

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

# FELONY

THIRD SUPERSEDING INDICTMENT FOR VIOLATIONS OF THE RACKETEER  
INFLUENCED CORRUPT ORGANIZATION ACT, THE VIOLENT CRIME IN AID OF  
RACKETEERING ACT, THE FEDERAL GUN CONTROL ACT, CONTROLLED  
SUBSTANCES ACT, AND OBSTRUCTION OF JUSTICE

UNITED STATES OF AMERICA

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CRIMINAL DOCKET NO. 10-329

v.

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SECTION: "F"(5)

MELVIN HUDSON

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VIOLATIONS:

18 U.S.C. § 1962(d)

a/k/a "Kane"

18 U.S.C. §1959(a)(1)

a/k/a "Keenan"

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18 U.S.C. § 1519

JERMAINE HUDSON

18 U.S.C. § 924(n)

a/k/a "Fresh"

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18 U.S.C. § 924(o)

TRAVIS HUDSON

18 U.S.C. § 924(j)

MOSES LAWSON

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18 U.S.C. § 924(c)(1)

a/k/a "Moes"

18 U.S.C. § 922(g)(1)

MONTERIO WIGGINS

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18 U.S.C. § 922(a)(6)

a/k/a "Peedy"

21 U.S.C. § 841(a)(1)

RODERICK WIGGINS

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21 U.S.C. § 841(b)(1)(A)

a/k/a "Chucky"

21 U.S.C. § 841(b)(1)(C)

a/k/a "Donald Carson"

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21 U.S.C. § 841(b)(1)(D)

DANTE CARSON

21 U.S.C. § 846

a/k/a "Tae"

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18 U.S.C. § 2

DWIGHT CARSON

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a/k/a "Cooby"

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TOREY RICHARDSON

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a/k/a "Toe-Toe"

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TEDRICK REYNARD

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SHAYNE LEBLANC

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AKAI SULLIVAN

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**The Grand Jury charges that:**

**GENERAL ALLEGATIONS**

1. The “Harvey Hustlers” originated in the Harvey area of Jefferson Parish, Louisiana in the mid-1980s. Members of the organization “hustled” meaning they distributed illegal narcotics. The original goal of the Harvey Hustlers was to make money from the sale of illegal narcotics.

2. The “Murder Squad,” also referred to as “MS”, is a neighborhood group composed primarily of individuals residing in the Harvey area of Jefferson Parish, Louisiana. The Murder Squad (“MS”) is a faction of and part of the Harvey Hustlers organization. While they primarily operate on the Westbank of Jefferson Parish, members would conduct business in other parts of the Eastern District of Louisiana.

3. As time progressed, various members of the original Harvey Hustlers were arrested and/or imprisoned. Eventually, other members of the Harvey Hustlers took over in the early 2000s. The organization and it’s members sought to make money through the distribution of illegal narcotics, primarily cocaine hydrochloride (cocaine) and cocaine base (crack) and used violence to protect its turf. An unindicted co-conspirator hereinafter referred to as “D.W.” led the organization beginning in the early 2000s. D.W. was the son of an original Harvey Hustler. D.W. provided his drug and money connections to the organization. D.W. maintained control over how drugs were distributed in the area and used other Harvey Hustler members as “muscle” for the organization to commit violent acts within the community.

4. Sometime in the late 2000s, several Harvey Hustler members disagreed with how D.W. ran the organization and formed the Murder Squad. The Murder Squad faction was not only interested in selling drugs, but also interested in committing acts of violence within the

community. Despite their differences, the Murder Squad was dependant on the Harvey Hustlers for the majority of its drug and money supply, and in essence, the Murder Squad became the enforcement faction of the Harvey Hustlers.

5. At all times relevant to this Third Superseding Indictment, the following defendants were members of the Murder Squad faction of the Harvey Hustlers: **MELVIN HUDSON, a/k/a “Kane” a/ka “Keenan,” JERMAINE HUDSON, a/k/a “Fresh,” TRAVIS HUDSON, MOSES LAWSON, a/k/a “Moes,” MONTERIO WIGGINS, a/k/a “Peedy,” RODERICK WIGGINS, a/k/a “Chucky,” a/k/a “Donald Carson,” DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Coobie,” and TOREY RICHARDSON, a/k/a “Toe.”**

6. At all relevant times to this Third Superseding Indictment, members of the Murder Squad faction from time to time signified their membership by wearing tattoos reading “MS”. Some Murder Squad faction members also wore “Harvey Hustler” or “HH” tattoos.

### **COUNT 1**

#### **(Conspiracy to Participate in a Racketeering (RICO) Enterprise)**

##### **The Racketeering Enterprise**

7. Paragraphs one through six are hereby realleged and incorporated as if fully set forth herein.

8. At all times relevant to this Third Superseding Indictment, the Harvey Hustlers, including its Murder Squad faction, (hereinafter “Harvey Hustlers/Murder Squad”) is a criminal organization whose members and associates engaged in, among other things, conspiracy to distribute and possess with intent to distribute controlled substances, distribution and possession with intent to distribute controlled substances, use of communication facilities to distribute controlled substances, murder, attempted murder, kidnaping, robbery, and obstruction of justice.

The Murder Squad faction members committed acts of violence to maintain membership and discipline within the organization and to cause fear and compliance with individuals outside the organization. Participation in criminal activity by a member, particularly violent acts directed at rival individuals or as directed by the organization's leadership, increased the respect accorded to that member, sometimes resulting in that member maintaining or increasing his position in the organization.

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

#### **Purposes of the Enterprise**

10. The purposes of the enterprise included but are not limited to:
- a. Enriching the members and associates of the enterprise through, among other things, the control of and participation in the 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, assault, robbery and murder;
  - c. Preserving and protecting the power, territory and profits of the enterprise through the use of intimidation, violence, threats of violence, assault, kidnapping 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 of the enterprise, including those who were incarcerated for committing acts of violence, robbery, distribution of controlled substances and other offenses; and

g. Providing assistance to members of the enterprise who committed crimes for and on behalf of the enterprise in order to hinder, obstruct and prevent law enforcement officers from identifying the offender or offenders, apprehending the offender or offenders, and prosecuting and punishing the offender or offenders.

