

COUNT 1

**Racketeer Influenced and Corrupt Organizations Conspiracy
18 U.S.C. § 1962(d)**

General Allegations

1. At all relevant times, defendants, DEMARCUS D. MORRIS, FRANK J. MORRIS, JIMMIE R. DURDEN, Jr., LONNIE D. JOHNSON, GARY J. McCain, RAVION M. ALFORD, RODRICK R. HICKS, and LARSHANDRA C. DAVENPORT, and others known and unknown to the Grand Jury, were members and associates of a criminal organization referred to as "Block Boyz," sometimes referred to as "Get Money Boyz," or "GMB," an organization engaged in, among other things, conspiracy to distribute controlled substances, distribution of controlled substances, and acts involving murder and robbery. At all relevant times, the "Block Boyz" operated in the Western District of Louisiana.

2. The Block Boyz has historically operated primarily in the Queensborough and Ingleside neighborhoods of Shreveport, Louisiana.

The Racketeering Enterprise

3. The Block Boyz, including its leadership, membership, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact. The enterprise engaged in, and its activities affected, interstate 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 included, 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 distribution of controlled substances in the territory controlled by the enterprise;
- b. Preserving and protecting the power, territory, and profits of the enterprise through the use of intimidation, violence, and threats of violence, including aggravated assault, and armed robbery;
- c. 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;
- d. 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. 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 conspired to commit, committed, attempted to commit, and threatened to commit shootings, firearms offenses, and violent acts, including but not limited to, acts involving murder, armed robbery, illegal possession of firearms, and aggravated assault, 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;
- b. Members of the enterprise and their associates promoted a climate of fear through violence, and threats of violence and sought retribution on anyone who showed them or the enterprise any disrespect;
- c. Members of the enterprise and their associates engaged in the distribution of controlled substances and armed robberies as a means to generate income;
- d. Members of the enterprise and their associates possessed and utilized firearms to assert their dominance over rival gangs in and around the geographic area utilized and controlled by the enterprise;

- e. Members of the enterprise and their associates maintained and circulated a collection of firearms for use in criminal activity by other conspirators;
- f. Members of the enterprise and their associates used telephones to give direction and advice to each other in an effort to circumvent the criminal justice system, distribute controlled substances, illegally possess firearms, perform violent acts, and intimidate witnesses; and
- h. Members of the enterprise and their associates bragged about their illegal activity, such as their possession and use of firearms, and took pictures of themselves posing with firearms and money in an effort to intimidate others in the community, and to maintain or increase their position inside the enterprise.

The RICO Conspiracy Charge

6. Beginning on or about 2012, and continuing to on or about the date of the return of this Indictment, in the Western District of Louisiana and elsewhere, the defendants, DEMARCUS D. MORRIS, FRANK J. MORRIS, JIMMIE R. DURDEN, Jr., LONNIE D. JOHNSON, GARY J. McCain, RAVION M. ALFORD, RODRICK R. HICKS, and LARSHANDRA C. DAVENPORT, and others known and unknown to the Grand Jury, being persons employed by and associated with the Block Boyz enterprise as described in paragraphs 1 through 5 of this Count, which enterprise 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:

- a. Murder, in violation of Louisiana Revised Statutes Sections 14:30, 14:30.1, 14:26 and 14:27;
- b. Robbery, in violation of Louisiana Revised Statutes Sections 14:64, 14:64.1, 14:26 and 14:27;
- c. Dealing controlled substances, in violation of Louisiana Revised Statutes Sections 40:966, 40:967, and 40:979; and multiple offenses involving narcotics trafficking in violation of the following federal offenses: Title 21, United States Code, Sections 841(a)(1) and 846.

