

FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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

UNITED STATES OF AMERICA	*	CRIMINAL NO: 12-051
v.	*	SECTION: "K "
WALTER CONLEY	*	VIOLATION: 18 U.S.C. § 1962(d)
"Ike Neezy"		18 U.S.C. § 1959
"Neezy"		21 U.S.C. § 846
TYRONNE STEVENSON		21 U.S.C. § 841(a)(1)
aka "Duke"	*	18 U.S.C. § 924(o)
NORMAN RATCLIFF		18 U.S.C. § 924(j)(1)
aka "Turk"	*	18 U.S.C. § 2
THERON GOLSTON		18 U.S.C. § 924(c)(1)(A)
aka "Thema"		18 U.S.C. § 922(g)(1)
BERNELL WILLIAMS		18 U.S.C. § 922(n)
aka "Bussy"	*	18 U.S.C. § 2119
aka "A-Boogie"		
MARK GLENN		
	*	*
	*	*

The Grand Jury charges that:

COUNT 1

(Racketeer Influenced and Corrupt Organizations Conspiracy)

General Allegations

1. At all relevant times, defendants **TYRONNE STEVENSON**, aka "Duke", **THERON GOLSTON**, aka "Thema", **BERNELL WILLIAMS** aka "Bussy", aka "A-Boogie", **WALTER CONLEY**, aka "Ike Neezy", **NORMAN RATCLIFF**, aka "Turk", **MARK GLENN**, and others known and unknown to the grand jury, were members and associates of an organization engaged in, among other things, conspiracy to distribute controlled substances, distribution of controlled substances, murder, conspiracy to commit murder, attempted murder, and obstruction of justice. At all relevant times, this organization operated in the Eastern District of Louisiana.

2. This organization has historically encompassed the Hollygrove area of New Orleans, Louisiana and operated primarily in this specified area. The boundaries of the area include South Carrollton Avenue, Earhart Boulevard, Interstate 10, and the Jefferson Parish line.

The Racketeering Enterprise

3. The organization, including its leadership, membership, and associates, constitutes an "enterprise", as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise engaged in, and its activities affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

4. The purposes of the enterprise include, but are not limited to, the following:
 - a. Enriching the members and associates of the enterprise through, among other things, the control of and participation in the illegal distribution of controlled substances in the territory controlled by the enterprise;
 - b. Enriching the members and associates of the enterprise through, among other things, violence and threats of violence, including assault, robbery, and murder;
 - c. Preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, and threats of violence, including assault, robbery and murder;
 - d. Promoting and enhancing the activities and authority of the enterprise and its members and associates;
 - e. 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;
 - f. Providing financial support and information to members and associates of the enterprise, including those who were incarcerated for committing acts of violence, robbery, illegal distribution of controlled substances, and other offenses, and;
 - g. Providing assistance to members and associates of the enterprise who committed crimes for and on behalf of the enterprise in order to hinder, obstruct, and prevent law enforcement officers from identifying the offender or offenders, apprehending the offender or offenders, and prosecuting and punishing the offender or offenders.

Means and Methods of the Enterprise

5. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise, included but were not limited to, the following:

- a. Members of the enterprise and their associates possessed and utilized firearms to prevent competition from other drug dealers in and around the geographic area utilized and controlled by the conspirators.
- b. Members of the enterprise and their associates possessed and utilized firearms in order to protect their illegal drug trafficking in and around the geographic area utilized and controlled by the conspirators.
- c. Members of the enterprise and their associates committed shootings, various firearms offenses, and violent acts, including but not limited to murder, attempted murder, armed robbery, aggravated battery, illegal possession of a firearm, aggravated assault, and arson in order to maintain and advance the goals of the enterprise, the individual conspirator's role within the enterprise and to control the specific geographic area utilized and controlled by the conspirators.
- d. Members of the enterprise and their associates promoted a climate of fear through violence and threats of violence.
- e. Members of the enterprise and their associates committed, attempted, and threatened to commit acts of violence, including arson, in an effort to obstruct justice and thwart police investigations.

- f. Members of the enterprise and their associates maintained and circulated a collection of firearms for use in criminal activity by other co-conspirators.
- g. Members of the enterprise and their associates used telephones, even while in jail, to give directions and advice to each other in an effort to circumvent the criminal justice system, obstruct justice, illegal distribute controlled substances, illegally possess firearms, attempt to intimidate witnesses, and to impose discipline on members of the conspiracy who may have acted in a reckless manner by bringing unwanted attention by law enforcement officials to the members of the conspiracy.
- h. Members of the enterprise and their associates bragged about their illegal activity, such as their possession and use of firearms, to each other in an effort to maintain or increase their position inside the enterprise.
- i. Members of the enterprise and their associates attempted to convince girlfriends and other associates to obstruct justice by falsely claiming that they had committed an illegal act or possessed a piece of contraband in an effort to keep the members of the conspiracy from being held legally accountable for their actions.
- j. Members of the enterprise and their associates targeted and retaliated against members of a rival drug group, identified as "Hell City", who lived in the Pigeontown area of New Orleans, bordered by S. Claiborne Avenue, S. Carrollton Avenue, Oak Street and Monticello Avenue.

