

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL DOCKET NO. 12-051

v.

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SECTION: "K"

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NORMAN RATCLIFF
aka "Turk"

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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:

Counts 1 and 2:

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", MARK GLEN, 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

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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.

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. Tyrone 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, Tyrone Stevenson, Walter Conley,

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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. Prior to this date, Stevenson and the others had been told by another associate, Melvin "Tiger" Plummer, that B.C. had put a "hit" on Stevenson, Jones and Carroll after the burglary of his residence by Carroll.

During this confrontation, L.W., who was associated with the members of "Hell City", was shot while running from the scene. Members of "Hell City" also returned fire and **Norman Ratcliff**, who is a co-conspirator and member of the "Hollygrove" group, was struck in the leg. NOPD responded to the scene and located thirteen (13) 7.62 caliber casings, which were all discharged from an assault weapon that 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 Jones, Conley, **Ratcliff**, and Stevenson 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 was shot at 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 at that location.

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

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police he was riding a bicycle 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. Additionally, during this investigation federal agents were able to locate a telephone call that was made on March 28, 2009 by Walter Conley from the Orleans Parish Prison. During this call Conley spoke with Jamal Garner, a member of "Hell City" and indicated that he knew that it was Jamal Garner who had shot him in the head back in December 2007 and that he was going to retaliate further. During this call Conley also brags to others in the background about his intent to retaliate. This phone call is additional proof that the feud between these two groups of individuals continued for several years and is an example of how the defendants continued to commit crimes of violence in an effort to maintain or increase their position in the enterprise.

Based on information received from a cooperating defendant, it was discovered that on December 26, 2007, at approximately 12:00 PM, **Norman Ratcliff**, Carey Jones, Bernell Williams and others were passengers in a Black, four door Pontiac Grand Prix, driven by Tyrone Stevenson when Stevenson was involved in a two car accident. According to the cooperating witness, Stevenson, **Ratcliff**, Jones, **Williams** and others were on the Westbank when they received a telephone call informing them that Walter Conley had been shot. Upon hearing the news they got their firearms and got into the car driven by Stevenson and began travelling from the Westbank to the Pigeontown area of New Orleans to retaliate against members of "Hell City", who they believed were responsible for the shooting. While on the Westbank Expressway they got into an accident and their vehicle caught on fire. All of the occupants

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fled the scene but were eventually apprehended by police. In extinguishing the fire, the fire department and police on the scene discovered three firearms secreted beneath the hood of the vehicle. Subsequent ballistics examination confirmed that the Norinco, MAK-90, 7.62 caliber assault rifle recovered from the scene of the accident was the firearm used by Jones, Conley, **Ratcliff**, and Stevenson during the shooting of L.W. on December 24, 2007.

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**, 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

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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 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 the defendants brag about their roles in this shooting. Bernell Williams, aka "Bussy" 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 **Ratcliff** talk about how they were also hiding under a house and stayed there all night until the police left the area. Conley and **Ratcliff** 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.

In call 1215-789-444, made on July 11, 2008 at 10:16 am, Bernell Williams calls **Norman Ratcliff**. Williams says that the police who arrested them referred to them as "New Orleans Most Wanted" claiming that with them in jail, "Hollygrove gone be dead" meaning there would be no more

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crime and the police would no longer have to work that area. Williams and **Ratcliff** laugh about this title and the NOPD's opinion of them. They talk about how the police are wrong and Williams says "ya'll just don't know ... we about to 'cause ruckus around that bitch!" meaning they are going to continue with their criminal activity. (Note: this call is an example of how the defendants bragged about their criminal conduct in an effort to maintain their position in the criminal enterprise). In call 1215-793-620, Williams calls and talks to Conley. Conley tells Williams that they still have two guns, a "Russia" and a "4-O", referring to a Russian made firearm as well as a .40 caliber pistol. Williams responds "*Ya'll should try to get like four of them bitches for us for when we come home.*" Conley replies "*I know. We gonna try and get our money up. We about to work as a team like on that paper level, like, ya heard me.*"

Ryan Carroll, aka "Ronnie Boo", also called **Norman Ratcliff** 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 ATF 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, Tyronne Stevenson ("Duke") calls **Norman**

