

TRUE BILL OF INDICTMENT FOR
CRIMES COMMITTED IN VIOLATION
OF LOUISIANA RACKETEERING
ACTIVITY

THE SPECIAL GRAND JURORS of The State of Louisiana, duly impaneled and sworn in for the body of the Parish of Orleans, in the name and by the authority of said State, upon their oath present as follows:

COUNT 1:

GENERAL ALLEGATIONS

1. At all relevant times, defendants **TYRONE BOVIA** aka “**SIX**”, **RANDY CALVIN** aka “**TOKEY HEFNER**”, **CHANCE SKIPPER** aka “**DOONA**”, **JAMES ALEXANDER** aka “**POO**” along with other unindicted Co-Conspirators known and unknown to the impaneled Special Grand Jury engaged in a pattern of criminal activity, including but not limited to: illegal weapons and narcotics possession, distribution of heroin, conspiracy to commit the murder of rival gang members, attempted murder of rival gang members, the discharge of firearms during these crimes of violence, obstruction of justice and acting as accessory after the facts of the crimes of violence. At all relevant times, this enterprise and its associates, operated in the Parish of Orleans.
2. The criminal enterprise operated throughout the City of New Orleans and Orleans Parish committing the aforementioned pattern of criminal activity for the benefit of the enterprise.
3. The defendants named in this indictment commonly identified as members of “**The Byrd Gang**” and/or “**Piff Gang**” and/or “**M3re**”. Additionally, through this gang affiliation, they have expressed strong affiliations on social media platforms with the “**Harmony Oaks Housing Development**” aka “**The Magnolia**” Housing Development.”
4. The defendants involved in the criminal enterprise’s violence primarily focused on attempts to kill rival gang members from the “**Calliope Ghost Gang**”, which operates out of the Marrero Commons Housing Development, formerly known as The Calliope Housing Development aka “**The Calliope**.”

5. The defendants named in this indictment, along with unindicted co-conspirators and associates, used social media websites such as Instagram to highlight the members' affiliation with other members of the organization and highlight their criminal activities.
6. The defendants named in this indictment along with unindicted coconspirators and associates, constitutes an "enterprise" as defined by Title 15 of the Louisiana Revised Statutes, Section 1352(B), that is, a group of individuals associated in fact.

PURPOSES OF THE ENTERPRISE

The purposes of the enterprise's criminal activity include, but are not limited to, distributing heroin for monetary gain, conspiring to kill rival gang members of "**The Ghost Gang**" who threatening the survival of members of the enterprise, the commission of acts of violence primarily targeting rival "**Ghost Gang**" members, and thwarting the efforts of law enforcement investigating these violent acts through the destruction of evidence and shielding of co-conspirators from lawful arrest.

MEANS AND METHODS OF THE ENTERPRISE

5. Among the means and methods by the members and their associates conspired to conduct, conducted and participate in the affairs of the enterprise were including but not limited to:

- a. Members, associates and unindicted co-conspirators of the enterprise conspired to sell heroin throughout the City of New Orleans through the use of cellular telephones.
- b. Members, associates and unindicted co-conspirators of the enterprise possessed multiple firearms in an attempt to protect the proceeds of ongoing heroin trafficking and other illegal narcotics dealings throughout the City of New Orleans.
- c. Members and associates of possessed multiple firearms in an attempt to protect themselves from violent acts of rival gang members.
- d. Members, associates and unindicted co-conspirators conspired to commit murder of rival gang members throughout the City of New Orleans in a cycle of retaliatory gang violence.
- e. Members and associates of the enterprise utilized firearms to commit numerous crimes of violence, such as attempted murder and illegal discharge of firearms during crimes of violence of rival gang members throughout the City of New Orleans as part of the cycle of retaliatory violence.

- f. Members, associates and unindicted co-conspirators of the enterprise conspired and obstructed justice through the removal and destruction of evidence used in violent crimes perpetrated by the enterprise.
- g. Members, associates and unindicted co-conspirators of the enterprise hid perpetrators of violent crimes from investigation and lawful arrest.
- h. Members and associates of the enterprise attempted to evade lawful arrest by providing false names to law enforcement when eventually detained.
- i. Members and associates of the enterprise utilized cellular telephones, social media, and jailhouse phones to communicate about enterprise activity, to keep members and associates informed about the ongoing enterprise activities and to threatened and taunt rival gang members.