Roles of the Defendants

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

- a. Co-conspirator China Stewart, aka "Miss China", aka "Mom", acted as a main supplier, processor and distributor of cocaine base ("crack") to the other members of the enterprise and to retail customers. She also provided advice to the members on how not to get caught by the police and provided the members of the enterprise a safe haven to store the drugs and firearms that belonged to the members of the enterprise.
- b. Defendants **TYRONNE STEVENSON**, aka "Duke", **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", **WALTER CONLEY**, aka "Ike Neezy", **THERON GOLSTON**, aka "Thema", **NORMAN RATCLIFF**, aka "Turk", and **MARK GLENN** acted as illegal drug distributors and gunmen for the enterprise.

The RICO Conspiracy Charge

7. Beginning on a date unknown, but prior to July 1, 2006, and continuing to on or about the date of the return of this indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **TYRONNE STEVENSON**, aka "Duke", **THERON GOLSTON**, aka "Thema", **BERNELL WILLIAMS** aka "Bussy", aka "A-Boogie", **WALTER CONLEY**, aka "Ike Neezy", **NORMAN RATCLIFF**, aka "Turk", **MARK GLENN**, and others known and unknown to the grand jury, being persons employed by and associated with the criminal enterprise, which enterprise engaged in and the activities of which affected interstate and foreign commerce, unlawfully and knowingly combined, conspired and agreed together and with each

other to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), consisting of multiple acts involving:

- a. Murder, in violation of Title 14, Louisiana Revised Statutes, 30.1, Sections 24 (Principals), 26 (Criminal Conspiracy), and 27 (Attempt);
- b. Robbery, in violation of Title 14, Louisiana Revised Statutes, Sections 64 and 65; Sections 24 (Principals), 26 (Criminal Conspiracy), and 27 (Attempt);
- c. Arson, in violation of Title 14, Louisiana Revised Statute, Section 52; Sections 24 (Principals), 26 (Criminal Conspiracy), and 27 (Attempt);
- d. the illegal distribution of controlled substances, including cocaine base ("crack"), heroin, and marijuana, in violation of Title 40, Louisiana Revised Statute Sections, 966, 967, and 979;

and multiple acts involving:

- e. the illegal distribution of controlled substances, including cocaine base ("crack"), heroin, and marijuana, in violation of Title 21, United States Code, Sections 846, 841, and 843.

8. It was a further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering in the conduct of the affairs of the enterprise.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, defendants **TYRONNE STEVENSON**, aka "Duke", **THERON GOLSTON**, aka "Thema", **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", **WALTER CONLEY**, aka "Ike Neezy", **NORMAN RATCLIFF**, aka "Turk", **MARK GLENN** and others known and unknown to the Grand Jury, committed various overt acts, on or about the following times and dates, in the Eastern District of Louisiana, including but not limited to the following:

(1) On or about August 27, 2007, co-conspirator Ryan Carroll, aka "Ronnie Boo", committed a burglary of 718 Lake Street, Metairie, Louisiana, stealing drug proceeds belonging to R.C.

(2) On or about December 24, 2007, defendants **TYRONNE STEVENSON**, aka "Duke", **WALTER CONLEY**, aka "Ike Neezy", **THERON GOLSTON**, aka "Thema", and **NORMAN RATCLIFF**, aka "Turk" and co-conspirator Carey Jones, aka "Bean", possessed and discharged firearms while attempting to rob known rival drug dealers from "Hell City" of drugs and drug proceeds, shooting L.W.

(3) On or about December 26, 2007, **TYRONNE STEVENSON**, aka "Duke", **BERNELL WILLIAMS**, aka "Bussy", **NORMAN RATCLIFF**, aka "Turk", and co-conspirator Carey Jones, aka "Bean", possessed firearms.

(4) On or about April 17, 2008, defendant **TYRONNE STEVENSON**, aka "Duke", distributed cocaine base ("crack").

(5) On or about April 17, 2008, defendant **TYRONNE STEVENSON**, aka "Duke", possessed a firearm.

(6) On or about April 17, 2008, defendant **TYRONNE STEVENSON**, aka "Duke", called defendant, **NORMAN RATCLIFF**, aka "Turk", and co-conspirator China Stewart, aka "Miss China", aka "Mom", to facilitate the recovery of crack cocaine.

(7) On or about April 18, 2008, defendant **TYRONNE STEVENSON**, aka "Duke", incarcerated on drug charges, telephoned co-conspirator China Stewart, aka "Ms. China", aka "Mom", and spoke with defendants **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", and **NORMAN RATCLIFF**, aka "Turk" and spoke about distributing cocaine base ("crack").

