

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

2021 AUG 13 P 4: 20

CAROL L. MICHEL
CLERK

SEALED UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

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

UNITED STATES OF AMERICA	*	CRIMINAL NO. 19-204
	*	
v.	*	SECTION: "R"
	*	
SAMUEL MORTON	*	VIOLATIONS: 18 U.S.C. § 1962(d)
a/k/a "Sosa"		18 U.S.C. § 1959
TIM JACKSON	*	21 U.S.C. § 841
a/k/a "T-Maf"		21 U.S.C. § 846
JAMES ALEXANDER	*	18 U.S.C. § 924(o)
a/k/a "Poo," a/k/a "Black,"		18 U.S.C. § 924(j)
a/k/a "Freak"	*	18 U.S.C. § 924(c)
CHANCE SKIPPER		18 U.S.C. § 922(g)
a/k/a "Duna"	*	18 U.S.C. § 2
ERNEST THOMAS		
a/k/a "E-Maf"	*	
TERRAN WILLIAMS		
a/k/a "Funky"	*	
TYRONE BOVIA		
a/k/a "Sixx"	*	
JAVONTA DOLEMAN		
a/k/a "Dutt"	*	
ALLEN GRAY		
a/k/a "Kyedi"	*	
RANDY CALVIN		
a/k/a "Tokey Hefner"	*	
	*	
	*	
	*	

The Grand Jury charges that:

Fee USA _____
 Process _____
 Dkt'd _____
 Ct Rm/Dep _____
 Doc. No. _____

COUNT 1

(Racketeer Influenced and Corrupt Organizations Conspiracy)

General Allegations

1. At all relevant times, defendants, **TIM JACKSON, a/k/a “T-Maf,” JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,” CHANCE SKIPPER, a/k/a “Duna,” ERNEST THOMAS, a/k/a “E-Maf,” SAMUEL MORTON, a/k/a “Sosa,” TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,” JAVONTA DOLEMAN, a/k/a “Dutt,” ALLEN GRAY, a/k/a “Kyedi,” RANDY CALVIN, a/k/a “Tokey Hefner,”** and others known and unknown to the Grand Jury, were members and associates of an organization engaged in, among other things, acts involving murder and trafficking in controlled substances. At all relevant times, this organization operated in the Eastern District of Louisiana and elsewhere.

2. This organization has historically encompassed the Uptown Central City area of New Orleans, Louisiana, and was primarily concentrated in the area around the Harmony Oaks Housing Development, which is commonly known as the Magnolia Housing Development or the Magnolia Projects. This enterprise for a period was known as the Byrd Gang, but was also associated with names M3re, 315, and/or Piff Gang. For convenience, the organization is referred to herein as the Byrd Gang. Though the Byrd Gang made alliances with groups from other areas, including from the Westbank area of New Orleans, the common and consistent feature of the organization was an association with the Magnolia Projects.

3. The defendants involved in the Byrd Gang’s violence frequently focused on attempts to kill rival gang members from the “Ghost Gang,” which operated out of the Marrero

Commons Housing Development, formerly known as the Calliope Housing Development or simply the “Calliope.”

4. The Byrd Gang often used social media websites such as Instagram and music videos featuring members and/or associates to highlight members’ affiliation with other members of the organization; to intimidate, taunt and threaten rivals, including members of the Ghost Gang; and to glorify their criminal activities.

The Racketeering Enterprise

5. The Byrd Gang, including its leadership, membership, and associates, constitutes 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 and associates functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

6. 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. Enriching the members and associates of the enterprise 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 those who were incarcerated for committing acts of violence, 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 the offender or offenders, apprehending the offender or offenders, and prosecuting and punishing the offender or offenders.

Means and Methods of the Enterprise

7. 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 and associates of the enterprise committed, attempted, and threatened to commit acts of violence, including murder, to protect and expand the criminal operations of the enterprise.

