

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA * **CRIMINAL DOCKET NO. 12-051**
v. * **SECTION: "K"**
*
WALTER CONLEY *
aka "Ike Neezy" *
* * *

FACTUAL BASIS

Should this matter proceed to trial, the United States will prove beyond a reasonable doubt, through credible testimony and the production of reliable evidence, the following facts:

In late 2010, federal agents with the United States Bureau of Alcohol, Tobacco, Firearms, and Explosives (A.T.F.) started investigating several acts of violence that had taken place in the Carrollton Area of the City of New Orleans. During the course of this investigation the agents reviewed numerous police reports, 911 calls, recorded telephone calls, and have spoken to several cooperating witnesses. Based on this investigation agents have determined that **TYRONNE STEVENSON**, aka "Duke", **CAREY JONES**, aka "Bean", **THERON GOLSTON**, aka "Thema", **RYAN CARROLL**, aka "Ronnie Boo", **BERNELL WILLIAMS** aka "Bussy", **WALTER CONLEY**, aka "Ike Neezy", **NORMAN RATCLIFF**, aka "Turk", and **CHINA**

STEWART, aka "Ms. China", aka "Mom", and other known individuals were members and associates of an organization engaged in, among other things, conspiracy to distribute controlled substances, the distribution of controlled substances, murder, conspiracy to commit murder, attempted murder, and obstruction of justice in the Hollygrove area of the City of New Orleans from 2006 to the present. This organization, including its leadership, membership, and associates, constituted an "enterprise", as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise engaged in, and its activities affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. As such, the members of this enterprise possessed, used, carried, and discharged numerous firearms in furtherance of their drug trafficking activities in an effort to protect their drug turf, to retaliate against other rival neighborhood drug groups, such as "Hell City", and for the purpose of maintaining and increasing their position in the enterprise.

Agents have identified some of the members of "Hell City" as B.C., J.G., C.M., G.B., L.W., J.S., D.H. G.S., and G.S. During the last several years, numerous shooting have taken place between these two rival groups.

In August 2007, Ryan Carroll, a member of the Hollygrove group, broke into a house belonging to B. C., who was a drug dealer and an associate of the "Hell City" group. While in B.C.'s house Ryan Carroll stole drug money (approximately \$7,000.00) and other items from B.C. Shortly thereafter, Ryan Carroll was arrested by law enforcement authorities for this crime but was released from jail on a bond. In an effort to get B.C. to drop the charges, Ryan Carroll had his uncle, who was also a known drug dealer, speak to B.C. on his behalf.

Non-fatal Shooting of Larry Williams (L.W.)

On December 24, 2007, Ryan Carroll, at the direction of his uncle, went to the "Hell City" neighborhood in order to speak with B.C. concerning the burglary from August 2007. Tyronne Stevenson, **Walter Conley**, Norman Ratcliff, Carey Jones, and Theron Golston dropped Ryan Carroll off in the neighborhood so that he could speak to B.C. While in the area, Tyronne Stevenson, **Walter Conley**, Norman Ratcliff, Carey Jones, and Theron Golston decided to rob several members of the "Hell City" group that were participating in a dice game in the 1700 block of Cambronne Street of their drugs and money.

During this confrontation, L.W., who was associated with the members of "Hell City" was shot by Carey Jones while running from the scene. Members of "Hell City" also returned fire and Norman Ratcliff was struck in the leg. When he was shot, Ratcliff dropped the gun that he had and it was recovered by members of "Hell City". NOPD responded to the scene and located thirteen (13) 7.62 caliber casings, which were fired from an assault weapon, which was fired by Carey Jones.

Immediately following the incident, Tyronne Stevenson, **Walter Conley**, Norman Ratcliff, and Carey Jones, went back to the Hollygrove area. A cooperating witness ("CW") saw Stevenson, **Conley**, Ratcliff and Jones at this location with guns. Since Ratcliff was shot, it was decided that he needed medical attention and he was brought to the hospital by Theron Golston and **Walter Conley**. NOPD interviewed Ratcliff at Ochsner Hospital. Ratcliff lied and told the police that he had been shot at the intersection of General Ogden and Olive Streets. He also told police that he had been brought to the hospital by Theron Golston and **Walter Conley**. **Conley** was also interviewed by the police at the hospital, but denied any knowledge of the shooting.

Golston left the hospital before he could be interviewed. NOPD went to General Ogden and Olive Streets and found no evidence of a shooting.