RACKETEERING CHARGE

6. Beginning at a time unknown, but prior to the year of our lord **September 1st, 2015**, and continuing to the present date, in the Parish of Orleans, and within the jurisdiction of the Criminal District Court for the Parish of Orleans, **TYRONE BOVIA aka "Six", RANDY CALVIN aka "TOKEY HEFNER", CHANCE SKIPPER aka "DOONA", JAMES ALEXANDER aka "POO"** and unindicted co-conspirators, known and unknown to this Grand Jury, were members and/or associates with the criminal enterprise, as described in paragraphs 1 through 3 of the General Allegations and paragraphs 4 and 5 of this Count, violated Title 15 of the Louisiana Revised Statutes, **Section 1353 (D)**, that is, did unlawfully and knowingly **conspire** and **engage** in the commission of the crime of Racketeering under **La. R.S. 15:1353**, that is, to knowingly conduct or participate in, directly or indirectly, in the affairs of the enterprise through a pattern of Racketeering Activity as defined in **La. R.S. 15:1352(A)**, consisting of illegal weapons and narcotics possession, distribution of heroin, conspiracy to commit the murder of rival gang members, attempted murder of rival gang members, the discharge of firearms during these crimes of violence, obstruction of justice and acting as accessory after the facts of these crimes of violence.

OVERT ACTS IN FURTHERANCE OF THE RACKETEERING CONSPIRACY

7. In furtherance of the racketeering conspiracy, and to accomplish the purposes of the enterprise conspiracy, defendants **TYRONE BOVIA aka "SIX"**, **RANDY CALVIN aka "TOKEY HEFNER"**, **CHANCE SKIPPER aka "DOONA"**, **JAMES ALEXANDER aka "POO"** and other co-conspirators known and unknown to the Orleans Parish Special Grand Jury, committed various overt acts, on or about the following times and dates, in the Parish of Orleans, including but not limited to the following:

1. On October 15th, 2015, **RANDY CALVIN aka "TOKEY HEFNER"**, **JAMES ALEXANDER aka "POO"** and **CHANCE SKIPPER AKA "DOONA"** sold several grams of Heroin to an FBI Informant while under surveillance and recording.
2. On April 8th, 2016, **CHANCE SKIPPER AKA "DOONA"** sold several grams of heroin to an FBI Informant while under surveillance and recording.
3. On April 28th, 2016, **JAMES ALEXANDER aka "POO"** along with associate D.B. are stopped by 3rd District NOPD Officers for running at stop sign at St. Roch and Gentilly Blvd. Officers proceeded to observe a .9mm Glock 17 handgun in the purse of the driver D.B. Both subjects are detained and mirandized. **JAMES ALEXANDER aka "POO"** admits to 3rd District Officers that he dropped the gun in D.B.'s purse after being pulled over in an attempt to distance himself from the weapon. A check of the 9mm reveals that it was stolen out of Terrebone Parish.
4. On May 23rd, 2016, **JAMES ALEXANDER aka "POO"** sold several grams of heroin to an FBI Informant while under surveillance and recording.
5. On December 28th, 2016, **CHANCE SKIPPER aka "DOONA"** is suspected by residents at a known apartment complex in the 2600 Block of Washington Ave of selling narcotics within the courtyard area. 6th District Officers then observe **SKIPPER** within the courtyard of the complex. **SKIPPER** is detained and found to be in possession of a .40 caliber Glock with a 21 round extended magazine, 30 grams of marijuana packed in 23 separate bags and \$160 in US Currency.
6. On January 4th, 2017, unindicted coconspirator, **TIMOTHY JACKSON aka "T-MAF"**, is stopped for a traffic violation at the intersection of Simon Bolivar and Josephine. During the stop officers recover a .40 caliber Glock 27 and a 9mm Glock 26 semi-automatic handgun with extended magazines in Jackson's waistband. A further search of the vehicle reveals 130 grams (approx 4.7 oz) of powdered heroin and \$1825.00 in US Currency.