(8) On or before May 13, 2008, **NORMAN RATCLIFF**, aka "Turk" provided D.T. with a firearm.

(9) On or about May 13, 2008, D.T. possessed a firearm belonging to **NORMAN RATCLIFF**, aka "Turk".

(10) On or about May 27, 2008, defendants, **THERON GOLSTON**, aka "Thema", and co-conspirators Carey Jones, aka "Bean" and Ryan Carroll, aka "Ronnie Boo", rode in a vehicle in an area controlled by members of "Hell City" looking to obtain illegal drugs.

(11) On or about July 9, 2008, defendants **TYRONNE STEVENSON**, aka "Duke", **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", **WALTER CONLEY**, aka "Ike Neezy", **NORMAN RATCLIFF**, aka "Turk", and co-conspirator Ryan Carroll, aka "Ronnie Boo", possessed and discharged several firearms in an attempt to injure or kill C.M., a rival drug dealer from "Hell City".

(12) Beginning on or about July 9, 2008, and continuing through August, 2008, defendants **TYRONNE STEVENSON**, aka "Duke", **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", and co-conspirator Ryan Carroll, aka "Ronnie Boo", completed in excess of

thirty (30) calls from the Orleans Parish Prison to co-conspirator China Stewart, aka "Ms. China", aka "Mom", and defendants **WALTER CONLEY**, aka "Ike Neezy" and **NORMAN RATCLIFF**, aka "Turk" and discussed criminal activity of the enterprise.

(13) On or about August 26, 2008, defendant **THERON GOLSTON**, aka "Thema" possessed and discharged a firearm, shooting L.D., an innocent bystander.

(14) On or about September 9, 2009, co-conspirator Carey Jones, aka "Bean", possessed firearms.

(15) On or about September 13, 2008, defendants **WALTER CONLEY**, aka "Ike Neezy", **THERON GOLSTON**, aka "Thema", and **NORMAN RATCLIFF**, aka "Turk" and co-conspirator Carey Jones, aka "Bean", possessed and discharged several firearms, resulting in injuries to J.J., D.S. and J.B.

(16) On or about September 14, 2008, defendant, **WALTER CONLEY**, aka "Ike Neezy", shot and killed Paul May.

(17) On or about September 14, 2008, defendant **WALTER CONLEY**, aka "Ike Neezy", and co-conspirator Carey Jones, aka "Bean", possessed firearms.

(18) Beginning on or about September 15, 2008, and continuing through September 24, 2008, defendants **WALTER CONLEY**, aka "Ike Neezy", **TYRONNE STEVENSON**, aka "Duke" and co-conspirators Carey Jones, aka "Bean" and Ryan Carroll, aka "Ronnie Boo", completed in excess of twenty-five (25) calls to co-conspirator China Stewart, aka "Ms. China", aka "Mom", and defendant **NORMAN RATCLIFF**, aka "Turk" to discuss the criminal activity of the enterprise.

(19) On September 26, 2008, **THERON GOLSTON**, aka "Thema", did illegally

possess a firearm.

(20) On or about November 21, 2008, defendant **TYRONNE STEVENSON**, aka "Duke", illegally possessed a firearm.

(21) On or about November 21, 2008, co-conspirator China Stewart, aka "Ms. China", aka "Mom", attempted to obstruct justice by asking both R.H. and J.R. to provide false information to law enforcement concerning who actually possessed the firearm that **STEVENSON** was arrested with on November 21, 2008.

(22) On or about February 2, 2009, members of the enterprise possessed and discharged firearms.

(23) On or about February 8, 2009, members of the enterprise possessed and discharged firearms, shooting S.F., an innocent bystander.

(24) On or about February 13, 2009, at approximately 1:43 PM, members of the enterprise possessed and discharged firearms.

(25) On or about February 13, 2009, at approximately 9:30 PM, defendants **TYRONNE STEVENSON**, aka "Duke", **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", **WALTER CONLEY**, aka "Ike Neezy" and **NORMAN RATCLIFF**, aka "Turk" rode together in a car and possessed several firearms.

(26) On or about March 8, 2009, defendants **NORMAN RATCLIFF**, aka "Turk", **TYRONNE STEVENSON**, aka "Duke", and **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", rode in a vehicle together.

(27) On or about March 8, 2009, defendant **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", possessed a firearm.

(28) On or about March 17, 2009, defendants **TYRONNE STEVENSON**, aka "Duke" and **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", possessed and discharged firearms injuring D.H., J.G., rival drug dealers from "Hell City", and S.R., a juvenile bystander.

(29) On or about March 22, 2009, defendants **BERNELL WILLIAMS**, aka "Bussy" aka "A-Boogie" and **NORMAN RATCLIFF**, aka "Turk", possessed and brandished firearms while extorting money and narcotics from a local narcotics distributor.

