterprise

3. The 39ers, including its leadership, membership, and associates, constitute 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 illegal distribution of controlled substances in the territory controlled by the enterprise;
 - b. Enriching the members and preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, and threats of violence, including assault, murder, and attempted murder;
 - c. Promoting and enhancing the activities and authority of the enterprise and its members and associates;
 - d. 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;

- e. Providing financial support and information to members and associates of the enterprise, including but not limited to those who were incarcerated, for committing acts of violence, illegal possession and distribution of controlled substances, and other offenses, and;
- f. 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, apprehending, and prosecuting 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 sold large amounts of heroin as well as cocaine base throughout the city of New Orleans, and especially in the Ninth Ward and Uptown neighborhoods of New Orleans.
 - b. 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.
 - c. Members of the enterprise and their associates possessed and utilized firearms in order to protect their illegal drug trafficking in and around the geographic area utilized and controlled by the conspirators.
 - d. Members of the enterprise and their associates committed shootings, various firearms offenses, and violent acts, including but not limited to murder, attempted

murder, aggravated battery, illegal possession of a 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.

- e. Members of the enterprise and their associates promoted a climate of fear in local communities through violence and threats of violence.
- f. Members of the enterprise and their associates committed, attempted, and threatened to commit acts of violence, in an effort to obstruct justice and thwart police investigations.
- g. Members of the enterprise and their associates maintained and circulated a collection of numerous firearms for use in criminal activity by other co-conspirators. They gave two of their favorite firearms nicknames. They also maintained at least one .223 caliber assault weapon, which they referred to as "Monkey Nuts," because of the double drum magazine which was attached to the weapon and which held approximately 100 hundred rounds of ammunition.
- h. Members of the enterprise and their associates used telephones to give directions and advice to each other in an effort to circumvent the criminal justice system, obstruct justice, illegally distribute controlled substances, illegally possess firearms, attempt to intimidate witnesses, and to impose discipline on members of the conspiracy who may have acted in a reckless manner by bringing unwanted attention by law enforcement officials to the members of the conspiracy.
- i. Members of the enterprise and their associates bragged about their illegal activity, such as their illegal possession and use of firearms, murder, and attempted murder

to each other in an effort to maintain or increase their position in the enterprise.

- j. Members of the enterprise and their associates used numerous vehicles, including rented vehicles and stolen vehicles, to distribute illegal drugs, to commit numerous drive-by shootings, and to commit murders.
- k. Members of the enterprise would travel from New Orleans, Louisiana, with large amounts of cash money to Houston, Texas, and purchase kilogram quantities of heroin. Members of the enterprise would transport the purchased heroin back to New Orleans, Louisiana, on a bus.
- l. Members of the enterprise rented a property in coastal Mississippi to use as a hideout and to store cash profits from the enterprise's heroin sales.
- m. Members of the enterprise and their associates targeted and retaliated against rival drug dealers and members of several rival drug gangs, included but not limited to a gang identified as "Ride or Die" from the Eighth Ward; a gang associated with the Desire Housing Development; and a gang associated with the Calliope Housing Development.

Roles of the Defendants

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

- a. Unindicted co-conspirators *Merle Offray* and *Darryl Franklin*, aka "Brother," were leaders of this enterprise and acted as the main suppliers of heroin to the other members of the enterprise. They also provided advice to the members on how not to get arrested by the police and provided the members of the enterprise a safe haven to store the drugs and firearms that belonged to the members of the

enterprise. They also directed members of the enterprise to commit murders and shootings and participated in some of the murders themselves.

- b. Unindicted co-conspirator *Gregory Stewart, aka "Rabbit,"* was also a leader of the enterprise. He participated in the illegal distribution of heroin and in multiple murders and attempted murders that were committed with other members of the 39ers.
- c. Defendants **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woo-dee," **JASMINE PERRY**, aka "J-Real," aka "Rell," **McCOY WALKER**, aka "Rat," **TERRIOUES OWNEY**, aka "T-Red," **EVANS LEWIS**, aka "Easy," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **RICO JACKSON**, aka "Freaky," **TYRONE KNOCKUM**, aka "T-Bone," **SOLOMON DOYLE**, aka "Black," aka "Sol," **WASHINGTON McCASKILL**, aka "Big Wash," **DAMIAN BARNES**, aka "AD," acted as illegal drug distributors and gunmen for the enterprise.

The RICO Conspiracy Charge

7. Beginning on a date unknown, but prior to June 2009, and continuing to on or about the date of the return of this indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woo-dee," **JASMINE PERRY**, aka "J-Real," aka "Rell," **McCOY WALKER**, aka "Rat," **TERRIOUES OWNEY**, aka "T-Red," **EVANS LEWIS**, aka "Easy," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **RICO JACKSON**, aka "Freaky," **TYRONE KNOCKUM**, aka "T-Bone," **SOLOMON DOYLE**, aka "Black," aka "Sol," **WASHINGTON McCASKILL**, aka "Big Wash," **DAMIAN BARNES**, aka "AD," and others known and

unknown to the Grand Jury, being persons employed by and associated with the criminal enterprise, which enterprise engaged in and the activities of which affected interstate and foreign commerce, unlawfully and knowingly combined, conspired and agreed 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 Statutes, Sections 30.1, and Sections 24 (Principals), 26 (Criminal Conspiracy), and 27 (Attempt);

multiple acts indictable under:

- b. Title 18, United States Code Section 1513 (retaliation against an informant); and,
- c. multiple acts involving illegal distribution of controlled substances, including heroin and cocaine base ("crack"), in violation of Title 21, United States Code Sections 841 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

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, defendants **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woo-dee," **JASMINE PERRY**, aka "J-Real," aka "Rell," **McCOY WALKER**, aka "Rat," **TERRIOUES OWNEY**, aka "T-Red," **EVANS LEWIS**, aka "Easy," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **RICO JACKSON**, aka "Freaky," **TYRONE KNOCKUM**, aka "T-Bone," **SOLOMON DOYLE**, aka "Black," aka "Sol," **WASHINGTON McCASKILL**, aka

