

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

SECOND SUPERSEDING INDICTMENT FOR VIOLATIONS OF  
THE FEDERAL GUN CONTROL ACT, THE FEDERAL CONTROLLED  
SUBSTANCES ACT, THE RACKETEER INFLUENCED AND CORRUPT  
ORGANIZATIONS CONSPIRACY ACT AND FOR THE COMMISSION OF  
VIOLENT CRIMES IN AID OF RACKETEERING

UNITED STATES OF AMERICA	*	CRIMINAL NO: 14-131
v.	*	SECTION: "N"
JEFFERY WILSON	*	VIOLATIONS: 21 U.S.C. § 846
LIONEL ALLEN		21 U.S.C. § 841(a)(1)
a/k/a "Lot"	*	18 U.S.C. § 924(o)
JAWAN FORTIA		18 U.S.C. § 924(c)
a/k/a "Tittie," "Wine"	*	18 U.S.C. § 1962(d)
DEDRICK KEELEN		18 U.S.C. § 1959
a/k/a "Roy"	*	18 U.S.C. § 924(j)
DELWIN McLAREN		18 U.S.C. § 2
a/k/a "Poo," "Poo Stupid"	*	
BRYAN SCOTT		
a/k/a "Killer"	*	
	*	*

The Grand Jury charges that:

COUNT 1

(Racketeer Influenced and Corrupt Organizations Conspiracy)

General Allegations

1. At all relevant times, defendants, JEFFERY WILSON, LIONEL ALLEN, a/k/a "Lot," JAWAN FORTIA, a/k/a "Tittie" and "Wine," and DEDRICK KEELEN, a/k/a "Roy,"<sup>1</sup> and others known and unknown to the Grand Jury, were members and associates of a criminal

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<sup>1</sup> Hereinafter, the nicknames and/or aliases of the defendants will not be repeated in the document.

enterprise referred to as "Young Melph Mafia" or "YMM" (herein referred to as "YMM"), an organization engaged in, among other things, conspiracy to distribute controlled substances, distribution of controlled substances, murder, conspiracy to commit murder, and attempted murder. At all relevant times, "YMM" operated in the Eastern District of Louisiana.

2. This organization has historically encompassed the area of New Orleans known as "Central City" and operated primarily in this specified area. The boundaries of this area generally comprise Earhart Boulevard, Jackson Avenue, Claiborne Avenue, and St. Charles Avenue.

#### The Racketeering Enterprise

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

#### Purposes of the Enterprise

4. The purposes of the enterprise include, but are not limited to, the following:
- a. Enriching the members and associates of the enterprise through, among other things, the control of and participation in the distribution of controlled substances in the territory controlled by the enterprise;

- b. Preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, and threats of violence, including aggravated assault, murder, and attempted murder;
- c. Keeping victims, potential victims, and witnesses in fear of the enterprise and in fear of its members and associates through violence and threats of violence;
- d. Providing information to members and associates of the enterprise, including discussions on recorded jail calls about YMM activity with those who were incarcerated for committing acts of violence, distribution of controlled substances, and other offenses; and
- e. Providing assistance to members and associates of the enterprise who committed crimes for and on behalf of the enterprise in order to hinder, obstruct, and prevent law enforcement officers from identifying the offender or offenders, apprehending the offender or offenders, and prosecuting and punishing the offender or offenders.

#### **Means and Methods of the Enterprise**

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

- a. Members of the enterprise and their associates engaged in the distribution of controlled substances as a means to generate income;
- b. Members of the enterprise and their associates conspired to, committed, attempted to, and threatened to commit shootings, various firearms offenses, and violent



acts, including but not limited to murder, attempted murder, aggravated battery, illegal possession of firearms, and aggravated assault, in order to maintain and advance the goals of the enterprise, the individual conspirator's role within the enterprise, and to control the specific geographic area utilized and controlled by the conspirators;

