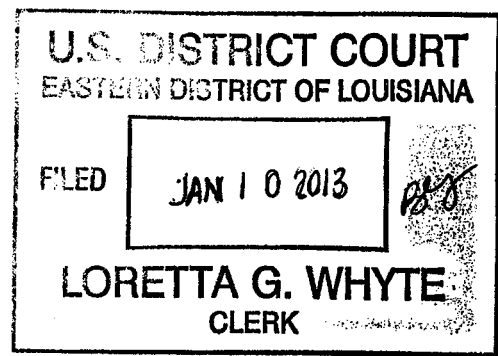




UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

*

CRIMINAL DOCKET NO.: 10-329

v.

*

SECTION: "I"(5)

TRAVIS HUDSON

*

* * *

FACTUAL BASIS

The above-named defendant, **TRAVIS HUDSON ("T. HUDSON")**, has agreed to plead guilty as charged to Counts 1 and 21 of the Third Superseding Indictment in this matter. Should this matter proceed to trial, the United States of America will prove beyond a reasonable doubt, through credible testimony of Special Agents of the Federal Bureau of Investigation ("FBI"), the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"), state and local law enforcement agencies, the production of reliable witnesses, and evidence, the following facts in support of the allegations against defendant **T. HUDSON**. The following proffer of the Government's evidence is intended only to provide the Court with enough evidence to satisfy the mandate of Rule 11(b)(3) of the Federal Rules of Criminal Procedure. This factual basis is not intended to be a disclosure of all the evidence available to the Government nor, to the extent it makes representations concerning anything the defendant said, is it a recitation of all that the defendant said.

COUNTS 1-RICO CONSPIRACY

Beginning on a date unknown, but prior to April 2004, and continuing up to on or about January 27, 2012, in the Eastern District of Louisiana and elsewhere, the defendant T. HUDSON, associated with an enterprise known as "Harvey Hustlers/Murder Squad." The "Harvey Hustlers" originated in the Harvey area of Jefferson Parish, Louisiana in the mid-1980s. Its members "hustled" meaning they distributed illegal narcotics, particularly cocaine base. The original goal of the Harvey Hustlers was to make money from the sale of illegal narcotics. The "Murder Squad" also referred to as "MS," is a neighborhood group composed primarily of individuals residing in the Harvey area of Jefferson Parish, Louisiana. The Murder Squad ("MS") is a faction of and part of the Harvey Hustlers organization. While they primarily operated on the Westbank of Jefferson Parish, members would conduct business in other parts of the Eastern District of Louisiana.

As such, the Harvey Hustlers/Murder Squad, was an enterprise, as defined in Title 18, United States Code, Section 1961(4), because it was comprised of a group of individuals who associated-in-fact for a common purpose. A principal objective of the Harvey Hustlers/Murder Squad was to obtain money through the illegal trafficking of controlled substances, including cocaine base ("crack"), cocaine hydrochloride, heroin, and marijuana. Other purposes of the enterprise included the following: (a) preserving and protecting the power, territory, and profits of the enterprise through the use of intimidation, violence, threats of violence, assault, and murder; (b) promoting and enhancing the activities and authority of the enterprise and its members and associates; (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 financial support and information to members of the enterprise, including those who

were incarcerated for committing acts of violence, robbery, distribution of controlled substances and other offenses; and (e) providing assistance to members 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.

The Government's evidence regarding the existence and nature of the Harvey Hustlers/Murder Squad would come from various sources, including but not limited to, the testimony of lay witnesses and cooperating individuals, police searches and seizures, historical arrests of the enterprise's members, and recorded telephone conversations between and among enterprise participants. Collectively, the evidence would show that the members of the Harvey Hustlers/Murder Squad included, among others Melvin Hudson, a/k/a "Kane," a/k/a "Keenan," Jermaine Hudson, a/k/a "Fresh," Moses Lawson, a/k/a "Moes," Monterio Wiggins, a/k/a "Peedy," Roderick Wiggins, a/k/a "Chucky," a/k/a "Donald Carson," Dante Carson, a/k/a "Tae," Dwight Carson, a/k/a "Coobie," Torey Richardson, a/k/a "Toe," and Tedrick Reynard. **T. HUDSON** was an associate of the organization and conspired with other members of the organization in regard to illegal narcotics sales.

D.W. was the highest ranking member of the Harvey Hustlers until his death in September 2010. Jermaine Hudson, and Melvin Hudson, were ranking members (lieutenants) of the Harvey Hustlers. Up until his death, D.W. was the main source of supply for most of the crack dealers in the Scotsdale area. D.W. would routinely acquire ten (10) kilograms of cocaine at a time. D.W. was both feared and respected in the Harvey neighborhoods and maintained almost complete control over the drug distribution in the area. Based on what subordinate

members of the Harvey Hustlers thought D.W. wanted done, they would carry out murders or assaults on his behalf.