Two days later, on December 26, 2007, NOPD officers responded to a 911 call of a shooting that took place in the 8800 block of Olive Street. When officers arrived on the scene they found **Walter Conley**, aka "Ike Neezy", suffering from a gunshot wound to the head. **Conley** was alert and told the police he was riding bikes with a friend and was shot in a "drive by" by an unknown person in a white SUV. It should be noted that at the time of the shooting, **Walter Conley** was wearing a shirt that belonged to Tyrone Stevenson.

Based on a follow-up investigation, it was determined that this was a retaliatory shooting by members of "Hell City" for the shooting two days earlier at the dice game. In call 1238-290-920, made on March 28, 2009, at 8:40 PM, **Walter Conley** calls from the Orleans Parish Prison and speaks to Jamal Garner, a member of "Hell City". **Conley**, not knowing to whom he is speaking, asks "Where Mal at?" Garner responds with "Who this?" **Conley** then states "This Ike Neezy, ya heard me! Tell that bitch, you shot me in my head, but look, when I catch that bitch, I'm a smoke him, ya heard me. And he better not come up on A3 ... I'm a smoke him. Yeah, this his ho? Ya heard me. I'm a smoke you too, ya dig." This phone call is additional proof that the feud between these two groups of individuals continued for several years.

Non-fatal Shooting of Corey Morris (C.M.)

On July 9, 2008, several of the defendants and their un-indicted co-conspirators, including Tyrone Stevenson, aka "Duke", Ryan Carroll, aka "Ronnie Boo", L.S., B.T., **Walter Conley**, aka "Ike Neezy", Norman Ratcliff, aka "Turk", and Bernell Williams, aka "Bussy" and others, got into a stolen white van with numerous firearms and drove through the area controlled by "Hell City"

looking to retaliate against the members of "Hell City". Ryan Carroll was armed with a handgun, Tyrone Stevenson had an assault weapon and other individuals inside the van had several other firearms. As the van approached 1726 Monroe Street, it slowed down and several individuals in the van produced firearms and attempted to shoot and kill C.M, who was a known member of "Hell City". At least 25 shots were fired from the van from five different firearms that were used in this drive by shooting, including but not limited to an AK-47 assault rifle, a 9mm semi-automatic handgun, a .45 caliber handgun, a .40 caliber handgun, and a .223 assault rifle. C.M. had just exited his car and was walking to his friend's house at 1726 Monroe Street, when the shots were fired. C.M. fled into the alley next to the house and discovered that he had been shot in the leg. Several cars that were parked on the street and other residences were also hit by the gunfire.

As the van fled down the street, an NOPD officer happened to be driving by and witnessed the shooting. This officer turned and chased the white van as it fled towards the river. The van came to a stop at the intersection of Joliet and Leake streets, where all occupants fled on foot into the neighborhood. The NOPD Officer approached the van and observed several guns and shell casings inside the van. A perimeter was set up around the neighborhood and a search was conducted. Tyrone Stevenson, aka "Duke", Ryan Carroll, aka "Ronnie Boo", L.S., B.T., and Bernell Williams, aka "Bussy" were eventually apprehended hiding under different houses in the area. The other individuals in the van at the time of the shooting, including **Walter Conley** and Norman Ratcliff, were able to elude police.

During the apprehension of these subjects, C.M. was transported to the hospital so that he could be treated for his injuries. However, he would not identify his assailants and was uncooperative with the police investigation.

During a follow-up investigation into this matter, federal ATF agents obtained recorded telephone conversations from the subjects while they were in jail. Based on these phone calls, agents were able to determine that Norman Ratcliff and **Walter Conley**, aka "Ike Neezy" were also in the van that day during the shooting. Since neither Ratcliff nor Conley were arrested by the police that day, the other suspects called them from jail numerous times. During these calls, Stevenson admits that he was grazed in the back by someone shooting over his shoulder. He also speaks to his mother (defendant China Stewart) and asks for her help to come up with an alibi so that he will have a defense in court. Stevenson also calls his girlfriend and warns her and his mother (China Stewart) to watch out for "the pretty bitches", which is the code that he uses when he refers to the members of "Hell City". He goes so far as to describe the cars that the members of "Hell City" drive. He also speaks to Conley ("Ike") and Ratcliff ("Turk") and they tell Stevenson that they are going to get their "issue" (firearms) from "Bean" (Carey Jones) and "Block" (another known co-conspirator). On several occasions during the calls, China Stewart tells Stevenson that he should not be talking like that on the phones because the police know all the coded words used by Stevenson and his associates when speaking about their criminal activities.