- c. Members of the enterprise and their associates promoted a climate of fear through violence and threats of violence and sought retribution on anyone who showed them or the enterprise any disrespect;
- d. Members of the enterprise and their associates possessed and utilized firearms to prevent competition from other drug dealers in and around the geographic area that was utilized and controlled by the conspirators;
- e. Members of the enterprise and their associates maintained and circulated a collection of firearms among themselves for use in criminal activity by other co-conspirators;
- f. Members of the enterprise and their associates used stolen vehicles in their efforts to avoid detection by law enforcement officers, distribute controlled substances, illegally possess firearms, commit violent acts, and intimidate witnesses;
- g. Members of the enterprise and their associates used telephones, even while in jail, to give direction and advice to each other in an effort to circumvent the criminal justice system, distribute controlled substances, illegally possess firearms, perform violent acts, and intimidate witnesses; and



- h. Members of the enterprise and their associates bragged about their illegal activity, such as their possession and use of firearms, to each other and made videos and took pictures of themselves posing with firearms and money in an effort to reflect their membership in the YMM and to intimidate others in the community.
- i. Members of the enterprise and their associates targeted and retaliated against rival drug gangs, including but not limited to the "110ers gang," who were from the 10<sup>th</sup> and 11<sup>th</sup> Wards of New Orleans, and the "2-Block gang."
- j. Members of the enterprise and their associates established a criminal gang alliance with the Mid-City Killers (MCK), another New Orleans gang. The members of these two gangs (YMM and MCK) acted in concert with each other and targeted mutual rival drug gangs for retribution.

#### **Roles of the Defendants**

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

- a. Defendant **LIONEL ALLEN** acted as one of the leaders and distributors of controlled substances. He also served as a gunman for the enterprise.
- b. Defendants **JAWAN FORTIA** and **DEDRICK KEELEN** acted as distributors of controlled substances and gunmen for the enterprise.
- c. Defendant **JEFFERY WILSON** supplied members of the enterprise with controlled substances for distribution.

### The RICO Conspiracy Charge

7. Beginning in or about 2007, and continuing to on or about the date of the return of this Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **JEFFERY WILSON, LIONEL ALLEN, JAWAN FORTIA, and DEDRICK KEELEN**, and others known and unknown to the Grand Jury, each being persons employed by and associated with the criminal enterprise, as described in paragraphs 1 through 6 of this Count, which are realleged and incorporated herein, which enterprise engaged in and the activities of which affected interstate and foreign commerce, did knowingly and intentionally, combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts involving:

- a. Murder, in violation of Title 14, Louisiana Revised Statute 30.1 (Second Degree Murder); and
- b. the illegal distribution of controlled substances, including cocaine base “(crack)”, and marijuana, in violation of Title 21, United States Code, Sections 846, and 841(a)(1).

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, the defendants, **JEFFERY WILSON, LIONEL ALLEN, JAWAN FORTIA, and DEDRICK**

**KEELEN**, and others known and unknown to the Grand Jury, committed various overt acts among others, on or about the following times and dates, in the Eastern District of Louisiana, and elsewhere:

1. On May 10, 2008, D. V., a YMM member at the time, shot and killed Arthur Mitchell because he believed Mitchell to be associated with a rival gang.
2. On March 22, 2009, YMM member Jawan FORTIA shot R.D. at a party on South Liberty Street after R.D. exchanged words with another YMM member.
3. On February 5, 2010, YMM members Delwin McLaren, Bryan Scott and R. G. attended a Mardi Gras parade and McLaren illegally possessed a stolen firearm.
4. On February 13, 2010, YMM member Bryan Scott illegally possessed a stolen firearm.
5. On December 22, 2010, YMM members D. H. and Lionel ALLEN possessed a quantity of cocaine base ("crack") with the intent to distribute it.
6. On or about February 28, 2011, YMM member D.H. posted a picture to Facebook of himself with YMM members including D.M., J.M., J.C., J.V., Lionel ALLEN, Jawan FORTIA, and Dedrick KEELEN for the purpose of reflecting their membership with the YMM.
7. On or about July 24, 2011, YMM member J.V. posted a picture to Facebook of YMM members Jawan FORTIA, Bryan Scott, and S.G. for the purpose of reflecting their membership with the YMM.
8. On October 18, 2011, YMM members Lionel ALLEN, S.G. and A.C. participated in the attempted murder of four males, R.T., L. S., T.S. and T.P., on Annunciation Street.



