

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA



SUPERSEDING INDICTMENT FOR SEALED VIOLATIONS OF THE FEDERAL CONTROLLED SUBSTANCES ACT AND THE FEDERAL GUN CONTROL ACT

UNITED STATES OF AMERICA

CRIMINAL NO. 21-184

 \mathbf{v} .

MICHAEL ALEXANDER, SR.

a/k/a "Monsta"

a/k/a "Jamond"

ATTREL ANDERSON

a/k/a "Trev"

a/k/a "Trel"

a/k/a "Da Boi"

TERRELL HAYNES

a/k/a "Redman"

STAR ROBICHAUX

JOSHUA PRINE

MICHAEL ALEXANDER, JR.

a/k/a "Mike Mike"

BRANDON BAKER

LOUIS BELLS, JR.

SECTION: "A"

VIOLATIONS: 21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(B)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 843(b)

18 U.S.C. § 2

18 U.S.C. § 924(c)(1)(A)(i)

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)(2)

The Grand Jury charges that:

COUNT 1

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances)

Beginning on a date unknown, but prior to March 20, 2019, and continuing to on or about

December 2, 2021, in the Eastern District of Louisiana, the defendants, MICHAEL

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ALEXANDER, SR., a/k/a "Monsta," a/k/a "Jamond," ATTREL ANDERSON, a/k/a "Trey," a/k/a "Trel," a/k/a "Da Boi," TERRELL HAYNES, a/k/a "Redman," STAR ROBICHAUX, JOSHUA PRINE, MICHAEL ALEXANDER, JR., a/k/a "Mike Mike," and BRANDON BAKER, 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 N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), methamphetamine, and cocaine hydrochloride, Schedule II controlled substances, and heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

QUANTITY OF CONTROLLED DANGEROUS SUBSTANCES ATTRIBUTABLE TO EACH DEFENDANT

With respect to the drug conspiracy involved in Count 1, the defendants knew or reasonably should have known, either through their own conduct or the reasonably foreseeable conduct of their co-conspirators that was taken in furtherance of the drug conspiracy, that the scope of the conspiracy involved the following quantities of a mixture and substance containing a detectable amount of the following controlled substances:

NAME	Quantity of Controlled Substance(s)
MICHAEL ALEXANDER, SR.	400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), 100 grams or more of a mixture and substance containing a detectable amount of heroin, and a quantity of a mixture and substance containing a detectable amount of cocaine hydrochloride, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and 841(b)(1)(C).
ATRELL ANDERSON	400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), 50 grams or more of methamphetamine, and 100 grams or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21,

NAME	Quantity of Controlled Substance(s)
	United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B).
TERRELL HAYNES	400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), 50 grams or more of methamphetamine, and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).
STAR ROBICHAUX	400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).
JOSHUA PRINE	400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), and 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).
MICHAEL ALEXANDER, JR.	A quantity of a mixture and substance containing a detectable amount of heroin, and a quantity of a mixture and substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).
BRANDON BAKER	A quantity of a mixture and substance containing a detectable amount of heroin, and a quantity of a mixture and substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

All in violation of Title 21, United States Code, Section 846.

<u>COUNT 2</u> (Possession with Intent to Distribute Fentanyl, Heroin, and Cocaine Hydrochloride)

On or about December 2, 2021, in the Eastern District of Louisiana, the defendant, MICHAEL ALEXANDER, SR., a/k/a "Monsta," a/k/a "Jamond," did knowingly and

intentionally possess with intent to distribute forty (40) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), and a quantity of a mixture and substance containing a detectable amount of cocaine hydrochloride, Schedule II controlled substances, and one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C).

COUNT 3(Possessing Firearms in Furtherance of a Drug Trafficking Crime)

On or about December 2, 2021, in the Eastern District of Louisiana, the defendant, MICHAEL ALEXANDER, SR., a/k/a "Monsta," a/k/a "Jamond," did knowingly possess firearms, to wit: a Springfield, model Saint, multi-caliber rifle, bearing serial number ST193191; a Glock, model 23, .40 caliber pistol, bearing serial number ALN818US; a Taurus, model G3, 9mm pistol, bearing serial number ABJ936400; a Smith & Wesson, model SD40VE, .40 caliber pistol, bearing serial number HES1705; and a Smith & Wesson, model SW9VE, 9mm pistol, bearing serial number DVZ8796, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute forty (40) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2phenylethyl)-4-piperidinyl] propanamide (fentanyl), and a quantity of a mixture and substance containing a detectable amount of cocaine hydrochloride, Schedule II controlled substances, and one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B) and 841(b)(1)(C), as charged in Count 2 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 4 (Felon in Possession of Firearms)