#### **Means and Methods of the Enterprise**

11. 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 committed, attempted and threatened to commit acts of violence, including murder and robbery, to protect and expand the criminal operations of the enterprise.

b. Members of the enterprise and their associates promoted a climate of fear through violence and threats of violence. Members threatened victims who owed them money and/or acted disrespectfully towards them. They retaliated against people who tried to move into their territory and take business away from them. Members threw bricks through windows, shot at cars and houses, and made threatening phone calls to victims in order to deter their cooperation with law enforcement. Victims' family members have been threatened by members who told

them they were going to kill their entire family for cooperating with police.

c. Members of the enterprise and their associates used and threatened to use physical violence against various individuals. Victims, including, but not limited to, girlfriends, wives, mothers and other associates of the members, have been physically beat, cut, tied up, shot at and murdered.

d. Members of the enterprise and their associates engaged in the distribution of controlled substances as a means to generate income. Members have been arrested repeatedly with crack cocaine, marijuana, ecstasy and heroin. In several instances members who were stopped by police would be in possession of narcotics packaged for distribution, as well as large sums of cash that could not be accounted for by legal employment. Members have had search warrants executed on their residences, where various quantities of illegal narcotics have been recovered.

e. Members of the enterprise possessed and utilized firearms to prevent competition from other drug dealers in and around the geographic area used and controlled by the enterprise.

f. Members of the enterprise possessed and utilized firearms in order to protect their business of distributing controlled substances. Members carried weapons whenever possible. Most members are convicted felons and, therefore prohibited from carrying a firearm.

g. Members of the enterprise utilized firearms to maintain and advance the goals of the enterprise.

h. Members of the enterprise purchased, maintained and circulated a collection of firearms for use in criminal activity by the enterprise members. Members who could not legally buy firearms would steal and/or trade firearms for drugs. Members also enlisted the use of straw purchasers. A girlfriend/sister/friend of a member would be asked to go to pawn shops and/or

gun shows and purchase weapons and ammunition for the organization. Members would then tell the straw purchaser to report the firearm stolen. Members often passed guns around after they were used. Members also “held” on to guns for other members by storing them in attics, backyards or family member’s houses that were not seen as targets to law enforcement. According to the National Integrated Ballistic Information Network, some firearms the Harvey Hustlers /Murder Squad had acquired were used several times before they were recovered. Several firearms that were associated with crimes still remain on the street.

### The RICO Conspiracy

12. Beginning on a date unknown to the Grand Jury, but prior to April 2004, and continuing to the date of this Third Superseding Indictment, in the Eastern District of Louisiana and elsewhere, defendants **MELVIN HUDSON, a/k/a “Kane” a/ka “Keenan,” JERMAINE HUDSON, a/k/a “Fresh,” TRAVIS HUDSON, MOSES LAWSON, a/k/a “Moes,” MONTERIO WIGGINS, a/k/a “Peedy,” RODERICK WIGGINS, a/k/a “Chucky,” a/k/a “Donald Carson,” DANTE CARSON, a/k/a “Tac,” DWIGHT CARSON, a/k/a “Coobie,” TOREY RICHARDSON, a/k/a “Toe,” and TEDRICK REYNARD** and others known and unknown to the Grand Jury, each being persons employed by and associated with the criminal enterprise known as “Harvey Hustlers/Murder Squad” as more fully described in paragraphs 1 through 6 of the General Allegations, and paragraphs 8 through 11 of this Count, which are realleged and incorporated herein, which enterprise was engaged in, and the activities of which affected, interstate and foreign commerce, did knowingly and intentionally combine, conspire, confederate, and agree 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 murder and robbery chargeable under the following provisions of state law:

a. Murder, in violation of Title 14, Louisiana Revised Statutes, Sections 24 (Principals), 26 (Criminal Conspiracy), 27 (Attempt), and 30.1(A)(1) (Second Degree Murder);

b. Robbery, in violation of Title 14, Louisiana Revised Statute, Section 64; and multiple acts involving narcotics trafficking in violation of the following federal statutes:

c. 21 U.S.C. § 846 (Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances-cocaine base, cocaine hydrochloride, heroin, and marijuana); and

d. 21 U.S.C. § 841(a)(1) (Distribution and Possession with Intent to Distribute cocaine base, cocaine hydrochloride, heroin, and marijuana).

13. It was further a 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.

### **ROLES OF THE DEFENDANTS**

14. The defendants agreed that a conspirator would participate in the operation and management of the enterprise.

At all times material to this Third Superseding Indictment:

15. The defendant, **JERMAINE HUDSON, a/k/a “Fresh,”** and his brothers, defendants **MELVIN HUDSON, a/k/a “Kane,” a/k/a “Keenan,”** and **TRAVIS HUDSON** were ranking members (lieutenants) of the Harvey Hustlers. D.W. was the highest ranking member of the Harvey Hustlers until his death in September 2010.



16. The defendant **MELVIN HUDSON, a/k/a “Kane,” a/k/a “Keenan,”** was an “enforcer” or “head buster” for D.W. **MELVIN HUDSON, a/k/a “Kane,” a/k/a “Keenan,” JERMAINE HUDSON, a/k/a “Fresh,”** and **TRAVIS HUDSON, a/k/a “Trap,”** distributed narcotics to lower ranking members of the Harvey Hustlers. **JERMAINE HUDSON, a/k/a “Fresh,”** and **MELVIN HUDSON, a/k/a “Kane,” a/k/a “Keenan,”** also recruited other gang members to participate in murders in order to be accepted into the “Murder Squad,” the enforcement side of the Harvey Hustlers. In September 2010, D.W. was murdered. **JERMAINE HUDSON, a/k/a “Fresh,”** and **MELVIN HUDSON, a/k/a “Kane,” a/k/a “Keenan,”** succeeded D.W., as the leaders of the organization.

17. The defendants **DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Coobie,” MOSES LAWSON, a/k/a “Moes,” MONTERIO WIGGINS, a/k/a “Peedy,” RODERICK WIGGINS, a/k/a “Chucky,” a/k/a “Donald Carson,” TOREY RICHARDSON, a/k/a “Toe,”** and **TEDRICK REYNARD** were soldiers in the organization and responsible for street level distribution of narcotics and acquisition of firearms.