- b. Members and associates of the enterprise promoted a climate of fear through violence and threats of violence, including acts involving murder and assault.
- c. Members and associates of the enterprise used and threatened to use physical violence against various individuals.
- d. Members and associates of the enterprise engaged in the distribution of controlled substances, including heroin, fentanyl, crack cocaine, and marijuana, primarily in the area around the Magnolia Projects, as a means to generate income.
- e. Members and associates of the enterprise possessed and utilized firearms to prevent competition from other drug dealers in and around the geographic area used and controlled by the enterprise.
- f. Members and associates of the enterprise possessed and utilized firearms in order to protect their business of distributing controlled substances.
- g. Members and associates of the enterprise possessed and utilized firearms to maintain and advance the goals of the enterprise.
- h. Members and associates of the enterprise purchased, maintained, and circulated a collection of firearms for use in criminal activity by the enterprise members.
- i. Members and associates of the enterprise committed shootings, various firearms offenses, and violent acts, including but not limited to murder, attempted murder, aggravated battery, illegal possession of a firearm, and

aggravated assault, in order to maintain and advance the goals of the enterprise, the individual's role within the enterprise and to control the specific geographic area utilized and controlled by the enterprise.

- j. Members and associates of the enterprise committed, attempted to commit, and threatened to commit acts of violence in an effort to obstruct justice and thwart police investigations.
- k. Members and associates of the enterprise bragged about their illegal activity, such as their illegal possession and use of firearms, murder, and attempted murder to each other, on social media, and in music videos, in an effort to maintain or increase their position in the enterprise.
- l. Members and associates of the enterprise targeted and retaliated against rival drug dealers and members of rival gangs, primarily the "Ghost Gang," which was associated with the Calliope Housing Development.
- m. Members and associates of the enterprise used numerous vehicles, including rented vehicles and stolen vehicles, to distribute illegal drugs, to commit numerous drive-by shootings, and to commit murders.

Roles of the Defendants

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

- a. Defendant, **TIM JACKSON**, a/k/a "**T-Maf**," acted as a leader and principal supplier of controlled substances for the enterprise, and as a distributor of controlled substances and gunman for the enterprise.

- b. Defendants, **JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,”** **CHANCE SKIPPER, a/k/a “Duna,”** **ERNEST THOMAS, a/k/a “E-Maf,”** **SAMUEL MORTON, a/k/a “Sosa,”** **TERRAN WILLIAMS, a/k/a “Funky,”** **TYRONE BOVIA, a/k/a “Sixx,”** **JAVONTA DOLEMAN, a/k/a “Dutt,”** **ALLEN GRAY, a/k/a “Kyedi,”** and **RANDY CALVIN, a/k/a “Tokey Hefner,”** acted as distributors of controlled substances and as gunmen for the enterprise.

The RICO Conspiracy Charge

9. Beginning on a date unknown, but prior to January 2014, and continuing to the date of this Second Superseding Indictment, in the Eastern District of Louisiana and elsewhere, defendants, **TIM JACKSON, a/k/a “T-Maf,”** **JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,”** **CHANCE SKIPPER, a/k/a “Duna,”** **ERNEST THOMAS, a/k/a “E-Maf,”** **SAMUEL MORTON, a/k/a “Sosa,”** **TERRAN WILLIAMS, a/k/a “Funky,”** **TYRONE BOVIA, a/k/a “Sixx,”** **JAVONTA DOLEMAN, a/k/a “Dutt,”** **ALLEN GRAY, a/k/a “Kyedi,”** **RANDY CALVIN, a/k/a “Tokey Hefner,”** and others known and unknown to the Grand Jury, being persons employed by and associated with the Byrd Gang, an enterprise engaged in and the activities of which affected interstate and foreign commerce, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other and with others known and unknown to the Grand Jury 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:

- a. acts involving murder, in violation of Title 14, Louisiana Revised Statutes, Sections 24 (Principals), 26 (Criminal Conspiracy), 27 (Attempt) and 30.1 (Second Degree Murder); and
- b. offenses involving trafficking in controlled substances, including heroin, fentanyl, crack cocaine, and marijuana, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

10. It was further a 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, **TIM JACKSON, a/k/a "T-Maf," JAMES ALEXANDER, a/k/a "Poo," a/k/a "Black," a/k/a "Freak," CHANCE SKIPPER, a/k/a "Duna," ERNEST THOMAS, a/k/a "E-Maf," SAMUEL MORTON, a/k/a "Sosa," TERRAN WILLIAMS, a/k/a "Funky," TYRONE BOVIA, a/k/a "Sixx," JAVONTA DOLEMAN, a/k/a "Dutt," ALLEN GRAY, a/k/a "Kyedi," RANDY CALVIN, a/k/a "Tokey Hefner,"** 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. Sometime between 2014 and January 2017, defendant, **TIM JACKSON, a/k/a "T-Maf,"** would regularly purchase large quantities of heroin from R.L., a source of supply in the New Orleans Metropolitan Area.
2. After defendant **TIM JACKSON, a/k/a "T-Maf,"** went to federal prison in January 2017, other Bryd Gang members, including but not limited to defendants, **JAMES ALEXANDER, a/k/a "Poo," a/k/a "Black," a/k/a "Freak,"** and **SAMUEL MORTON, a/k/a "Sosa,"** continued purchasing heroin from R.L.