9. On or about October 29, 2011, YMM members J.B., D.H, and Lionel ALLEN took a photo in front a rival gang member's house while posing with a firearm. The photo was thereafter posted to Facebook with a threat against the rival gang member.
10. On December 4, 2011, YMM member Lionel ALLEN shot rival gang member J.J. in the lower leg.
11. On or about December 30, 2011, YMM member S.G. posted a picture to Facebook of himself and YMM members Bryan Scott, Lionel ALLEN and A.C. with Jeffery WILSON and members of the Mid City Killers reflecting the relationship of the YMM, WILSON and the MCK gang.
12. On or about January 25, 2012, YMM member S.G. posted a picture to Facebook of himself with YMM members Jawan FORTIA, Lionel ALLEN, Bryan Scott, A.C., D.W., and D.M. for the purpose of reflecting their membership with the YMM.
13. On February 7, 2012, YMM members Bryan Scott, Lionel ALLEN and D.W. were trespassing in an abandoned residence when an NOPD officer stopped to investigate. D.W. pulled a firearm and shot at the officer, who returned fire.
14. On April 22, 2012, YMM members Lionel ALLEN and Jawan FORTIA and other un-indicted conspirators murdered by gunfire Vennie "Funk" Smith in a gang-related attack and shot at Smith's girlfriend, C.L., while Smith and his girlfriend were traveling in a car.
15. On May 9, 2012, Dedrick KEELEN illegally possessed cocaine base ("crack") in a plastic bag after exiting an alley.
16. On June 3, 2012, YMM member Lionel ALLEN shot and killed Dashawn Hartford and wounded C.P. in the 2500 block of Dryades in a gang-related attack.

17. On June 14, 2012, YMM members S.G. and Delwin McLAREN talked on the phone. McLAREN told S.G. that YMM members Jawan FORTIA and Bryan Scott were involved in a shooting in the St. Andrew neighborhood. McLAREN admitted that he was in the car with them but got out. He also stated that he was "just getting started."

18. On August 21, 2012, YMM member Bryan Scott possessed with intent to distribute cocaine base ("crack").

19. On November 26, 2012, YMM members Lionel ALLEN and J.B. shot at and injured J.V. while attempting to murder rival gang member J.J. in a gang-related attack.

20. On November 26, 2012, YMM member Lionel ALLEN and other un-indicted conspirators attempted to murder by gunfire R.T. and K.M. in a gang-related attack.

21. On November 26, 2012, YMM member Lionel ALLEN and other un-indicted conspirators attempted to murder by gunfire T.P., B.T. and D.S. in a gang-related attack.

22. On December 16, 2012, YMM member Dedrick KEELLEN and other un-indicted conspirators murdered Lawrence Burt and Vivian Snyder and injured J.B. in a gang-related attack.

23. On March 13, 2013, YMM members Lionel ALLEN and Jawan FORTIA possessed a stolen firearm.

24. On May 6, 2013, YMM member Lionel ALLEN and other un-indicted conspirators murdered Travis "Streets" Thomas and injured R.R. after an encounter at a nightclub in a gang-related attack.

25. On May 16, 2013, YMM members S.G. and Jawan FORTIA illegally possessed stolen firearms.

26. On January 14, 2014, YMM member Bryan Scott illegally possessed a .45 caliber pistol.

27. From on or about 2008 through 2014, Jeffery WILSON provided crack cocaine to YMM members for retail sale.

### **SPECIAL SENTENCING ALLEGATIONS**

The Grand Jury further alleges that:

1. Beginning in or about 2008, and continuing to on or about the date of the return of this Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **JEFFERY WILSON, JAWAN FORTIA**, and **DEDRICK KEELEN**, and others known and unknown to the Grand Jury, combined, conspired, confederated and agreed with each other to knowingly and intentionally distribute and possess with the intent to distribute 280 grams or more of a mixture or substance containing a detectible amount of cocaine base ("crack"), a Schedule II drug controlled substance and a quantity of marijuana, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 841(b)(1)(D); all in violation of Title 21, United States Code, Section 846.