18. In order to maintain Murder Squad status, members of the Murder Squad, which included **MELVIN HUDSON, a/k/a “Kane” a/ka “Keenan,” JERMAINE HUDSON, “Fresh,” TRAVIS HUDSON, a/k/a “Trap,” MOSES LAWSON, a/k/a “Moes,” MONTERIO WIGGINS, a/k/a “Peedy,” RODERICK WIGGINS, a/k/a “Chucky,” a/k/a “Donald Carson,” DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Coobie,”** and **TOREY RICHARDSON, a/k/a “Toe”** were expected to participate in the following gang activity: intimidate other gangs and/or individuals who tried to sell narcotics in Harvey, LA, collect drug debts, threaten and/or intimidate potential or actual witnesses and their family

members who were suspected of cooperating with law enforcement, and to assist other Murder Squad gang members in robberies and shootings.

### OVERT ACTS

19. In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, defendants **MELVIN HUDSON, a/k/a “Kane” a/ka “Keenan,” JERMAINE HUDSON, a/k/a “Fresh,” TRAVIS HUDSON, MOSES LAWSON, a/k/a “Moes,” MONTERIO WIGGINS, a/k/a “Peedy,” RODERICK WIGGINS, a/k/a “Chucky,” a/k/a “Donald Carson,” DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Coobie,” TOREY RICHARDSON, a/k/a “Toe,” TEDRICK REYNARD** 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 and elsewhere, including but not limited to the following:

- (1) On October 30, 2003, defendant Melvin Hudson was arrested for attempted First Degree Murder of a Police Officer and Possession of Cocaine.
- (2) On or about April 21, 2004, defendant Moses Lawson possessed a quantity of marijuana.
- (3) On or about March 25, 2005, defendant Moses Lawson possessed a quantity of cocaine base (crack cocaine)(6.1 grams) and a firearm.
- (4) On or about January 11, 2006, defendant Moses Lawson and B.C. possessed a quantity of marijuana.
- (5) On or about February 24, 2006, defendant Moses Lawson shot T.N.
- (6) On or about April 7, 2006, defendant Jermaine Hudson assaulted S.B.
- (7) On or about May 16, 2006, defendant Tedrick Reynard possessed a quantity of

marijuana, crack cocaine, and a small metal scale.

- (8) On or about January 13, 2007, defendant Melvin Hudson assaulted C.W.
- (9) On or about February 15, 2007, defendant Jermaine Hudson assaulted David C. Green, Sr., a Jefferson Parish law enforcement officer.
- (10) On or about April 24, 2007, defendant Jermaine Hudson possessed a quantity of cocaine base (crack cocaine) (46.3 grams).
- (11) On or about April 27, 2007, defendant Dwight Carson possessed a quantity of cocaine base (crack cocaine), marijuana, and a firearm.
- (12) On or about May 17, 2007, defendant Jermaine Hudson exited 1161 Clydesbank, Apt. A and sold 1 gram of crack cocaine for \$70 in United States currency.
- (13) On or about May 17, 2007, defendant Jermaine Hudson possessed \$695.00 in United States currency at the time of his arrest.
- (14) On or about November 14 and 15, 2007, defendant Melvin Hudson threatened his neighbor, J.T., for calling the police.
- (15) On or about March 16, 2008, defendant Monterio Wiggins possessed a firearm and robbed E.W. of her cell phone.
- (16) On or about March 26, 2008, defendant Melvin Hudson fled from 1248 Aberdeen, Apt. A.
- (17) On or about March 26, 2008, defendants Tedrick Reynard, Travis Hudson, and others were found hiding inside 1248 Aberdeen, Apt. A. Inside the residence, law enforcement officials located a quantity of cocaine base (crack cocaine)(5.92 ounces), a quantity of marijuana (2.92 ounces), three firearms, and \$2,590.00 in United States currency.

- (18) On May 5, 2008, defendant Moses Lawson distributed and possessed a quantity of cocaine base (crack cocaine)(2.5 grams).
- (19) On May 5, 2008, defendant Moses Lawson provided a false name to law enforcement officers.
- (20) On or about September 5, 2008, defendant Travis Hudson assaulted a law enforcement officer.
- (21) On or about October 3, 2008, defendant Melvin Hudson possessed firearms within 1248 Aberdeen Dr., Apt. B.
- (22) On or about October 3, 2008, defendant Melvin Hudson admitted that he sold a quantity of cocaine base (crack cocaine) to D.A. earlier in the day outside 1248 Aberdeen Dr., Apt. B.
- (23) On or about October 3, 2008, defendant Melvin Hudson possessed a quantity of cocaine hydrochloride (14.2 grams), and 40 individual foils and 1 clear bag of heroin (10.3 grams).
- (24) On or about October 10, 2008, defendant Tedrick Reynard drove a vehicle containing two firearms and crack cocaine (1 gram). K.J., T.S., K.R., and J.H. were also inside the vehicle.
- (25) On or about October 28, 2008, defendant Travis Hudson stated during a jail house telephone conversation that he possessed and kept a .40 caliber semi-automatic pistol on defendant Melvin Hudson's behalf.
- (26) On or about October 30, 2008, Akai Sullivan paid K.N. \$900 in United States currency to alter a leasing agreement between defendant Melvin Hudson and K.N.

- (27) On or about November 4, 2008, defendant Melvin Hudson called E.L. from jail. E.L. stated that, "he was holding it down for the double H gang."
- (28) On or about November 7, 2008, defendant Melvin Hudson spoke with Tim LNU from jail. Tim stated to Hudson that the hood was not the same without him and that the BGs were still holding it down.
- (29) On or about November 8, 2008, defendant Melvin Hudson spoke with E.L. from jail. E.L. explained that (D. W.) supposedly shot 'Lil Rod' and paralyzed him. Melvin Hudson stated that he was "certified" and he would have walked up on that boy.
- (30) On or about November 8, 2008, defendant Melvin Hudson spoke with Courtney Faulkner, Jr. a/k/a 'Cort'. Cort stated that D.W. felt that Cort, defendant Tedrick Reynard and "Buck" were acting like a click. Melvin Hudson mentioned 'MS.'
- (31) On November 20, 2008, defendant Melvin Hudson made a jail house call to Akai Sullivan from jail who in turn called defendant Tedrick Reynard. Tedrick explained how Courtney Faulkner, Jr. and "Buck" were robbed by defendant Torey Richardson a/k/a "Toe-Toe."
- (32) On November 20, 2008, defendant Melvin Hudson talked to Courtney Faulkner, Jr. from jail about the robbery.
- (33) On or about November 23, 2008, Akai Sullivan agreed to retrieve a .40 caliber semi-automatic pistol from defendant Travis Hudson on defendant Melvin Hudson's behalf.
- (34) On or about December 14, 2008, defendant Melvin Hudson spoke with Courtney Faulkner, Jr. from jail. Faulkner explained how he was with Todd, Buck and

Torey. Todd was getting a MS tattoo.