(30) Beginning on or about March 26, 2009 and continuing through April 4, 2009, defendant **WALTER CONLEY**, aka "Ike Neezy", completed in excess of twenty (20) calls from the Orleans Parish Prison to defendants **NORMAN RATCLIFF**, aka "Turk", **TYRONNE STEVENSON**, aka "Duke", and **BERNELL WILLIAMS**, aka "Bussy" aka "A-Boogie", and co-conspirator Carey Jones, aka "Bean" and discussed the criminal activity of the enterprise.

(31) On or about April 4, 2009, D. P., an unindicted member of the enterprise, falsely reported that his vehicle had been stolen.

(32) On or about April 6, 2009, defendants **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", **THERON GOLSTON**, aka "Thema" and **NORMAN RATCLIFF**, aka "Turk", possessed and discharged firearms while attempting to shoot a rival drug dealer.

(33) On or about April 6, 2009, defendants **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", and **NORMAN RATCLIFF**, aka "Turk", and co-conspirator Carey Jones, aka "Bean", did commit an arson of the vehicle belonging to D.P.

(34) On or about April 6, 2009, defendant **WALTER CONLEY**, aka "Ike Neezy", telephoned **TYRONNE STEVENSON**, aka "Duke", from the Orleans Parish Prison, and discussed the criminal activity of the enterprise.

(35) On or about April 10, 2009, defendants **TYRONNE STEVENSON**, aka "Duke", **THERON GOLSTON**, aka "Thema" and **NORMAN RATCLIFF**, aka "Turk", possessed and discharged firearms injuring G.B., a rival drug dealer from "Hell City".

(36) On or about April 11, 2009, defendant **NORMAN RATCLIFF**, aka "Turk", possessed a firearm.

(37) On or about June 9, 2009, defendant **NORMAN RATCLIFF**, aka "Turk", possessed a firearm.

(38) On or about August 1, 2009, defendants **MARK GLENN**, and **NORMAN RATCLIFF**, aka "Turk", and co-conspirator Carey Jones, aka "Bean", rode in a vehicle together.

(39) On or about August 1, 2009, defendant **MARK GLENN** possessed a quantity of marijuana.

(40) On or about November 12, 2009, **WALTER CONLEY**, aka "Ike Neezy" called defendant **NORMAN RATCLIFF**, aka "Turk" and co-conspirator Carey Jones, aka "Bean", and discusses the criminal activity of the enterprise.

(41) On or about November 12, 2009, **WALTER CONLEY**, aka "Ike Neezy" called an unindicted co-conspirator and discussed the criminal activity of the enterprise.

(42) On January 15, 2010, defendant **WALTER CONLEY**, aka "Ike Neezy", car jacked and shot M.W and subsequently burned the victim's vehicle in the Hollygrove area.

(43) On or about January 22, 2010, defendant **WALTER CONLEY**, aka "Ike Neezy", illegally possessed a firearm.

(44) On or about January 22, 2010, defendant **WALTER CONLEY**, aka "Ike Neezy", possessed with intent to distribute a quantity of marijuana.

(45) On or about January 23, 2010, defendants **THERON GOLSTON**, aka "Thema" and **NORMAN RATCLIFF**, aka "Turk" located and retrieved a firearm for defendant **WALTER CONLEY**, aka "Ike Neezy".

(46) On or about June 13, 2010, defendant **MARK GLENN** provided a firearm to defendant **THERON GOLSTON**, aka "Thema" and co-conspirator Carey Jones, aka "Bean".

(47) On or about June 13, 2010, defendant **THERON GOLSTON**, aka "Thema" and co-conspirator Carey Jones, aka "Bean", possessed and discharged firearms in an attempt to shoot G.B., a rival drug dealer from "Hell City".

(48) On or about June 13, 2010, **MARK GLENN** possessed and discharged a firearm, injuring G.B., a rival drug dealer from "Hell City".

(49) On or about June 14, 2010, defendants **THERON GOLSTON**, aka "Thema", **NORMAN RATCLIFF**, aka "Turk", co-conspirator Carey Jones, aka "Bean", C.J., L.S. and C.C. possessed and discharged firearms, killing Eula May Ivey.

(50) On or about August 31, 2010, defendant **THERON GOLSTON**, aka "Thema", possessed a firearm.

(51) On or about November 28, 2010, defendant **MARK GLENN** possessed a firearm.

(52) On or about November 28, 2010, defendant **MARK GLENN** possessed with intent to distribute a quantity of crack cocaine.

(53) On or about February 20, 2011, defendant **THERON GOLSTON**, aka "Thema", along with T.C., possessed and discharged firearms.

(54) On or about March 31, 2011, defendant **NORMAN RATCLIFF**, aka "Turk" along with O.D. possessed a firearm.

(55) On or about April 3, 2011, defendant **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie" possessed a firearm.

(56) On or about April 3, 2011, defendant **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie" possessed with the intent to distribute a quantity of heroin.

