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defendants, **AL VERNON BROWN**, a/k/a “**Al V. Brown,**” a/k/a “**Al Vernon Brown Jr.,**” a/k/a “**Al Brown,**” a/k/a “**Al Verno Brown,**” **CHRISTOPHER JOHNSON**, **KEVIN JOHNSON**, **DONALD MYLES**, a/k/a “**D-Ray,**” **JOHN CRAWFORD**, a/k/a “**Cuz,**” and **SUSAN BREAU**X, did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown to the Grand Jury, to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] (fentanyl), a Schedule II narcotic controlled substance; and a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

**QUANTITY OF CONTROLLED DANGEROUS
SUBSTANCES ATTRIBUTABLE TO EACH DEFENDANT**

With respect to the drug conspiracy involved in Count 1, the defendants knew or reasonably should have known, either through their own conduct or the reasonably foreseeable conduct of their co-conspirators that was taken in furtherance of the drug conspiracy, that the scope of the conspiracy involved the following quantities of a mixture and substance containing a detectable amount of the following narcotic controlled substances:

NAME	Quantity of Controlled Dangerous Substance(s)
AL VERNON BROWN	400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] (fentanyl), and 1 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).
CHRISTOPHER JOHNSON	400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] (fentanyl), and 1 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).

NAME	Quantity of Controlled Dangerous Substance(s)
KEVIN JOHNSON	1 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).
DONALD MYLES	1 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).
JOHN CRAWFORD	1 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).
SUSAN BREAUX	100 grams 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)(B).

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Distribution and Possession with Intent to Distribute Fentanyl and Heroin)

On or about November 23, 2020, in the Eastern District of Louisiana and elsewhere, the defendants, **AL VERNON BROWN**, a/k/a “**Al V. Brown,**” a/k/a “**Al Vernon Brown Jr.,**” a/k/a “**Al Brown,**” a/k/a “**Al Verno Brown,**” and **CHRISTOPHER JOHNSON**, did knowingly and intentionally distribute and possess with intent to distribute four hundred (400) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] (fentanyl), a Schedule II narcotic controlled substance, and 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 3

(Felon in Possession of Firearms)

On or about November 23, 2020, in the Eastern District of Louisiana, the defendant, **CHRISTOPHER JOHNSON**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that is: a conviction on or about December 21,

2009, in the Orleans Parish Criminal District Court, Parish of Orleans, State of Louisiana, for Possession with the Intent to Distribute (Schedule 1) Marijuana, in violation of La. R.S. 40:966 (A), in Case Number 487251, Section “C,” did knowingly possess in and affecting interstate commerce, firearms, that is: (1) a Smith & Wesson 9mm semi-automatic pistol, bearing serial number, RAY0530; (2) a Rohm .22 caliber revolver, bearing serial number 1066361; (3) a Ruger .380 caliber semi-automatic pistol, bearing serial number 371960196; and (4) a Sig Sauer .380 caliber semi-automatic pistol, bearing serial number 27A166243, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 4

(Possession of Firearms in Furtherance of a Drug Trafficking Crime)

On or about November 23, 2020, in the Eastern District of Louisiana, the defendant, **CHRISTOPHER JOHNSON**, did knowingly possess firearms, that is: (1) a Smith & Wesson 9mm semi-automatic pistol, bearing serial number RAY0530; (2) a Rohm .22 caliber revolver, bearing serial number 1066361; (3) a Ruger .380 caliber semi-automatic pistol, bearing serial number 371960196; and (4) a Sig Sauer .380 caliber semi-automatic pistol, bearing serial number 27A166243, in furtherance of a drug trafficking offense for which he may be prosecuted in a court of the United States, that is: conspiracy to distribute and possess with intent to distribute N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] (fentanyl) and heroin, as charged in Count 1 of this Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(c)(1)(A)(i).

COUNT 5

(Use of a Communications Facility)

On or about April 11, 2021, in the Eastern District of Louisiana, the defendants, **CHRISTOPHER JOHNSON** and **DONALD MYLES, a/k/a “D-Ray,”** did knowingly and

intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Section 841(a)(1), that is, distribution and possession with intent to distribute heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 6
(Use of a Communications Facility)

On or about April 11, 2021, in the Eastern District of Louisiana, the defendants, **KEVIN JOHNSON** and **DONALD MYLES**, a/k/a “**D-Ray**,” did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Sections 841(a)(1), that is, distribution and possession with intent to distribute heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 7
(Use of a Communications Facility)

On or about June 19, 2021, in the Eastern District of Louisiana and elsewhere, the defendants, **AL VERNON BROWN**, a/k/a “**Al V. Brown**,” a/k/a “**Al Vernon Brown Jr.**,” a/k/a “**Al Brown**,” a/k/a “**Al Verno Brown**,” and **CHRISTOPHER JOHNSON**, did knowingly and intentionally use a communication facility, to wit, a telephone, in committing, causing and facilitating the commission of a violation of Title 21, United States Code, Section 841(a)(1), that is, distribution and possession with intent to distribute heroin, Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 8
(Possession with the Intent to Distribute Heroin)