“Big Wash,” **DAMIAN BARNES**, aka “AD,” 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) In late 2009 Gregory Stewart and Darryl Franklin, both members of the G-strip gang, started supplying members of the 3NG gang with heroin for retail sale.
- (2) In early 2010 members of the G-Strip and 3NG gangs combined and became known as the 39ers.
- (3) Beginning on a date unknown, but prior June 2009, and continuing to on or about the date of the return of this indictment, members of the 39ers would travel from New Orleans, Louisiana, to Houston, Texas, to purchase kilogram quantities of heroin. A member of the 39ers would then travel from Houston, Texas, in possession of the newly-purchased kilogram quantities of heroin, back to New Orleans, Louisiana, on a bus.
- (4) On a date unknown, but after June 2009, **SOLOMON DOYLE**, aka “Black,” aka “Sol,” made a trip to Houston, Texas, from New Orleans, Louisiana, to assist in the purchase of heroin.
- (5) On a date unknown, but after June 2009, **CURTIS NEVILLE**, aka “Pooney,” aka “Poonie,” made a trip to Houston, Texas, from New Orleans, Louisiana, to assist in the purchase of heroin.
- (6) On a date unknown, but after June 2009, **McCOY WALKER**, aka “Rat,” made a trip to Houston, Texas, from New Orleans, Louisiana, to assist in the purchase of heroin.
- (7) On a date unknown, but after June 2009, **JASMINE PERRY**, aka “J-Real,” aka

“Rell,” made a trip to Houston, Texas, from New Orleans, Louisiana, to assist in the purchase of heroin.

- (8) On a date unknown, but after June 2009, **ASHTON PRICE**, aka “Pound,” made a trip to Houston, Texas, from New Orleans, Louisiana, to assist in the purchase of heroin.
- (9) On a date unknown, but after June 2009, **EVANS LEWIS**, aka “Easy,” made a trip to Houston, Texas, from New Orleans, Louisiana, to assist in the purchase of heroin.
- (10) On or about January 6, 2010, **ALONZO PETERS**, aka “Woo-dee,” illegally possessed a quantity of cocaine in New Orleans, Louisiana.
- (11) On or about February 22, 2010, **ASHTON PRICE**, aka “Pound,” **ALONZO PETERS**, aka “Woo-dee,” and **JASMINE PERRY**, aka “J-Real,” aka “Rell,” and Gregory Stewart shot and killed Kendall Faibvre, who was believed to be an associate of the Desire Housing Project gang.
- (12) On or about March 3, 2010, **McCOY WALKER**, aka “Rat” shot and wounded Elton Williams and Quinieece Noble as they rode in a vehicle that **WALKER** believed belonged to a rival drug dealer associated with the Desire Housing Project gang.
- (13) On or about April 5, 2010, **ASHTON PRICE**, aka “Pound,” illegally possessed a firearm in New Orleans, Louisiana.
- (14) On or about April 7, 2010, **ALONZO PETERS**, aka “Woo-dee,” illegally possessed a firearm in New Orleans, Louisiana.
- (15) On or about May 11, 2010, **ASHTON PRICE**, aka “Pound,” and Gregory

Stewart shot and killed Rayshon Jones, who was believed to be an associate of the Ride or Die gang.

- (16) On or about May 19, 2010, **LEROY PRICE**, aka "Lee," **EVANS LEWIS**, aka "Easy," **TERRIOUES OWNEY**, aka "T-Red," and **McCOY WALKER**, aka "Rat," and Gregory Stewart shot and killed Lester Green and shot and wounded Jamal Smith, who were believed to be associated with the Calliope Housing Project gang.
- (17) On or about May 27, 2010, **LEROY PRICE**, aka "Lee," conducted surveillance on Donald Daniels. **PRICE** provided information concerning the location of Donald Daniels to Gregory Stewart and **TERRIOUES OWNEY**, aka "T-Red." **TERRIOUES OWNEY**, aka "T-Red," shot and killed Donald Daniels, an associate of the Desire Housing Project gang.
- (18) Beginning in 2010 and continuing until approximately May of 2011, Gregory Stewart sold **TYRONE KNOCKUM**, aka "T-Bone," one ounce of heroin for \$2,000.00 approximately one time per week.
- (19) Beginning in 2010 and continuing until approximately May of 2011, Gregory Stewart sold **DAMIAN BARNES**, aka "AD," seven grams of heroin for \$500.00 approximately two times per week.
- (20) Beginning in 2010 and continuing until approximately May of 2011, Gregory Stewart sold **RICO JACKSON**, aka "Freaky," four ounces of heroin for \$8,000.00 approximately two times per month.
- (21) Beginning in 2010 and continuing until approximately May of 2011, Gregory Stewart sold **McCOY WALKER**, aka "Rat," two ounces of heroin for \$4,000.00

on approximately ten occasions.

- (22) Beginning in 2010 and continuing until approximately May of 2011, Gregory Stewart occasionally distributed heroin in one ounce quantities to **WASHINGTON McCASKILL**, aka "Big Wash."
- (23) Beginning in 2010 and continuing until approximately May of 2011, Gregory Stewart occasionally distributed four ounces of heroin to **LEROY PRICE**, aka "Lee."
- (24) Beginning in 2009 or 2010 and continuing until approximately May of 2011, Gregory Stewart distributed heroin in seven gram and/or fourteen gram quantities to **ASHTON PRICE**, aka "Pound," every week. Gregory Stewart would pay **ASHTON PRICE**, aka "Pound," approximately \$3,000.00 per week to distribute heroin and keep the balance of the proceeds for himself.
- (25) Beginning in 2009 or 2010 and continuing until approximately May of 2011, Gregory Stewart distributed heroin in seven gram and/or fourteen gram quantities to **EVANS LEWIS**, aka "Easy," every week. Gregory Stewart would pay **EVANS LEWIS**, aka "Easy," approximately \$3,000.00 per week to distribute heroin and keep the balance of the proceeds for himself.
- (26) Beginning in 2009 or 2010 and continuing until approximately May of 2011, Gregory Stewart distributed one ounce of heroin to **JASMINE PERRY**, aka "J-Real," aka "Rell," every week.
- (27) Beginning in 2009 or 2010 and continuing until approximately May of 2011, Gregory Stewart distributed 14 grams of heroin to **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," multiple times per week.