2. On April 22, 2012, in the Eastern District of Louisiana and elsewhere, defendants **LIONEL ALLEN, JAWAN FORTIA** and other unindicted co-conspirators, with the specific intent to kill and inflict great bodily harm, did kill Vennie "Funk" Smith, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.

3. On June 3, 2012, in the Eastern District of Louisiana and elsewhere, defendant **LIONEL ALLEN**, and other unindicted co-conspirators, with the specific intent to kill and inflict great bodily harm, did kill Dashawn Hartford, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.



4. On December 16, 2012, in the Eastern District of Louisiana and elsewhere, defendant **DEDRICK KEELEN**, and other unindicted co-conspirators, with the specific intent to kill and inflict great bodily harm, did kill Lawrence Burt and Vivian Snyder, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.

5. On May 6, 2013, in the Eastern District of Louisiana and elsewhere, defendants **LIONEL ALLEN**, and other unindicted co-conspirators, with the specific intent to kill and inflict great bodily harm, did kill Travis "Streets" Thomas, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.

#### **COUNT 2**

(Conspiracy to Distribute Controlled Substances)

Beginning in or about 2007, and continuing to on or about the date of this Second Superseding Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **JEFFERY WILSON, JAWAN FORTIA, DEDRICK KEELEN, DELWIN McLAREN** and **BRYAN SCOTT**, and others known and unknown to the Grand Jury, did combine, conspire, confederate and agree with each other to knowingly and intentionally distribute and possess with intent to distribute 280 grams or more of cocaine base ("crack"), a Schedule II controlled substance and a quantity of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and 841(b)(1)(D); all in violation of Title 21, United States Code, Section 846.

#### **COUNT 3**

(Conspiracy to Possess Firearms)

Beginning in or about 2008, and continuing to on or about the date of this Second

Superseding Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **LIONEL ALLEN, JAWAN FORTIA, DEDRICK KEELLEN, DELWIN McLAREN** and **BRYAN SCOTT**, 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 and carry firearms, during and in relation to, and possessed firearms in furtherance of crimes of violence and drug trafficking crimes as alleged in Counts 1 and 2 of this Second Superseding Indictment, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances; all in violation of Title 18, United States Code, Section 924(o).

**COUNT 4**

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. At all times relevant to this Second Superseding Indictment, the enterprise as more fully described in Paragraphs 1, 2, and 4 through 6 of Count 1 of this Second Superseding 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 Second Superseding 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, murder, in violation of Title 14, Louisiana Revised Statutes, Section 30.1(A)(1); and the distribution and possession with the intent to distribute controlled substances in violation of the laws of the United States

(Title 21, United States Code, Sections 841(a)(1) and 846).

3. On or about October 18, 2011, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon R.T., L.S., T.S. and T.P., 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 5**

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

On or about October 18, 2011, in the Eastern District of Louisiana, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did knowingly use, carry, brandish, and discharge an FN Herstal, 5.7x28 caliber semi-automatic handgun (serial number 386183628) and an unknown .45 caliber handgun during and in relation to, and in furtherance of, a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment; and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack") and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of this Second Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

**COUNT 6**

(Assault with a Dangerous Weapon in Aid of Racketeering)



1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about December 4, 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, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon J.J., 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 7

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

On or about December 4, 2011, in the Eastern District of Louisiana, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did knowingly use, carry, brandish, and discharge an FN Herstal, 5.7x28 caliber semi-automatic handgun (serial number 386183628) during and in relation to, and in furtherance of, a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment; and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack") and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of this Second Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

#### COUNT 8

(Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are

realleged and incorporated by reference as though fully set forth herein.