7. 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 object of the conspiracy, the defendants DEMARCUS D. MORRIS, FRANK J. MORRIS, JIMMIE R. DURDEN, Jr., LONNIE D. JOHNSON, GARY J. McCAIN, RAVION M. ALFORD, RODRICK R. HICKS, and LARSHANDRA C. DAVENPORT, and others known and unknown to the Grand Jury, committed various overt acts, on or about the following

dates, in the Western District of Louisiana, and elsewhere including but not limited to the following:

1. On or about May 13, 2012, defendant GARY J. McCain possessed and discharged a firearm at multiple people, resulting in injury to two individuals.
2. On or about August 7, 2013, defendant RAVION M. ALFORD possessed and discharged a firearm into a residence.
3. On or about December 15, 2013, defendant GARY J. McCain possessed and discharged a firearm into a vehicle.
4. On or about January 28, 2014, defendant LONNIE D. JOHNSON committed an armed robbery.
5. On or about January 28, 2014, defendants DEMARCUS D. MORRIS and LONNIE D. JOHNSON committed an armed robbery and defendants, DEMARCUS D. MORRIS and LARSHANDRA C. DAVENPORT helped to aid and abet LONNIE D. JOHNSON after the armed robbery.
6. On or about April 13, 2014, defendants FRANK J. MORRIS and RODRICK R. HICKS possessed firearms and a quantity of marijuana and alprazolam.
7. On or about January 17, 2016, defendant DEMARCUS D. MORRIS possessed a firearm and cocaine base ("crack cocaine").
8. On or about April 6, 2016, defendant GARY J. McCain possessed a firearm and a quantity of marijuana.

9. On or about April 22, 2016, defendant RODRICK R. HICKS possessed a firearm and discharged it into a vehicle.
10. On or about April 24, 2016, defendant DEMARCUS D. MORRIS and an unknown individual discussed by Facebook the trade of a firearm.
11. On or about May 5, 2016, defendant RODRICK R. HICKS possessed and discharged a firearm into a residence.
12. On or about May 5, 2016, defendant DEMARCUS D. MORRIS and defendant GARY J. McCain distributed a quantity of cocaine base ("crack cocaine").
13. On or about May 12, 2016, defendant DEMARCUS D. MORRIS and defendant GARY J. McCain distributed a quantity of cocaine base ("crack cocaine").
14. On or about May 18, 2016, defendant FRANK J. MORRIS possessed a firearm, marijuana, ecstasy and alprazolam.
15. On or about May 23, 2016, defendant RODRICK R. HICKS possessed and discharged a firearm at people outside of a residence.
16. On or about May 31, 2016, defendant DEMARCUS D. MORRIS distributed a quantity of cocaine base ("crack cocaine").
17. On or about June 8, 2016, defendant DEMARCUS D. MORRIS distributed a quantity of cocaine base ("crack cocaine") and hydrocodone.
18. On or about June 22, 2016, defendant DEMARCUS D. MORRIS distributed a quantity of cocaine base ("crack cocaine").

19. On or about June 27, 2016, defendant DEMARCUS D. MORRIS possessed a firearm.
20. On or about July 14, 2016, during a telephone call, defendants RAVION M. ALFORD and DEMARCUS D. MORRIS discussed discharging a firearm into a vehicle.
21. On or about July 14, 2016, during a telephone call, defendants DEMARCUS D. MORRIS, JIMMIE R. DURDEN, Jr., and an unindicted co-conspirator, "R.N.," discussed purchasing powder cocaine from an unidentified male. During subsequent calls on the same day, DEMARCUS D. MORRIS and JIMMIE R. DURDEN, Jr., discussed robbing the unidentified male.
22. On or about July 15, 2016, during a telephone call, defendant DEMARCUS D. MORRIS and an unidentified male discussed selling a firearm to an unidentified male.
23. On or about July 15, 2016, during a telephone call, defendant DEMARCUS D. MORRIS and an unindicted co-conspirator, "M.E.," discussed obtaining controlled substances.
24. On or about July 19, 2016, during a telephone call, defendants DEMARCUS D. MORRIS and JIMMIE R. DURDEN, Jr., both convicted felons, discussed the purchase of a firearm from "Worm" for JIMMIE R. DURDEN, Jr.