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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, “*I been coming through all day, son*”, meaning that he had been selling drugs. Jones then tell Stevenson that “*Ike had just made two more, we just brung that to her*”, referring to the fact that they had made two hundred dollars from selling drugs and brought the money to Ms. China. They also talk about a recent shooting in which they were involved 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

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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, Tyronne Stevenson ("Duke") calls to the residence of **Norman Ratcliff** ("Turk") and speaks first to Walter Conley ("Ike") and then to **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, **Norman Ratcliff** can be heard answering another phone and identifying the caller as "Bean" (Carey Jones). **Ratcliff** confirms with Jones that 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 the assault rifle and went to look for his target. After initially being unable to locate him, **Ratcliff** later returned outside with Golston and found the target. They began shooting at the victim. During the shooting **Ratcliff** used the assault rifle and Golston 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, Tyronne 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.

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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. Ann Carroll told officers that her son, Carey Jones, aka "Bean" 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; 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. Note: a Ruger, P95, 9mm pistol, SN 316-43940 was also recovered from inside the residence. Hallet Ann Carroll claimed ownership of this weapon.

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Arthur Harris, aka "Black", aka "Raymine", was inside the residence with Carey Jones, aka "Bean", when the police arrived. Both were placed under arrest for illegal possession of firearms and drug paraphernalia.

A cooperating defendant has stated that at the time of the shooting, Conley, Harris and Jones were walking from a local bar in the Hollygrove area when they encountered the victim, Paul May. Conley asked Paul May, "How much you got?" Paul May 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 shot Paul May several times. After the first shot Arthur Harris and Carey Jones fled down the street to Jones' house. Conley shot Paul May several more times and then fled to Jones' house as well, arriving within a few minutes, where he discarded the murder weapon under the back of the house. Later that night Paul May was pronounced dead. According to the autopsy protocol 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 by ballistics experts at the N.O.P.D. Crime Lab 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") about the incident. Golston then speaks to Conley and they discuss a "crackhead" who may be "ratting" (speaking to the police) about the murder.

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In call 1221-496-595, which was recorded on September 15, 2008 at 11:35am, Tyrone 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 1221-503-796, 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, 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:

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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.

On February 2, 2009, NOPD responded to the intersection of General Ogden and Olive Streets after receiving reports of shots fired. When they arrived they recovered five (5) .40 caliber casings and one (1) live .40 caliber round in the 8800 block of Olive Street. They were also told that a victim, Walter Conley, was located at Ochsner Hospital. Conley told officers that upon leaving the grocery store at 8841 Olive Street, he heard gun fire and ran, injuring his thumb as he fell. Conley stated that he did not see the shooters, nor did he know who the target was.

Information received from a cooperating individual identified that Bernell Williams, Walter Conley and **Norman Ratcliff** had all been standing on the street outside the store prior to the shooting. Members of "Hell City" approached the store in a red, Dodge Charger and began shooting. Conley and **Ratcliff** returned fire. All three, including Stevenson, had been hanging out together by the store but at the time of the shooting Stevenson had left to purchase some marijuana. The shooting occurred as Stevenson was returning to the area, driving **Ratcliff's** burgundy Expedition. The red charger fled the area, past Stevenson and shot at him as well.

On February 8, 2009, at approximately 1:30 am, NOPD responded to the 9300 block of Apricot Street after receiving reports of shots fired. Officers recovered ten (10) 9mm spent casings and two (2) .40 caliber casings. Officers were also informed that a victim, S.F., had relocated to Oschner Hospital. The victim was interviewed and stated that she was the passenger in a car driven by her grandmother when they heard several gun shots. She realized she had been hit in the abdomen and was taken to the hospital. Neither she nor the others in the car could identify the shooters and/or targets.

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On February 13, 2009, at approximately 1:45 pm, NOPD responded to the 8800 block of Olive Street after receiving reports of shots fired. When they arrived at that location they recovered twenty-five (25) 9mm casings and sixteen (16) .40 caliber casings. There were no victims or witnesses located and the only damage identified was to vehicles parked on the street.