Bernell Williams, aka "Bussy" also called Norman Ratcliff and **Walter Conley**, aka "Ike", on several occasions. During these calls they talk about the specifics of the incident and how Williams was hiding under the house and trying to escape from the police perimeter. Conley and N.R. talk about how they were also hiding under a house and stayed there all night until the police

left the area. They also tell Williams that they are going back to take care of business (retaliate against "Hell City"), that they now have additional guns, and how they all need to work together to get the members of "Hell City" when everyone gets out of jail.

Ryan Carroll, aka "Ronnie Boo", also called Norman Ratcliff, aka "Turk", and Walter Conley, aka "Ike", on several occasions. Ryan Carroll also spoke to other individuals and admitted that he had a gun in the van and that his prints might be found on the gun but that he did not fire the weapon at the time of the shooting. In another call, Norman Ratcliff tries to see if Ryan Carroll used his (Ratcliff's) firearm during the shooting. They refer to the guns as "hoes". Ryan Carroll also talks to his friends about coming up with an alibi, such as going to see some girls who live nearby, so that they could have a legitimate reason why they were in the "Hell City" area. Ryan Carroll also discusses how Stevenson ("Duke") got grazed by one of them during the drive-by shooting as they were shooting over Stevenson's shoulder.

It should be noted that the victim, C.M., is a known drug dealer and member of "Hell City". He is currently in state custody serving a sentence on a drug charges.

During the follow-up investigation federal agents also located several recorded telephone calls that took place between September 9, 2008 and September 14, 2008. During call 1220-964-186, which was recorded on September 9, 2008 at 7:42pm, Stevenson ("Duke") calls Norman Ratcliff and also talks to Carey Jones ("Bean"). During the conversation they talk about guns and how "Black" (Arthur Harris, another unindicted co-conspirator) was able to get guns for them. In call 1221-095-422, which was recorded on September 10, 2008 at 8:09pm, Stevenson ("Duke") calls Norman Ratcliff and talks about their group as a whole. In call 1221-426-922, which was recorded on September 14, 2008 at 4:14pm, Stevenson ("Duke") calls China Stewart,

who places a three way call to Jones ("Bean"). During the call Jones tells Stevenson that they are selling drugs all day. He says that Conley ("Ike") just made \$200.00. They also talk about a recent shooting that they were involved in on September 14, 2008 in Jefferson Parish.

In calls 1221-427-887, which was recorded on September 14, 2008 at 4:30pm, and call 1221-433-388, which was recorded on September 14, 2008 at 6:02pm, Stevenson ("Duke") calls his girlfriend. She says that China Stewart is sending all of the members of the group out on the street to sell "ice cream" (crack cocaine) in an effort to raise money to bond him (Stevenson) out of jail. She also says that China Stewart wanted to give her some "ice cream" to sell, but she said she did not want to because she did not know how to do it correctly (sell crack cocaine).

In call 1221-444-144, which was recorded on September 14, 2008 at 9:01pm, Bernell Williams ("Bussy") calls J.R. She tells him that "all your partners are working off something" (selling crack cocaine) in an effort to raise money for a bond. She also tells them that Norman Ratcliff "had a party" (participated in a shooting) in Jefferson Parish.

On September 13, 2008, at approximately 10:30 PM, JPSO officers responded to an aggravated battery by shooting of J.J., J.B., and D.S., in the 2333 Alex Kornman Drive, Harvey, Louisiana. At the time of the incident, Norman Ratcliff was living with his mother at 2321 Alex Kornman Drive. These three individuals suffered non-lethal gunshot wounds to their bodies. Through a follow-up investigation, ATF agents were able to pull telephone calls from the Orleans Parish Prison. In call 1221-359-799, made on September 13, 2008 at 9:35 PM, Tyrone Stevenson ("Duke") calls to the residence of Norman Ratcliff ("Turk") and speaks first to Walter Conley ("Ike") and then Ratcliff. Conley tells Stevenson that Ratcliff had gotten into a verbal altercation with another individual from the area. Stevenson then speaks directly with Ratcliff

who identifies that he had been disrespected by someone in the area and this same individual had called him names and embarrassed him in front of a group of people. During the call, Ratcliff can be heard answering another phone and identifying the caller as "Bean" (Carey Jones). Ratcliff confirms with Jones and Jones is on his way to the Alex Kornman address.