25. On or about July 20, 2016, during a telephone call, defendants RAVION M. ALFORD and DEMARCUS D. MORRIS discussed purchasing firearms.
26. On or about July 22, 2016, during a telephone call, DEMARCUS D. MORRIS directed an unidentified male to purchase ammunition and masks.
27. On or about July 22, 2016, during a telephone call, defendant DEMARCUS D. MORRIS received information from GOLANDA W. ATKINS concerning the activities of law enforcement for the purpose of his evading law enforcement.
28. On or about July 23, 2016, during a telephone call, defendants LARSHANDRA C. DAVENPORT and DEMARCUS D. MORRIS facilitated the distribution of cocaine base, also known as crack cocaine.
29. On or about July 23, 2016, during a telephone call, DEMARCUS D. MORRIS and an unknown male discussed planning a robbery.
30. On or about July 25, 2016, during a telephone call, defendants DEMARCUS D. MORRIS and JIMMIE R. DURDEN, Jr., discussed trading firearms with an unindicted co-conspirator, "T.R."
31. On or about July 25, 2016, during a telephone call, defendants DEMARCUS D. MORRIS and GARY J. MCCAIN discussed obtaining a firearm.

32. On or about July 25, 2016, during a telephone call, defendants DEMARCUS D. MORRIS and FRANK J. MORRIS discussed use of a firearm.
33. On or about July 26, 2016, during a series of telephone calls, defendants DEMARCUS D. MORRIS, RAVION M. ALFORD, GARY J. McCain and others, discussed criminal activity of the enterprise.
34. On or about July 27, 2016, during a series of telephone calls, defendant DEMARCUS D. MORRIS and an unidentified male discussed the sale of a firearm.
35. On or about July 27, 2016, during a telephone call, defendant DEMARCUS D. MORRIS and an unindicted co-conspirator discussed criminal activity involving the criminal enterprise.
36. On or about July 27, 2016, during a telephone call, defendant DEMARCUS D. MORRIS granted permission to an unknown male to carry out criminal activity against another individual.
37. On or about July 27, 2016, during a telephone call, DEMARCUS D. MORRIS directed JIMMIE R. DURDEN, Jr., to distribute a controlled substance.
38. On or about July 28, 2016, during a telephone call, defendants DEMARCUS D. MORRIS, JIMMIE R. DURDEN, Jr., and RAVION M. ALFORD conspired to conceal firearms and ammunition from law enforcement.

39. On or about July 28, 2016, during a telephone call, defendant DEMARCUS D. MORRIS and an unknown male negotiated a price to purchase powder cocaine.
40. On or about July 29, 2016, during a telephone call, defendant DEMARCUS D. MORRIS admitted to defendant GOLANDA W. ATKINS that he was in possession of a firearm.
41. On or about July 31, 2016, during a telephone call, defendants DEMARCUS D. MORRIS and RAVION M. ALFORD discussed the use of firearms.
42. On or about July 31, 2016, during a telephone call, defendants DEMARCUS D. MORRIS and JIMMIE R. DURDEN, Jr., discussed the use of firearms.
43. On or about July 31, 2016, during a telephone call, defendants RAVION M. ALFORD and DEMARCUS D. MORRIS discussed possessing illegal firearms.
44. On or about July 31, 2016, during a telephone call, defendant DEMARCUS D. MORRIS and an unknown male discussed robbing an individual.
45. On or about August 2, 2016, during a series of telephone calls, defendant DEMARCUS D. MORRIS and unindicted co-conspirator, "R.C.," discussed the purchase of a firearm.