- (28) Beginning in 2009 or 2010 and continuing until approximately May of 2011, Gregory Stewart distributed seven grams of heroin to **ALONZO PETERS**, aka "Woo-dee," on approximately five occasions.
- (29) During the course of the conspiracy, **ALONZO PETERS**, aka "Woo-dee," rented hotel rooms in Metairie, Louisiana, to facilitate members of the 39ers in distributing heroin.
- (30) Beginning in 2009 or 2010 and continuing until approximately May of 2011, Gregory Stewart distributed seven grams of heroin to **SOLOMON DOYLE**, aka "Black," aka "Sol," approximately two times per month.
- (31) On or about August 26, 2010, **ALONZO PETERS**, aka "Woo-dee," illegally possessed a stolen firearm in New Orleans, Louisiana.
- (32) On or about September 17, 2010, **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," shot and killed Hansel Picard in New Orleans, Louisiana.
- (33) On or about October 11, 2010, **LEROY PRICE**, aka "Lee," drove a vehicle that was occupied by Gregory Stewart and **TERRIOUES OWNEY**, aka "T-Red." They followed a vehicle being driven by Elton Fields with the intent to kill Fields, who was associated with the Desire Housing Project gang. They approached the vehicle that was driven by Fields. Stewart and **OWNEY** shot and killed Fields.
- (34) On or about December 20, 2010, **TYRONE KNOCKUM**, aka "T-Bone," **TERRIOUES OWNEY**, aka "T-Red," while armed with an AK-47 assault weapon, **RICO JACKSON**, aka "Freaky," while armed with a Norinco 7.62x39mm assault weapon bearing serial number 8072906P, **McCOY WALKER**, aka "Rat," while armed with Glock Model 19, 9mm semi-automatic

handgun, and Gregory Stewart while armed with a Glock model 27, .40 caliber semi-automatic handgun bearing serial number KKL549 shot and killed Jerome Hampton, aka "Man Man," an associate of the Calliope Housing Project gang, and Renetta Lowe, aka "Magnolia Shorty."

(35) On or about February 19, 2011, Darryl Franklin, **ASHTON PRICE**, aka "Pound" and **JASMINE PERRY**, aka "J-Real, aka "Rell," were driving in a vehicle together when they spotted Terrance Dennis, who was an associate of the Ride or Die Gang, near the 2300 block of North Galvez Street. **ASHTON PRICE**, aka "Pound," directed **JASMINE PERRY**, aka "J-Real, aka "Rell," to get out of the vehicle and shoot Dennis. **JASMINE PERRY** exited the vehicle with a Bushmaster .223 assault rifle bearing serial number BFI590140 and referred to by other 39er gang members as "Monkey Nuts," chased Dennis down the street, and shot and killed him.

(36) On or about February 20, 2011, **JASMINE PERRY**, aka "J-Real, aka "Rell," while armed with a Glock Model 27, .40 caliber semi-automatic handgun bearing serial number KKL549, **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," while armed with a Norinco 7.62x39mm assault rifle bearing serial number 8072906P, **EVANS LEWIS**, aka "Easy," while armed with a .410 gauge handgun, **SOLOMON DOYLE**, aka "Black," aka "Sol," while armed with Glock Model 23, .40 caliber semi-automatic handgun with bearing serial number MVN115, and Gregory Stewart, while armed with a Bushmaster .223 assault rifle bearing serial number BFI590140 ("Monkey Nuts") shot and killed Littlejohn Haynes in New Orleans, Louisiana.

- (37) On or about February 20, 2011, **ASHTON PRICE**, aka "Pound," illegally possessed a firearm in New Orleans, Louisiana.
- (38) On or about March 22, 2011, **SOLOMON DOYLE** and unindicted co-conspirator Parnell Watts were found by members of the Jefferson Parish Sheriff's Office to be in possession of mannitol, a chemical substance used to "cut" heroin. Gregory Stewart had requested the "cut" to be delivered in order to prepare a quantity of heroin for distribution.
- (39) On or about March 22, 2011, **SOLOMON DOYLE** was found in possession of a room key to room 239 of the Days Inn hotel in Metairie, Louisiana, by members of the Jefferson Parish Sheriff's Office. Calls intercepted on a Title III wiretap on March 21 and 22, 2011, revealed that **EVANS LEWIS** had been in the Days Inn hotel room and told Gregory Stewart that the "cut" was in the room so that he could arrange for someone to pick up the "cut" and bring it to Gregory Stewart, who was planning to use it to prepare the nine ounces of heroin for unindicted co-conspirator Montreal Delaney.
- (40) On or about March 24, 2011 at 12:30 p.m., Gregory Stewart called **JASMINE PERRY**, aka "J-Real, aka "Rell," and directed **PERRY, EVANS LEWIS**, aka "Easy," and **ASHTON PRICE**, aka "Pound," to find **RICO JACKSON**, aka "Freaky," in an effort to obtain a quantity of heroin from him.
- (41) On or about March 24, 2011 at approximately 1:00 p.m., Stewart told **JASMINE PERRY**, aka "J-Real, aka "Rell," that **RICO JACKSON**, aka "Freaky," wanted "5 racks" or \$5,000 for the heroin.

- (42) On a date unknown in 2011, Gregory Stewart distributed 4.5 ounces of heroin to **MCCOY WALKER**, aka "Rat."
- (43) On another date unknown in 2011, Gregory Stewart distributed 4.5 ounces of heroin to **MCCOY WALKER**, aka "Rat."
- (44) On or about April 28, 2011, Gregory Stewart, **WASHINGTON McCASKILL**, aka "Big Wash," and **DAMIEN BARNES**, aka "AD," shot and killed Floyd Moore, who was believed to be an associate of the Calliope Housing Project gang, with Bushmaster .223 caliber assault rifle bearing serial number BFI590140 and an AK-47 assault weapon.
- (45) On or about May 22, 2011, **WASHINGTON McCASKILL**, aka "Big Wash," **JASMINE PERRY**, aka "J-Real, aka "Rell," **CURTIS NEVILLE**, aka "Pooney" aka "Poonie," shot and wounded Albert Hardy, Kelvin Baham, and Carrie Henry.
- (46) On or about May 24, 2011, at Gregory Stewart's direction, **JASMINE PERRY**, aka "J-Real, aka "Rell," while armed with a Romarm GP WASR 7.62x39 assault rifle bearing serial number 1983AH-3447, and Evans Lewis, while armed with a Glock Model 23, .40 caliber semi-automatic handgun bearing serial number MVN115, shot and killed Gregory Keys and wounded Kendrick Smothers.
- (47) On or about May 27, 2011, **CURTIS NEVILLE**, aka "Poonie," possessed four digital scales, part of a "jack" used to compress heroin, plastic containers with heroin residue, several baggies of heroin packaged for retail sale, two firearms, a loaded magazine, a blender and sifter with heroin residue, and a bottle of mannitol, a known cutting agent, at his residence located at 1809 Desire Street in

New Orleans.