3. On or about August 26, 2015, defendant, **TIM JACKSON, a/k/a "T-Maf,"** possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
4. On or about September 2, 2015, defendant, **TIM JACKSON, a/k/a "T-Maf,"** possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
5. On or about September 9, 2015, defendant, **TIM JACKSON, a/k/a "T-Maf,"** possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
6. On or about September 10, 2015, defendant, **TIM JACKSON, a/k/a "T-Maf,"** possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
7. On or about October 21, 2015, defendants, **TIM JACKSON, a/k/a "T-Maf," JAMES ALEXANDER, a/k/a "Poo," a/k/a "Black,"** and **RANDY CALVIN, a/k/a "Tokey Hefner,"** possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
8. On or about November 25, 2015, defendant, **ALLEN GRAY, a/k/a "Kyedi,"** was shooting dice in A.L. Davis park, located near the center of the Byrd Gang's territory, while in possession of prescription narcotics that were not prescribed to him and a .45 caliber semi-automatic handgun.
9. On or about January 1, 2016, defendant, **TIM JACKSON, a/k/a "T-Maf,"** possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
10. On or about February 2, 2016, defendant, **TYRONE BOVIA, a/k/a "Sixx,"** was traveling in a rental vehicle in the 900 Block of Manhattan Boulevard in Harvey, Louisiana, while in possession of a 9 mm semi-automatic handgun equipped with an extended 30-round magazine and marijuana.
11. On or about March 1, 2016, defendants, **TIM JACKSON, a/k/a "T-Maf,"** and **JAMES ALEXANDER, a/k/a "Poo," a/k/a "Black," a/k/a "Freak,"** possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
12. On or about March 10, 2016, defendant, **ERNEST THOMAS, a/k/a "E-Maf,"** shot two individuals, one in the right knee and one in the head, both of whom survived, near the intersection of 3rd Street and South Saratoga Street in New Orleans.

13. On or about April 8, 2016, defendants, **TIM JACKSON, a/k/a "T-Maf,"** and **CHANCE SKIPPER, a/k/a "Duna,"** possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
14. On or about April 22, 2016, defendant, **JAVONTA DOLEMAN, a/k/a "Dutt,"** was in a vehicle on Esther Street in Harvey, Louisiana, while in possession of heroin packaged for distribution and a stolen 9 mm semi-automatic handgun.
15. On or about April 27, 2016, defendant, **JAMES ALEXANDER, a/k/a "Poo," a/k/a "Black," a/k/a "Freak,"** possessed a stolen 9 mm semi-automatic handgun.
16. On or about May 10, 2016, defendant, **TIM JACKSON, a/k/a "T-Maf,"** and unindicted co-conspirator M.G., possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
17. On or about May 23, 2016, defendants, **TIM JACKSON, a/k/a "T-Maf,"** and **JAMES ALEXANDER, a/k/a "Poo," a/k/a "Black," a/k/a "Freak,"** possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
18. On or about July 18, 2016, defendants, **TYRONE BOVIA, a/k/a "Sixx,"** and **JAVONTA DOLEMAN, a/k/a "Dutt,"** were at an apartment in Harvey, Louisiana on Tensas Drive with several other individuals while in possession of numerous semi-automatic handguns, including four .40 caliber handguns, a .45 caliber handgun, and a .22 caliber handgun.
19. On or about July 18, 2016, defendants, **ERNEST THOMAS, a/k/a "E-Maf,"** **SAMUEL MORTON, a/k/a "Sosa,"** and **TERRAN WILLIAMS, a/k/a "Funky,"** shot and killed Kent Franklin, a/k/a "Digg."
20. On or about September 3, 2016, defendant, **TIM JACKSON, a/k/a "T-Maf,"** directed members of the Byrd Gang to shoot and kill Javon Johnigan, a/k/a "Tokyo."
21. On or about September 15, 2016, defendant, **TIM JACKSON, a/k/a "T-Maf,"** unindicted co-conspirator, C.B., and an unidentified third person, possessed an EXTAR rifle, a Glock .357 caliber semi-automatic handgun, a Glock .40 caliber semi-automatic handgun, a Glock 9 mm semi-automatic handgun, heroin, prescription drugs, a digital scale, and ski masks, when they crashed into the Le Palms Reception Hall at 1936 Esplanade Avenue.