7. On February 8th, 2017, **TYRONE BOVIA aka "SIX"** and D.M., are stopped by Calcasieu Parish Sheriff's Deputies on I-10 East at Mile Marker 17. During the stop, after providing inconsistent stories to deputies, a search of the vehicle located drug paraphernalia and a stolen .223 Assault Rifle taken during a home invasion and robbery in Bryan, Texas days earlier.
8. In the afternoon hours of May 3rd, 2017, 3 masked gunmen armed with assault rifles unleashed multiple rounds into Bern Mas apartment E-09 belonging to Ghost Gang associate M.I.
9. During the May 3rd, 2017 attack, private video surveillance belonging to the intended target and Ghost Gang associate, M.I. captured the distinctive clothing belonging to all 3 perpetrators of the shooting wielding the assault rifles.
10. Several minutes after the May 3rd, 2017 shooting at the Bern Mas Apartments, **TYRONE BOVIA aka "SIX" and JAMES ALEXANDER aka "POO"** arrived at E.R. of the New Orleans East Hospital carrying the body of fellow gang member Terrance Augustine. Hospital surveillance caught all 3 individuals attired in the exact clothing (minus the masks) as the perpetrators of the shooting minutes earlier at the Bern Mas Apartments in the 7200 Block of Chef Menteur Highway.
11. After dropping the body of fellow gang member and co-conspirator **TERRANCE AUGUSTINE** in the Emergency Room, **TYRONE BOVIA aka "SIX" and JAMES ALEXANDER aka "POO"** fled the hospital before law enforcement arrived.
12. On July 7th, 2017 Louisiana State Police stop a heavily tinted black Chevy Malibu sedan for disregarding a stop sign at the intersection of St. Anthony and N. Miro St. The driver, unindicted co-conspirator G.T., immediately exited the vehicle and approached the LSP Troopers in an attempt to distract officers from the interior of the vehicle.
13. Officers eventually detained the driver, G.T., and removed the 3 other occupants from the vehicle upon arrival of several other Louisiana State Police Units. Unindicted co-conspirators, E.T. aka "E-MAF" and A.G aka "COTTY", along with **CHANCE SKIPPER aka "DOONA"** are removed from the vehicle. A subsequent search of the vehicle located 40 grams of Marijuana, 155 pills of Tramadol, a stolen .45 caliber Taurus semi-automatic handgun and a AK-47 Assault Rifle loaded with "Green Tip Rounds" aka "Armor Piercing" ammunition.
14. On August 12th, 2017, **TYRONE BOVIA aka "SIX"** is arrested with unindicted co-conspirator, R.I., after a high speed chase with Louisiana State Police Troopers throughout Central City. **BOVIA'S** vehicle crashed out at the intersection of Simon Bolivar and Earhardt Blvd. Unindicted co-conspirator R.I. and BOVIA resisted arrest and attempted to flee before being hit multiple times with a Louisiana State Police issued taser.
15. Following the arrest of **TYRONE BOVIA aka "SIX"** and unindicted coconspirator, R.I., Louisiana State Police Troopers located 2 semi-automatic handguns and marijuana inside the crashed out vehicle formerly containing the arrested subjects.

16. On August 25th, 2017, **RANDY CALVIN aka "TOKEY HEFNER", JAMES ALEXANDER aka "POO" and CHANCE SKIPPER AKA "DOONA"** entered into the Foreign Clothing Store in the 1900 Block of Magazine St. shortly after 3:30pm. Upon entering the store, **RANDY CALVIN aka "TOKEY HEFNER", JAMES ALEXANDER aka "POO" and CHANCE SKIPPER AKA "DOONA"**, began a verbal altercation with known Calliope "Ghost Gang" associate T.H.
17. T.H. attempted to leave the store and is followed by **RANDY CALVIN aka "TOKEY HEFNER", JAMES ALEXANDER aka "POO" and CHANCE SKIPPER AKA "DOONA"** onto the sidewalk in the 1900 Block of Magazine St. **JAMES ALEXANDER aka "POO"** proceeded to remove a semi-automatic handgun from his waistband and slap the victim T.H. across the back of his head.
18. As **JAMES ALEXANDER aka "POO"** raised his firearm, T.H. proceeded to remove a weapon from his waistband, with both subjects opening fire at one another. **JAMES ALEXANDER aka "POO"**, T.H. and C.P., an innocent bystander half a block away all sustained gunshot wounds during the incident.
19. **RANDY CALVIN aka "TOKEY HEFNER", and CHANCE SKIPPER AKA "DOONA"** proceeded to load an injured **JAMES ALEXANDER aka "POO"**, who was suffering from multiple gunshot wounds, into a gray 4-door Infinity and speed from the location.
20. **RANDY CALVIN aka "TOKEY HEFNER", and CHANCE SKIPPER AKA "DOONA"** proceeded to University Medical Center where they dropped **JAMES ALEXANDER aka "POO"** and then quickly departed the location without ever exiting the gray 4-door Infinity.
21. On January 10th, 2018, unindicted coconspirator **TIMOTHY JACKSON aka "T-MAF"** plead guilty as charged to federal weapons and heroin charges related to his January 4th, 2017 at the intersection of Simon Bolivar and Josephine.
22. On March 1st, 2018, members of the Federal Bureau of Investigation (FBI) and NOPD T.I.G.E.R Team Detectives attempted to locate **RANDY CALVIN aka "TOKEY HEFNER", JAMES ALEXANDER aka "POO" and CHANCE SKIPPER AKA "DOONA"** on outstanding warrants. Detectives located the subjects in the 2400 Block of S.Robertson within the "Old Magnolia" Housing Development. All 3 subjects observed the approaching units and attempted to flee into the front 2414 S. Robertson and out a back exit.
23. After NOPD T.I.G.E.R Team Detectives set a perimeter within the block, detectives and FBI Agents located and arrested **RANDY CALVIN aka "TOKEY HEFNER", JAMES ALEXANDER aka "POO" and CHANCE SKIPPER AKA "DOONA"** on the outstanding warrants.