- (48) On or about July 14, 2011, **RICO JACKSON**, aka "Freaky," illegally possessed a Glock Model 27, .40 caliber semi-automatic handgun bearing serial number KKL549, in New Orleans, Louisiana.
- (49) On or about August 11, 2011, **ALONZO PETERS**, aka "Woo-dee," illegally possessed with the intent to distribute a quantity of heroin in New Orleans, Louisiana.
- (50) On or about August 30, 2011, **LEROY PRICE**, aka "Lee," illegally possessed a firearm in New Orleans, Louisiana.
- (51) On or about September 10, 2011, **ASHTON PRICE**, aka "Pound," **LEROY PRICE**, aka "Lee," and **WASHINGTON McCASKILL**, aka "Big Wash," learned that Michael Marshall was cooperating with Drug Enforcement Agency (D.E.A.) agents and agreed to kill Michael Marshall for a sum of money.
- (52) On or about September 11, 2011, **LEROY PRICE**, aka "Lee," learned that Michael Marshall was living in New Orleans East and started conducting surveillance on him.
- (53) On or about September 14, 2011, **WASHINGTON McCASKILL**, aka "Big Wash," **LEROY PRICE**, aka "Lee," and **ASHTON PRICE**, aka "Pound," were in a red Toyota Corolla that was driven by **LEROY PRICE**. They followed Michael Marshall to his place of employment, located at 1741 Poland Avenue in New Orleans, Louisiana. **WASHINGTON McCASKILL**, aka "Big Wash," while armed with a Romarm GP WASR 7.62x39 assault rifle bearing serial number 1983AH-3447, and **ASHTON PRICE**, aka "Pound," while armed with a

Glock Model 23, .40 caliber semi-automatic handgun bearing serial number MVN115, exited the red Toyota Corolla and shot and killed Michael Marshall as Marshall attempted to exit his vehicle. **WASHINGTON McCASKILL**, aka "Big Wash," **LEROY PRICE**, aka "Lee," and **ASHTON PRICE**, aka "Pound," fled the scene of the murder in the red Toyota Corolla.

(54) On or about December 2, 2011, **WASHINGTON McCASKILL**, aka "Big Wash," stored a Glock Model 23, .40 caliber semi-automatic handgun bearing serial number MVN115 and a Romarm GP WASR 7.62x39 assault rifle bearing serial number 1983AH-3447 at his residence, both of which were used in several shootings and murders committed by members and associates of the 39ers.

(55) On or about March 8, 2012, **ASHTON PRICE**, aka "Pound," illegally possessed a Glock Model 27 .40 caliber semi-automatic handgun bearing serial number RUD679 in New Orleans, Louisiana.

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

SPECIAL SENTENCING ALLEGATIONS REGARDING COUNT ONE

The Grand Jury further alleges with regard to certain offenses described in Count

One that:

1. On or about February 22, 2010, in the Eastern District of Louisiana, the defendants, **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woo-dee," and **JASMINE PERRY**, aka "J-Real," aka "Rell," with the specific intent to kill and to inflict great bodily harm, did murder Kendall Faibvre, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

2. On or about May 11, 2010, in the Eastern District of Louisiana, the defendant, **ASHTON**

PRICE, aka "Pound," with the specific intent to kill and to inflict great bodily harm, did murder Rayshon Jones, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

3. On or about May 19, 2010, in the Eastern District of Louisiana, the defendants, **LEROY PRICE**, aka "Lee," **EVANS LEWIS**, aka "Easy," **TERRIOUES OWNEY**, aka "T-Red," and **McCOY WALKER**, aka "Rat," with the specific intent to kill and to inflict great bodily harm, did murder Lester Green, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

4. On or about May 27, 2010, in the Eastern District of Louisiana, the defendants, **LEROY PRICE**, aka "Lee," and **TERRIOUES OWNEY**, aka "T-Red," with the specific intent to kill and to inflict great bodily harm, did murder Donald Daniels, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

5. On or about September 17, 2010, in the Eastern District of Louisiana, the defendant, **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," with the specific intent to kill and to inflict great bodily harm, did murder Hansel Picard, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

6. On or about October 11, 2010 in the Eastern District of Louisiana, the defendants, **LEROY PRICE**, aka "Lee," and **TERRIOUES OWNEY**, aka "T-Red," with the specific intent to kill and to inflict great bodily harm, did murder Elton Fields, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

7. On or about December 20, 2010, in the Eastern District of Louisiana, the defendants, **TERRIOUES OWNEY**, aka "T-Red," **RICO JACKSON**, aka "Freaky," **McCOY WALKER**, aka "Rat," and **TYRONE KNOCKUM**, aka "T-Bone," with the specific intent to kill and to

inflict great bodily harm, did murder Jerome Hampton and Renetta Lowe, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

8. On or about February 19, 2011, in the Eastern District of Louisiana, the defendant, **JASMINE PERRY**, aka "J-Real, aka "Rell," with the specific intent to kill and to inflict great bodily harm, did murder Terrance Dennis, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

9. On or about February 20, 2011 in the Eastern District of Louisiana, the defendants, **JASMINE PERRY**, aka "J-Real, aka "Rell," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **EVANS LEWIS**, aka "Easy," and **SOLOMON DOYLE**, aka "Black," aka "Sol," with the specific intent to kill and to inflict great bodily harm, did murder Littlejohn Haynes, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

10. On or about April 28, 2011 in the Eastern District of Louisiana, the defendants, **WASHINGTON McCASKILL**, aka "Big Wash," and **DAMIEN BARNES** aka "AD," with the specific intent to kill and to inflict great bodily harm, did murder Floyd Moore, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

11. On or about May 24, 2011 in the Eastern District of Louisiana, the defendant, **JASMINE PERRY**, aka "J-Real, aka "Rell," with the specific intent to kill and to inflict great bodily harm, did murder Gregory Keys, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

12. On or about September 14, 2011 in the Eastern District of Louisiana, the defendants,

WASHINGTON McCASKILL, aka "Big Wash," **LEROY PRICE**, aka "Lee," and **ASHTON PRICE**, aka "Pound," with the specific intent to kill and to inflict great bodily harm, did murder Michael Marshall, in violation of the laws of the State of Louisiana (Title 14, Louisiana Revised Statutes, Section 30.1-- second degree murder).

