

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

2015 MAY -1 PM 1:32

WILLIAM W. BLEVINS
CLERK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**SUPERSEDING INDICTMENT FOR VIOLATIONS OF THE HOBBS ACT,
THE FEDERAL GUN CONTROL ACT, MURDER OF A FEDERAL WITNESS
AND ACCESSORY AFTER THE FACT**

UNITED STATES OF AMERICA

* CRIMINAL NO. 15-12

v.

* SECTION: "J" (4)

GREGORY DENSON

a/k/a "PEP"

* VIOLATIONS: 18 U.S.C. § 924(c)(1)(A)(ii)
18 U.S.C. § 924(c)(1)(A)(iii)

JOE LEE MILLER

a/k/a "LOGGER BLACK"

* 18 U.S.C. § 1951(a)
18 U.S.C. § 922(g)(1)

QUINCY LEE JYNES

a/k/a "Q"

* 18 U.S.C. § 924(a)(2)
18 U.S.C. § 1512(c)(2)

COREY CRAIG DENSON

* 18 U.S.C. § 1512(a)(3)(A)

CLARENCE R. SINGLETON

* 18 U.S.C. § 1512(a)(1)(C)

ANNETTE S. ROBINSON

a/k/a "NET"

* 18 U.S.C. § 3
18 U.S.C. § 2

ESCRELITA M. CARMOUCHE

a/k/a "S"

*

BRIDGETT MARIE MILES

a/k/a "EBONY"

*

a/k/a "COOKIE MONSTER"

* * *

The Grand Jury charges that:

COUNT 1

A. THE CONSPIRACY:

Beginning at a time unknown, but at least by on or about June 22, 2013, and continuing

Fee _____
Process _____
☒ Dkt'd _____
ClkRmDep _____
Doc. No. _____

until on or about the date of this Indictment, in the Eastern District of Louisiana, the defendants, **GREGORY DENSON, a/k/a "PEP," JOE LEE MILLER, a/k/a "LOGGER BLACK," QUINCY LEE JYNES, a/k/a "Q," COREY CRAIG DENSON, CLARENCE R. SINGLETON, ANNETTE S. ROBINSON, a/k/a "NET," ESCRELITA M. CARMOUCHE, a/k/a "S," and BRIDGETT MARIE MILES, a/k/a "EBONY," a/k/a "COOKIE MONSTER,"** did knowingly combine, conspire, confederate and agree with each other and with persons known and unknown to the Grand Jury, to take and obtain personal property consisting of illegal drugs and proceeds of drug trafficking, by means of actual and threatened force, violence and fear of injury, from the persons and presences of individuals engaged in an activity affecting commerce, and thereby did unlawfully affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3);

B. MANNER AND MEANS OF THE CONSPIRACY:

1. As part of the conspiracy the conspirators would and did occupy different roles in the conspiracy in order to accomplish the ultimate shared goal of the conspiracy. The conspirators planned and conducted burglaries of residences as a precursor to the robbery by force and intimidation of individuals known by them to be drug dealers. The purpose of the robberies was to deprive the victims of the proceeds of their drug trafficking; including cash and other valuable properties acquired with drug cash, and drugs including heroin, marijuana, cocaine hydrochloride, cocaine base "crack" and other controlled substances, including prescription pills for the financial benefit of the conspirators.

2. It was further part of the conspiracy that the conspirators committed burglaries, shootings, various firearms offenses, and violent acts, including but not limited to murder, attempted murder, kidnapping, armed robbery, illegal possession of a firearm, aggravated

battery, and aggravated assault in order to maintain and advance the goals of the conspiracy; all in violation of Title 18, United States Code, Sections 1951(a).

COUNT 2

A. That at all times material to this Superseding Indictment, Individual A, a known drug trafficker, was engaged in the procurement, packaging, and selling of illicit drugs in the New Orleans Metropolitan area, in interstate and foreign commerce and an industry which affects interstate and foreign commerce.