2. On or about April 22, 2012, 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, **LIONEL ALLEN, JAWAN FORTIA**, and others known and unknown to the Grand Jury, did murder Vennie "Funk" Smith, in violation of the laws of the State of Louisiana, that is, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

#### **COUNT 9**

(Causing Death Through the Use of a Firearm)

On or about April 22, 2012, in the Eastern District of Louisiana, the defendants, **LIONEL ALLEN, JAWAN FORTIA**, and others known and unknown to the Grand Jury, did knowingly discharge unknown firearms, during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment; and during and in relation to the commission of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack") and marijuana, as set forth in Count 2 of this Second Superseding Indictment which are both realleged and incorporated by reference herein, 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 Vennie "Funk" Smith, by shooting him with the firearm willfully, deliberately,

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

**COUNT 10**

(Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about June 3, 2012, 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, **LIONEL ALLEN**, others known and unknown to the Grand Jury, did murder Dashawn Hartford, in violation of the laws of the State of Louisiana, that is, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

**COUNT 11**

(Causing Death Through the Use of a Firearm)

On or about June 3, 2012, in the Eastern District of Louisiana, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did knowingly discharge unknown firearms, during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment; and during and in relation to the commission of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack") and marijuana, as set forth in Count 2 of this Second Superseding Indictment which are both realleged and incorporated by reference herein, 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 Dashawn Hartford, by shooting him with the firearm willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2

**COUNT 12**

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about June 3, 2012, 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, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon C.P., 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 13**

(Use and Carrying of a Firearm During and in Relation to  
a Crime of Violence)

On or about June 3, 2012, in the Eastern District of Louisiana, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did knowingly use, carry, brandish, and discharge an unknown firearm, during and in relation to, and in furtherance of, a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to

distribute and to possess with the intent to distribute cocaine base ("crack") and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of the Second Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

**COUNT 14**

(Use and Carrying of a Firearm During and in Relation to  
a Crime of Violence)

On or about September 24, 2012, in the Eastern District of Louisiana, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did knowingly use, carry, brandish, and discharge an assault rifle firearm, during and in relation to, and in furtherance of, a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack") and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of the Second Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

**COUNT 15**

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about November 26, 2012, 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, **LIONEL ALLEN**, and others known

and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon J.V., 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 16**

(Use and Carrying of a Firearm During and in Relation to  
a Crime of Violence)

On or about November 26, 2012, in the Eastern District of Louisiana, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did knowingly use, carry, brandish, and discharge several semi-automatic firearms to wit: a 9mm semi-automatic handgun, a .40 caliber semi-automatic handgun, and an AK-47 assault rifle, during and in relation to, and in furtherance of, a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack") and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of the Second Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

**COUNT 17**

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about November 26, 2012, 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, **LIONEL ALLEN**, and others known



and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon R.T and K.M., 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 18**

(Use and Carrying of a Firearm During and in Relation to  
a Crime of Violence)

On or about November 26, 2012, in the Eastern District of Louisiana, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did knowingly use, carry, brandish, and discharge a 9mm semi-automatic handgun, during and in relation to, and in furtherance of, a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack") and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of the Second Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

**COUNT 19**

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about November 26, 2012, 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, **LIONEL ALLEN**, and others known

and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon T.P, and B.T., 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 20**

(Use and Carrying of a Firearm During and in Relation to  
a Crime of Violence)

On or about November 26, 2012, in the Eastern District of Louisiana, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did knowingly use, carry, brandish, and discharge a 9mm semi-automatic handgun, during and in relation to, and in furtherance of, a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack") and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of the Second Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

**COUNT 21**

(Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about December 16, 2012, 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, **DEDRICK KEELLEN**, and others

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

**COUNT 22**

(Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about December 16, 2012, 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, **DEDRICK KEELEN**, and others known and unknown to the Grand Jury, did murder Vivian Snyder, in violation of the laws of the State of Louisiana, that is, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

**COUNT 23**

(Causing Death Through the Use of a Firearm)