46. On or about August 2, 2016, during a telephone call, defendant DEMARCUS D. MORRIS and unindicted co-conspirator, "R.C.," discussed a potential firearm trade with defendant GARY J. McCain.
47. On or about August 3, 2016, during a series of telephone calls, defendant DEMARCUS D. MORRIS and unindicted co-conspirator "G.F.," discussed firearms transactions.
48. On or about August 3, 2016, during a telephone call, defendants DEMARCUS D. MORRIS and JIMMIE R. DURDEN, Jr., discussed purchasing a firearm.
49. On or about August 4, 2016, during a telephone call, defendant DEMARCUS D. MORRIS and an unidentified male discussed the purchase of distribution quantities of powder cocaine.
50. On or about August 4, 2016, during a telephone call, defendant DEMARCUS D. MORRIS and an unindicted co-conspirator known as "Worm" discussed criminal activity of the enterprise.
51. On or about August 4, 2016, during a telephone call, defendant DEMARCUS D. MORRIS and an unknown male discussed the purchase of powder cocaine.
52. On or about August 4, 2016, during a telephone call, defendants DEMARCUS D. MORRIS and JIMMIE R. DURDEN, Jr., discussed DURDEN and RAVION M. ALFORD's use of a firearm.

53. On or about August 4, 2016, during a telephone call, defendants DEMARCUS D. MORRIS, JIMMIE R. DURDEN, Jr., and RAVION M. ALFORD discussed the whereabouts of opposing gang members.
54. On or about August 5, 2016, during a telephone call, defendant DEMARCUS D. MORRIS and an unidentified female discussed criminal activity of the enterprise. On the same date, defendants DEMARCUS D. MORRIS and JIMMIE R. DURDEN, Jr., discussed criminal activity of the enterprise.
55. On or about August 6, 2016, during a telephone call, defendants LARSHANDRA C. DAVENPORT and DEMARCUS D. MORRIS discussed the distribution of marijuana.
56. On or about August 8, 2016, during a telephone call, defendants DEMARCUS D. MORRIS, LARSHANDRA C. DAVENPORT and an unidentified male discussed the distribution of Roxicodone.
57. On or about August 8, 2016, during a telephone call, DEMARCUS D. MORRIS and JIMMIE R. DURDEN, Jr., discussed the possession of a firearm and marijuana.
58. On or about August 8, 2016, during a telephone call, GOLANDA W. ATKINS and DEMARCUS D. MORRIS discussed storing of firearms at her residence.
59. On or about August 8, 2016, during a telephone call, defendants LARSHANDRA C. DAVENPORT, DEMARCUS D. MORRIS and an

unindicted co-conspirator, "A.J.," discussed a shooting involving RAVION M. ALFORD.

60. Beginning on August 8, 2016, and continuing to August 9, 2016, during a series of telephone calls, defendants DEMARCUS D. MORRIS, RAVION M. ALFORD, LARSHANDRA C. DAVENPORT and an unindicted co-conspirator, "R.W.," discussed the attempted armed robbery of an individual.
61. On or about August 8, 2016, defendants DEMARCUS D. MORRIS, JIMMIE R. DURDEN, Jr., and RAVION M. ALFORD attempted to commit an armed robbery of an individual.
62. On or about August 18, 2016, during a recorded jail call, defendant LARSHANDRA C. DAVENPORT reported a "snitch" in the jail cell to defendant JIMMIE R. DURDEN, Jr. Immediately following the call, JIMMIE R. DURDEN, Jr. committed a battery on his cellmate.
63. On or about April 11, 2017, during a recorded jail call, defendant RAVION M. ALFORD attempted to influence the testimony of a witness regarding an offense that occurred on August 8, 2016.
64. On or about April 25, 2017, defendant LARSHANDRA C. DAVENPORT distributed a quantity of cocaine ("powder cocaine").
65. On or about April 28, 2017, defendant LARSHANDRA C. DAVENPORT distributed a quantity of cocaine ("powder cocaine").

66. On or about May 3, 2017, defendant LARSHANDRA C. DAVENPORT distributed a quantity of cocaine ("powder cocaine").

All in violation of Title 18, United States Code, Sections 1962(d) and 1963(a).