According to a cooperating witness, Carey Jones ("Bean") and Theron Golston rode over to the Alex Kornman location to bring firearms to Norman Ratcliff, specifically an MAK-90, 7.62 caliber assault rifle and a handgun. When they arrived, Ratcliff took of the assault rifle and went to look for his target. After initially being unable to locate him, Ratcliff later returned outside and found the target and began shooting at him, along with Golston who used the handgun.

Immediately following the shooting, and before the police arrived to investigate, Ratcliff, Conley, Jones and Golston all left the area and returned to Hollygrove.

In call 1221-426-922, made on September 14, 2008, at 4:14, Tyrone Stevenson ("Duke") calls from Orleans Parish Prison and speaks to Carey Jones ("Bean"). Jones tells Stevenson that they "had a whole party last night", referring to the shooting. Stevenson asks if it occurred "on the other side of the river", referring to Jefferson Parish and Jones confirms that that was where the shooting happened.

Murder of Paul May

On September 14, 2008, NOPD officers responded to an aggravated battery by shooting of Paul May, who later died from his injuries. While on the scene, officers were approached by witnesses who told officers that the shooter fled to 3526 Hollygrove Street, which is the residence of Ryan Carroll and Carey Jones and is located within half of a block from the murder scene. Officers went to that location and met with Hallet Ann Carroll (the mother of Ryan Carroll and

Carey Jones) who signed a consent to search form for her residence. Hallet Carroll told officers that her son, Carey Jones, aka "Bear" and his friends had been in and out all night. Other witnesses had told officers that many firearms were kept at or under this same residence. While checking the room of Carey Jones, officers observed rounds of ammunition and drug paraphernalia (mirror with cocaine residue, a razor blade, baggies, boxes of baggies, and a scale, all of which are commonly used in the packaging of crack cocaine for retail sale). In securing the rear yard of the house, officers met with **Walter Conley**, aka "Ike Neezy" who had a marijuana cigarette in his hand. Officers also found a 9mm Tec-9 semi-automatic handgun on the ground near **Conley**. As **Conley** was being escorted from the house, one of the witnesses told officers that **Conley** was the one who shot the victim (Paul May). Officers looked under the house and saw a cache of firearms. They obtained a search warrant and recovered the following: a Norinco, Sporter MAK-90, 7.63 Assault Rifle, SN 9342623; an Armalite, M16A2, .223 Assault Rifle, SN US112179; an Astra Model A-80, .45 caliber pistol, SN J3650; a Ruger, P95, 9mm pistol, SN 316-43940; an AR-15 magazine with 24 rounds of .223 MAK-90 magazine with 20 7.62 rounds; 14 9mm rounds of ammunition; an empty box of .45 caliber rounds; a MAK-90 magazine and two 7.62 rounds; 9 Remington rounds; a Handgun magazine; an Intratec, Tec 9, 9mm pistol, SN 26496; and one 30 round 9mm magazine with 24 rounds of ammunition.

Hallet Ann Carroll claimed ownership of the Ruger 9mm recovered from inside the house. Arthur Harris, aka "Black", aka "Raymine", was inside the residence with Carey Jones, aka "Bear", when the police arrived. Both were placed under arrest for illegal possession of firearms and drug paraphernalia.

The evidence at trial would show that **Conley**, Harris and Jones were walking from a local bar in the Hollygrove area when they encountered the victim, Paul May. **Conley** asked the victim "How much you got?" The victim responded that he did not have anything, indicating that he did not want to buy any crack cocaine from **Conley**. **Conley** became angry and pulled out a .45 caliber firearm and pointed it at the victim. The victim began to run at which point **Conley** intentionally shot Paul May several times, as Arthur Harris and Carey Jones stood by. All three subjects (**Conley**, Jones, and Harris) fled down the street to Jones' house where **Conley** discarded the murder weapon under the back of the house. Later that night Paul May was pronounced dead. The autopsy protocol indicates that Paul May was the victim of a homicide, which resulted from being shot several times by a firearm. Note: the .45 caliber semi-automatic handgun that was located under the house has been ballistically matched to the casings at the scene of the murder of Paul May. In short, it is the murder weapon.