22. On or about September 16, 2016, defendant, **TIM JACKSON, a/k/a "T-Maf,"** possessed and distributed a quantity of heroin to an undercover informant acting under the control and direction of the Federal Bureau of Investigation.
23. On or about October 4, 2016, defendants, **SAMUEL MORTON, a/k/a "Sosa," ALLEN GRAY, a/k/a "Kyedi," CHANCE SKIPPER, a/k/a "Duna,"** and now-deceased Byrd Gang Member Terran Young, a/k/a "Trilla," possessed a 9 mm Glock semi-automatic handgun, a .45 caliber Glock semi-automatic handgun, a 7.62 semi-automatic AK-47 rifle, and marijuana while traveling through Jackson County, Mississippi.
24. On or about October 4, 2016, defendant, **TIM JACKSON, a/k/a "T-Maf,"** possessed scales, boxes of sandwich bags, and \$9,000 in cash while traveling through Jackson County, Mississippi.
25. On or about November 25, 2016, defendants, **TIM JACKSON, a/k/a "T-Maf," ERNEST THOMAS, a/k/a "E-Maf,"** and others attempted to shoot and kill a known member of the Ghost Gang on Magnolia Street between Felicity Street and Martin Luther King Boulevard in New Orleans, during which four other individuals were shot, as well as a house and a vehicle.
26. On or about December 28, 2016, defendant, **CHANCE SKIPPER, a/k/a "Duna,"** was selling marijuana at 2605 Washington Avenue, while in possession of a .40 caliber Glock semi-automatic handgun with an extended magazine.
27. On or about December 30, 2016, defendant, **ERNEST THOMAS, a/k/a "E-Maf,"** and others attempted to shoot and kill a known member of the Ghost Gang while in a stolen black truck in the 2300 block of Martin Luther King Boulevard and hit one victim and one house.
28. On or about January 4, 2017, defendant, **TIM JACKSON, a/k/a "T-Maf,"** possessed a .40 caliber Glock semi-automatic handgun with an extended magazine containing 21 live rounds, a 9 mm Glock semi-automatic handgun with an extended magazine containing 16 live rounds, approximately 130 grams of heroin, \$1,825 in cash, and prescription medication that was not in his name.
29. On or about January 31, 2017, defendants, **TERRAN WILLIAMS, a/k/a "Funky," TYRONE BOVIA, a/k/a "Sixx,"** and **JAVONTA DOLEMAN, a/k/a "Dutt,"** shot and killed Lawrence Williams, IV, and Wynston Jackson, a/k/a "Baby Ghost," who was a rival Ghost Gang member.
30. On or about February 4, 2017, defendants, **TERRAN WILLIAMS, a/k/a "Funky,"** and **JAVONTA DOLEMAN, a/k/a "Dutt,"** while in a vehicle in the 1400 Block of North Claiborne Avenue, possessed a .40 caliber Glock semi-automatic handgun and a .45 caliber Glock semi-automatic handgun.