- (35) On or about December 16, 2008, defendant Monterio Wiggins possessed a firearm with an obliterated serial number.
- (36) On or about December 16, 2008, defendant Torey Richardson possessed a firearm, and a quantity of cocaine base (crack cocaine)(.93 grams).
- (37) On or about April 11, 2009, defendants Dante Carson, Dwight Carson and Roderick Wiggins were riding in a car together.
- (38) On or about April 11, 2009, defendant Roderick Wiggins possessed a firearm and a quantity of marijuana.
- (39) On or about April 11, 2009, defendants Dwight Carson and Dante Carson possessed a firearm and quantity of marijuana.
- (40) On or about June 15, 2009, defendant Tedrick Reynard was arrested with B.G., D.G., and some juveniles on suspicion of gambling.
- (41) On or about August 3, 2009, defendants Torey Richardson, Roderick Wiggins and others robbed Byron Henderson, Brian Williams and Troy Paul.
- (42) On or about August 3, 2009, defendants Torey Richardson, Roderick Wiggins and others possessed firearms.
- (43) On or about September 4, 2009, defendant Tedrick Reynard possessed a quantity of crack cocaine.
- (44) On or about February 15, 2010, K.H. purchased a firearm.
- (45) On or about March 6, 2010, K.H. reported the firearm stolen at the request of defendants Moses Lawson, Monterio Wiggins, Dante Carson, and Roderick Wiggins.

- (46) On or about March 11, 2010, defendants Dante Carson, Dwight Carson, Moses Lawson, Monterio Wiggins and Roderick Wiggins were riding in a car together.
- (47) On or about March 11, 2010, defendant Roderick Wiggins possessed a firearm, a quantity of cocaine base (crack cocaine)(2.26 grams), and \$190.00 in United States currency.
- (48) On or about March 11, 2010, defendant Dwight Carson possessed a firearm, a quantity of cocaine base (crack cocaine)(3.31 grams), benzylpiperazine (a Schedule 1 drug controlled substance), and \$219.00 in United States currency.
- (49) On or about March 11, 2010, defendant Moses Lawson possessed a quantity of benzylpiperazine, a Schedule 1 drug controlled substance.
- (50) On or about March 16, 2010, defendant Melvin Hudson was a passenger in a vehicle driven by E.L. that contained a firearm. E.L. claimed ownership of the firearm.
- (51) On or about March 26, 2010, C.F. conspired with defendants Dante Carson and Dwight Carson to illegally purchase a firearm.
- (52) On or about March 29, 2010, defendant Travis Hudson and T.J. possessed a quantity of cocaine hydrochloride.
- (53) On or about March 30, 2010, C.F. conspired with defendants Dante Carson and Dwight Carson to illegally purchase two firearms.
- (54) In 2010 but on or before April 1, 2010, C.F. witnessed as defendants Monterio Wiggins, Moses Lawson, Dante Carson, and Dwight Carson attempted several times to collect a drug debt from Reginald Francois.

- (55) On or about a date unknown but prior to April 1, 2010, defendants Monterio Wiggins, Moses Lawson, Dante Carson and Dwight Carson threatened to kill Reginald Francois.
- (56) On or about April 1, 2010, defendants Dante Carson, Dwight Carson, Moses Lawson and Monterio Wiggins rode in a car together.
- (57) On or about April 1, 2010, defendants Monterio Wiggins, Moses Lawson, Dante Carson, and Dwight Carson each possessed a firearm.
- (58) On or about April 1, 2010, defendant Dante Carson and Monterio Wiggins shot and killed Reginald Francois.
- (59) On or about April 3, 2010, defendants Dante Carson and Dwight Carson were passengers in a car driven by C.F.
- (60) On or about April 3, 2010, defendant Dante Carson possessed a quantity of marijuana.
- (61) On or about April 19, 2010, defendants Monterio Wiggins and Moses Lawson fled to Texas after the murder of Reginald Francois. Both were subsequently arrested in Texas by the United States Marshal's Service.
- (62) On or about June 28, 2010, defendant Jermaine Hudson assaulted S.H.
- (63) On or about August 9, 2010, defendant Torey Richardson possessed a firearm and a quantity of crack cocaine.
- (64) On or about August 15, 2010, defendant Melvin Hudson possessed a firearm, \$1,174.00 in United States currency and possessed a quantity cocaine base (crack cocaine).



- (65) On or about August 15, 2010, defendant Melvin Hudson resisted arrest by committing a battery on a Jefferson Parish law enforcement officer.
- (66) On or about August 25, 2010, defendants Dwight Carson and Monterio Wiggins were riding in a car together.
- (67) On or about August 25, 2010, defendant Monterio Wiggins possessed a quantity of cocaine base (crack cocaine)(1.2 grams).
- (68) On or about August 25, 2010, defendant Dwight Carson possessed a quantity of cocaine base (crack cocaine)(2.8 grams) and \$900.00 in United States currency.
- (69) On or about September 27, 2010, defendant Jermaine Hudson fled from the scene of a traffic stop.
- (70) On or about September 27, 2010, defendant Jermaine Hudson identified himself to law enforcement officers with the false name of “Josh Hustler.”
- (71) On or about September 27, 2010, defendant Jermaine Hudson possessed a firearm.
- (72) On or about November 3, 2010, a caller named “Bam” asked defendant Melvin Hudson if he was straight. Melvin responded “no”.
- (73) On or about November 3, 2010, defendant Melvin Hudson called “Dank’s” residence and left a message.
- (74) On or about November 3, 2010, E.L. called defendant Melvin Hudson and instructed him to keep an eye on the camera because he was informed that three undercover cars were headed his way.
- (75) On or about November 3, 2010, defendant Melvin Hudson called an unknown male and stated that he was about to come over to get his “banger.”