COUNT 2

(Conspiracy to Distribute Controlled Substances)

Beginning on a date unknown, but prior to January 2009, and continuing to on or about the date of this Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woodee," **McCOY WALKER**, aka "Rat," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **RICO JACKSON**, aka "Freaky," **TYRONE KNOCKUM**, aka "T-Bone," **WASHINGTON McCASKILL**, aka "Big Wash," and **DAMIAN BARNES**, aka "AD," 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 the intent to distribute one kilogram or more of heroin and 280 grams or more of cocaine base, Schedule I and II drug controlled substances, respectively, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A); all in violation of Title 21, United States Code, Section 846.

COUNT 3

(Conspiracy to Use Firearms to Further Drug Trafficking Crimes and Crimes of Violence)

Beginning on a date unknown, but prior to January 2009, and continuing to on or about the date of this Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woodee," **JASMINE PERRY**, aka "J-Real," aka "Rell," **McCOY WALKER**, aka "Rat," **TERRIOUES OWNEY**, aka "T-Red," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie,"

RICO JACKSON, aka “Freaky,” **TYRONE KNOCKUM**, aka “T-Bone,” **SOLOMON DOYLE**, aka “Black,” aka “Sol,” **WASHINGTON McCASKILL**, aka “Big Wash,” and **DAMIAN BARNES**, aka “AD,” did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury to use, carry, brandish, and discharge firearms during and in relation to and possessed firearms in furtherance of a federal crime of violence, to wit: a conspiracy to violate the Racketeering Influenced Corrupt Organization Act in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”) in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(o).

COUNT 4

(Murder of Kendall Faivre in Aid of Racketeering)

1. At all times relevant to this Indictment, the enterprise as more fully described in Paragraphs 1 through 6 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; attempted murder, in violation of Title 14, Louisiana Revised Statutes, Sections (27)30.1; and the distribution and possession with the intent to distribute controlled substances, in violation of Federal Criminal Law (Title 21, United States Code, Sections 841 and 846).

3. On or about February 22, 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 defendants, **ASHTON PRICE**, aka “Pound,” **ALONZO PETERS**, aka “Woo-dee,” **JASMINE PERRY**, aka “J-Real,” aka “Rell,” and Gregory Stewart did murder Kendall Faivre, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1).

COUNT 5

(Murder of Kendall Faivre through the Use of a Firearm)

On or about February 22, 2010 in the Eastern District of Louisiana, the defendants, **ASHTON PRICE**, aka “Pound,” **ALONZO PETERS**, aka “Woo-dee,” **JASMINE PERRY**, aka “J-Real,” aka “Rell,” and Gregory Stewart, did knowingly use, carry, brandish, and discharge firearms during and in relation to a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this

Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, did unlawfully kill Kendall Faibvre, by shooting him with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 6

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about February 22, 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 defendants, **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woo-dee," **JASMINE PERRY**, aka "J-Real," aka "Rell," and Gregory Stewart did commit an assault with a dangerous weapon, to wit; a firearm, upon Jasmine Jones, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(2)(3) and (5).

COUNT 7

(Using and Carrying a Firearm During and in Relation to a
Crime of Violence and a Drug Trafficking Crime)

On or about February 22, 2010 in the Eastern District of Louisiana, the defendants, **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woo-dee," **JASMINE PERRY**, aka "J-Real," aka "Rell," and Gregory Stewart, did knowingly use, carry, brandish, and

discharge several firearms during and in relation to a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 8

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about March 3, 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, **McCOY WALKER**, aka “Rat,” and others known to the Grand Jury, did commit an assault with a dangerous weapon, to wit; a firearm, upon Elton Williams, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 9

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about March 3, 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, **McCOY WALKER**, aka “Rat,” and others known to the Grand Jury, did commit an assault with a dangerous weapon, to wit; a firearm, upon Quiece Noble, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 10

(Using and Carrying a Firearm During and in Relation to a
Crime of Violence and a Drug Trafficking Crime)

On or about March 3, 2010 in the Eastern District of Louisiana, the defendant, **McCOY WALKER**, aka “Rat,” and others known to the Grand Jury, did knowingly use, carry, brandish, and discharge several firearms during and in relation to a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 11

(Using and Carrying a Firearm During and in Relation to a
Crime of Violence and a Drug Trafficking Crime)

On or about March 3, 2010 in the Eastern District of Louisiana, the defendant, **McCOY WALKER**, aka “Rat,” and others known to the Grand Jury, did knowingly use, carry, brandish, and discharge several firearms during and in relation to a federal crime of violence, to wit:

conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 12

(Murder of Rayshon Jones in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about May 11, 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 defendants, **ASHTON PRICE**, aka “Pound” and Gregory Stewart, did murder Rayshon Jones, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 13

(Murder of Rayshon Jones through the Use of a Firearm)

On or about May 11, 2010 in the Eastern District of Louisiana, the defendant, **ASHTON PRICE**, aka “Pound” and Gregory Stewart, did knowingly use, carry, brandish, and discharge firearms, during and in relation to and possessed firearms in furtherance of the commission of a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count

1 of this Indictment, and a drug trafficking crime, for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, with malice aforethought, did unlawfully kill Rayshon Jones, by shooting him with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 14

(Murder of Lester Green in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about May 19, 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 defendants, **LEROY PRICE**, aka “Lee,” **EVANS LEWIS**, aka “Easy,” **TERRIOUES OWNEY**, aka “T-Red,” **McCOY WALKER**, aka “Rat,” and Gregory Stewart, did murder Lester Green, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 15