B. That on or about April 23, 2014, in the Eastern District of Louisiana, the defendants, **GREGORY DENSON, a/k/a "PEP," JOE LEE MILLER, a/k/a "LOGGER BLACK,"** and **QUINCY LEE JYNES, a/k/a "Q"**, and others known and unknown to the Grand Jury, aiding and abetting each other and others, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants **GREGORY DENSON, a/k/a "PEP," JOE LEE MILLER, a/k/a "LOGGER BLACK,"** and **QUINCY LEE JYNES, a/k/a "Q,"** did unlawfully take and obtain personal property consisting of approximately ninety thousand dollars (\$90,000) in cash in the custody and control of Individual A, a quantity of heroin, and other valuable property from Individual A, against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by lying in wait in his apartment after breaking and entering same, confronting Individual A with firearms, zip tying his hands, brandishing firearms and threatening harm.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT 3

On or about April 23, 2014, in the Eastern District of Louisiana, defendants **JOE LEE MILLER, a/k/a "LOGGER BLACK," QUINCY LEE JYNES, a/k/a "Q,"** and **GREGORY DENSON, a/k/a "PEP,"** and others known and unknown to the Grand Jury, aiding and abetting each other and others, did knowingly brandish firearms, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, to wit: the offenses charged in Counts 1 and 2 of this Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT 4

On or about April 23, 2014, in the Eastern District of Louisiana, the defendant, **JOE LEE MILLER, a/k/a "LOGGER BLACK,"** having been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: a conviction on July 11, 2012, in the Criminal District Court, Orleans Parish, Case Number 512-222, Division "D/E," for possession of cocaine in violation of La. R.S. 40:967(C)(2); a conviction on July 11, 2012, in the Criminal District Court, Orleans Parish, Case Number 510-596, Division "E," for simple burglary in violation of La. R.S. 14:62(B); a conviction on March 27, 2014, in the Criminal District Court, Orleans Parish, Case Number 517-881, Division "D" for possession of marijuana, third offense in violation of La. R.S. 40:966(E)(3), did knowingly possess in and affecting interstate commerce a firearm, to wit: a black .40 caliber handgun, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 5

On or about April 23, 2014, in the Eastern District of Louisiana, the defendant, **QUINCY LEE JYNES, a/k/a "Q,"** having been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: a conviction on February 20, 2008, in the Criminal District Court, Orleans Parish, Case Number 471-794, Division "C," for possession of cocaine in violation of La. R.S. 40:967(C)(2), and a conviction on December 17, 2003, in the matter entitled United States v. Quincy. L. Jynes, in the Eastern District of Louisiana, Case Number 10-080, Division "F" for felon in possession of a firearm in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2), did knowingly possess in and affecting interstate commerce a firearm, to wit: a black .40 caliber handgun, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 6

On or about April 25, 2014, in the Eastern District of Louisiana, defendants **COREY CRAIG DENSON, and GREGORY DENSON, a/k/a "PEP,"** aiding and abetting each other and others did knowingly brandish firearms, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, to wit: the offense, charged in Count 1 of this Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT 7

On or about April 25, 2014, in the Eastern District of Louisiana, the defendant, **COREY DENSON,** having been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: a conviction on November 19, 2003, in the Criminal District Court, Orleans Parish, Case Number 442-537, Division "E," for simple burglary in violation of La. R.S.

14:62(A); a conviction on January 31, 2005, in the Criminal District Court, Orleans Parish, Case Number 452-913, Division "G," for possession with the intent to distribute crack cocaine in violation of La. R.S. 40:967(B)(1); and a conviction on February 25, 2010, in the Criminal District Court, Orleans Parish, Case Number 493-727, Division "E," for simple burglary in violation of La. R.S. 14:62(A), did knowingly possess in and affecting interstate commerce a firearm, to wit: a revolver, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 8

A. That at all times material to this Indictment, Individual B, a known drug trafficker, was engaged in the procurement, packaging, and selling of illicit drugs in the New Orleans Metropolitan area, in interstate and foreign commerce and an industry which affects interstate and foreign commerce.

B. That on or about May 22, 2014, in the Eastern District of Louisiana, the defendants, **GREGORY DENSON, a/k/a "PEP," JOE LEE MILLER, a/k/a "LOGGER BLACK," CLARENCE R. SINGLETON, QUINCY LEE JYNES, a/k/a "Q," and COREY CRAIG DENSON**, aiding and abetting each other and others, did unlawfully obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **GREGORY DENSON, a/k/a "PEP," COREY DENSON, CLARENCE R. SINGLETON, JOE LEE MILLER, a/k/a "LOGGER BLACK," and QUINCY LEE JYNES, a/k/a "Q,"** did unlawfully take and obtain personal property consisting of approximately one thousand dollars (\$1,000) cash, an Infinity vehicle, and other valuable property unknown to the Grand Jury, from Individual B against his

will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person and property, that is, by lying in wait in his apartment after breaking and entering same, confronting Individual B with firearms, zip tying his hands, brandishing firearms and threatening harm, attempted kidnapping, and attempted murder by shooting Individual B eight times while he was trying to escape the kidnapping.