31. On or about February 8, 2017, defendant, **TYRONE BOVIA, a/k/a "Sixx,"** was traveling from Texas through Sulphur, Louisiana, while in possession of a stolen .223 caliber rifle.
32. On or about February 10, 2017, defendant, **ERNEST THOMAS, a/k/a "E-Maf,"** engaged in a gun fight with W.W. and other Ghost Gang associates near the 2500 block of Dryades Street when Norma Perez was shot and killed while inside her home.
33. On or about February 28, 2017, defendant, **ERNEST THOMAS, a/k/a "E-Maf,"** was in possession of a stolen .40 caliber Glock semi-automatic handgun in A.L. Davis Park.
34. On or about May 3, 2017, defendants, **JAMES ALEXANDER, a/k/a "Poo," a/k/a "Black," a/k/a "Freak,"** and **TYRONE BOVIA, a/k/a "Sixx,"** along with now-deceased Byrd Gang member Terrance Augustine, a/k/a "T-Shoota," attempted to shoot and kill known Ghost Gang member, M.I., a/k/a "Millie," at the Bern Mas Apartments at 7225 Chef Menteur Highway, when Augustine was shot and killed.
35. On or about June 15, 2017, known Byrd Gang members possessed a firearm when Byrd Gang members Terran Young, a/k/a "Trilla," and Darrell Pollard, a/k/a "Mickey," were shot and killed by Ghost Gang members.
36. On or about July 8, 2017, G.T., and defendants, **CHANCE SKIPPER, a/k/a "Duna," ERNEST THOMAS, a/k/a "E-Maf,"** and **ALLEN GRAY, a/k/a "Kyedi,"** possessed 40 grams of marijuana, 155 Tramadol pills, a stolen .45 caliber Taurus semi-automatic handgun with 9 live rounds, a Taurus 9 mm semi-automatic handgun with 16 live rounds, and an AK-47 assault rifle loaded with 25 rounds of armor piercing ammunition.
37. On or about August 11, 2017, defendant, **TYRONE BOVIA, a/k/a "Sixx,"** was traveling with R.I. and was in possession of a 9 mm Glock semi-automatic handgun with an extended magazine with 26 live rounds, a 9 mm Glock semi-automatic handgun with an extended magazine with 31 live rounds, and approximately 9.6 grams of crack cocaine in the vehicle.
38. On or about August 25, 2017, defendant, **JAMES ALEXANDER, a/k/a "Poo," a/k/a "Black," a/k/a "Freak,"** engaged in a gun fight with a known associate of the Ghost Gang, T.H., when **JAMES ALEXANDER, a/k/a "Poo," a/k/a "Black," a/k/a "Freak,"** T.H., and C.P., an innocent bystander, were shot.
39. On or about August 25, 2017, defendants, **CHANCE SKIPPER, a/k/a "Duna,"** and **RANDY CALVIN, a/k/a "Tokey Hefner,"** who were with

JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,” during the gun fight, helped **ALEXANDER**, who was suffering from multiple gunshot wounds, escape from the shooting scene and drove him to University Medical Center, where they dropped off **ALEXANDER**, before quickly leaving the area and failing to speak with law enforcement.

40. On or about March 1, 2018, defendants, **CHANCE SKIPPER, a/k/a “Duna,” JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,”** and **RANDY CALVIN, a/k/a “Tokey Hefner,”** and others possessed a stolen .40 caliber Glock semi-automatic handgun with an extended magazine, a .223 caliber assault rifle with 22 live rounds, a .40 caliber Glock semi-automatic handgun with an extended magazine with 22 live rounds, 120 grams of marijuana packaged into 40 bags, drug paraphernalia, and multiple pills.
41. On or about September 12, 2018, defendant, **CHANCE SKIPPER, a/k/a “Duna,”** and B.L. attacked known “Ghost Gang” member D.A., a/k/a “Paw Weezy,” while all three were incarcerated in the Orleans Justice Center.
42. On or about July 5, 2019, defendant, **SAMUEL MORTON, a/k/a “Sosa,”** purchased a quantity of heroin from R.L., who was a main source of supply for the Byrd Gang.
43. On or about July 17, 2019, defendant, **SAMUEL MORTON, a/k/a “Sosa,”** purchased a quantity of heroin from R.L., who was a main source of supply for the Byrd Gang.
44. On or about September 4, 2019, defendant, **TYRONE BOVIA, a/k/a “Sixx,”** obstructed justice when he and his one-year old son, T.G., were shot.
45. On or about August 13, 2020, defendant, **TERRAN WILLIAMS, a/k/a “Funky,”** posted an Instagram live video of himself holding a rifle.
46. On or about August 20, 2020, defendant, **TERRAN WILLIAMS, a/k/a “Funky,”** posted a photo of himself holding a rifle on his Instagram account.
47. On or about August 25, 2020, defendant, **TERRAN WILLIAMS, a/k/a “Funky,”** posted photos and video on Instagram showing himself and an unknown associate with a rifle and a Glock pistol with an extended magazine.
48. On or about August 26, 2020, defendants, **TERRAN WILLIAMS, a/k/a “Funky”** and **ALLEN GRAY, a/k/a “Kyedi,”** and one other person, fled from police in a Nissan Maxima after the police attempted to stop them near the Family Dollar in the Central City neighborhood of New Orleans. They ultimately crashed the vehicle a few blocks away and fled on foot, making good their escape. **TERRAN WILLIAMS, a/k/a “Funky”** and **ALLEN GRAY, a/k/a “Kyedi,”** left their phones and identification in the crashed vehicle, as