During the follow-up investigation of this incident, ATF agents were able to locate numerous recorded telephone calls from the defendants. In call 1221-475-564, which was recorded on September 15, 2008 at 5:45am, Carey Jones ("Bean") calls Norman Ratcliff. Jones tells Ratcliff that "they are hit" meaning the police found all of their guns and ammunition. Jones and **Conley** also talk to Theron Golston ("Thema") and discuss a "crackhead" who may be "ratting" (speaking to the police) about the murder.

In call 1221-496-595, which was recorded on September 15, 2008 at 11:35am, Stevenson ("Duke") calls J.R. and talks to China Stewart about the murder. China Stewart tells him about everything that happened including what she saw and heard at the scene of the murder. She also

talks to him about losing money that "Bean" (Carey Jones) and "Ike" (Walter Conley) were supposed to be bringing her from selling drugs because now they are in jail.

In call 1221-497-521, which was recorded on September 15, 2008 at 11:51am, Stevenson ("Duke") calls J.R. J.R. then calls Norman Ratcliff's number and Theron Golston answers. Golston tries to tell Stevenson who the victim was and identifies Paul May as a crackhead that had owed Stevenson money for a prior drug deal. Golston explains how he and Stevenson had gone to the victim's trailer on Hamilton where he lived to try and collect the drug debt. Golston also tells Stevenson that it's just him (Golston) and Ratcliff out on the street and that they are working on getting them out.

In call 1221-503-796, which was recorded on September 15, 2008 at 1:35pm, Bernell Williams ("Bussy") calls J.R. and she calls Norman Ratcliff on a three-way. During the call Williams also talks to Theron Golston. During the call Golston tells him that they are getting bond money for Stevenson ("Duke") and Williams ("Bussy"). He says, "we makin' some cake for you and Duke", "Miss China got a cake bakery, ya heard me." In this call he refers to selling crack cocaine as "makin' cake" and indicates that Ms. China has a "cake bakery" which identifies that she is the one supplying/making the crack cocaine.

In call 1221-510-741, which was recorded on September 15, 2008 at 3:31pm, Ryan Carroll, aka "Ronnie Boo" called his mother, Ms. Hallet Ann Carroll. She tells him that she saw **Walter Conley** ("Ike") shoot Paul May and describes the shooting in detail down to how Paul May screamed out after each shot.

In call 1221-512-485, which was recorded on September 15, 2008 at 4:00pm, Ryan Carroll, aka "Ronnie Boo" called his mother, Miss Hallet Ann Carroll. During the call she tells

Carroll to "read between the lines". Then she tells him that in addition to what happened yesterday (the murder of Paul May), they (Conley, Ratcliff, Arthur Harris, Jones and Golston) had gotten involved in something (a shooting) the night before across the river (in Jefferson Parish) and that all of those charges could be put on Jones ("Bean") also. It is obvious that she is very upset and she says, "There is so much, I can't even talk about it!" Note: the casings that were collected from the Jefferson Parish shooting under JPSO Item #I-19465-08, on September 13, 2008, were found to ballistically match one of the firearms recovered as a result of the Paul May homicide investigation.

In call 1221-584-270, which was recorded on September 16, 2008 at 11:56am, Stevenson ("Duke") calls his girlfriend J.R. J.R. tells him that Golston is selling drugs for China Stewart. She says that China Stewart tried to give her drugs to sell but that she doesn't know how to sell drugs on the street.

In call 1221-587-161, which was recorded on September 16, 2008 at 12:44 pm, Arthur Harris called Ms. Hallet Ann Carroll. Ms. Carroll talks about the murder with him and how stupid it was that Conley ("Ike") ran into her house and led the police to all the guns. Ms. Carroll also talks about how China Stewart ("Miss China") was giving the members of "Hollygrove" drugs to sell to get bond money for Stevenson ("Duke").

In call 1221-587-855, which was recorded on September 16, 2008 at 12:56 pm, Stevenson ("Duke") calls J.R. They talk about drugs and China Stewart ("Ms. China") asking J.R. if she wanted any crack cocaine. Stevenson ("Duke") tells J.R. to take the drugs and hold onto them so he'll have something to sell when he "gets home" (gets out of jail).

In call 1221-674-185, which was recorded on September 17, 2008 at 12:55 pm Ryan Carroll, aka "Ronnie Boo" calls his mother, Ms. Hallet Ann Carroll. She tells him that Conley ("Ike") killed Paul May because May didn't want to spend any more money buying drugs from Conley. Ms. Carroll says that because of what Jones ("Bean") kept in her house (guns, ammunition, and drug paraphernalia), she should have put him out of the house.