- (76) On or about November 4, 2010, defendant Melvin Hudson explained to an unknown female that he was in the kitchen. Melvin Hudson inferred that he was not on the Westbank.
- (77) On or about November 4, 2010, defendant Melvin Hudson called an unknown female "Steph" and indicated that he was on his way.
- (78) On or about November 4, 2010, defendant Melvin Hudson instructed Akai Sullivan to buy him some bags.
- (79) On or about November 4, 2010, Akai Sullivan informed defendant Melvin Hudson that she had to go to the Family Dollar to purchase the bags.
- (80) On or about November 4, 2010, defendant Melvin Hudson stated that he was driving down Manhattan Blvd. The caller stated that she needed a "dollar."
- (81) On or about November 4, 2010, the female customer indicated that she was tired of waiting. Defendant Melvin Hudson stated that he stopped in Scottsdale and that he is on his way.
- (82) On or about November 4, 2010, defendant Melvin Hudson asked the female customer whether "them people been around?" The female customer said "no."
- (83) On or about November 4, 2010, defendant Melvin Hudson called an unknown male and informed him that he was back on line.
- (84) On or about November 6, 2010, an unknown female called and informed defendant Melvin Hudson that the Villa Boyz were in Caesar's last night. The female stated that Harvey Hustlers were "bucking" with their Hs (showing their Harvey Hustler signs).

- (85) On or about November 6, 2010, defendant Melvin Hudson spoke with ‘Dank.’ Dank asked about defendant Jermaine Hudson’s whereabouts.
- (86) On or about November 6, 2010, defendant Jermaine Hudson talked about retaliating against the Villa Boyz for how they spoke to the unknown female caller.
- (87) On or about November 6, 2010, defendant Melvin Hudson spoke to an unknown caller. Melvin Hudson stated to the unknown caller that the reason he (Melvin) went to jail earlier was because he “smacked the f\*\*\*” out of his partner’s nephew.
- (88) On or about November 6, 2010, defendant Melvin Hudson spoke with an unknown male and told him that he was doing some homework.
- (89) On or about December 15, 2010, defendant Monterio Wiggins possessed and fired an assault weapon at his mother and sister while he was under indictment for crack possession.
- (90) On or about February 17, 2011, defendant Moses Lawson possessed a firearm.
- (91) On or about May 1, 2011, defendant Monterio Wiggins committed an aggravated assault with a firearm against K.W.
- (92) On or about May 5, 2011, defendant Monterio Wiggins verbally threatened D.C.
- (93) On or about May 17, 2011, defendant Roderick Wiggins assaulted a Jefferson Parish law enforcement officer.
- (94) On or about June 25, 2011, defendant Dwight Carson discharged a firearm at C.F.
- (95) On or about September 7, 2011, defendant Roderick Wiggins drove a car with L.D., C.G., and M.J. as passengers that contained heroin and three firearms. Two

of the firearms were stolen.

- (96) On or about November 1, 2011, defendant Tedrick Reynard distributed cocaine base (crack cocaine).
- (97) On or about November 1, 2011, defendant Travis Hudson distributed cocaine base (crack cocaine).
- (98) On or about November 29, 2011, defendant Tedrick Reynard possessed a quantity of cocaine base (crack cocaine).

### SPECIAL SENTENCING ALLEGATIONS

**The Grand Jury further alleges that:**

20. Beginning on a date unknown, but prior to April 2004, and continuing to on or about the date of this Third Superseding Indictment, in the Eastern District of Louisiana and elsewhere, defendants **MELVIN HUDSON, a/k/a “Kane” a/ka “Keenan,” JERMAINE HUDSON, a/k/a “Fresh,” TRAVIS HUDSON, MOSES LAWSON, a/k/a “Moes,” MONTERIO WIGGINS, a/k/a “Peedy,” RODERICK WIGGINS, a/k/a “Chucky,” a/k/a “Donald Carson,” DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Coobie,” TOREY RICHARDSON, a/k/a “Toe,” TEDRICK REYNARD** and others known and unknown to the Grand Jury, combined, conspired, confederated, and agreed with each other to knowingly and intentionally distribute and possess with intent to distribute 280 grams or more of cocaine base (crack cocaine), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

21. Beginning on a date unknown, but prior to April 2004, and continuing to on or about the date of this Third Superseding Indictment, in the Eastern District of Louisiana and

elsewhere, defendants **MELVIN HUDSON, a/k/a “Kane” a/ka “Keenan,” JERMAINE HUDSON, a/k/a “Fresh,” TRAVIS HUDSON,** and others known and unknown to the Grand Jury, combined, conspired, confederated, and agreed with each other to knowingly and intentionally distribute and possess with intent to distribute five (5) kilograms or more of cocaine hydrochloride, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

22. On April 1, 2010, in the Eastern District of Louisiana and elsewhere, defendants **MONTERIO WIGGINS, a/k/a “Peedy,” DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Coobie,” and MOSES LAWSON, a/k/a “Moes”** committed an act involving murder, to wit, with the specific intent to kill or inflict great bodily harm, where they and others both known and unknown to the Grand Jury, did kill Reginald Francois, in violation of the laws of the State of Louisiana, Title 14, Louisiana Revised Statutes, Sections 30.1(A)(1) and 24.

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

## **COUNT 2**

(Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Base)

Beginning on a date unknown, but prior to April 2004, and continuing to the date of this Third Superseding Indictment, in the Eastern District of Louisiana and elsewhere, defendants **MELVIN HUDSON, a/k/a “Kane” a/ka “Keenan,” JERMAINE HUDSON, a/k/a “Fresh,” TRAVIS HUDSON, MOSES LAWSON, a/k/a “Moes,” MONTERIO WIGGINS, a/k/a “Peedy,” RODERICK WIGGINS, a/k/a “Chucky,” a/k/a “Donald Carson,” DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Coobie,” TOREY RICHARDSON,**

**a/k/a “Toe,” TEDRICK REYNARD, SHAYNE LEBLANC, AKAI SULLIVAN** and others known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute two-hundred and eighty (280) grams or more of cocaine base (“crack”), a Schedule II narcotic drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

**COUNT 3**

(Conspiracy to Distribute and Possess with Intent to Distribute Cocaine Hydrochloride)

Beginning on a date unknown, but prior to April 2004, and continuing to the date of this Third Superseding Indictment, in the Eastern District of Louisiana and elsewhere, defendants **MELVIN HUDSON, a/k/a “Kane” a/k/a “Keenan,” JERMAINE HUDSON, a/k/a “Fresh,” TRAVIS HUDSON,** and others known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute five (5) kilograms or more of cocaine hydrochloride, a Schedule II narcotic drug controlled substance in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

**COUNT 4**

(Conspiracy to Distribute and Possess with Intent to Distribute Marijuana)

Beginning on a date unknown, but prior to October 21, 2008, and continuing to January 24, 2009, in the Eastern District of Louisiana and elsewhere, defendant **MELVIN HUDSON,**

**a/k/a “Kane” a/ka “Keenan,”** and others known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute a quantity of marijuana, a Schedule I drug controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D); all in violation of Title 21, United States Code, Section 846.