All in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT 9

On or about May 22, 2014, in the Eastern District of Louisiana, defendants, **JOE LEE MILLER, a/k/a "LOGGER BLACK," QUINCY LEE JYNES, a/k/a "Q," GREGORY DENSON, a/k/a "PEP", COREY CRAIG DENSON and CLARENCE R. SINGLETON** and others known and unknown to the Grand Jury, aiding and abetting by each other, did knowingly discharge firearms, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, to wit: the offenses, charged in Counts 1 and 2 of this Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

COUNT 10

On or about May 22, 2014, in the Eastern District of Louisiana, the defendant, **JOE LEE MILLER, a/k/a "LOGGER BLACK,"** having been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: a conviction on July 11, 2012, in the Criminal District Court, Orleans Parish, Case Number 512-222, Division "D/E," for possession of cocaine in violation of La. R.S. 40:967(C)(2); a conviction on July 11, 2012, in the Criminal District Court, Orleans Parish, Case Number 510-596, Division "E," for simple burglary in violation of La. R.S. 14:62(B); a conviction on March 27, 2014, in the Criminal District Court,

Orleans Parish, Case Number 517-881, Division "D" for possession of marijuana, third offense in violation of La. R.S. 40:966(E)(3), did knowingly possess in and affecting interstate commerce a firearm, to wit: a revolver, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 11

On or about May 24, 2014, in the Eastern District of Louisiana, the defendant, **QUINCY LEE JYNES, a/k/a "Q,"** having been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: a conviction on February 20, 2008, in the Criminal District Court, Orleans Parish, Case Number 471-794, Division "C," for possession of cocaine in violation of La. R.S. 40:967(C)(2), and a conviction on December 17, 2003, in the matter entitled United States v. Quincy L. Jynes, in the Eastern District of Louisiana, Case Number 10-080, Division "F" for felon in possession of a firearm in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2), did knowingly possess in and affecting interstate commerce a firearm, to wit: a revolver, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 12

That on or about May 7, 2014, in the Eastern District of Louisiana, the defendant, **GREGORY DENSON, a/k/a Pep,** did willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully kill and caused to be killed Ellery Boyd with the intent to prevent Ellery Boyd from communicating to a law enforcement officer of the United States information relating to the commission of federal offenses, to wit: the Hobbs Act robberies by Gregory Denson and others as charged in Counts 1, 2, and 8 of this Superseding Indictment and a bank robbery, which killing is a first-degree murder as defined by Title 18,

United States Code, Section 1111; all in violation of Title 18, United States Code, Sections 1512(a)(1)(C) and (a)(3)(A).

COUNT 13

That between on or about May 8, 2014 and May 9, 2014, in the Eastern District of Louisiana, the defendants, **JOE LEE MILLER, a/k/a "LOGGER BLACK and QUINCY LEE JYNES, a/k/a "Q,"** aiding and abetting each other and others, knowing that an offense against the United States had been committed, to wit, Tampering and Murder of a Witness as set forth in Count 12 of this superseding indictment, did receive, relieve, comfort, and assist the offender, Gregory Denson, by helping to dispose of the body of Ellery Boyd, in order to hinder and prevent the offender's apprehension, trial, and punishment, in violation of Title 18, United States Code, Sections 3 and 2.

COUNT 14

That between on or about May 8, 2014 and May 9, 2014, in the Eastern District of Louisiana, the defendants, **JOE LEE MILLER, a/k/a "LOGGER BLACK and QUINCY LEE JYNES, a/k/a "Q,"** aiding and abetting each other and others, did knowingly and corruptly attempt to obstruct, influence and impede an official proceeding, that is, a federal grand jury investigation, by helping to dispose of the body of Ellery Boyd, in violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

NOTICE OF HOBBS ACT FORFEITURE

1. The allegations of Counts 1, 2 and 8 of this Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging

forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1951 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 1, 2 and 8, defendants, **GREGORY DENSON, a/k/a "PEP," JOE MILLER, a/k/a "LOGGER BLACK," QUINCY JYNES, a/k/a "Q," COREY DENSON, CLARENCE R. SINGLETON, ESCRELITA CARMOUCHE, a/k/a "S," BRIDGETT MILES, a/k/a "EBONY," a/k/a "COOKIE MONSTER,"** shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1951.