SPECIAL SENTENCING ALLEGATIONS

The Grand Jury further alleges that:

1. On September 14, 2008, in the Eastern District of Louisiana and elsewhere, defendant **WALTER CONLEY**, aka "Ike Neezy", with the specific intent to kill and inflict great bodily harm, did kill Paul May, in violation of the laws of the State of Louisiana (Title 14, La. R.S. Sections 30.1 second degree murder).

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

2. On June 14, 2010, in the Eastern District of Louisiana and elsewhere, defendants **THERON GOLSTON**, aka "Thema", and **NORMAN RATCLIFF**, aka "Turk", with the specific intent to kill and inflict great bodily harm, did kill Eula May Ivey, in violation of the laws of the State of Louisiana (Title 14, La. R.S. Sections 30.1 second degree murder).

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

COUNT 2

(Conspiracy to Distribute Controlled Substances)

Beginning on a date unknown, but sometime prior to June 1, 2006, and continuing to on or about the date of this indictment, in the Eastern District of Louisiana and elsewhere, the

defendants, **TYRONNE STEVENSON**, aka "Duke", **THERON GOLSTON**, aka "Thema", **BERNELL WILLIAMS** aka "Bussy", aka "A-Boogie", **WALTER CONLEY**, aka "Ike Neezy", **NORMAN RATCLIFF**, aka "Turk", and **MARK GLENN** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base (crack cocaine), a Schedule II narcotic drug controlled substance and a quantity of heroin and marijuana, both Schedule I drug controlled substances; in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), 841(b)(1)(C), and 841(b)(1)(D); all in violation of Title 21, United States Code, Section 846.

COUNT 3

(Conspiracy to Possess Firearms)

Beginning on a date unknown, but prior to July 1, 2006, and continuing to on or about the date of this indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **TYRONNE STEVENSON**, aka "Duke", **THERON GOLSTON**, aka "Thema", **BERNELL WILLIAMS** aka "Bussy", aka "A-Boogie", **WALTER CONLEY**, aka "Ike Neezy", **NORMAN RATCLIFF**, aka "Turk", and **MARK GLENN** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, during and in relation to a crime of violence and a drug trafficking crime, to use and carry firearms, and possess firearms in furtherance of crimes of violence and drug trafficking crimes as alleged in this indictment; all in violation of Title 18, United States Code, Section 924(o).

COUNT 4

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. At all times relevant to this Indictment, the enterprise as more fully described in Paragraphs 1 through 6 of Count 1 of this indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

2. At all times relevant to this Indictment, the above described enterprise, through its members and associates, engaged in racketeering activity as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, in violation of Title 14, Louisiana Revised Statute, Section 30.1; robbery, in violation of Title 14, Louisiana Revised Statutes, Sections 64 and 65; arson, in violation of Title 14, Louisiana Revised Statute, Section 52; and the distribution and possession with the intent to distribute controlled substances, in violation of the laws of Louisiana (La. R.S. 40: 966, 967, and 979) and in violation of Federal Criminal Law (Title 21, United States Code, Sections 841, 846, and 843).

3. On or about December 24, 2007, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendant **WALTER CONLEY**, aka "Ike Neezy", and other known to the Grand Jury, did commit an assault with a dangerous weapon upon L.W., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections

1959(a)(3) and 2.

COUNT 5

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

On or about December 24, 2007, in the Eastern District of Louisiana, the defendant, **WALTER CONLEY**, aka "Ike Neezy", and others known to the Grand Jury, did knowingly use, carry, brandish, and discharge several unknown firearms during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and to possess with the intent to distribute cocaine base, heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 6

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.
2. On or about July 9, 2008, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie" and **WALTER CONLEY**, aka "Ike Neezy", did commit an assault with a dangerous weapon, to wit; a firearm, during a drive-by shooting of C.M., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 37.1 and 24; all in violation of

Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 7

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

On or about July 9, 2008, in the Eastern District of Louisiana, the defendants, **BERNELL WILLIAMS**, aka "Bussy", and **WALTER CONLEY**, aka "Ike Neezy", did knowingly use, carry, brandish, and discharge several known firearms, to wit: Romarm 7.62 x 39mm assault rifle, serial number CP064671, and an Interarms 9mm pistol, serial number 1121663, and other unknown firearms including but not limited to a .40 caliber pistol, .223 caliber rifle, and a .45 caliber pistol, during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute cocaine base, heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 8

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.
2. On or about August 26, 2008, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **THERON GOLSTON**, aka "Thema", and

others, did commit an assault with a dangerous weapon, to wit; a firearm, upon L.D., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 9

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

On or about August 26, 2008, in the Eastern District of Louisiana, the defendant, **THERON GOLSTON**, aka "Thema", and others, did knowingly use, carry, brandish, and discharge an unknown make and model firearm, during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute cocaine base, heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 10

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.
2. On or about September 13, 2008, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **THERON GOLSTON**, aka "Thema", and others, did commit an assault with a dangerous weapon, to wit; a firearm, upon J.J., D.S. and