In call 1222-099-710, which was recorded on September 22, 2008 at 11:07am, Carey Jones ("Bean") calls his mother Ms. Hallet Ann Carroll. Ms. Carroll tells Jones that she found a piece of "candy" (crack cocaine) when she was cleaning his room. She asks him how much he thinks it's worth, specifically mentioning an amount of \$35.00?

In call 1222-130-874, which was recorded on September 22, 2008 at 7:46pm, Walter Conley, aka "Ike" calls J.R. and she places a three way call to Norman Ratcliff. They talk about how many and what types of guns the police found inside Jones' house and who they belonged to.

In call 1222-192-323, which was recorded on September 23, 2008 at 12:51pm, Walter Conley ("Ike") calls J.R. and talks to Tyronne Stevenson ("Duke") who was just released from jail. Conley tells him that when they were first arrested and arrived at the jail, Jones was trying to get Conley to admit to the police that he had killed Paul May. However, Conley then identifies that Jones later told him not to admit to anything. Conley talks about what happened the night before the shooting. He also refers back to the van shooting where C.M was shot, identifying that incident and the arrest of Ryan Carroll as the reason why "Ms. Ann" doesn't like any of them.

In call 1222-194-592, which was recorded on September 23, 2008 at 1:28 pm, Carey Jones ("Bean") calls Stevenson's ("Duke") phone and talks to J.R., Stevenson "Duke", and Theron

Golston. They talk about **Conley** ("Ike") and the events leading up to the shooting, including selling crack cocaine to get Stevenson ("Duke") out of jail. They talk about how "Ike was trippin'", and how "Ellis dimed them out" (told the police).

On February 2, 2009, officers responded to a call of a shooting at the intersection of General Ogden and Olive Streets. At the location, officers recovered a total of five (5) .40 caliber casings and one (1) live .40 caliber bullet. Officers received information that a possible victim was located at Ochsner Hospital. When they arrived there they located and interviewed **Walter Conley** who stated that he was leaving the grocery store on Olive Street when he heard what sounded like gun fire. He ran, tripped and cut his thumb and a friend transported him to the hospital. He had no information on who had shot at him. Ballistics examination identified that the casings recovered from the scene were fired by two (2) separate .40 caliber handguns.

A cooperating witness will testify that **Walter Conley**, Bernell Williams and Norman Ratcliff, were all standing outside the store at General Ogden and Olive Streets when individuals from "Hell City" pulled up in a vehicle and began shooting. Both **Conley** and Ratcliff returned fire. **Conley** was injured in the volley of gun fire.

On February 8, 2009, officers responded to a shooting in the 9300 block of Apricot Street. When they arrived, they observed a number of vehicles and residences that had sustained gunshot damage. They also learned that a victim, S.F., had been transported to Ochsner Hospital suffering from gunshot wounds. The victim's grandmother was interviewed and stated that she and her granddaughter were driving down the street when they heard several gunshots. After realizing her granddaughter had been shot, she immediately drove to the hospital for medical assistance.

At the time of the shooting, the witness observed three black males standing in the block holding handguns. These same individuals started shooting at one another just as the victim's vehicle passed by.

Officers recovered two (2) .40 caliber casings and a total of ten (10) 9mm casings. Ballistics examination identified that the .40 caliber casings were fired from two (2) separate .40 caliber handguns and that the 9mm casings were also fired from two (2) separate 9mm handguns.

On February 13, 2009, at approximately 1:45 PM, officers responded to a shooting in the 8800 block of Olive Street. Upon arrival, officers located twenty-five (25) 9mm casings and sixteen (16) .40 caliber casings. No witnesses or victims were located at that time.

A cooperating witness will testify that Carey Jones, Tyronne Stevenson, **Walter Conley** and Norman Ratcliff, were standing in the 8800 block of Olive Street, when members of "Hell City" pulled up in a red Sunfire occupied by at least two (2) people. Someone from inside the Sunfire began firing at the group. Jones, **Conley**, Stevenson and Ratcliff all returned fire. At the time, Tyronne Stevenson was in possession of a Glock, .40 caliber pistol.