**COUNT 5**

(Conspiracy to Possess Firearms)

Beginning on a date unknown, but before April 2004, and continuing to the date of this Third Superseding Indictment, in the Eastern District of Louisiana and elsewhere, defendants **MELVIN HUDSON, a/k/a “Kane” a/k/a “Keenan,” JERMAINE HUDSON, a/k/a “Fresh,” TRAVIS HUDSON, MOSES LAWSON, a/k/a “Moes,” MONTERIO WIGGINS, a/k/a “Peedy,” RODERICK WIGGINS, a/k/a “Chucky,” a/k/a “Donald Carson,” DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Coobie,” TOREY RICHARDSON, a/k/a “Toe,” TEDRICK REYNARD, AKAI SULLIVAN,** and other known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated and agreed with each other and with other persons known and unknown to the Grand Jury, during and in relation to a crime of violence and drug trafficking crimes, to use and carry firearms, and possess firearms in furtherance of a crime of violence and drug trafficking crimes as alleged in Counts 1 through 4, to wit: conspiracy to violate RICO and a conspiracy to distribute cocaine base (crack cocaine), cocaine hydrochloride, and marijuana; all in violation of Title 18, United States Code, Section 924(o).

**COUNT 6**  
(Obstruction of Justice)

Beginning on or about October 27, 2008, and continuing until on or about January 22, 2009, in the Eastern District of Louisiana, the defendants, **MELVIN HUDSON, a/k/a “Kane” a/k/a “Keenan,” AKAI SULLIVAN,** and K.N., did knowingly conceal, cover up, falsify, and make false entry in, a document with the intent to impede, obstruct, and influence the investigation and proper administration of violations of the Federal Gun Control and Controlled Substances Acts, matters within the jurisdiction of the Bureau of Alcohol, Tobacco, Firearms and Explosives and the Federal Bureau of Investigation, agencies of the United States, in violation of Title 18, United States Code, Sections 1519 and 2.

**COUNT 7**  
(Felon in Possession of a Firearm)

On or after February 15, 2010 but before April 1, 2010, in the Eastern District of Louisiana, the defendant, **MOSES LAWSON, a/k/a “Moes,”** having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a felony conviction on May 24, 2007, in the 24<sup>th</sup> Judicial District for the Parish of Jefferson, Docket No. 05-2224 “K”, for Attempted Possession of a CDS-cocaine while possessing a firearm, in violation of LA-R.S. 14(27)95(E), did knowingly possess in and affecting commerce, a firearm, to wit: a Smith and Wesson Model SW40VE, .40 caliber semi-automatic pistol, serial number PDY9711; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).



**COUNT 8**  
(Possession of a Stolen Firearm)

On or about March 6, 2010, in the Eastern District of Louisiana, the defendant **MOSES LAWSON, a/k/a "Moes,"** knowingly possessed a stolen firearm, to wit: a Smith and Wesson Model SW40VE, .40 caliber semi-automatic pistol, serial number PDY9711, which had been shipped and transported in interstate commerce, knowing and having reasonable cause to believe the firearm was stolen, in violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

**COUNT 9**  
(Aiding and Abetting in the Unlawful Acquisition of a Firearm)

On or about March 26, 2010, in the Eastern District of Louisiana, the defendants, **DANTE CARSON, a/k/a "Tae," and DWIGHT CARSON, a/k/a "Coobie,"** did aid, abet, counsel, command, induce, procure and willfully cause another person, C.F., to make a false statement and representation with respect to his acquisition of a firearm, to wit: a Ruger Model P95, 9 millimeter caliber semi-automatic pistol, serial number 316-02213, from Top Dollar Pawnshop, 51 Westbank Expwy., Gretna, Louisiana, a federally licensed firearms dealer, to make a false and fictitious written statement to Top Dollar Pawnshop, which statement was intended and likely to deceive Top Dollar Pawnshop, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that C.F. stated in the Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that C.F. was the actual buyer of the firearm, when in truth and in fact, C.F. was acquiring the firearm on behalf of defendants **DANTE CARSON, a/k/a "Tae," and DWIGHT CARSON, a/k/a "Coobie,"** in

violation of Title 18, United States Code, Sections 922(a)(6) and 2.

**COUNT 10**

(Aiding and Abetting in the Unlawful Acquisition of a Firearm)

On or about March 30, 2010, in the Eastern District of Louisiana, the defendants, **DANTE CARSON, a/k/a “Tae,” and DWIGHT CARSON, a/k/a “Coobie,”** did aid, abet, counsel, command, induce, procure and willfully cause another person, C.F., to make a false statement and representation with respect to his acquisition of a firearm, to wit: a Taurus International Model PT145 Pro, .45 caliber semi-automatic pistol, serial number NAS33397, from Cash America Pawn, 5901 Lapalco Blvd., Marrero, Louisiana, a federally licensed firearms dealer, to make a false and fictitious written statement to Cash America Pawn, which statement was intended and likely to deceive Cash America Pawn, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that C.F. stated in the Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that C.F. was the actual buyer of the firearm, when in truth and in fact, C.F. was acquiring the firearm on behalf of defendants **DANTE CARSON, a/k/a “Tae,” and DWIGHT CARSON, a/k/a “Coobie,”** in violation of Title 18, United States Code, Sections 922(a)(6) and 2.