J.B., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 11

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

On or about September 13, 2008, in the Eastern District of Louisiana, the defendant, **THERON GOLSTON**, aka "Thema", and others, did knowingly use, carry, brandish, and discharge several known firearms, to wit: a Norinco, Model MAK90, 7.62 caliber rifle, serial number 9342623 and an unknown make and model firearm, during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute cocaine base, heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 12

(Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.
2. On or about September 14, 2008, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **WALTER CONLEY**, aka "Ike Neezy", did murder Paul May, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana

Revised Statute, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 13

(Causing Death Through the Use of a Firearm)

On or about September 14, 2008, in the Eastern District of Louisiana, the defendant, **WALTER CONLEY**, aka "Ike Neezy", did knowingly use and carry an Astra, Model A80, .45 caliber pistol, serial number J3650, during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and during and in relation to the commission of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack"), heroin, and marijuana, as set forth in Count 2 of this indictment which are both realleged and incorporated by reference herein, in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendant, with malice aforethought, did unlawfully kill Paul May, by shooting him with the firearm willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Section 924(j).

COUNT 14

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

On or about September 14, 2008, in the Eastern District of Louisiana, the defendants, **WALTER CONLEY**, aka "Ike Neezy", and others known to the Grand Jury, did knowingly possess several known firearms, to wit: an Intratec, Model Tec-9, 9mm pistol, serial number

26496; a Ruger, Model P95, 9mm pistol, serial number 316-43940; a Astra, Model A80, .45 caliber pistol, serial number J3650; an Armalite, Model M15, .223 caliber rifle, serial number US112179; and a Norinco, Model MAK90, 7.62 caliber rifle, serial number 9342623; in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to possess with the intent to distribute cocaine base (“crack”), heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 15

(Possession of a Firearm by Person Under Indictment)

On or about November 21, 2008, in the Eastern District of Louisiana, the defendant, **TYRONNE STEVENSON**, aka “Duke”, who was then under indictment for a crime punishable by imprisonment for a term exceeding one year, to wit: a Bill of Information filed on July 9, 2008, in Orleans Parish Criminal District Court, Case No. 479-298 “B”, for distribution of crack cocaine, in violation of LA. R.S. 40:967, did willfully receive a firearm, to wit: a CZ, Model CZ2075 RAMI, .40 caliber pistol, serial number A042161, that was shipped and transported in interstate commerce; all in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

COUNT 16

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

On or about February 13, 2009, in the Eastern District of Louisiana, the defendants, **TYRONNE STEVENSON**, aka “Duke”, **BERNELL WILLIAMS**, aka “Bussy”, and

WALTER CONLEY, aka "Ike Neezy", did knowingly possess several known firearms, to wit: an Taurus, Model Millenium Pro 140, .40 caliber pistol, serial number SYC72039; a Glock, Model 23, .40 caliber pistol, serial number GVV943; and a Jimenez Arms, Model JA-9, 9mm pistol, serial number 002772; in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d), as charged in Count 1; and in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and possess with the intent to distribute cocaine base ("crack"), heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 17

(Possession of a Firearm by Person Under Indictment)

On or about February 13, 2009, in the Eastern District of Louisiana, the defendant, **TYRONNE STEVENSON**, aka "Duke", who was then under indictment for a crime punishable by imprisonment for a term exceeding one year, to wit: a Bill of Information filed on July 9, 2008, in Orleans Parish Criminal District Court, Case No. 479-298 "B", for distribution of crack cocaine, in violation of LA. R.S. 40:967; did willfully receive a firearm, to wit: a Glock, Model 23, .40 caliber pistol, serial number GVV943, that was shipped and transported in interstate commerce; all in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

COUNT 18

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.

2. On or about March 17, 2009, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **TYRONNE STEVENSON**, aka "Duke", and **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", did commit an assault with a dangerous weapon upon J.G., D.H. and S.R., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections, 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 19

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

On or about March 17, 2009, in the Eastern District of Louisiana, the defendants, **TYRONNE STEVENSON**, aka "Duke", and **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", did knowingly use, carry and discharge several unknown firearms, to wit: an .40 caliber semi-automatic handgun and a 9mm semi-automatic handgun; during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and possess with the intent to distribute cocaine base ("crack"), heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 20

(Possession of a Firearm by Person Under Indictment)

On or about March 17, 2009, in the Eastern District of Louisiana, the defendant, **TYRONNE STEVENSON**, aka "Duke", who was then under indictment for a crime punishable by imprisonment for a term exceeding one year, to wit: a Bill of Information filed on July 9, 2008, in Orleans Parish Criminal District Court, Case No. 479-298 "B", for distribution of crack cocaine, in violation of LA. R.S. 40:967, did willfully receive a firearm, to wit: a .40 caliber semi-automatic handgun and a 9mm semi-automatic handgun that was shipped and transported in interstate commerce; all in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