(Murder of Lester Green through the Use of a Firearm)

On or about May 19, 2010 in the Eastern District of Louisiana, the defendants, **LEROY PRICE**, aka "Lee," **EVANS LEWIS**, aka "Easy," **TERRIOUES OWNEY**, aka "T-Red," **McCOY WALKER**, aka "Rat," and Gregory Stewart, did knowingly use, carry, brandish, and discharge firearms, during and in relation to and possessed firearms in furtherance of the commission of a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime, for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base ("crack"), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, did unlawfully kill Lester Green, by shooting him with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 16

(Assault of Jamal Smith with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about May 19, 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 defendants, **LEROY PRICE**, aka "Lee," **EVANS LEWIS**,

aka "Easy," **TERRIOUES OWNEY**, aka "T-Red," **McCOY WALKER**, aka "Rat," and Gregory Stewart, did commit an assault with a dangerous weapon, to wit; a firearm, upon Jamal Smith, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 17

(Using and Carrying a Firearm During and in Relation to a
Crime of Violence and a Drug Trafficking Crime)

On or about May 19, 2010, in the Eastern District of Louisiana, the defendants, **LEROY PRICE**, aka "Lee," **EVANS LEWIS**, aka "Easy," **TERRIOUES OWNEY**, aka "T-Red," **McCOY WALKER**, aka "Rat," and Gregory Stewart, did knowingly use, carry, brandish, and discharge several firearms, during and in relation to a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base ("crack"), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 18

(Murder of Donald Daniels in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.

2. On or about May 27, 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, **LEROY PRICE**, aka "Lee," **TERRIOUES OWNEY**, aka "T-Red," and Gregory Stewart, did murder Donald Daniels, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 19

(Murder of Donald Daniels through the Use of a Firearm)

On or about May 27, 2010 in the Eastern District of Louisiana, the defendant, **LEROY PRICE**, aka "Lee," **TERRIOUES OWNEY**, aka "T-Red," and Gregory Stewart did knowingly use, carry, brandish, and discharge firearms, during and in relation to and possessed firearms in furtherance of the commission of a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime, for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base ("crack"), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, did unlawfully kill Donald Daniels, by shooting him with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 20

(Murder of Elton Fields in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about October 11, 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 defendants, **LEROY PRICE**, aka "Lee," **TERRIOUES OWNEY**, aka "T-Red," and Gregory Stewart did murder Elton Fields, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 21

(Murder of Elton Fields through the Use of a Firearm)

On or about October 11, 2010 in the Eastern District of Louisiana, the defendants, **LEROY PRICE**, aka "Lee," **TERRIOUES OWNEY**, aka "T-Red," and Gregory Stewart did knowingly use, carry, brandish, and discharge firearms, during and in relation to and possessed firearms in furtherance of the commission of a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime, for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base ("crack"), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with

malice aforethought, did unlawfully kill Elton Fields, by shooting him with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 22

(Murder of Jerome Hampton, aka "Man Man," in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about December 20, 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 defendants, **TERRIOUES OWNEY**, aka "T-Red," **RICO JACKSON**, aka "Freaky," **McCOY WALKER**, aka "Rat," **TYRONE KNOCKUM**, aka "T-Bone," and Gregory Stewart did murder Jerome Hampton, aka "Man Man," in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 23

(Murders of Jerome Hampton, aka "Man Man," and Renetta Lowe, aka "Magnolia Shorty,"
through the Use of a Firearm)

On or about December 20, 2010 in the Eastern District of Louisiana, the defendants, **TERRIOUES OWNEY**, aka "T-Red," **RICO JACKSON**, aka "Freaky," **McCOY WALKER**, aka "Rat," **TYRONE KNOCKUM**, aka "T-Bone," and Gregory Stewart did knowingly use, carry, brandish, and discharge firearms, during and in relation to and possessed firearms in furtherance of the commission of a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime, for which

they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base ("crack"), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of two persons through the use of a firearm, which killings are murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, did unlawfully kill Jerome Hampton, aka "Man Man," and Renetta Lowe, aka "Magnolia Shorty," by shooting both victims with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 24

(Murder of Renetta Lowe, aka "Magnolia Shorty," in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about December 20, 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 defendants, **TERRIOUES OWNEY**, aka "T-Red," **RICO JACKSON**, aka "Freaky," **McCOY WALKER**, aka "Rat," **TYRONE KNOCKUM**, aka "T-Bone," and Gregory Stewart did murder Renetta Lowe, aka "Magnolia Shorty," in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 25

(Murder of Terrance Dennis in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though

fully set forth herein.

2. On or about February 19, 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, **JASMINE PERRY**, aka “J-Real, aka “Rell,” **ASHTON PRICE**, aka “Pound,” and others known to the Grand Jury, did murder Terrance Dennis, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 26

(Murder of Terrance Dennis through the Use of a Firearm)

On or about February 19, 2011 in the Eastern District of Louisiana, the defendants, **JASMINE PERRY**, aka “J-Real, aka “Rell,” **ASHTON PRICE**, aka “Pound” and others known to the Grand Jury, did knowingly use, carry, brandish, and discharge firearms, during and in relation to and possessed firearms in furtherance of the commission of a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime, for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, did unlawfully kill Terrance Dennis, by shooting him with

several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 27

(Murder of Littlejohn Haynes in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about February 20, 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, **JASMINE PERRY**, aka "J-Real, aka "Rell," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **EVANS LEWIS**, aka "Easy," **SOLOMON DOYLE**, aka "Black," aka "Sol," and Gregory Stewart did murder Littlejohn Haynes, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 28

(Murder of Littlejohn Haynes through the Use of a Firearm)

On or about February 20, 2011 in the Eastern District of Louisiana, the defendants, **JASMINE PERRY**, aka "J-Real, aka "Rell," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **EVANS LEWIS**, aka "Easy," **SOLOMON DOYLE**, aka "Black," aka "Sol," and Gregory Stewart did knowingly use, carry, brandish, and discharge firearms, during and in relation to and possessed firearms in furtherance of the commission of a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime, for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base

("crack"), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, did unlawfully kill Littlejohn Haynes, by shooting him with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 29