The Harvey Hustlers forced non-member drug dealers to pay a tax if they wanted to sell drugs in Harvey Hustler controlled areas. At times, D.W. would send Harvey Hustler soldiers out to the street corners to collect cash from drug dealers. One of the Harvey Hustler mottos was "get down or lay down," which meant that either the drug dealer would pay the tax or they could be killed.

Melvin Hudson ("**M. HUDSON**"), was an "enforcer" or "head buster" for D.W. Also, **M. HUDSON** and Jermaine Hudson ("**J. HUDSON**") distributed narcotics to lower ranking members of the Harvey Hustlers. **J. HUDSON**, and **M. HUDSON**, also recruited other gang members for membership in the "Murder Squad," the enforcement side of the Harvey Hustlers. In September 2010, D.W. was murdered and **J. HUDSON**, and **M. HUDSON**, succeeded D.W., as the leaders of the organization.

Prior to finalizing the "Murder Squad" name, **M. HUDSON** thought about calling the group "Money and Murder." **M. HUDSON** baited younger members into the group by providing them financial support in times of need. For example, **M. HUDSON** would sometimes pay utility bills for Murder Squad family members. In the beginning, members of the Harvey Hustlers and Murder Squad were able to co-exist and function as a group. Some members of Murder Squad were also Harvey Hustler members.

Co-conspirators Dante Carson, Dwight Carson, Moses Lawson, Monterio Wiggins, Roderick Wiggins, Torey Richardson, and Tedrick Reynard ("**T. REYNARD**") were associates in the organization and responsible for street level distribution of narcotics and acquisition of firearms. In order to maintain Murder Squad status, members of the Murder

Squad, which included **M. HUDSON**, **J. HUDSON**, Moses Lawson, Monterio Wiggins, Roderick Wiggins, Dante Carson, Dwight Carson, and Torey Richardson were expected to participate in the following gang activity: intimidate other gangs and/or individuals who tried to sell narcotics in Harvey, LA, collect drug debts, threaten and/or intimidate potential or actual witnesses and their family members who were suspected of cooperating with law enforcement, and to assist other Murder Squad gang members in robberies and shootings.

T. HUDSON sold drugs, mostly quantities of cocaine base, from the time he was a teenager up until the time of his arrest on January 13, 2012. For example, if **T. HUDSON** was temporarily out of drugs, he would refer customers to other drug dealers that were members of the Harvey Hustlers/Murder Squad. Also, **T. HUDSON** and other Scotsdale drug dealers, would alert each other if police entered their drug distribution area.

T. HUDSON stated that shortly after Hurricane Katrina, he obtained quantities of cocaine hydrochloride, which he converted into cocaine base. During the mid to late 2000's while not incarcerated, **T. HUDSON** stated that his brothers, **M. HUDSON** and **J. HUDSON**,^{SH 7 H} became some of the largest drug dealers on the Westbank. During that time, **T. HUDSON** observed both **J. HUDSON** and **M. HUDSON** convert kilograms quantities of cocaine hydrochloride into cocaine base on several occasions. **T. HUDSON** also observed his brothers in possession of firearms on several occasions, at times when they participated in drug deals. **T. HUDSON** stated that **M. HUDSON** stored drugs and crack, powder cocaine, heroin, and marijuana in an apartment located at 1248 Aberdeen Street. **M. HUDSON** also sold drugs, mainly cocaine base, from inside and outside the apartment.

On October 28, 2008, **M. HUDSON**, who was incarcerated, placed a call to **T. HUDSON**. During this recorded jail house telephone conversation, **M. HUDSON** ask **T.**

HUDSON "Where my 40 at?" **T. HUDSON** replied "at my house!" **M. HUDSON** then stated that his baby's mother would retrieve the "40" the next day. On November 27, 2008 and during another recorded jail house telephone conversation, **M. HUDSON** stated that at an earlier time, **T. HUDSON** sold him the firearm for three (3) bills or \$300.00 in United States currency. **M. HUDSON** ordered **T. HUDSON** to transfer the firearm to C.F. (deceased). **T. HUDSON** never transferred the firearm to C.F.