3. If any of the property subject to 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 1951 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

NOTICE OF GUN FORFEITURE

1. The allegations of Counts 3-7, and 9-11 of this Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924 (d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 3-7 and 9-11, defendants, **GREGORY DENSON, a/k/a "PEP," JOE MILLER, a/k/a "LOGGER BLACK," QUINCY JYNES, a/k/a "Q," COREY DENSON, CLARENCE R. SINGLETON, ESCRELITA CARMOUCHE, a/k/a "S," and BRIDGETT MILES, a/k/a "EBONY," a/k/a "COOKIE MONSTER,"** 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)(ii), as alleged in Counts 3-7 and 9-11 of the 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(c)(1)(A)(ii) and 924(d)(1).

NOTICE OF WITNESS TAMPERING FORFEITURE

1. The allegations of Counts 12 and 14 of this Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1512 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 12 and 14, defendants, **GREGORY DENSON, JOE LEE MILLER, a/k/a "LOGGER BLACK and QUINCY LEE JYNES, a/k/a "Q,"** shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1512.

3. If any of the property subject to 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 1512 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

NOTICE OF SPECIAL FINDINGS

1. The Grand Jury incorporates by reference and re-alleges the allegations contained in Count 12 of this Superseding Indictment and makes the following special findings:

2. As to Count 12, defendant, **GREGORY DENSON, a/k/a PEP**,
 - a. was 18 years of age or older at the time of the offense;
 - b. intentionally killed Ellery Boyd (18 U.S.C. §3591(a)(2)(A));
 - c. intentionally inflicted serious bodily injury that resulted in the death of Ellery Boyd (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 Ellery Boyd 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 Ellery Boyd died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));

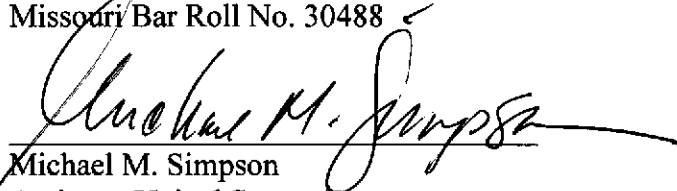
- f. committed the offense after substantial planning and premeditation to cause the death of Ellery Boyd (18 U.S.C. § 3592(c)(9)); and
- g. committed the offense after having been previously convicted of a violent felony involving a firearm (18 U.S.C. § 3592(c)(2)).

FOREPERSON'S SIGNATURE
HAS BEEN REDACTED

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY



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Louisiana Bar Roll No. 12299

New Orleans, Louisiana
May 1, 2015

No. 15-12 "J" (4)**UNITED STATES DISTRICT COURT**Eastern *District of* LouisianaCriminal *Division***THE UNITED STATES OF AMERICA**

vs.

GREGORY DENSON, a/k/a "Pep"
JOE LEE MILLER, a/k/a/ "Logger Black"
QUINCY LEE JYNES, a/k/a "Q"
COREY CRAIG DENSON
CLARENCE R. SINGLETON
ANNETTE S. ROBINSON, a/k/a "Net"
ESCRELITA M. CARMOUCHE, a/k/a "S"
BRIDGETT MARIE MILES, a/k/a "Ebony,"
a/k/a "Cookie Monster"

SUPERSEDING INDICTMENT

**FOR VIOLATIONS OF THE HOBBS ACT,
 THE FEDERAL GUN CONTROL ACT, MURDER OF
 FEDERAL WITNESS AND ACCESSORY AFTER THE FACT**

VIOLATIONS:

**18 U.S.C. § 924(c)(1)(A)(ii); 18 U.S.C. § 924(c)(1)(A)(iii);
 18 U.S.C. § 1951(a); 18 U.S.C. § 922(g)(1); 18 U.S.C. § 924(a)(2);
 18 U.S.C. § 1512(c)(2); 18 U.S.C. § 1512(a)(3)(A);
 18 U.S.C. § 1512(a)(1)(C); 18 U.S.C. § 3; and 18 U.S.C. § 2**

A true bill.

**FOREPERSON'S SIGNATURE
 HAS BEEN REDACTED**

Filed in open court this _____ *day of* _____
 _____ *A.D. 2015.*

*Clerk**Bail, \$* _____

Mark A. Miller
Assistant United States Attorney