Through subsequent investigation, it was learned that Stevenson, Jones, Conley, and **Ratcliff** were in the 8800 block of Olive Street when "Hell City" pulled up in a red, Pontiac Sunfire occupied by the driver and at least one other person in the passenger seat. Someone from the Sunfire began firing at the group standing on the street. Stevenson, Jones, Conley, and **Ratcliff** all returned fire. Stevenson was in possession of a Glock, .40 caliber pistol.

On February 13, 2009, sometime prior to 9:30 pm, NOPD received information from a concerned citizen identifying Stevenson and **Ratcliff** as the perpetrators of a number of shootings having recently occurred in the "Hollygrove" area. The caller stated that Stevenson and **Ratcliff** were driving around the area in a maroon Ford Expedition with a temporary tag. Officers located the vehicle and attempted to pull it over on Carrollton Avenue. As the car stopped, Stevenson fled via the rear passenger door. Officers chased him and observed him throw a Glock, .40 caliber handgun onto the sidewalk. He was apprehended seconds later. Under the front passenger seat of the vehicle, where **Norman Ratcliff** had been seated, officers recovered two additional handguns, a Jimenez 9mm and a Taurus, .40 caliber pistol. **Bernell Williams** had been driving the vehicle which was also occupied by Conley as a second rear passenger.

Subsequent ballistic examination has identified that three (3) .40 caliber casing recovered from the February 2, 2009 incident, one (1) .40 caliber casing recovered from the February 8, 2009 incidents, and five (5) .40 caliber casings from the February 13, 2009 incident were determined to have been fired from

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the same weapon, specifically identified as the Taurus, Millenium, .40 caliber pistol recovered from under the front passenger seat of the vehicle they were stopped in on February 13, 2009. Additionally, two (2) .40 caliber casings recovered from the February 2, 2009 incident, one (1) .40 caliber casing recovered from the February 8, 2009 incident and eleven (11) casings recovered from the February 13, 2009 incident were determined to have been fired from the same weapon, specifically identified as the Glock, Model 23, .40 caliber pistol possessed by Stevenson on the evening of February 13, 2009.

On March 17, 2009, at approximately 8:48 pm, J.G. and D.H., both members of "Hell City", were sitting on the porch of 1726 Monroe Street when a white, Ford pickup truck, travelling southbound on Monroe opened fire on them from the front passenger window. When police arrived, J.G. was found in the middle of the street while D.H. was located in an alley next to 1726 Monroe. Officers later learned that, another victim, an eight year old boy identified as S.R., had been taken to the hospital by his mother. All three sustained gunshot wounds and were treated and later released from the hospital. J.G. was shot in the both the arm and the foot while D.H. was shot in the leg. Officers recovered both .40 caliber and 9mm casings from the scene. No arrests were made.

ATF agents received information from a cooperating individual who stated that Carey Jones and Dejean Pierce were together at Pierce's residence when Tyronne Stevenson and Bernell Williams arrived in a white, pickup truck which belonged to D.W. Stevenson and Williams told Jones and Pierce that they were about to go looking for "Hell City". Stevenson and Williams asked where the .40 caliber pistol was located and learned that the firearm was at an abandoned house on Olive Street. Stevenson and Williams left, retrieved the firearm, drove to "Hell City" and shot J.G., D.H. and S.R..

During the follow-up investigation of this incident, ATF agents were able to locate numerous recorded telephone calls regarding this incident. In call 1237-346-432, made on March 17, 2009 at 10:19

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pm, Walter Conley calls and speaks to Bernell Williams ("Bussy"). During this call Williams admits to shooting two members of "Hell City" and identifies that he was "*strapped*" and "*I had a magnum*", meaning that he was armed with a firearm. Williams also admits that "they" passed through the neighborhood and found the victims standing on the porch. In call 1237-417-493, made on March 18, 2009, at 6:04 pm, Conley calls and speaks to Williams. Williams says "*I got the one I wanted*" specifying that he shot one of the victims in the leg and one of victims in the side. In call 1237-417-780, made on March 18, 2009, at 6:08 pm, Conley calls again and speaks to Tyrone Stevenson. Stevenson tells Conley "*I was with him*" referring to the fact that he was with Williams at the time of the shooting. Stevenson also states "*A-boogie had that bitch singing*" meaning that Williams ("A-boogie") shot many times at the victims.