well as a loaded Glock Model 30S, .45 caliber handgun, a loaded Aero Precision Model 300 Blackout rifle, 200 grams of marijuana and 12 grams of fentanyl packaged for distribution, a loaded 7.62 caliber magazine, two digital scales, and two boxes of sandwich bags.

49. On or about September 12, 2020, defendant, **TERRAN WILLIAMS, a/k/a “Funky,”** was arrested on a federal warrant while in possession of marijuana packaged for distribution, a Glock Model 26 Gen 5, 9 mm caliber semi-automatic pistol, and a Diamondback Model DB-15 5.56mm caliber semi-assault rifle.
50. On or about September 14, 2020, defendant, **ALLEN GRAY, a/k/a “Kyedi,”** was arrested on a federal warrant while in possession of marijuana and fentanyl that were packaged for distribution, a Glock Model 27, .40 caliber semi-automatic pistol, and a Glock Model 30, .45 caliber semi-automatic pistol.

SPECIAL SENTENCING ALLEGATIONS

The Grand Jury further alleges that:

1. Beginning on a date unknown, but no later than January 2014, and continuing to on or about the date of this Second Superseding Indictment, in the Eastern District of Louisiana and elsewhere, defendants, **TIM JACKSON, a/k/a “T-Maf,” JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,” CHANCE SKIPPER, a/k/a “Duna,” ERNEST THOMAS, a/k/a “E-Maf,” SAMUEL MORTON, a/k/a “Sosa,” TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,” JAVONTA DOLEMAN, a/k/a “Dutt,” ALLEN GRAY, a/k/a “Kyedi,” RANDY CALVIN, a/k/a “Tokey Hefner,”** 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 intent to distribute a kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.
2. On or about January 31, 2017, in the Eastern District of Louisiana, defendants, **TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,”** and **JAVONTA**

DOLEMAN, a/k/a “Dutt,” committed an act involving murder, to wit, with the specific intent to kill and inflict great bodily harm, did kill Wynston Jackson, a/k/a “Baby Ghost,” in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.

3. On or about January 31, 2017, in the Eastern District of Louisiana, defendants, **TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,”** and **JAVONTA DOLEMAN, a/k/a “Dutt,”** committed an act involving murder, to wit, with the specific intent to kill and inflict great bodily harm, did kill Lawrence Williams, IV, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.

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

COUNT 2

(Conspiracy to Distribute Controlled Substances)

THE CONSPIRACY:

Beginning on a date unknown, but not later than January 2014, and continuing to on or about the date of this Second Superseding Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **TIM JACKSON, a/k/a “T-Maf,” JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,” CHANCE SKIPPER, a/k/a “Duna,” ERNEST THOMAS, a/k/a “E-Maf,” SAMUEL MORTON, a/k/a “Sosa,” TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,” JAVONTA DOLEMAN, a/k/a “Dutt,” ALLEN GRAY, a/k/a “Kyedi,”** and **RANDY CALVIN, a/k/a “Tokey Hefner,”** knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons known and unknown to the Grand Jury, to distribute a kilogram or more of a mixture and substance containing heroin, a Schedule I drug controlled substance, a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II drug controlled substance, a quantity of

a mixture and substance containing a detectable amount of cocaine base, a Schedule II drug controlled substance, and a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(C), and 841(b)(1)(D); all in violation of Title 21, United States Code, Section 846.

COUNT 3

(Conspiracy to Possess Firearms)

Beginning on a date unknown, but no later than January 2014, and continuing to on or about the date of this Second Superseding Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **TIM JACKSON, a/k/a “T-Maf,” JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,” CHANCE SKIPPER, a/k/a “Duna,” ERNEST THOMAS, a/k/a “E-Maf,” SAMUEL MORTON, a/k/a “Sosa,” TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,” JAVONTA DOLEMAN, a/k/a “Dutt,” ALLEN GRAY, a/k/a “Kyedi,”** and **RANDY CALVIN, a/k/a “Tokey Hefner,”** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, during and in relation to a drug trafficking crime, to use and carry firearms, and to possess firearms in furtherance of a drug trafficking crime, to wit: the conspiracy to distribute heroin, fentanyl, cocaine base, and marijuana as alleged in Count 2; all in violation of Title 18, United States Code, Section 924(o).