On March 29, 2010, **T. HUDSON** was a passenger in a gray Nissan Maxima with a severely cracked windshield. Law enforcement officers observed as the vehicle travelled south on Bellemeade Blvd. in Jefferson Parish. As the Maxima accelerated it passed the law enforcement vehicle travelling in the opposite direction. The law enforcement vehicle turned around and attempted to make a traffic stop. As the Maxima turned onto Whitney Avenue, the passenger, **T. HUDSON**, discarded what appeared to be a large chunk of a white powdery substance from the front passenger window. In mid-air, the object broke apart and scattered chunks of white powder along the Whitney Avenue's canal bank.

The Maxima finally stopped at 1537 London Cross. Both the driver and **T. HUDSON** initially resisted arrest but were ultimately arrested. When the law enforcement officers inspected the front seat area of the Maxima, they noticed that the front passenger floorboard was coated with a white powdery substance, as well as, larger clumps of white powder. A K-9 Unit inspected the Whitney Avenue canal bank and recovered approximately two (2) grams of cocaine hydrochloride. The windy conditions and the heavy foliage around the canal bank prevented law enforcement officials from recovering additional contraband. A forensic scientist employed by the Jefferson Parish Sheriff's Office analyzed the suspected illegal narcotics recovered from the Maxima and the canal bank and determined that it was cocaine

hydrochloride, a Schedule II narcotic drug controlled substance. The total net weight was 1.83 grams.

On September 3, 2010, **T. HUDSON** pled guilty to Possession of Cocaine in the 24th Judicial District for the Parish of Jefferson, Docket No. 10-1972 "B," in violation of LA-R.S. 40:967(C)(2). **T. HUDSON** received a sentence of 18 months home incarceration. The State of Louisiana revoked **T. HUDSON**'s home incarceration and he was subsequently sentenced to 18 months in the Louisiana Department of Corrections.

COUNT 21 – DISTRIBUTION OF COCAINE BASE

On November 1, 2011, the FBI completed a controlled buy of cocaine base from **T. HUDSON**. A CI telephoned **T. HUDSON** and informed him that he/she needed to get a "hundred feet deep." The code "hundred feet deep" meant that the CI wanted to purchase \$100.00 worth of cocaine base. The FBI outfitted the CI with a recording device. Prior to attempting the cocaine base purchase, the CI was searched for money, weapons, and contraband with negative results. The FBI provided the CI with \$100.00 in United States currency.

The CI met with **T. HUDSON** in the backyard of 1104 Clydesbank Drive in Harvey, Louisiana. In exchange for the \$100.00, **T. HUDSON** provided the CI with a quantity of cocaine base. A forensic scientist employed by the Jefferson Parish Sheriff's Office analyzed the suspected illegal narcotics distributed by **T. HUDSON** and determined that it was cocaine base, a Schedule II narcotic drug controlled substance. **T. REYNARD** supplied **T. HUDSON** with

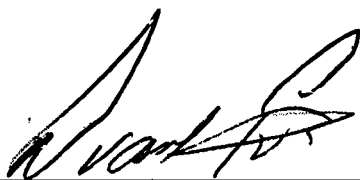
the crack that was sold to the CI. The CI purchased crack from **T. HUDSON** on numerous occasions. Over the course of the conspiracy, the CI purchased on average \$50 cocaine base quantities from **T. HUDSON** multiple times. Both the Government and **T. HUDSON** agree that he is personally responsible for the distribution of between 280-840 grams of cocaine base, a schedule II narcotic drug controlled substance, as it was reasonably foreseeable to him that this amount of drugs was distributable by him and some of his co-defendants during the course of the conspiracy.

Through his actions, **T. HUDSON** knowingly agreed to facilitate the commission of at least two racketeering acts constituting a pattern to be committed by any member of the conspiracy. Accordingly, **T. HUDSON** adopted the goal of facilitating RICO violations.

The enterprise had an effect on interstate commerce as the enterprise's members continuously procured drugs (mainly cocaine base) and firearms to carry out the organization's mission. The drugs and weapons all came at some point from outside the State of Louisiana. Also, members of the enterprise, including **T. HUDSON**, used cell phones (instrumentalities of commerce) to conduct the affairs of the enterprise. The level of the drug trafficking, the size of

the enterprise's operation, and the longevity of the enterprise, had at least a de minimis effect of interstate commerce.

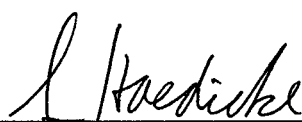
READ AND APPROVED:



DUANE A. EVANS
Assistant United States Attorney

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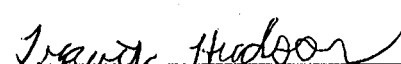
DATE



STEPHEN J. HAEDICKE
Counsel for Defendant Travis Hudson

1/10/13

DATE



TRAVIS HUDSON
Defendant

1/10/13

DATE