On or about December 16, 2012, in the Eastern District of Louisiana, the defendant, **DEDRICK KEELEN**, and others known and unknown to the Grand Jury, did knowingly discharge an AK-47 assault rifle, during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment; and during and in relation to the commission of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack") and marijuana, as set forth in Count 2 of this Second Superseding



Indictment which are both realleged and incorporated by reference herein, 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 Lawrence Burt and Vivian Snyder, by shooting them with the firearm willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

**COUNT 24**

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about December 16, 2012, 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, **DEDRICK KEELEN**, and others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon J.B., 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 25**

(Use and Carrying of a Firearm During and in Relation to  
Crime of Violence)

On or about December 16, 2012, in the Eastern District of Louisiana, the defendant, **DEDRICK KEELEN**, and others known and unknown to the Grand Jury, did knowingly

discharge an AK-47 assault rifle, during and in relation to, and in furtherance of, a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack") and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of this Second Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

**COUNT 26**

(Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.

2. On or about May 6, 2013, 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, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did murder Travis "Streets" Thomas, in violation of the laws of the State of Louisiana, that is, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

**COUNT 27**

(Causing Death Through the Use of a Firearm)

On or about May 6, 2013, in the Eastern District of Louisiana, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did knowingly discharge firearms, to wit: AK-47 Assault firearms, during and in relation to, and in furtherance of a federal crime of

violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment; and during and in relation to the commission of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack") and marijuana, as set forth in Count 2 of this Second Superseding Indictment which are both realleged and incorporated by reference herein, 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 Travis "Streets" Thomas, by shooting him with the firearm willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

#### **COUNT 28**

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 of this Second Superseding Indictment are realleged and incorporated by reference as though fully set forth herein.
2. On or about May 6, 2013, 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, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon upon R.R., 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 29**

(Use and Carrying of a Firearm During and in Relation to  
a Crime of Violence)



On or about May 6, 2013, in the Eastern District of Louisiana, the defendant, **LIONEL ALLEN**, and others known and unknown to the Grand Jury, did knowingly discharge an AK-47 assault rifle, during and in relation to, and in furtherance of, a crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1 of this Second Superseding Indictment, and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base ("crack") and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2 of this Second Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

#### **COUNT 30**

On or about May 13, 2014, in the Eastern District of Louisiana, the defendant, **JEFFERY WILSON**, did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

#### **COUNT 31**

On or about May 30, 2014, in the Eastern District of Louisiana, the defendant, **JEFFERY WILSON**, did knowingly and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base ("crack"), a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

#### **NOTICE OF RICO FORFEITURE**

1. The allegations contained in Count 1 of this Second Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 1963.

2. Pursuant to Title 18, United States Code, Section 1963, upon conviction of an offense in violation of Title 18, United States Code, Section 1962, the defendants, **JEFFERY WILSON, LIONEL ALLEN, JAWAN FORTIA, and DEDRICK KEELLEN**, shall forfeit to the United States of America:

- a. any interest acquired or maintained in violation of section 1962;
- b. any interest in, security of, claim against, and/or property and contractual rights of any kind affording a source of influence over any enterprise which the defendants established, operated, controlled, conducted, or participated in the conduct of, in violation of section 1962; and
- c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of 1962.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18, United States Code, Section 1963(m).

All in violation of Title 18, United States Code, Section 1963.

### **NOTICE OF DRUG FORFEITURE**

1. The allegations of Counts 2, 30 and 31 of this Second Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 25, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 2, 30 and 31 of this Second Superseding Indictment, the defendants, **JEFFERY WILSON, JAWAN FORTIA, DEDRICK KEELLEN, DELWIN McLAREN** and **BRYAN SCOTT**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts 2, 30 and 31 of this Second Superseding Indictment.