[18 U.S.C. §§ 1962(d) and 1963(a)]

COUNT 2

Conspiracy to Distribute Controlled Substances
21 U.S.C. §§ 841(a)(1) and 846

Beginning on a date unknown but at least by April 13, 2014, and continuing to on or about the date of this Indictment, in the Western District of Louisiana and elsewhere, the defendants, DEMARCUS D. MORRIS, FRANK J. MORRIS, JIMMIE R. DURDEN, Jr., GARY J. McCAIN, RAVION M. ALFORD, RODRICK R. HICKS, and LARSHANDRA C. DAVENPORT, did knowingly and intentionally conspire, and agree with each other and with other persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute: (1) a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance; (2) a mixture or substance containing a detectable amount of cocaine hydrochloride, also known as powder cocaine, a Schedule II controlled substance; (3) hydrocodone, a Schedule II controlled substance; (4) Roxicodone, a Schedule II controlled substance; (5) marijuana, a Schedule I controlled substance; (6) ecstasy, a Schedule I controlled substance; and (7) alprazolam, a Schedule IV controlled substance; all in violation of Title 21, United States Code, Sections 841(a)(1) and Section 846. [21 U.S.C. §§ 841(a)(1) and 846]

COUNT 3

**Conspiracy to Possess Firearms
18 U.S.C. § 924(o)**

Beginning on or about 2012, and continuing to on or about the date of this Indictment, in the Western District of Louisiana and elsewhere, the defendants, DEMARCUS D. MORRIS, FRANK J. MORRIS, JIMMIE R. DURDEN, Jr., LONNIE D. JOHNSON, GARY J. McCain, RAVION M. ALFORD, RODRICK R. HICKS, LARSHANDRA C. DAVENPORT, and GOLANDA W. ATKINS, 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 drug trafficking crimes, to use and carry firearms, and possess firearms in furtherance of crimes of violence and drug trafficking crimes as alleged in Counts 1 and 2, to wit: conspiracy to violate RICO and conspiracy to distribute controlled substances; all in violation of Title 18, United States Code, Section 924(o).
[18 U.S.C. § 924(o)]

COUNT 4

**Violent Crime in Aid of Racketeering
18 U.S.C. §§ 1959(a)(3)**

1. At all times relevant to this Indictment, the Block Boyz, including its leadership, membership, and associates, as more fully described in Paragraphs 1 through 5 of Count 1 of this Indictment, which are re-alleged 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), that is murder, robbery, and dealing controlled substances in violation of the laws of the State of Louisiana and narcotics trafficking in violation of Title 21, United States Code, Sections 841 and 846.

3. On or about January 28, 2014, in the Western District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in Block Boyz, an enterprise engaged in racketeering activity, the defendant, LONNIE D. JOHNSON, did knowingly commit an assault with a dangerous weapon upon victim "K.M.", in violation of the laws of the State of Louisiana, that is Louisiana Revised Statutes Sections 14:37 and 14:24; all in violation of Title 18, United States Code, Section 1959(a)(3). [18 U.S.C. § 1959(a)(3)]

COUNT 5

Using and Carrying of a Firearm During and in Relation to a Crime of Violence
18 U.S.C. § 924(c)

On or about January 28, 2014, in the Western District of Louisiana, the defendant, LONNIE D. JOHNSON, did knowingly, intentionally, and unlawfully use carry, and discharge a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, assault with a dangerous

weapon in aid of racketeering, as alleged in Count 4, in violation of Title 18, United States Code, Section 924(c). [18 U.S.C. § 924(c)].