On or about June 22, 2021, in the Eastern District of Louisiana and elsewhere, the defendants, **AL VERNON BROWN**, a/k/a “**Al V. Brown**,” a/k/a “**Al Vernon Brown Jr.**,” a/k/a “**Al Brown**,” a/k/a “**Al Verno Brown**,” **CHRISTOPHER JOHNSON**, **KEVIN JOHNSON**, and **SUSAN BREAU****X**, did knowingly and intentionally possess with the intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 9
(Possession with the Intent to Distribute Methamphetamine)

On or about June 22, 2021, in the Eastern District of Louisiana, the defendant, **SUSAN BREAU****X**, did knowingly and intentionally possess with the intent to distribute a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 10
(Possession with the Intent to Distribute Heroin)

On or about June 22, 2021, in the Eastern District of Louisiana, the defendants, **CHRISTOPHER JOHNSON** and **KEVIN JOHNSON**, did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 11
(Possession with Intent to Distribute Marijuana)

On or about June 22, 2021, in the Eastern District of Louisiana, the defendant, **KEVIN JOHNSON**, did knowingly and intentionally possess with intent to distribute less than 50 kilograms of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D).

COUNT 12
(Possession with the Intent to Distribute Cocaine)

On or about June 23, 2021, in the Eastern District of Louisiana, the defendant, **ERNEST GREEN**, did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine hydrochloride, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 13
(Felon in Possession of Firearms)

On or about June 23, 2021, in the Eastern District of Louisiana, the defendant, **ERNEST GREEN**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, that is: a conviction on or about June 9, 1995, in the Eastern District of Louisiana, United States District Court, Criminal Docket Number 2:95-cr-00065-ML-1, for Possession with Intent to Distribute quantities of Cocaine Hydrochloride, in violation of Title 21, United States Code, Section 841(a)(1), did knowingly possess in and affecting interstate commerce, firearms, that is: a Glock, Model 19 Gen4, 9mm caliber, semi-automatic pistol, bearing serial number BBWR134 and a High Standard, Model HSA-15, 5.56 NATO caliber, semi-automatic rifle, bearing serial number 04657, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 14

(Possession of Firearms in Furtherance of a Drug Trafficking Crime)

On or about June 23, 2021, in the Eastern District of Louisiana, the defendant, **ERNEST GREEN**, did knowingly possess firearms, that is: a Glock, Model 19 Gen4, 9mm caliber, semi-automatic pistol, bearing serial number BBWR134 and a High Standard, Model HSA-15, 5.56 NATO caliber, semi-automatic rifle, bearing serial number 04657, in furtherance of a drug trafficking offense for which he may be prosecuted in a court of the United States, that is: possession with intent to distribute cocaine hydrochloride, as charged in Count 12 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

NOTICE OF FORFEITURE

1. The allegations of Counts 1 through 14 of this 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 offenses alleged in Counts 1-2 and 5-13, the defendants, **AL VERNON BROWN**, a/k/a “**Al V. Brown**,” a/k/a “**Al Vernon Brown Jr.**,” a/k/a “**Al Brown**,” a/k/a “**Al Verno Brown**,” **CHRISTOPHER JOHNSON**, **KEVIN JOHNSON**, **DONALD MYLES**, a/k/a “**D-Ray**,” **ERNEST GREEN**, **JOHN CRAWFORD**, a/k/a “**Cuz**,” and **SUSAN BREAU**X, 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 offenses, 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:

\$2,628.00 in United States currency;

\$86,220.00 in United States currency;

\$6,733.00 in United States currency;

\$14,168.00 in United States currency;

\$552.00 in United States currency; and

2017 BMW 750, bearing VIN WBA7F0C37HGM22334.

3. As a result of the offenses alleged in Counts 3-4 and 13-14 the defendants, **ERNEST GREEN** and **CHRISTOPHER JOHNSON**, 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 the following:

KAHR ARMS CW9 .9mm pistol with magazine, bearing serial number EM0484;

Taurus G2C, .9mm caliber pistol, bearing serial number TLT75673;

High Standard Firearms HSA-15 5.56mm rifle, bearing serial number 0465.

Glock GMBH Model 19, 9mm handgun, bearing serial number BBWR134;

Smith & Wesson 9mm semi-automatic pistol, bearing serial number RAY0530;

Rohm .22 caliber revolver, bearing serial number 1066361;

Ruger .380 caliber semi-automatic pistol, bearing serial number 371960196; and

Sig Sauer .380 caliber semi-automatic pistol, bearing serial number 27A166243.

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

A TRUE BILL:


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DUANE A. EVANS
UNITED STATES ATTORNEY


MOBAYONLE OSUNDARE
Assistant United States Attorney

New Orleans, Louisiana
October 28, 2021