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

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;



- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

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

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

#### **NOTICE OF GUN FORFEITURE**

1. The allegations of Counts 3, and 4 through 29 of this Second Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924 (d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 3, and 4 through 29 of this Second Superseding Indictment, the defendants, **LIONEL ALLEN, JAWAN FORTIA, DEDRICK KEELLEN, DELWIN McLAREN** and **BRYAN SCOTT**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in a knowing violation of Title 18, United States Code, Sections 924(o), 924(j), and 924(c)(1)(A), as alleged in Counts 3, and 4 through 29 of the Second Superseding Indictment.

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

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

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

All in violation of Title 18, United States Code, Sections 924(o), 924(j), and 924(c)(1)(A).

#### **NOTICE OF SPECIAL FINDINGS**

1. The Grand Jury incorporates by reference and realleges the allegations contained in Counts 1, 8, 9, 10, 11, 21, 22, 23, 26 and 27 and makes the following special findings:
2. As to Counts 8 and 9, defendants **LIONEL ALLEN** and **JAWAN FORTIA**,

- a. were 18 years of age or older at the time of the offense;
- b. intentionally killed Vennie "Funk" Smith (18 U.S.C. § 3591(a)(2)(A));
- c. intentionally inflicted serious bodily injury that resulted in the death of Vennie "Funk" Smith; (18 U.S.C. § 3591(a)(2)(B));

- d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Vennie "Funk" Smith died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));
- e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Vennie "Funk" Smith died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));
- f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592 (c)(5));
- g. committed the offense after substantial planning and premeditation to cause the death of Vennie "Funk" Smith (18 U.S.C. § 3592(c)(9)); and
- h. the defendants intentionally killed or attempted to kill more than one person in a single criminal episode (18 U.S.C. §



3592(c)(16)).

3. As to Counts 10 and 11, defendant **LIONEL ALLEN**,

- a. was 18 years of age or older at the time of the offense;
- b. intentionally killed Dashawn Hartford (18 U.S.C. § 3591(a)(2)(A));
- c. intentionally inflicted serious bodily injury that resulted in the death of Dashawn Hartford; (18 U.S.C. § 3591(a)(2)(B));
- d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Dashawn Hartford died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));
- e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Dashawn Hartford died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));
- f. knowingly created a grave risk of death to one or more

persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592 (c)(5));

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

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

4. As to Counts 21, 22 and 23, defendant **DEDRICK KEELEN**,

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

b. intentionally killed Lawrence Burt and Vivian Snyder (18 U.S.C. § 3591(a)(2)(A));

c. intentionally inflicted serious bodily injury that resulted in the deaths of Lawrence Burt and Vivian Snyder; (18 U.S.C. § 3591(a)(2)(B));

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

- e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Lawrence Burt and Vivian Snyder died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));
- f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592 (c)(5));
- g. committed the offense after substantial planning and premeditation to cause the death of Lawrence Burt and Vivian Snyder (18 U.S.C. § 3592(c)(9)); and
- h. the defendant intentionally killed or attempted to kill more than one person in a single criminal episode (18 U.S.C. § 3592(c)(16)).

5. As to Counts 26 and 27, defendant **LIONEL ALLEN**,

- a. was 18 years of age or older at the time of the offense;
- b. intentionally killed Travis "Streets" Thomas (18 U.S.C. § 3591(a)(2)(A));
- c. intentionally inflicted serious bodily injury that resulted in



the death of Travis "Streets" Thomas; (18 U.S.C. § 3591(a)(2)(B));

- d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Travis "Streets" Thomas died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));
- e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Travis "Streets" Thomas died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));
- f. knowingly created a grave risk of death to one or more persons in addition to the victim of the offense in the commission of the offense or in escaping apprehension for the violation of the offense (18 U.S.C. § 3592 (c)(5));
- g. committed the offense after substantial planning and premeditation to cause the death of Travis "Streets" Thomas (18 U.S.C. § 3592(c)(9)); and

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

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY



MAURICE E. LANDRIEU, JR.  
Assistant United States Attorney  
Deputy Chief, Criminal Division  
LA Bar Roll No. 22104



EDWARD J. RIVERA  
Assistant United States Attorney

New Orleans, Louisiana  
August 28, 2015