COUNT 21

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.
2. On or about April 10, 2009, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **TYRONNE STEVENSON**, aka "Duke", **THERON GOLSTON**, aka "Thema", and others known to the Grand Jury, did commit an assault with a dangerous weapon upon G.B., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections, 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 22

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

On or about April 10, 2009, in the Eastern District of Louisiana, the defendants, **TYRONNE STEVENSON**, aka "Duke", **THERON GOLSTON**, aka "Thema", and others known to the Grand Jury, did knowingly use, carry and discharge several unknown firearms, to wit: a 7.62 caliber semi-automatic assault rifle, and 9mm semi-automatic handgun; during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and possess with the intent to distribute cocaine base ('crack'), heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 23

(Possession of a Firearm by Person Under Indictment)

On or about April 10, 2009, in the Eastern District of Louisiana, the defendant, **TYRONNE STEVENSON**, aka "Duke", who was then under indictment for a crime punishable by imprisonment for a term exceeding one year, to wit: a Bill of Information filed on July 9, 2008, in Orleans Parish Criminal District Court, Case No. 479-298 "B", for distribution of crack cocaine, in violation of LA. R.S. 40:967, did willfully receive a firearm, to wit: a 7.62 caliber semi-automatic assault rifle and a 9mm semi-automatic handgun that was shipped and transported in interstate commerce; all in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

COUNT 24
(Carjacking)

On or about January 15, 2010, in the Eastern District of Louisiana, the defendant, **WALTER CONLEY**, aka "Ike Neezy", with the intent to cause death or serious bodily harm, took a motor vehicle; to wit, a 2005 Suzuki Forenza bearing Louisiana license plate number NHN004, that had been transported, shipped, and received in interstate commerce, from the person and presence of another by force and violence and by intimidation, in violation of Title 18, United States Code, Section 2119.

COUNT 25
(Discharge of a Firearm During the Commission of a Crime of Violence)

On or about January 15, 2010, in the Eastern District of Louisiana, the defendant, **WALTER CONLEY**, aka "Ike Neezy", did knowingly use, carry, brandish, and discharge a firearm, to wit: an unknown make and model 9mm semi-automatic handgun, during and in relation to the commission of a crime of violence for which the defendant may be prosecuted in a court of the United States, to wit: carjacking as set forth in Count 24 of this indictment, in violation of Title 18, United States Code, Sections 924(c)(1).

COUNT 26
(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.
2. On or about June 13, 2010, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **THERON GOLSTON**, aka "Thema", and

others known to the Grand Jury, did commit an assault with a dangerous weapon upon G.B., in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised Statute, Sections, 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 27

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

On or about June 13, 2010, in the Eastern District of Louisiana, the defendant **THERON GOLSTON**, aka "Thema", and others known to the Grand Jury, did knowingly use, carry and discharge two firearms, to wit: 9mm semi-automatic handguns; during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: conspiracy to distribute and possess with the intent to distribute cocaine base ("crack"), heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 28

(Assault with a Dangerous Weapon in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.
2. On or about June 13, 2010, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendant, **MARK GLENN**, did commit an assault with a dangerous weapon upon G.B., in violation of the laws of the State of Louisiana, that is Title 14,

Louisiana Revised Statute, Sections, 37.4 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2.

COUNT 29

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

On or about June 13, 2010, in the Eastern District of Louisiana, the defendant, **MARK GLENN**, did knowingly use, carry and discharge a firearm, to wit: a 9mm semi-automatic handgun; during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: conspiracy to distribute and possess with the intent to distribute cocaine base ("crack"), heroin, and marijuana, in violation of Title 21, United States Code, Section 846, as charged in Count 2; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 30

(Murder in Aid of Racketeering)

1. Paragraphs 1 and 2 of Count 4 are realleged and incorporated by reference as though fully set forth herein.
2. On or about June 14, 2010, in the Eastern District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in the enterprise, an enterprise engaged in racketeering activity, the defendants, **THERON GOLSTON**, aka "Thema" and **NORMAN RATCLIFF**, aka "Turk", and others known to the Grand Jury, did murder Eula May Ivey, in violation of the laws of the State of Louisiana, that is Title 14, Louisiana Revised

Statute, Sections 30.1 and 24; all in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT 31

(Causing Death Through the Use of a Firearm)

On or about June 14, 2010, in the Eastern District of Louisiana, the defendants, **THERON GOLSTON**, aka "Thema" and **NORMAN RATCLIFF**, aka "Turk", and others known to the Grand Jury, did knowingly use and carry firearms, during and in relation to, and in furtherance of a federal crime of violence, to wit: conspiracy to violate RICO, in violation of Title 18, United States Code, Section 1962(d) as charged in Count 1; and during and in relation to the commission of a drug trafficking crime for which they may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack"), heroin, and marijuana, as set forth in Count 2 of this indictment which are realleged and incorporated by reference herein, in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder as defined in Title 18, United States Code, Section 1111, in that the defendants, with malice aforethought, did unlawfully kill Eula Mae Ivey, by shooting her with the firearm willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Sections 924(j) and 2.