COUNT 4

(Murder in Aid of Racketeering)

1. At all times relevant to this Second Superseding Indictment, the Byrd Gang as more fully described in Paragraphs 1 through 8 of Count 1, which are re-alleged and incorporated by reference as though set forth fully herein, including its members and associates, constituted an

enterprise as defined in 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 and associates 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 Byrd Gang, 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 Louisiana Revised Statutes, and offenses involving trafficking in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.

3. On or about January 31, 2017, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the Byrd Gang, an enterprise engaged in racketeering activity, the defendants, **TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,”** and **JAVONTA DOLEMAN, a/k/a “Dutt,”** with others known and unknown to the Grand Jury, did murder Wynston Jackson, a/k/a “Baby Ghost,” in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1(A)(1) and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 5

(Causing Death Through the Use of a Firearm)

On or about January 31, 2017, in the Eastern District of Louisiana, the defendants, **TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,”** and **JAVONTA DOLEMAN, a/k/a “Dutt,”** and others known and unknown to the Grand Jury, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence and drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: murder

in aid of racketeering and conspiracy to distribute controlled substances, as set forth in Counts 2 and 4 of this Second Superseding Indictment; and in the course thereof caused the death of Wynston Jackson, a/k/a “Baby Ghost,” through the use of a firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111, in that defendants willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully killed and caused the death of Wynston Jackson, a/k/a “Baby Ghost”; all in violation of Title 18, United States Code, Sections 924(j)(1) and 2.

COUNT 6

(Murder in Aid of Racketeering)

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

2. On or about January 31, 2017, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the Byrd Gang, an enterprise engaged in racketeering activity, the defendants, **TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,”** and **JAVONTA DOLEMAN, a/k/a “Dutt,”** with others known and unknown to the Grand Jury, did murder Lawrence Williams, IV, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 30.1(A)(1) and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 7

(Causing Death Through the Use of a Firearm)

On or about January 31, 2017, in the Eastern District of Louisiana, the defendants, **TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,”** and **JAVONTA DOLEMAN, a/k/a “Dutt,”** and others known and unknown to the Grand Jury, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence and drug

trafficking crime for which they may be prosecuted in a court of the United States, to wit: murder in aid of racketeering and conspiracy to distribute controlled substances, as set forth in Counts 2 and 6 of this Second Superseding Indictment; and in the course thereof caused the death of Lawrence Williams, IV, through the use of a firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111, in that defendants willfully, deliberately, maliciously, with premeditation and malice aforethought, unlawfully killed and caused the death of Lawrence Williams, IV; all in violation of Title 18, United States Code, Sections 924(j)(1) and 2.

COUNT 8

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 through 2 of Count 4 are re-alleged and incorporated by reference as though fully set forth herein.
2. On or about May 3, 2017, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the Byrd Gang, an enterprise engaged in racketeering activity, the defendants, **JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,”** and **TYRONE BOVIA, a/k/a “Sixx,”** with others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon on M.I., 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)(3) and 2.

COUNT 9

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

On or about May 3, 2017, in the Eastern District of Louisiana, the defendants, **JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,”** and **TYRONE BOVIA, a/k/a “Sixx,”** and others known and unknown to the Grand Jury, did knowingly use, carry, brandish,

and discharge a firearm during and in relation to a crime of violence and drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: assault with a dangerous weapon in aid of racketeering and conspiracy to distribute controlled substances, as set forth in Counts 2 and 8 of this Second Superseding Indictment, which are incorporated herein; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 10

(Assault with a Dangerous Weapon in Aid of Racketeering)

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

2. On or about August 25, 2017, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the Byrd Gang, an enterprise engaged in racketeering activity, the defendant, **JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,”** with others known and unknown to the Grand Jury, did commit an assault with a dangerous weapon on T.H., 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)(3) and 2.

