

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

2014 AUG 21 PM 1:56

WILLIAM W. BLEVINS
CLERK

SEALED

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

FELONY

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

UNITED STATES OF AMERICA	*	CRIMINAL NO: 14-131
v.	*	SECTION: "N"
JEFFREY WILSON	*	VIOLATIONS: 21 U.S.C. § 846
JACOBI BOYD	*	21 U.S.C. § 841(a)(1)
a/k/a "Co"	*	18 U.S.C. § 924(o)
ALFRED COBBINS	*	18 U.S.C. § 924(c)(1)(A)
a/k/a "Al"	*	18 U.S.C. § 2
JAWAN FORTIA	*	
a/k/a "Tittie"	*	
DEONTRE HILLS	*	
a/k/a "Soulja"	*	
DEDRICK KEELLEN	*	
a/k/a 'Roy	*	
RUBEN GEIGER	*	
a/k/a "Rue"	*	
SHAWN GRACIN	*	
a/k/a "Gunner"	*	
DELWIN MCCLAREN	*	
a/k/a "Poo" "Poo Stupid"	*	
BRYAN SCOTT	*	
a/k/a "Killer"	*	
DARIUS WILLIAMS	*	
a/k/a "D-Man	*	

* * *

Fee 7500
 Process _____
 x Dtd _____
 CFM/Dep _____
 Doc. No. _____

The Grand Jury charges that:

COUNT 1

Beginning in or about 2007, and continuing to on or about the date of the return of this Superseding Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **JEFFREY WILSON, JACOBI BOYD, a/k/a "Co," ALFRED COBBINS, a/k/a "Al," JAWAN FORTIA, a/k/a "Tittie," DEONTRE HILLS a/k/a "Soulja," RUBEN GEIGER a/k/a "Rue," SHAWN GRACIN a/k/a "Gunner, "DEDRICK KEELEN, a/k/a "Roy," DELWIN MCCLAREN, a/k/a "Poo" and "Poo Stupid," BRYAN SCOTT, a/k/a "Killer," DARIUS WILLIAMS a/k/a "D-Man,"** 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 28 grams or more of cocaine base ("crack cocaine"), a Schedule II controlled substance in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B); all in violation of Title 21, United States Code, Section 846.

COUNT 2

Beginning in or about 2008, and continuing to on or about the date of this Superseding Indictment, in the Eastern District of Louisiana and elsewhere, the defendants, **JACOBI BOYD, a/k/a "Co," ALFRED COBBINS, a/k/a "Al," JAWAN FORTIA, a/k/a "Tittie," DEONTRE HILLS a/k/a "Soulja," RUBEN GEIGER a/k/a "Rue," SHAWN GRACIN a/k/a "Gunner, "DEDRICK KEELEN, a/k/a "Roy," DELWIN MCLAREN, a/k/a "Poo" and "Poo Stupid," BRYAN SCOTT, a/k/a "Killer," DARIUS WILLIAMS a/k/a "D-Man,"** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to possess firearms in furtherance of drug trafficking

crimes as alleged in Count 1 of this Superseding Indictment; all in violation of Title 18, United States Code, Section 924(o).

COUNT 3

On or about October 18, 2011, in the Eastern District of Louisiana, the defendants, **SHAWN GRACIN** a/k/a “Gunner” and **ALFRED COBBINS** a/k/a “Al,” did knowingly use, carry and discharge a firearm during and in relation to 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 intent to distribute cocaine base as charged in Count 1 of this Superseding Indictment; all in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT 4

On or about May 13, 2014, in the Eastern District of Louisiana, the defendant, **JEFFREY WILSON**, did knowingly and intentionally distribute a quantity of a mixture or substance containing a detectable amount of cocaine hydrochloride, a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 5

On or about May 30, 2014, in the Eastern District of Louisiana, the defendant, **JEFFREY WILSON**, did knowingly and intentionally distribute 28 grams or more of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and Title 18, United States Code, Section 2.

NOTICE OF DRUG FORFEITURE

1. The allegations of Counts 1, 4 and 5 of this 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 25, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1, 4 and 5 of this Superseding Indictment, the defendants, **JEFFREY WILSON, JACOBI BOYD, a/k/a "Co," ALFRED COBBINS, a/k/a "Al," JAWAN FORTIA, a/k/a "Tittie," DEONTRE HILLS a/k/a "Soulja," RUBEN GEIGER a/k/a "Rue," SHAWN GRACIN a/k/a "Gunner, "DEDRICK KEELEN, a/k/a "Roy," DELWIN MCLAREN, a/k/a "Poo" and "Poo Stupid," BRYAN SCOTT, a/k/a "Killer,"** and **DARIUS WILLIAMS a/k/a "D-Man,"** 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 1, 4 and 5 of this 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 GUN FORFEITURE

1. The allegations of Counts 2 and 3 of this 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 2 and 3 of this Superseding Indictment, the defendants, **JACOBI BOYD**, a/k/a "Co," **ALFRED COBBINS**, a/k/a "Al," **JAWAN FORTIA**, a/k/a "Tittie," **DEONTRE HILLS** a/k/a "Soulja," **RUBEN GEIGER** a/k/a "Rue," **SHAWN GRACIN** a/k/a "Gunner," **DEDRICK KEELEN**, a/k/a "Roy," **DELWIN MCLAREN**, a/k/a "Poo" and "Poo Stupid," **BRYAN SCOTT**, a/k/a "Killer," and **DARIUS WILLIAMS** a/k/a "D-Man," 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 924(o) and 924(c)(1)(A), as alleged in Counts 2 and 3 of the 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 924(o) and 924(c)(1)(A).

FOREPERSON'S SIGNATURE
HAS BEEN REDACTED

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY


MAURICE E. LANDRIEU, JR.
Assistant United States Attorney
Deputy Chief, Criminal Division
Louisiana Bar Roll No. 22104


EDWARD J. RIVERA
Assistant United States Attorney

New Orleans, Louisiana
August 21, 2014