A subsequent ballistic examination has identified that the .40 caliber casings recovered during the investigation into the shooting of J.G., D.H. and S.R. were fired from a Desert Eagle, .40 caliber pistol which was recovered in May 2009, during the execution of a search warrant at the residence of D.P., an unindicted co-conspirator and member of "Hollygrove".

In telephone call # 1237-777-314, made from the Orleans Parish Prison on March 22, 2009, at approximately 10:00 pm, Walter Conley calls and talks to both **Norman Ratcliff** and Bernell Williams. Bernell Williams tells Conley how he and the others are having other street level drugs dealers pay them "draft" or money paid on a regular basis to protect them from being robbed of their drugs and/or drug proceeds. Williams tells Conley about a specific dealer named "Baller" and how Williams "*had that big old thing in his face, like, bitch, don't play with me!*" referring to how he put a gun in "Baller's" face. Williams says "*Every Friday though, every Friday he comin' with it*" and "*'bout a couple hundred dollars*" meaning that "Baller" will be paying them money every Friday to leave him alone.

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In call # 1239-055-082, made on April 6, 2009, at approximately 7:00 pm, Walter Conley calls and talks to both **Norman Ratcliff** and Bernell Williams. Bernell Williams tells Conley how he and the others had just chased one of the members of "Hell City". Williams says "*man, that bitch runnin' from me Neezy. You know I got the ru-ru on me*" identifying that he was armed with a Ruger pistol when he chased his target. Williams identifies his target, similar to phone calls made after the March 17, 2009 shooting of J.G., as "that's the one I want bad!" Williams also states "*These pretty bitches scared of us! They scared. I had that bitch runnin'. Look, Turk come out the window, boom, boom! Theron come out ...*" referring to the fact that he was with **Norman Ratcliff**, aka "Turk" and Theron Golston and they were all armed with firearms and shot repeatedly at their target.

A cooperating defendant has confirmed that the individual being chased at the time of this incident was J.G. who (still injured because of the March 17, 2009 shooting) limped to his vehicle and fled, that Carey Jones was driving **Norman Ratcliff's** burgundy Expedition which was occupied by **Norman Ratcliff**, Theron Golston and Bernell Williams, and that all four individuals were in possession of firearms.

On April, 6, 2009, at approximately 10:00 PM, NOPD officers were on routine patrol when they saw three individuals standing next to a maroon, Hyundai, SUV parked in the 2100 block of Philip Street. As the officers stopped to watch the three, they observed Bernell Williams quickly enter and exit the vehicle at which time the interior of the car burst into flames. The officers approached and the subjects fled. Bernell Williams and **Norman Ratcliff** were apprehended by officers, while Carey Jones escaped capture.

In call 1239-136-117, made on April 7, 2009, at 3:27 PM, Walter Conley ("Ike") calls and speaks to Tyronne Stevenson ("Duke"). Stevenson identifies that "Bean", "Turk" and "Bussy" (Jones, **Ratcliff**

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and **Williams**) “ran from the people ... last night” (ran from the police) after “burnin’ D-Rock’s car up” (setting fire to Dejean Pierce’s vehicle). Stevenson tells Conley that the three used a can of air-freshener as an accelerant, lit the car on fire, ran from the police, and that only **Williams** and **Ratcliff** were caught. Stevenson explains how Carey Jones (“Bean”) hid on the top of a house and hurt his foot while trying to escape.

On April 10, 2009, Tyronne Stevenson, Golston, and **Ratcliff** went to Carey Jones’ house and asked him if he wanted to ride with them over into the “Hell City” Area. Jones told them “no” because his ankle was still injured from running from the police a few days earlier. Stevenson, Golston and **Ratcliff** then left in a stolen Dodge Intrepid.