**COUNT 11**

(Aiding and Abetting in the Unlawful Acquisition of a Firearm)

On or about March 30, 2010, in the Eastern District of Louisiana, the defendants, **DANTE CARSON, a/k/a “Tae,” and DWIGHT CARSON, a/k/a “Coobie,”** did aid, abet, counsel, command, induce, procure and willfully cause another person, C.F., to make a false statement and representation with respect to his acquisition of a firearm, to wit: a Glock Model

27, .40 caliber semi-automatic pistol, serial number MVV816, from BJ's Pawnshop, 518 Lapalco Blvd., Gretna, Louisiana, a federally licensed firearms dealer, to make a false and fictitious written statement to BJ's Pawnshop, which statement was intended and likely to deceive BJ's Pawnshop, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44 of Title 18, in that C.F. stated in the Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473 that C.F. was the actual buyer of the firearm, when in truth and in fact, C.F. was acquiring the firearm on behalf of defendants **DANTE CARSON, a/k/a "Tae," and DWIGHT CARSON, a/k/a "Coobie,"** in violation of Title 18, United States Code, Sections 922(a)(6) and 2.

**COUNT 12**

(Murder in Aid of Racketeering)

1. At all times relevant to this Third Superseding Indictment, the Harvey Hustlers/Murder Squad, as more fully described in Paragraphs 1 through 6 of the General Allegations Section and Paragraphs 8 through 11 of Count 1 of this Third Superseding Indictment, which are realleged and incorporated by reference as though set forth fully herein, constituted an enterprise as defined in 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 Third Superseding 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 and robbery in violation of the laws of the State of Louisiana, and narcotics trafficking in violation of Title 21, United States Code, Sections 841(a)(1) and 846.

3. On or about April 1, 2010, in the Eastern District of Louisiana, as consideration for the receipt of, and as consideration for a promise and an agreement to pay, anything of pecuniary value from the enterprise, and for the purpose of gaining entrance to and maintaining and increasing position in the Harvey Hustler/Murder Squad, an enterprise engaged in racketeering activity, the defendants, **MONTERIO WIGGINS, a/k/a “Peedy,” DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Coobie,” MOSES LAWSON, a/k/a “Moes,”** with others known and unknown to the Grand Jury, did murder Reginald Francois, in violation of the Laws of the State of Louisiana, that is Title 14, Louisiana Revised Statutes, Sections 30.1(A)(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 April 1, 2010, in the Eastern District of Louisiana, the defendants, **MONTERIO WIGGINS, a/k/a “Peedy,” DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Cooby,” MOSES LAWSON, a/k/a “Moes,”** with others known and unknown to the Grand Jury, did knowingly carry and use a firearm, during and in relation to a crime of violence which may be prosecuted in a court of the United States, to wit: conspiracy to violate RICO and conspiracy to distribute and possess with intent to distribute 280 grams or more of cocaine base (“crack”), as set forth in Counts 1 and 2 of this Third Superseding Indictment, and in the course thereof caused the death of Reginald Francois through the use of a

firearm, whose death constituted murder as defined in Title 18, United States Code, Section 1111, in that the defendants willfully, deliberately, maliciously and with malice aforethought, unlawfully killed and caused the death of Reginald Francois, all in violation of Title 18, United States Code, Sections 924(j)(1) and 2.

**COUNT 14**

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

On or about April 1, 2010, in the Eastern District of Louisiana, the defendants, **DANTE CARSON, a/k/a "Tae," DWIGHT CARSON, a/k/a "Cooby," MOSES LAWSON, a/k/a "Moes," MONTERIO WIGGINS, a/k/a "Peedy,"** with others known and unknown to the Grand Jury, did knowingly carry and use a firearm, during and in relation to a crime of violence and a drug trafficking crime, to wit: conspiracy to violate RICO and conspiracy to distribute and possess with intent to distribute 280 grams or more of cocaine base ("crack"), as set forth in Counts 1 and 2 of this Third Superseding Indictment, which are incorporated herein; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

**COUNT 15**

(Distribution of Heroin)

On or about May 28, 2010, in the Eastern District of Louisiana, the defendant **MELVIN HUDSON,** did knowingly and intentionally distribute a quantity of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 16**

(Felon in Possession of a Firearm)

On or about August 15, 2010, in the Eastern District of Louisiana, the defendant **MELVIN HUDSON**, having previously been convicted of crimes punishable by imprisonment for a term exceeding one year, to wit: convictions on October 11, 2006, in the 24<sup>th</sup> Judicial District for the Parish of Jefferson, Docket No. 03-7252 "L," for Aggravated Assault upon a Peace Officer with a Firearm, in violation of LA-R.S. 14:37.2 and Possession of Cocaine, in violation of LA-R.S. 40:967(C)(2), did knowingly possess in and affecting commerce, a firearm, to wit: a Smith and Wesson Model SW40VE, .40 caliber semi-automatic pistol, serial number RAT3920; all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

**COUNT 17**

(Possession with Intent to Distribute Cocaine Base)

On or about August 15, 2010, in the Eastern District of Louisiana, the defendant **MELVIN HUDSON**, did knowingly and intentionally possess with intent to distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 18**

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

On or about August 15, 2010, in the Eastern District of Louisiana, the defendant, **MELVIN HUDSON**, did knowingly possess a firearm, to wit: a Smith and Wesson Model SW40VE, .40 caliber semi-automatic pistol, serial number RAT3920, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, to

wit: possession with intent to distribute cocaine base (“crack”) as charged in Count 17 of this Third Superseding Indictment, in violation of Title 21, United States Code, Section 841(b)(1)(C); all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**COUNT 19**

(Person under Indictment in Possession of a Firearm)

On or about December 15, 2010, in the Eastern District of Louisiana, the defendant, **MONTERIO WIGGINS, a/k/a “Peedy,”** who was then under indictment for a crime punishable by imprisonment for a term exceeding one year, to wit: in the 24<sup>th</sup> Judicial District for the Parish of Jefferson, Docket No. 10-4358 “D,” for Possession of Crack Cocaine, in violation of LA-R.S. 40:967(C)(2), did willfully receive a firearm, to wit: a Norinco model SKS, 7.62 X 39 millimeter caliber semi-automatic rifle, serial number 21000366-2; in violation of Title 18, United States Code, Sections 922(n) and 924(a)(1)(D).