COUNT 11

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

On or about August 25, 2017, in the Eastern District of Louisiana, the defendant, **JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” a/k/a “Freak,”** and others known and unknown to the Grand Jury, did knowingly use, carry, brandish, and discharge a firearm during and in relation to a crime of violence and drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: assault with a dangerous weapon in aid of racketeering and conspiracy to distribute controlled substances, as set forth in Counts 2 and 10 of this Second Superseding

Indictment, which are incorporated herein; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

NOTICE OF FORFEITURE

1. The allegations contained in Counts 1 through 11 of this Second Superseding Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.

2. As a result of the offense alleged in Count 1, the United States hereby gives notice to the defendants, **TIM JACKSON, a/k/a “T-Maf,” JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” CHANCE SKIPPER, a/k/a “Duna,” ERNEST THOMAS, a/k/a “E-Maf,” SAMUEL MORTON, a/k/a “Sosa,” TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,” JAVONTA DOLEMAN, a/k/a “Dutt,” ALLEN GRAY, a/k/a “Kyedi,” RANDY CALVIN, a/k/a “Tokey Hefner,”** that upon their conviction of said offense, the Government shall seek forfeiture in accordance with Title 18, United States Code, Section 1963(a), which requires any person convicted of such offense to forfeit: (a) any interest the person acquired or maintained in violation of Title 18, United States Code, Section 1962; (b) any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the person has established, operated, controlled, conducted or participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and (c) any property constituting, or derived from, any proceeds which the person obtained, directly or indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962.

3. As a result of the offense alleged in Count 2, the defendants, **TIM JACKSON, a/k/a “T-Maf,” JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” CHANCE SKIPPER, a/k/a “Duna,” ERNEST THOMAS, a/k/a “E-Maf,” SAMUEL MORTON, a/k/a “Sosa,”**

TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,” JAVONTA DOLEMAN, a/k/a “Dutt,” ALLEN GRAY, a/k/a “Kyedi,” RANDY CALVIN, a/k/a “Tokey Hefner,” shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds obtained directly or indirectly as the result of said offense, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of said offenses, including but not limited to the following:

\$4,900.00 U.S. currency;

\$1,131.66 U.S. currency;

\$994.50 U.S. currency;

Glock 27, .40 caliber semi-automatic pistol, bearing serial number H MV869;

Glock, model 30, .45 caliber semi-automatic pistol, bearing serial number BFCW490.

4. As a result of the offenses alleged in Counts 1 through 11, the defendants, **TIM JACKSON, a/k/a “T-Maf,” JAMES ALEXANDER, a/k/a “Poo,” a/k/a “Black,” CHANCE SKIPPER, a/k/a “Duna,” ERNEST THOMAS, a/k/a “E-Maf,” SAMUEL MORTON, a/k/a “Sosa,” TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,” JAVONTA DOLEMAN, a/k/a “Dutt,” ALLEN GRAY, a/k/a “Kyedi,” RANDY CALVIN, a/k/a “Tokey Hefner,”** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm or ammunition involved in or used in the commission of said offenses, including but not limited to any firearm or ammunition described above.

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

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

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

NOTICE OF SPECIAL FINDINGS

1. The Grand Jury incorporates by reference and re-alleges the allegations contained in Counts 4, 5, 6 and 7, and makes the following special findings:

2. As to Counts 4, 5, 6 and 7, defendants **TERRAN WILLIAMS, a/k/a “Funky,” TYRONE BOVIA, a/k/a “Sixx,”** and **JAVONTA DOLEMAN, a/k/a “Dutt,”**

- a. were 18 years of age or older at the time of the offense;
- b. intentionally killed Lawrence Williams, IV, and Wynston Jackson (18 U.S.C. § 3591(a)(2)(A));
- c. intentionally inflicted serious bodily injury that resulted in the death of Lawrence Williams, IV, and Wynston Jackson (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 Williams, IV, and Wynston Jackson, 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 Williams, IV, and Wynston Jackson, 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 Lawrence Williams, IV, and Wynston Jackson, (18 U.S.C. § 3592(c)(9)); and

- g. 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:

FC 


DUANE A. EVANS
UNITED STATES ATTORNEY



ELIZABETH PRIVITERA
Assistant United States Attorney



DAVID HALLER
Assistant United States Attorney



INGA PETROVICH
Assistant United States Attorney

New Orleans, Louisiana
August 13, 2021