COUNT 6

Violent Crime in Aid of Racketeering
18 U.S.C. §§ 1959(a)(3) and 2

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

2. On or about January 28, 2014, in the Western District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in Block Boyz, an enterprise engaged in racketeering activity, the defendants, DEMARCUS D. MORRIS and LONNIE D. JOHNSON did knowingly commit an assault with a dangerous weapon upon victim, "T.J.," in violation of the laws of the State of Louisiana, that is Louisiana Revised Statutes Sections 14:37 and 14:24; all in violation of Title 18, United States Code, Sections 1959(a)(3) and 2. [18 U.S.C. §§ 1959(a)(3) and 2]

COUNT 7

Using and Carrying of Firearms During and in Relation to a Crime of Violence
18 U.S.C. § 924(c) and 2

On or about January 28, 2014, in the Western District of Louisiana, the defendants, DEMARCUS D. MORRIS and LONNIE D. JOHNSON, did aid and abet each other in knowingly, intentionally, and unlawfully use, carry, and discharge firearms during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, assault with a dangerous weapon

in aid of racketeering, as alleged in Count 6, in violation of Title 18, United States Code, Section 924(c). [18 U.S.C. § 924(c) and 2].

COUNT 8

Possession of a Firearm by a Convicted Felon
18 U.S.C. § 922(g)(1)

On or about April 6, 2016, in the Western District of Louisiana, the defendant, GARY J. McCain, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce a firearm, magazine and ammunition, to-wit: Century Arms pistol, model M85NP, caliber 5.56, in violation of Title 18, United States Code, Section 922(g)(1). [18 U.S.C. § 922(g)(1)].

COUNT 9

Distribution of Crack Cocaine
21 U.S.C. § 841(a)(1)

On or about May 31, 2016, in the Western District of Louisiana, the defendant, DEMARCUS D. MORRIS, did knowingly and intentionally distribute a mixture or substance containing 28 grams or more of cocaine base, also known as crack cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)].

COUNT 10

Distribution of Crack Cocaine
21 U.S.C. § 841(a)(1)

On or about June 8, 2016, in the Western District of Louisiana, the defendant, DEMARCUS D. MORRIS, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base, also known as crack

cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)].

COUNT 11
Distribution of Crack Cocaine
21 U.S.C. § 841(a)(1)

On or about June 22, 2016, in the Western District of Louisiana, the defendant, DEMARCUS D. MORRIS, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)].

COUNT 12
Possession of a Firearm by a Convicted Felon
18 U.S.C. § 922(g)(1)

On or about June 27, 2016, in the Western District of Louisiana, the defendant, DEMARCUS D. MORRIS, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce a firearm, magazine and ammunition, to-wit: Remington shotgun, in violation of Title 18, United States Code, Section 922(g)(1). [18 U.S.C. § 922(g)(1)].

COUNT 13
Conspiracy to Commit a Violent Crime in Aid of Racketeering
18 U.S.C. § 1959(a)(6)

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

2. On or about August 8, 2016, in the Western District of Louisiana, for the purpose of gaining entrance to and maintaining and increasing position in Block

Boyz, an enterprise engaged in racketeering activity, the defendants, DEMARCUS D. MORRIS, RAVION M. ALFORD, and JIMMIE R. DURDEN, Jr., did knowingly conspire to commit an assault with a dangerous weapon upon victim, "L.B.," in violation of the laws of the State of Louisiana, that is Louisiana Revised Statutes Sections 14:37 and 14:26; all in violation of Title 18, United States Code, Section 1959(a)(6). [18 U.S.C. § 1959(a)(6)]

COUNT 14

Possession of a Firearm in Furtherance of a Crime of Violence
18 U.S.C. §§ 924(c) and 2

On or about August 8, 2016, in the Western District of Louisiana, the defendants, DEMARCUS D. MORRIS, RAVION M. ALFORD, and JIMMIE R. DURDEN, Jr., did knowingly, intentionally, and unlawfully possess firearms during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, a conspiracy to commit an assault with a dangerous weapon in aid of racketeering, as alleged in Count 13, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2. [18 U.S.C. §§ 924(c) and 2]

COUNT 15

Possession of a Firearm by a Convicted Felon
18 U.S.C. §§ 922(g)(1) and 2

On or about August 8, 2016, in the Western District of Louisiana, the defendants, DEMARCUS D. MORRIS, JIMMIE R. DURDEN, Jr., and RAVION M. ALFORD, all having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce, firearms, magazines and ammunition, to-wit:

1. Beretta, 9mm and magazine;
2. Glock, semi-automatic pistol, Model 23, .40 caliber and magazine;
3. Taurus, semi-automatic pistol, Model PT145, .45 caliber;
4. Astra, semi-automatic pistol, Model A90, 9mm; and
5. MPA, 9mm automatic pistol and magazine

in violation of Title 18, United States Code, Sections 922(g)(1) and 2. [18 U.S.C. §§ 922(g)(1) and 2].