**COUNT 20**

(Distribution of Cocaine Base)

On or about November 1, 2011, in the Eastern District of Louisiana, the defendant **TEDRICK REYNARD**, did knowingly and intentionally distribute a quantity of cocaine base (“crack”), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 21**

(Distribution Cocaine Base)

On or about November 1, 2011, in the Eastern District of Louisiana, the defendant **TRAVIS HUDSON**, did knowingly and intentionally distribute a quantity of cocaine base

("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 22**

(Possession with Intent to Distribute Cocaine Base)

On or about November 29, 2011, in the Eastern District of Louisiana, the defendant **TEDRICK REYNARD**, did knowingly and intentionally possess with intent to distribute a quantity of cocaine base ("crack"), a Schedule II narcotic drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**NOTICE OF RICO FORFEITURE**

1. The allegations contained in Count 1 of this Third Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant Title 18, United States Code, Sections 1963.

2. Pursuant to Title 18, United States Code, Section 1963, upon conviction of an offense in violation of Title 18, United States Code, Section 1962, the defendants, **MELVIN HUDSON, a/k/a "Kane," a/k/a "Keenan," JERMAINE HUDSON, a/k/a "Fresh," TRAVIS HUDSON, MOSES LAWSON, a/k/a "Moes," MONTERIO WIGGINS, a/k/a "Peedy," RODERICK WIGGINS, a/k/a "Chucky," a/k/a "Donald Carson," DANTE CARSON, a/k/a "Tae," DWIGHT CARSON, a/k/a "Cooby," TOREY RICHARDSON, a/k/a "Toe-Toe," and TEDRICK REYNARD**, shall forfeit to the United States of America:

- a. any interest acquired or maintained in violation of section 1962;
- b. any interest in security of claim against or property or contractual right of



any kind affording a source of influence over any enterprise which the defendant[s] established, operated, controlled, conducted, or participated in the conduct of, in violation of section 1962; and

- c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of 1962.

3. If any of the property described above, 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 party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18, United States Code, Section 1963(m).

All in violation of Title 18, United States Code, Section 1963.

### **NOTICE OF GUN FORFEITURE**

1. The allegations of Counts 5, 7, 8, 9, 10, 11, 13, 14, 16, 18 and 19 of this Third 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 5, 7, 8, 9, 10, 11, 13, 14, 16, 18 and 19, the defendants, **MELVIN HUDSON, a/k/a "Kane," a/k/a "Keenan," JERMAINE**

**HUDSON, a/k/a “Fresh,” TRAVIS HUDSON, MOSES LAWSON, a/k/a “Moes,”  
MONTERIO WIGGINS, a/k/a “Peedy,” RODERICK WIGGINS, a/k/a “Chucky,” a/k/a  
“Donald Carson,” DANTE CARSON, a/k/a “Tae,” DWIGHT CARSON, a/k/a “Cooby,”  
TOREY RICHARDSON, a/k/a “Toe-Toe,” TEDRICK REYNARD, SHAYNE LEBLANC,  
AKAI SULLIVAN, 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, Sections  
922(a)(6), 922(g)(1), 922(j), 924(c)(1)(A), 924(j)(1), 924(n) and 924(o), as alleged in Counts 5,  
7, 8, 9, 10, 11, 13, 14, 16, 18 and 19 of the Third Superseding 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 18, United States Code, Sections 922(a)(6), 922(g)(1), 922(j), 924(c)(1)(A), 924(j)(1), 924(n) and 924(o) and 924(d)(1).

## NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 2, 3, 4, 15, 17, 20, 21 and 22 of this Third 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 Counts 2, 3, 4, 15, 17, 20, 21 and 22, the defendants, **MELVIN HUDSON, a/k/a "Kane," a/k/a "Keenan," JERMAINE HUDSON, a/k/a "Fresh," TRAVIS HUDSON, MOSES LAWSON, a/k/a "Moes," MONTERIO WIGGINS, a/k/a "Peedy," RODERICK WIGGINS, a/k/a "Chucky," a/k/a "Donald Carson," DANTE CARSON, a/k/a "Tae," DWIGHT CARSON, a/k/a "Coobie," TOREY RICHARDSON, a/k/a "Toe-Toe," TEDRICK REYNARD, SHAYNE LEBLANC, AKAI SULLIVAN,** 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 defendants 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 Counts 2, 3, 4, 15, 17, 20, 21, and 22 of this Third Superseding 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 SPECIAL FINDINGS**

1. The Grand Jury incorporates by reference and realleges the allegations contained in Counts 12 and 13, and makes the following special findings:
2. As to Counts 12 and 13, defendants **MONTERIO WIGGINS, a/k/a "Peedy," DANTE CARSON, DWIGHT CARSON, a/k/a "Coobie," and MOSES LAWSON, a/k/a "Moes,"**
  - a. were 18 years of age or older at the time of the offense;
  - b. intentionally killed Reginald Francois (18 U.S.C. § 3591(a)(2)(A));
  - c. intentionally inflicted serious bodily injury that resulted in the death of Reginald Francois (18 U.S.C. § 3591(a)(2)(B));
  - d. 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 Reginald Francois died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));
  - e. 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

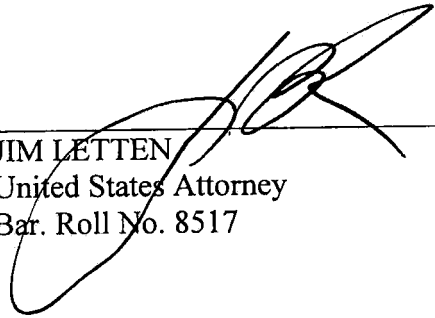
act or acts constituted a reckless disregard for human life, and Reginald Francois died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D));

- f. committed the offense after substantial planning and premeditation to cause the death of Reginald Francois (18 U.S.C. § 3592(c)(9)).

A TRUE BILL:


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FOREPERSON



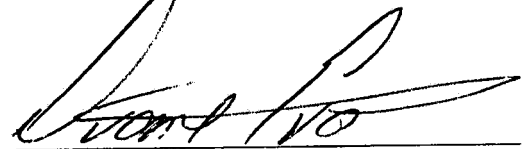
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JIM LETTEN  
United States Attorney  
Bar. Roll No. 8517



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JAN MASELLI MANN  
Chief, Criminal Division  
Assistant United States Attorney  
Bar Roll No. 9020



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DUANE A. EVANS  
Assistant United States Attorney  
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New Orleans, Louisiana  
January 27, 2012