Later that morning, police responded to a call in the 1700 block of Monroe Street where they found G. B., a member of “Hell City”, suffering from multiple gunshot wounds. Evidence recovered from the scene identified seventeen (17) 7.62 caliber rifle casings and thirteen (13) 9mm casings. Ballistics examination further identified that all seventeen (17) rifle casings were fired from the same weapon and that the thirteen (13) 9mm casings were fired from three (3) different 9mm firearms. The victim, G. B., was transported to the hospital. During a follow-up investigation the victim was uncooperative and did not identify any of his assailants, despite his serious injuries.

Later that day, Stevenson, Golston, and **Ratcliff** spoke with Carey Jones and bragged to him that they had shot Glin Butler, who was a member of the rival group, “Hell City”.

On April 11, 2009, NOPD was dispatched to investigate a call of Illegal Use of Weapons in the 700 block of N. Prieur Street. When officers arrived they observed several bullet casings on the ground in the 700 block of N. Prieur, a blood stain and a Smith & Wesson, 9mm pistol, S/N RAN4590. Officers checked University Hospital for potential victims and located **Norman Ratcliff**, D.P (aka “DJ”), and two

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other victims. The four victims told police that while in the 700 block of N. Prieur, they were approached by a black male, with dreadlocks who began shooting into the crowd. Subsequent investigation by ATF determined that Carey Jones ("Bean"), Tyronne Stevenson ("Duke") and Mark Glen were also present at the time of the shooting.

Collected from the scene were a total of thirteen (13) 9mm casings as well as the Smith & Wesson handgun, loaded with a total of sixteen (16) live rounds. Officers also followed a blood trail to the steps of 2020 Dumaine Street. A Norinco, 7.62 x 39 mm caliber assault rifle was also recovered from inside 2020 Dumaine Street while a single live round of 9mm ammunition was recovered from the 2000 block of Dumaine. At the time of the incident, **Norman Ratcliff** was residing at 2020 Dumaine Street with his mother. A ballistic comparison positively identified both the Smith & Wesson, 9mm handgun, as well as the Norinco, 7.62 caliber assault rifle, as two of the firearms that were used the day before, on April 10, 2009, in the shooting of Glin Butler.

Counts 1, 2, and 31:

According to a cooperating defendant, on June 14, 2010, in the morning hours, Carey Jones, aka "Bean", **Norman Ratcliff**, aka "Turk" and Theron Golston, aka "Thema", went to the Eastside Hollygrove area to the house of C.J., aka "Chuck". C.J. was trying to get a vehicle that the group could use to "spin" later that day on 'Hell City'. C.J. and Jones decided to do this because they knew that Jones, Mark Glen, and Theron Golston shot at Glin Butler the previous day, on June 13, 2010, but that he had survived again. Based on this information, the group decided to once again locate and shoot Butler. C.J. was already in possession of a black, Volkswagen Jetta that he had obtained from a drug user but did not want to use this vehicle to 'spin'. C.J. called C.C. and asked C.C. to bring his vehicle over so that C.J. and the others could borrow the car to 'spin'.

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Prior to C.C.'s arrival with his vehicle, Carey Jones, aka "Bean", L.S. and C.J. , left C.J.'s house and travelled to the Academy Sports store in Elmwood to purchase ammunition. C.J., because he had valid identification, purchased the 9mm and .40 caliber ammunition using cash. The group then left the store and returned to Hollygrove.

C.C. arrived at C.J.'s house with his white, Chevrolet Malibu rental car. At this time Carey Jones, **Norman Ratcliff**, Theron Golston, C.J. (aka "Chuck"), L.S., and C.C. all piled into the two vehicles while armed with at least five firearms and went driving around looking for Glin Butler in an attempt to kill him. The white vehicle drove off first followed by the black vehicle.

On June 14, 2010, at approximately 6:15 PM, NOPD officers responded to a homicide at 8921 Birch Street, the residence of Glin Butler. Upon arrival, officers found Miss Eula Mae Ivey, who was identified as Glin Butler's grandmother, lying in the front yard deceased as the result of multiple gunshot wounds. A second victim, Jonathan Butler, Glin Butler's younger brother, was struck by a bullet that entered the residence. Witnesses to this incident told the police that Miss Ivey was killed by several individuals who drove past the location and opened fire from two vehicles. During the shooting one of the cars wrecked and one of the shooters exited one of the cars and continued firing his weapon. Officers located approximately twenty-four (24) 9mm casings, seven (7) .45 caliber casings and one (1) .40 caliber casing from the scene. Ballistic examinations indicate that five (5) different weapons were used in this incident, one (1) .45 caliber, one (1) .40 caliber, and three (3) different 9mm firearms.