A concerned citizen called and identified Tyronne Stevenson and Norman Ratcliff as two of the shooters involved in the incident earlier on February 13, 2009. The caller identified a vehicle in which both subjects were currently riding. Police searched the area and located the vehicle, a Ford Expedition, maroon/burgundy in color, driving in a reckless manner. Officers pulled the vehicle over, at which point Tyronne Stevenson fled from the rear passenger seat. He was apprehended but not before he pulled a Glock, .40 caliber pistol from his waistband and threw it to the ground. Bernell Williams was the driver of the vehicle, Norman Ratcliff was the front

passenger and **Walter Conley** was the backseat passenger on the driver's side. Officers recovered two (2) additional handguns; a Taurus .40 caliber pistol and a Jimenez, 9mm pistol from under the front passenger seat.

It was subsequently determined that the Glock, .40 caliber pistol recovered from Tyrone Stevenson on the evening of February 13, 2009, ballistically matched to three (3) .40 caliber casings from February 2, 2009, one (1) .40 caliber casing from February 8, 2009, and eleven (11) .40 caliber casings from earlier in the day on February 13, 2009. Additionally, the Taurus, .40 caliber pistol recovered from inside the vehicle on February 13, 2009, ballistically matched to two (2) .40 caliber casings from February 2, 2009, one (1) .40 caliber casing from February 8, 2009, and five (5) .40 caliber casings from earlier in the day on February 13, 2009. The third recovered firearm, a Jimenez 9mm pistol, did not match to any of the casings from the other incidents.

On March 17, 2009, officers responded to a shooting at 1726 Monroe Street. When they arrived at the scene, officers found J.G. lying in the middle of the street while D.H. was found lying in the alleyway next to the residence. Officers subsequently learned that a third, 8 year old victim, S.R., was transported to the hospital by family. J.G. and D.H., known members of "Hell City", informed police that they were sitting on the front porch when they observed a white, pickup truck travelling southbound on Monroe Street. As it approached 1726 Monroe Street, someone from inside the vehicle began shooting from the passenger window. Neither adult victim could or would provide information regarding the identity of the shooters. Officers recovered both .40 caliber and 9mm casings from the scene.

Through a follow-up investigation, ATF obtained telephone calls from the Orleans Parish Prison made by **Walter Conley**. Based on these calls, agents learned that Bernell Williams was the shooter and passenger in a vehicle driven by Tyronne Stevenson. A cooperating witness informed agents that the vehicle driven by Stevenson belonged to D.W. Agents also discovered that the vehicle, a white Dodge pickup truck, was recovered by the Jefferson Parish Sheriff's office after a concerned citizen observed the truck with bullet holes in the tailgate area parked next to her residence.

In call 1237-346-432, which was recorded on March 17, 2009 at 10:19 pm, **Walter Conley** calls Norman Ratcliff's phone and talks to Ratcliff, Stevenson, and Williams. They talk about the shooting of J.G. **Conley** asks Ratcliff, "That's ya'll?" inquiring as to whether or not J.G. was shot by "Hollygrove". Ratcliff replies "That's all ours" confirming Hollygrove's involvement. **Conley** then speaks to Williams who states "I had a magnum" referring to the type of weapon he possessed. **Conley** tell Williams "Man, I wish I was out."

In call 1238-697-465, made on April 1, 2009, at 1:34 PM, **Walter Conley** calls from the Orleans Parish Prison and speaks to Tyronne Stevenson. **Conley** informs Stevenson that he ran into G.S. (a known member of Hell City) in the prison. **Conley** tells Stevenson, "I'm like 'Who that is?' That boy said 'it's that city'. I said, 'yeah?' I said 'that Garvin?' He said 'yeah'. I said 'You know what it is'. He said 'You know what it is.' I was like 'Yeah, don't come upstairs, nigger a do you in, ya heard me.'"

Carjacking and Shooting of Morris Williams (M.W.)

On January 15, 2010, Jefferson Parish Sheriff Office responded to a shooting at the intersection of Elise Avenue and Kevin Drive, Metairie, LA. Upon arrival, JPSO deputies discovered the victim, M.W., lying on the ground and suffering from multiple gunshot wounds to the legs and body. M.W., who suffered from serious bodily injury was taken to the hospital. M.W. told the officers that he had met an unknown male on a chat line and agreed to meet him in person at the Winn Dixie at that location. M.W. said that sometime after arriving, the male produced a handgun and attempted to rob M.W. of his purse and cell phone. M.W. tried to run away but the male began shooting at him, hitting him several times. The shooter then fled the scene in M.W.'s vehicle.

On January 19, 2010, the vehicle belonging to M.W. was recovered from the intersection of Eagle and Palmetto Streets, New Orleans, LA, in the Hollygrove neighborhood of the city. The vehicle had been severely burned.