COUNT 16

Distribution of Powder Cocaine
21 U.S.C. § 841(a)(1)

On or about April 25, 2017, in the Western District of Louisiana, the defendant, LARSHANDRA C. DAVENPORT, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)].

COUNT 17

Distribution of Powder Cocaine
21 U.S.C. § 841(a)(1)

On or about April 28, 2017, in the Western District of Louisiana, the defendant, LARSHANDRA C. DAVENPORT, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)].

COUNT 18

**Distribution of Powder Cocaine
21 U.S.C. § 841(a)(1)**

On or about May 3, 2017, in the Western District of Louisiana, the defendant, LARSHANDRA C. DAVENPORT, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). [21 U.S.C. § 841(a)(1)].

NOTICE OF RICO FORFEITURE

A. The allegations contained in Count 1 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 1963.

B. 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, DEMARCUS D. MORRIS, FRANK J. MORRIS, JIMMIE R. DURDEN, Jr., LONNIE D. JOHNSON, GARY J. McCain, RAVION M. ALFORD, RODRICK R. HICKS, and LARSHANDRA C. DAVENPORT, 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, and/or property and contractual rights of any kind affording a source of influence over any enterprise which the defendants 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.

C. 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. [18 U.S.C. 1963]

NOTICE OF DRUG FORFEITURE

A. The allegations of Count 2 of this Indictment are re-alleged 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.

B. As a result of the offenses alleged in Count 2 of this Indictment, the defendants, DEMARCUS D. MORRIS, FRANK J. MORRIS, JIMMIE R. DURDEN, Jr., GARY J. McCain, RAVION M. ALFORD, RODRICK R. HICKS, and LARSHANDRA C. DAVENPORT, 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 Count 2 of this Indictment.

C. 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. [21 U.S.C. § 853]

NOTICE OF FIREARM FORFEITURE

A. The allegations of Counts 3, 5, 7, 8, 12, 13, 14 and 15 of this Indictment are re-alleged 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).

B. As a result of the offenses alleged in Counts 3, 5, 7, 8, 12, 13, 14 and 15 of this Indictment, the defendants, DEMARCUS D. MORRIS, FRANK J. MORRIS, JIMMIE R. DURDEN, Jr., LONNIE D. JOHNSON, GARY J. McCain, RAVION M. ALFORD, RODRICK R. HICKS, LARSHANDRA C. DAVENPORT, and GOLANDA W. ATKINS, 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), 924(c)(1)(A) and 922(g)(1), as alleged in Counts 3, 8, 10, 12, 13, and 14 of the Indictment, including but not limited to:

1. Beretta, 9mm and magazine;
2. Glock, semi-automatic pistol, Model 23, .40 caliber and magazine;
3. Taurus, semi-automatic pistol, Model PT145, .45 caliber;
4. Astra, semi-automatic pistol, Model A90, 9mm;
5. MPA, 9mm automatic pistol and magazine; and
6. Century Arms pistol, model M85NP, caliber 5.56.

C. 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:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. 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.

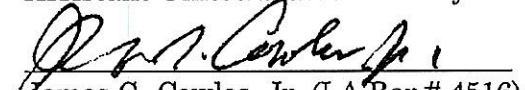
All in violation of Title 18, United States Code, Section 924(d)(1). [18 U.S.C. § 924(d)(1)]

A TRUE BILL:

REDACTED
GRAND JURY FOREPERSON

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