After both vehicles sped away from the 8900 block of Birch Street, they drove down Hollygrove Street toward Hickory, turning westbound into the 9000 block of Hickory Street. D.M. was standing on the porch of his residence with his children when he heard several gunshots coming from nearby. After

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about a minute, D.M. saw a white Chevrolet Malibu travelling north on Hollygrove Street. The vehicle had a damaged front passenger side. D.M. said the vehicle sped toward Hollygrove and Hickory Streets and then turned west into the 9000 block of Hickory. As the vehicle made the turn, D.M. hurried his children inside their residence, following directly behind them. As he shut the door, he heard several gunshots directly outside of his residence. After the shooting ceased, he walked outside and saw multiple spent shell casings in the middle of the street.

The casings were recovered by NOPD and ballistically compared to those recovered from the scene of the Eula Ivey murder. It was determined that the nine (9) 9mm casings had been fired from two (2) 9mm weapons. These casings were further determined to have been fired from the Taurus 9mm and the Glock Model 19, 9mm pistols that were used in the Eula Ivey homicide. Additionally the Taurus 9mm was ballistically linked to the shooting of Glin Butler which occurred on June 13, 2010 at approximately 9:00pm.

Within hours of these shootings, NOPD homicide detectives developed Carey Jones as a suspect. Witnesses identified Carey Jones as one of the several individuals who participated in this murder. NOPD also eventually arrested C.C., R.G., A.G., T.G. and Ryan Carroll in connection with this homicide. It should be noted that Carey Jones has pled guilty in federal court to participating in this drive-by murder of Ms. Eula May Ivey. He has identified C.J. (aka "Chuck"), Theron Golston, **Norman Ratcliff**, C.C. and L.S. as the other individuals who were in the two vehicles and participated in the murder with him. Jones specifically stated that R.G, A.G., T.G., and Ryan Carroll did not participate in this homicide.¹ It should also be noted that this homicide took place about thirty minutes after NOPD officers left Glin

¹ Despite not being directly involved in murder of Eula May Ivey, R.G., A.G., and T.G. were all charged in state court with participating in this homicide. Furthermore, each of them pled guilty to substantially reduced charges in state court in Orleans Parish under case number 507-769 "E".

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Butler's residence after trying to get him to cooperate with their investigation of his shooting that took place the prior day.

According to a cooperating witness, following the shooting of Eula Ivey, Carey Jones, aka "Bean", **Norman Ratcliff**, aka "Turk" and Theron Golston, aka "Thema", returned to Ratcliff's vehicle and drove out to Mark Glenn's apartment. The three waited on Glenn to return home from work. While at the apartment, Jones and the others told Glenn that they had "spinned" and gone to Hell City where they had killed Eula Ivey while attempting to shoot Glin Butler again. Mark Glenn asked "why ya'll left me." Jones, **Ratcliff** and Golston discussed how Theron Golston had gotten out of one of the cars and continued to fire his weapon. Both Jones and **Ratcliff** were angry with Golston about what he had done, saying that they had mothers too and he had gone too far.

Approximately one week after the murder of Eula Ivey, a cooperating defendant was at the Orleans Parish Criminal District Court, along with Theron Golston and other individuals both known and unknown to the cooperating defendant. These other individuals were heard asking Golston about the murder and what had happened. When given the opportunity, the cooperating defendant specifically questioned Golston about his involvement in the murder. Golston admitted that he had participated in the murder Eula May Ivey.