Further information provided by the victim and subsequent investigation by JPSO through phone records led to **Walter Conley** being developed as a suspect. The victim then viewed a photographic lineup and immediately identified **Walter Conley** as the person that shot him several times and forcefully took his 2005 Suzuki Forenza automobile, bearing license plate number NHN004, at gun point. (Note: Agents would also testify that this vehicle was not manufactured in Louisiana and therefore had been transported, shipped, and received in interstate commerce).

By pleading guilty to this incident, Conley admits that he stole the vehicle from M.W. and shot M.W. several times causing his serious bodily injury.

On January 21, 2010, at approximately 9:45 PM, **Walter Conley** was arrested by NOPD after he was chased to an abandoned residence located at 3024 Hollygrove Street. He was subsequently charged with Trespassing and booked into the Orleans Parish Prison. A warrant out of Jefferson Parish for Aggravated Assault and Robbery was filed while he was in OPCSO custody and Conley remained in OPCC until January 25th when he was transferred to JPCC. When interviewed by the JPSO detectives, Conley admitted to both shooting the victim as well as burning the victim's car. He also stated that he discarded the gun used to shoot M.W. into the Mississippi River.

In call 1254-185-802, made on January 22, 2010, at 12:42 PM, **Walter Conley** ("Ike") calls and speaks to China Stewart ("Miss China"). Conley asks Stewart to call Theron Golston for him so that he can be bonded out. Conley also tells Stewart that "I burnt them people" referring to the fact that at the time he was chased by NOPD officers, Conley was in possession of a gun and drugs. Stewart asks Conley "You stash your little girl?" referring to Conley's gun. Conley then tells Stewart that he was able to stash the gun in the abandoned house before the police found him and arrested him.

In calls 1264-277-807, 1264-278-642, and 1264-279-585, made in the afternoon hours of January 23, 2010, at, **Walter Conley** calls and speaks to Norman Ratcliff, Carey Jones and Theron Golston and instructs and directs them on where to find the gun and drugs he stashed at the abandoned house at 3024 Hollygrove Street. Golston, with the assistance of Conley, eventually locates and retrieves the gun.

Furthermore, witnesses would testify that TYRONNE STEVENSON, aka "Duke", CAREY JONES, aka "Bean", THERON GOLSTON, aka "Thema", RYAN CARROLL, aka "Ronnie Boo", BERNELL WILLIAMS aka "Bussy", NORMAN RATCLIFF, aka "Turk" and WALTER CONLEY, aka "Ike Neezy", were street level dealers of illegal narcotics and sold crack cocaine and marijuana (and on occasion heroin) on a daily basis from 2006 through 2012, while hanging out on the street corners in the Hollygrove neighborhood, when they were not in jail. These witnesses would also testify that CHINA STEWART, aka "Ms. China", aka "Mom", supplied these individuals with crack cocaine so that they could sell these drugs on the street in an effort to make money.

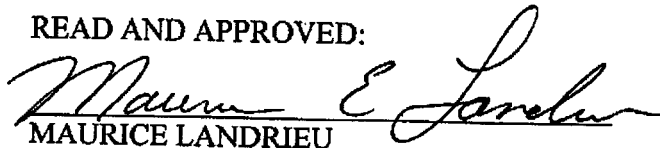
By pleading guilty to these charges, WALTER CONLEY acknowledges that he participated in these shooting and this criminal conduct to maintain the respect of his associates and his position in the criminal enterprise and to further his drug trafficking crimes.

The Government and the defendant WALTER CONLEY agree and stipulate that for sentencing purposes the government could prove that the amount of cocaine base ("crack") that was distributed and possessed with the intent to be distributed by members of this conspiracy during the course of this conspiracy was not less than 28 grams but not more than 196 grams of cocaine base ("crack"). The amount of marijuana and heroin that was involved in this conspiracy was negligible for sentencing purposes.


Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **WALTER CONLEY** and described by **WALTER CONLEY** to the government, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for **WALTER CONLEY'S** plea of guilty to the charged offenses in Counts 1, 12 and 24 of the Second Superseding Indictment.

READ AND APPROVED:


MAURICE LANDRIEU
Assistant United States Attorney

8/22/13
DATE


PAUL FLEMMING
Counsel for Walter Conley

8/22/2013
DATE


WALTER CONLEY
Defendant

8/22/2013
DATE