On or about December 2, 2021, in the Eastern District of Louisiana, the defendant, MICHAEL ALEXANDER, SR., a/k/a "Monsta," a/k/a "Jamond," knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on or about January 26, 2005, in the 21st Judicial District Court, Parish of Tangipahoa, State of Louisiana, under docket number CR-112008, for possession of a schedule II controlled substance, in violation of LA. R.S. 40:967, and a conviction on or about March 7, 2007, in the 21st Judicial District Court, Parish of Tangipahoa, State of Louisiana, under docket number CR-603380, for possession with intent to distribute a schedule II controlled substance, in violation of LA. R.S. 40:967, did knowingly possess in and affecting commerce, firearms, to wit: a Springfield, model Saint, multi-caliber rifle, bearing serial number ST193191; a Glock, model 23, .40 caliber pistol, bearing serial number ALN818US; a Taurus, model G3, 9mm pistol, bearing serial number ABJ936400; a Smith & Wesson, model SD40VE, .40 caliber pistol, bearing serial number DVZ8796, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 5 (Use of a Communication Facility)

On or about November 28, 2021, in the Eastern District of Louisiana, the defendants, MICHAEL ALEXANDER, SR., a/k/a "Monsta," a/k/a "Jamond," and ATTREL ANDERSON, a/k/a "Trey," a/k/a "Trel," a/k/a "Da Boi," did knowingly and intentionally use any communication facility, to wit, a telephone, in facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and possess with intent to distribute controlled substances as set forth in

Count 1 of this Indictment, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 6(Use of a Communication Facility)

On or about November 10, 2021, in the Eastern District of Louisiana, the defendants, MICHAEL ALEXANDER, SR., a/k/a "Monsta," a/k/a "Jamond," and MICHAEL ALEXANDER, JR., a/k/a "Mike Mike," did knowingly and intentionally use any communication facility, to wit, a telephone, in facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and possess with intent to distribute controlled substances as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 7 (Distribution of Methamphetamine)

On or about March 20, 2019, in the Eastern District of Louisiana, the defendant, ATTREL ANDERSON, a/k/a "Trey," a/k/a "Trel," a/k/a "Da Boi," did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 8 (Distribution of Methamphetamine)

On or about April 11, 2019, in the Eastern District of Louisiana, the defendant, ATTREL ANDERSON, a/k/a "Trey," a/k/a "Trel," a/k/a "Da Boi," did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 9 (Distribution of Methamphetamine)

On or about August 8, 2019, in the Eastern District of Louisiana, the defendant, ATTREL ANDERSON, a/k/a "Trey," a/k/a "Trel," a/k/a "Da Boi," did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 10 (Distribution of Methamphetamine)

On or about March 2, 2020, in the Eastern District of Louisiana, the defendant, **TERRELL HAYNES**, a/k/a "Redman," did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 11 (Distribution of Methamphetamine)

On or about March 11, 2020, in the Eastern District of Louisiana, the defendant, **TERRELL HAYNES, a/k/a "Redman,"** did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 12 (Distribution of Fentanyl and Heroin)

On or about August 19, 2020, in the Eastern District of Louisiana, the defendant, **TERRELL HAYNES, a/k/a "Redman,"** did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, and a quantity of a

mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 13 (Distribution of Fentanyl and Heroin)

On or about September 10, 2020, in the Eastern District of Louisiana, the defendant, **TERRELL HAYNES, a/k/a "Redman,"** did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 14 (Use of a Communication Facility)

On or about March 24, 2021, in the Eastern District of Louisiana, the defendants, TERRELL HAYNES, a/k/a "Redman," and STAR ROBICHAUX, did knowingly and intentionally use any communication facility, to wit, a telephone, in facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 841(a)(1) and 846, that is, conspiracy to distribute and possess with intent to distribute controlled substances as set forth in Count 1 of this Indictment, in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

COUNT 15 (Possession with Intent to Distribute Fentanyl and Heroin)