On August 31, 2010, Officers were on routine patrol when they observed Theron Golston walking toward the front passenger door of a parked 4 door, Gray Altima. They watched as Golston removed a handgun from his waistband and opened the car door. Upon seeing the police, Golston attempted to re-conceal the weapon. He entered the car and made movements toward the floorboard as if to conceal the weapon there. As the officers approached, Johnnelle Duncan, exited a nearby convenience store and

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walked toward the vehicle. When the officers reached the vehicle they could see the gun lying on the floorboard of the car. Officers retrieved a Springfield, Model XD, .45 caliber pistol, S/N US583281. After arrest, Golston gave a statement to police, admitting to possession of the gun, saying that he had it because he felt like his life and the life of his family was in danger. Golston told the police that he found the gun near the intersection of General Ogden and Olive Streets in Hollygrove a few days prior to his arrest. However, cooperating witnesses will testify that Golston has told them that that firearm was the one he used when he shot and killed Ms. Eula May Ivey.

By pleading guilty to participating in the murder of Eula May Ivey, **Norman Ratcliff** admits that he was in possession of a known firearm and that he voluntarily got into one of the two vehicles described above with the intent to find, shoot, and kill Glin Butler. He further admits that he participated in this murder along with Carey Jones, Theron Golston, C.J. (aka "Chuck"), C.C. and L.S. and that he and this group of individuals possessed at least five different firearms during this incident. However, Ratcliff denies that he fired his weapon during the shooting, but nevertheless acknowledges that he was not "just merely present" at the scene of this crime as he was armed and had the knowledge and intent to commit this crime and aided and abetted his co-conspirators during this drive by shooting. **Ratcliff** also specifically states that R.G., A.G., and T.G. were not with him and the above named associates when the drive by shooting occurred which resulted in the death of Ms. Eula May Ivey. He also admits that he participated in this shooting to maintain his position in the enterprise and that this shooting was done in furtherance of his and his associates' drug trafficking activities, as Glin Butler, who was the intended target, was a member of a rival drug gang.

Additional Relevant Conduct:

Additional witnesses would testify that TYRONNE STEVENSON, aka "Duke", CAREY JONES,

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aka "Bean", THERON GOLSTON, aka "Thema", RYAN CARROLL, aka "Ronnie Boo", BERNELL WILLIAMS aka "Bussy", NORMAN RATCLIFF aka "Turk", MARK GLENN and WALTER CONLEY, aka "Ike Neezy", were street level dealers of illegal narcotics and sold crack cocaine (and on occasion marijuana and 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 on occasion so that they could sell these drugs on the street in an effort to raise bond money to get their associates out of jail.

By pleading guilty to these charges, **Norman Ratcliff** acknowledges that he participated in the shootings listed above and this other criminal conduct to maintain the respect of his associates and his position in the criminal enterprise. He also admits that these crimes were done in furtherance of his drug trafficking activities as several of these victims, or intended victims, were members of a rival drug gang.

The Government and the defendant **Norman Ratcliff** 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 amounts of marijuana and heroin that was involved in this conspiracy were negligible for sentencing purposes.

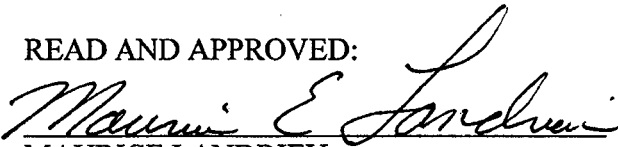
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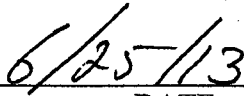
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Limited Nature of Factual Basis

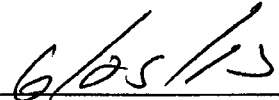
This proffer of evidence is not intended to constitute a complete statement of all facts known by NORMAN RATCLIFF and described by NORMAN RATCLIFF to the government, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for NORMAN RATCLIFF'S plea of guilty to the charged offenses in Counts 1, 2, and 31 of the Second Superseding Indictment.

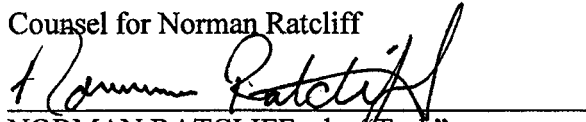
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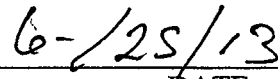

MAURICE LANDRIEU
Assistant United States Attorney


DATE


MICHAEL CIACCIO
Counsel for Norman Ratcliff


DATE


NORMAN RATCLIFF, aka "Turk"
Defendant


DATE