(Murder of Floyd Moore in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about April 28, 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, **WASHINGTON McCASKILL**, aka "Big Wash," **DAMIEN BARNES** aka "AD," and Gregory Stewart did murder Floyd Moore, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 30

(Murder of Floyd Moore through the Use of a Firearm)

On or about April 28, 2011, in the Eastern District of Louisiana, the defendants, **WASHINGTON McCASKILL**, aka "Big Wash," **DAMIEN BARNES** aka "AD," and Gregory Stewart did knowingly use, carry, brandish, and discharge firearms, during and in relation to and possessed firearms in furtherance of the commission of a federal crime of violence, to wit:

conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime, for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, did unlawfully kill Floyd Moore, by shooting him with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 31

(Assault of Albert Hardy with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about May 22, 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, **WASHINGTON McCASKILL**, aka “Big Wash,” **JASMINE PERRY**, aka “J-Real, aka “Rell,” **CURTIS NEVILLE**, aka “Pooney” aka “Poonie,” and others known to the Grand Jury, did commit an assault with a dangerous weapon, to wit: a firearm, upon Albert Hardy, Kelvin Baham, and Carrie Henry, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 32

(Using and Carrying a Firearm During and in Relation to a
Crime of Violence and a Drug Trafficking Crime)

On or about May 22, 2011, in the Eastern District of Louisiana, the defendants, **WASHINGTON McCASKILL**, aka "Big Wash," **JASMINE PERRY**, aka "J-Real, aka "Rell," **CURTIS NEVILLE**, aka "Pooney" aka "Poonie," and others known to the Grand Jury, did knowingly use, carry, brandish, and discharge several firearms, during and in relation to a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base ("crack"), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 33

(Assault of Kelvin Baham with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about May 22, 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, **WASHINGTON McCASKILL**, aka "Big Wash," **JASMINE PERRY**, aka "J-Real, aka "Rell," **CURTIS NEVILLE**, aka "Pooney" aka "Poonie," and others known to the Grand Jury, did commit an assault with a dangerous weapon, to wit; a firearm, upon Kelvin Baham, in violation of the laws of the State of Louisiana, that is

Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 34

(Using and Carrying a Firearm During and in Relation to a
Crime of Violence and a Drug Trafficking Crime)

On or about May 22, 2011, in the Eastern District of Louisiana, the defendants, **WASHINGTON McCASKILL**, aka "Big Wash," **JASMINE PERRY**, aka "J-Real, aka "Rell," **CURTIS NEVILLE**, aka "Pooney" aka "Poonie," and others known to the Grand Jury, did knowingly use, carry, brandish, and discharge several firearms, during and in relation to a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base ("crack"), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 35

(Assault of Carrie Henry with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about May 22, 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, **WASHINGTON McCASKILL**, aka "Big Wash," **JASMINE PERRY**, aka "J-Real, aka "Rell," **CURTIS NEVILLE**, aka "Pooney" aka

“Poonie,” and others known to the Grand Jury, did commit an assault with a dangerous weapon, to wit; a firearm, upon Carrie Henry, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 36

(Using and Carrying a Firearm During and in Relation to a
Crime of Violence and a Drug Trafficking Crime)

On or about May 22, 2011, in the Eastern District of Louisiana, the defendants, **WASHINGTON McCASKILL**, aka “Big Wash,” **JASMINE PERRY**, aka “J-Real, aka “Rell,” **CURTIS NEVILLE**, aka “Pooney” aka “Poonie,” and others known to the Grand Jury, did knowingly use, carry, brandish, and discharge several firearms, during and in relation to a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 37

(Murder of Gregory Keys in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about May 24, 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

rackeering activity, **JASMINE PERRY**, aka “J-Real, aka “Rell,” and Gregory Stewart and other known to the Grand Jury, did murder Gregory Keys, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 38

(Murder of Gregory Keys through the Use of a Firearm)

On or about May 24, 2011 in the Eastern District of Louisiana, the defendant, **JASMINE PERRY**, aka “J-Real, aka “Rell” ,” and Gregory Stewart and other known to the Grand Jury, did knowingly use, carry, brandish, and discharge firearms, during and in relation to and possessed firearms in furtherance of the commission of a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime, for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, did unlawfully kill Gregory Keys, by shooting him with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 39

(Assault of Kendrick Smothers with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though

fully set forth herein.

2. On or about May 24, 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 defendant, **JASMINE PERRY**, aka “J-Real,” aka “Rell,” and Gregory Stewart and other known to the Grand Jury, did commit an assault with a dangerous weapon, to wit; a firearm, upon Kendrick Smothers, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 40

(Using and Carrying a Firearm During and in Relation to a
Crime of Violence and a Drug Trafficking Crime)

On or about May 24, 2011, in the Eastern District of Louisiana, the defendant, **JASMINE PERRY**, aka “J-Real, aka “Rell,” and,” and Gregory Stewart and other known to the Grand Jury, did knowingly use, carry, brandish, and discharge firearms, during and in relation to a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base (“crack”), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 41

(Possession with the Intent to Distribute Heroin)

On or about May 27, 2011, in the Eastern District of Louisiana, the defendant, **CURTIS NEVILLE**, a/k/a "Poonie," did knowingly and intentionally possess with the 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), 841 (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 42

(Possession of a Firearm in furtherance of a
Drug Trafficking Crime)

On or about May 27, 2011, in the Eastern District of Louisiana, the defendant, **CURTIS NEVILLE**, a/k/a "Poonie," and others known and unknown to the Grand Jury possessed two firearms to wit: Smith and Wesson Model SW40VE, .40 caliber semi-automatic handgun bearing serial number PBK6606 and a Taurus Model PT92AF, nine-millimeter semi-automatic handgun bearing serial number TNF84336, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: a conspiracy to possess with the intent to distribute heroin, as set forth in Count 2 of this Indictment and the possession with the intent to distribute heroin, as set forth in Count 41 of this Indictment, in violation of Title 18, United States Code, Sections 924(c)(1)(A).