On or about March 27, 2021, in the Eastern District of Louisiana, the defendants, **STAR ROBICHAUX** and **JOSHUA PRINE**, did knowingly and intentionally possess with intent to distribute forty (40) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled

substance, and one hundred (100) grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 16 (Possession with Intent to Distribute Methamphetamine and Heroin)

On or about June 16, 2021, in the Eastern District of Louisiana, the defendant, MICHAEL ALEXANDER, JR., a/k/a "Mike Mike," did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 17 (Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about June 16, 2021, in the Eastern District of Louisiana, the defendant, MICHAEL ALEXANDER, JR., a/k/a "Mike Mike," did knowingly possess a firearm, to wit: a Smith & Wesson, .38 caliber revolver, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a quantity of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a quantity of a mixture and substance containing a detectable amount of methamphetamine, Schedule II controlled substances, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), as charged in Count 16 of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 18 (Possession with Intent to Distribute Heroin)

On or about November 11, 2021, in the Eastern District of Louisiana, the defendant, MICHAEL ALEXANDER, JR., a/k/a "Mike Mike," did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 19 (Possession with Intent to Distribute Methamphetamine and Heroin)

On or about November 11, 2021, in the Eastern District of Louisiana, the defendant, **BRANDON BAKER**, did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 20 (Felon in Possession of a Firearm)

On or about November 11, 2021, in the Eastern District of Louisiana, the defendant, LOUIS BELLS, JR., knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: a conviction on December 11, 2018, in the 21st Judicial District Court, Parish of Tangipahoa, State of Louisiana, under docket number CR-1801693, for Aggravated Assault with a Firearm, in violation of LA. R.S.14:37, and a conviction on June 23, 2020, in the 21st Judicial District Court, Parish of Tangipahoa, State of Louisiana, under docket number CR-2000776, for Possession of Heroin, in violation of LA. R.S. 40:966, did knowingly possess in and affecting commerce, a firearm, to wit: a BUL Armory, Model Cherokee, 9mm

pistol, bearing serial number CP-27773, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF FORFEITURE

- 1. The allegations of Counts 1-20 of this Superseding Indictment are incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States.
- 2. As a result of the offenses alleged in Counts 1-2, 5-16, and 18-19, the defendants, MICHAEL ALEXANDER, SR., a/k/a "Monsta," a/k/a "Jamond," ATTREL ANDERSON, a/k/a "Trey," a/k/a "Trel," a/k/a "Da Boi," TERRELL HAYNES, a/k/a "Redman," STAR ROBICHAUX, JOSHUA PRINE, MICHAEL ALEXANDER, JR., a/k/a "Mike Mike," and BRANDON BAKER, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting or derived from any proceeds obtained directly or indirectly as the result of said offense, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of said offenses, including but not limited to the following:

\$264,884.70 in U.S. currency;

\$24,340.00 in U.S. currency;

\$2,623.00 in U.S. currency;

2016 GMC Sierra pickup truck;

2010 Mercedes Benz C350; and

2021 Can-Am Outlander ATV.

3. As a result of the offenses alleged in Counts 3-4, 17, and 20, the defendants, MICHAEL ALEXANDER, SR., a/k/a "Monsta," a/k/a "Jamond," MICHAEL ALEXANDER, JR., a/k/a "Mike Mike," and LOUIS BELLS, JR., 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(c), any firearm or ammunition involved in or used in the commission of said offenses, including but not limited to the following:

Springfield, model Saint, multi-caliber rifle, bearing serial number ST193191;

Glock, model 23, .40 caliber pistol, bearing serial number ALN818US, with a spare magazine;

Taurus, model G3, 9mm pistol, bearing serial number ABJ936400;

Smith & Wesson, model SD40VE, .40 caliber pistol, bearing serial number HES1705;

Smith & Wesson, model SW9VE, 9mm pistol, bearing serial number DVZ8796;

Smith & Wesson, .38 caliber revolver; and

BUL Armory, Model Cherokee, 9mm pistol, bearing serial number CP-27773.

- 4. If any of the above-described property, 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 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;

the United States shall seek a money judgment and, pursuant to Title 21, United States Code, Section 853(p), forfeiture of any other property of the defendants up to the value of said property.

A TRUE RILL.

FOREPERSON

DUANE A. EVANS UNITED STATES ATTORNEY

A BENJAMIN MYERS
Assistant United States Attorney

New Orleans, Louisiana March 25, 2022