COUNT 32

(Possession with Intent to Distribute a Controlled Substance)

On or about April 3, 2011, in the Eastern District of Louisiana, the defendant, **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", did knowingly and intentionally

possess with the intent to distribute a quantity of heroin, a Schedule I drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 33

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

On or about April 3, 2011, in the Eastern District of Louisiana, the defendant, **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", did knowingly possess a firearm, to wit: a Smith and Wesson, Model SW40VE, .40 caliber pistol, serial number RAT4637, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: possess with the intent to distribute a quantity of heroin, a Schedule I drug controlled substance; in violation of Title 21, United States Code, Section 841(a)(1); all in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT 34

(Felon in Possession of a Firearm)

On or about April 3, 2011, in the Eastern District of Louisiana, the defendant, **BERNELL WILLIAMS**, aka "Bussy", aka "A-Boogie", having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a plea of guilty on December 2, 2009, in the Criminal District Court for the Parish of Orleans, State of Louisiana, under case number 490-374 J/B, for Illegal Use of a Weapon, in violation of LA. R.S. 14:94, did knowingly possess in and affecting interstate commerce a firearm, to wit: a Smith and Wesson, Model SW40VE, .40 caliber pistol, serial number RAT4637; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF SPECIAL FINDINGS

1. The Grand Jury incorporates by reference and realleges the allegations contained in Counts 12, 13, 30 and 31 and makes the following special findings:
2. As to Counts 12, 13, 30 and 31 defendants **WALTER CONLEY**, aka "Ike Neezy," **THERON GOLSTON**, aka "Thema" and **NORMAN RATCLIFF**, aka "Turk",
 - a. were 18 years or older at the time of the offenses for which they were charged;
 - b. **WALTER CONLEY** intentionally killed Paul May (18 U.S.C. § 3591(a)(2)(A));
 - c. **THERON GOLSTON** and **NORMAN RATCLIFF** intentionally killed Eula Ivey (18 U.S.C. § 3591(a)(2)(A));
 - d. **WALTER CONLEY** intentionally inflicted serious bodily injury that resulted in the death of Paul May and **THERON GOLSTON** and **NORMAN RATCLIFF** intentionally inflicted serious bodily injury that resulted in the death of Eula May Ivey (18 U.S.C. § 3591(a)(2)(B));
 - e. **WALTER CONLEY** intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Paul May would die as a direct result of such act or acts and **THERON GOLSTON** and **NORMAN RATCLIFF** intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense and Eula May Ivey would die as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));

- f. **WALTER CONLEY** intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Paul May died as a direct result of such act or acts; **THERON GOLSTON** and **NORMAN RATCLIFF** intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Eula May Ivey died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D)).

NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 1, 2, and 32 of this Second Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offenses alleged in 1, 2, and 32 the defendants, **TYRONNE STEVENSON**, aka "Duke", **THERON GOLSTON**, aka "Thema", **BERNELL WILLIAMS** aka "Bussy", **WALTER CONLEY**, aka "Ike Neezy" and **NORMAN RATCLIFF**, aka "Turk", and **MARK GLENN**, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in 1, 2, and 32 of this Indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendants:

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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

NOTICE OF GUN FORFEITURE

1. The allegations of Counts 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, and 34 of this Second Superseding Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 924 (d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 1, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 33, and 34, the defendants, **TYRONNE STEVENSON**, aka "Duke", **THERON GOLSTON**, aka "Thema", **BERNELL WILLIAMS** aka "Bussy", **WALTER CONLEY**, aka "Ike Neezy", **NORMAN RATCLIFF**, aka "Turk", and **MARK GLENN** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461, any firearm or ammunition, which was involved in or used in a knowing violation of Title 18, United States Code, Section 924(c)(1)(A).

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;


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

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

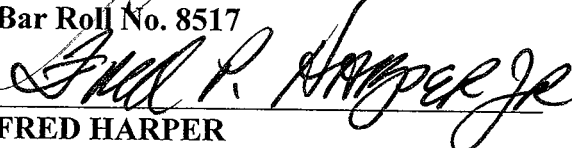
All in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(d)(1).

A TRUE BILL:

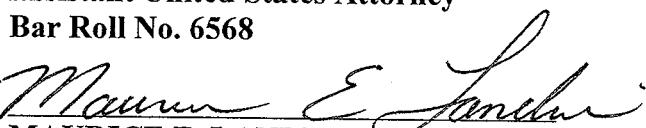
FOREPERSON



JIM LETTEN
UNITED STATES ATTORNEY
Bar Roll No. 8517



FRED HARPER
Chief, Criminal Division
Assistant United States Attorney
Bar Roll No. 6568



MAURICE E. LANDRIEU, JR
Assistant United States Attorney
Bar Roll No. 22104

New Orleans, Louisiana
November 16, 2012