COUNT 43

(Murder of Michael Marshall in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about September 14, 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 defendant, **WASHINGTON McCASKILL**, aka "Big Wash," **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," and others known to the Grand Jury, did murder Michael Marshall, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 44

(Murder of Michael Marshall through the Use of a Firearm)

On or about September 14, 2011, in the Eastern District of Louisiana, the defendants, **WASHINGTON McCASKILL**, aka "Big Wash," **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," and others known to the Grand Jury, did knowingly use, carry, brandish, and discharge firearms, during and in relation to and possessed firearms in furtherance of the commission of a federal crime of violence, to wit: conspiracy to violate the Racketeering Influenced Corrupt Organization Act, in violation of Title 18, United States Code, Section 1962 as charged in Count 1 of this Indictment, and a drug trafficking crime, for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute heroin and cocaine base ("crack"), in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, did unlawfully kill Michael Marshall, by shooting him with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 45

(Murder of Federal Informant Michael Marshall)

On or about September 14, 2011, in the Eastern District of Louisiana, the defendants, **WASHINGTON McCASKILL**, aka "Big Wash," **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," and others known to the Grand Jury, did knowingly kill Michael Marshall with the intent to retaliate against Michael Marshall for providing to law enforcement officers information relating to the commission or possible commission of a federal offense, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, with malice aforethought, did unlawfully kill Michael Marshall by shooting him with several firearms willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 1513(a)(1)(B), 1513(a)(2)(A), and 2.

NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 2 and 41 of this Indictment are re-alleged 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 2 and 41, the defendants, **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woo-dee," **McCOY WALKER**, aka "Rat," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **RICO JACKSON**, aka "Freaky," **TYRONE KNOCKUM**, aka "T-Bone," **WASHINGTON McCASKILL**, aka "Big Wash," and **DAMIAN BARNES**, aka "AD," 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 2 and 41 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 3, 5, 7, 10, 11, 13, 15, 17, 19, 21, 23, 26, 28, 30, 32, 34, 36, 38, 40, 42, and 44 of this Indictment are re-alleged 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 3, 5, 7, 10, 11, 13, 15, 17, 19, 21, 23, 26, 28, 30, 32, 34, 36, 38, 40, 42, and 44, the defendants, **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woo-dee," **JASMINE PERRY**,

aka "J-Real," aka "Rell," **McCOY WALKER**, aka "Rat," **TERRIOUES OWNEY**, aka "T-Red," **EVANS LEWIS**, aka "Easy," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **RICO JACKSON**, aka "Freaky," **TYRONE KNOCKUM**, aka "T-Bone," **SOLOMON DOYLE**, aka "Black," aka "Sol," **WASHINGTON McCASKILL**, aka "Big Wash," and **DAMIAN BARNES**, aka "AD," 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, Section 924(c)(1)(A), Title 18, United States Code, Section 924(j), or Title 18, United States Code, Section 1959.

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(c)(1)(A) and 924(d)(1).

NOTICE OF RICO FORFEITURE

1. The allegations of Count One of this Indictment are hereby repeated, re-alleged

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 1963 and Title 28, United States Code, Section 2461(c). Pursuant to Federal Rule of Criminal Procedure Rule 32.2, notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of any defendant's conviction under Count One of this Indictment.

2. The defendants, **LEROY PRICE**, aka "Lee," **ASHTON PRICE**, aka "Pound," **ALONZO PETERS**, aka "Woo-dee," **JASMINE PERRY**, aka "J-Real," aka "Rell," **McCOY WALKER**, aka "Rat," **TERRIOUES OWNEY**, aka "T-Red," **EVANS LEWIS**, aka "Easy," **CURTIS NEVILLE**, aka "Pooney," aka "Poonie," **RICO JACKSON**, aka "Freaky," **TYRONE KNOCKUM**, aka "T-Bone," **SOLOMON DOYLE**, aka "Black," aka "Sol," **WASHINGTON McCASKILL**, aka "Big Wash," and **DAMIAN BARNES**, aka "AD,"

- a) have acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);
- b) have an interest in, security of, claims against, and property and contractual rights which afford a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963 (a)(2);
- c) have property constituting and derived from proceeds obtained, directly and

indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

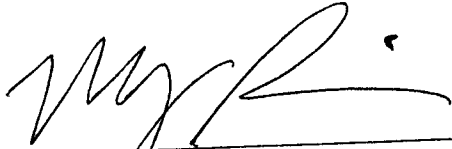
3. If any of the property described in paragraphs 2 and 3 above, as a result of any act or omission of a defendant --

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party; (3)
has been placed beyond the jurisdiction of the court;
3. has been substantially diminished in value; or
4. has been commingled with other property which cannot be divided without difficulty;
5. the court shall order the forfeiture of any other property of the defendants up to the value of any property set forth in paragraphs 2 and 3 above.

4. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 1963.

FOREPERSON'S SIGNATURE
HAS BEEN REDACTED



MYLES RANIER
Assistant United States Attorney
Louisiana Bar Roll No. 30029

New Orleans, Louisiana
June 12, 2015

No. _____

UNITED STATES DISTRICT COURT

 Eastern District of Louisiana
 Criminal Division

THE UNITED STATES OF AMERICA

vs.

LERoy PRICE a/k/a "Lee"	RICO JACKSON a/k/a "Freaky"
ASHTON PRICE a/k/a "Pound"	TYRONE KNOCKUM a/k/a "T-Bone"
ALONZO PETERS a/k/a "Woo-die"	SOLOMON DOYLE a/k/a "Black"
JASMINE PERRY a/k/a "J-Real"	a/k/a "Sol"
a/k/a "Reli"	WASHINGTON McCASKILL
McCOY WALKER a/k/a "Rat"	a/k/a "Big Wash"
TERRIOUES OWNEY "T-Red"	DAMIAN BARNES a/k/a "AD"
EVANS LEWIS a/k/a "Easy"	
CURTIS NEVILLE a/k/a "Pooney"	
a/k/a "Poonie"	

INDICTMENT

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

VIOLATIONS:	18 U.S.C. § 1962(d)	18 U.S.C. § 924(c)(1)(A)
	18 U.S.C. § 1959	18 U.S.C. § 846
	18 U.S.C. § 924(o)	18 U.S.C. § 1513(a)(1)(B)
	18 U.S.C. § 924(j)	18 U.S.C. § 2

A true
 Foreperson
 Filed in of

FOREPERSON'S SIGNATURE
 HAS BEEN REDACTED

Clerk

Bail, \$ _____

MYLES DREW RANIER
 Assistant United States Attorney