24. A search of the yard where **RANDY CALVIN aka "TOKEY HEFNER"**, **JAMES ALEXANDER aka "POO"** and **CHANCE SKIPPER AKA "DOONA"** were first located yielded a stolen .40 Caliber Glock 27 with an extended magazine discarded into the grass and a .223 S&W Assault Rifle propped against the house of 2420 S. Robertson St.
25. A search of the interior of the residence at 2414 S. Robertson, for which **RANDY CALVIN aka "TOKEY HEFNER"**, **JAMES ALEXANDER aka "POO"** and **CHANCE SKIPPER AKA "DOONA"** fled, revealed a .40 Caliber Glock 23, 40 bags of marijuana, drug paraphenalia and multiple pills.
26. On May 9th, 2018, **TYRONE BOVIA aka "SIX"** was arrested on an outstanding warrant. During a recorded interview, **TYRONE BOVIA aka "SIX"** admitted to NOPD T.I.G.E.R. Team Detectives and FBI Agents that he and **JAMES ALEXANDER aka "POO"** were the two individuals that dropped fellow gang member Terrance Augustine off at The New Orleans East Hospital shortly after the shooting at the Bern Mas Apartments on May 3rd, 2017.
27. On September 12th, 2018, B.L. and **CHANCE SKIPPER aka "DOONA"** attacked Calliope "Ghost Gang" member D.A. aka "Paw Paw" while incarcerated in Orleans Justice Center. D.A. aka "Paw Paw" received multiple contusions during the attack which was caught on video tape.
28. On December 20th, 2018, **CHANCE SKIPPER aka "DOONA"** plead guilty to the crime of Simple Battery for the jailhouse attack of Calliope Ghost Gang associate D.A. aka "Paw Paw".
29. On September 4th, 2019, **TYRONE BOVIA aka "SIX"** was wanted on outstanding warrants. **BOVIA**, along with associate R.E. and his one year old son, T.G., arrived at University Medical Center. Upon arrival, hospital staff learned that both **BOVIA** and his one year old child were suffering from gunshot wounds to the head.
30. **TYRONE BOVIA aka "SIX"** gave multiple names to hospital staff and the New Orleans Police Department before admitting his identity.
31. **TYRONE BOVIA aka "SIX"** proceeded to give several different stories of how the shooting happened and where the shooting happened before leaving his 1 year old child and fleeing from University Medical Center. He remains at large at the time of the indictment.

State of Louisiana { ss.

CRIMINAL DISTRICT COURT FOR THE PARISH OF ORLEANS

ITEM NO: J-30276-19

COUNT 2

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **JAMES ALEXANDER AKA "POO" AND ONE RANDY CALVIN AKA "TOKEY HEFFNER" AND ONE CHANCE SKIPPER AKA "DOONA" AND UNINDICTED CO-CONSPIRATOR T.J. AKA "T-MAF" EACH**

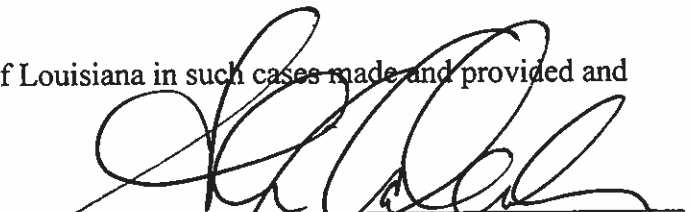
late of the Parish of Orleans, between the **21ST** day of **OCTOBER** in the year of our Lord, two thousand **AND FIFTEEN UNTIL PRESENT** in the year of our lord, two thousand **AND NINETEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **DID WILFULLY AND UNLAWFULLY CONSPIRE TO DISTRIBUTE A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: HEROIN, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

COUNT 3

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **TYRONE BOVIA AKA "6" AND ONE JAMES ALEXANDER AKA "POO" AND ONE UN-INDICTED CO-CONSPIRATOR T.A. EACH**

late of the Parish of Orleans, on the **3RD** day of **MAY** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **CONSPIRED TO COMMIT SECOND DEGREE MURDER OF RIVAL GANG MEMBERS KNOWN AS THE GHOST GANG, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

contrary to the form of Statute of the State of Louisiana in such cases made and provided and against the peace and dignity of the same.



Assistant District Attorney for the Parish Of Orleans

PARISH OF ORLEANS

State of Louisiana { ss.

CRIMINAL DISTRICT COURT FOR THE PARISH OF ORLEANS

COUNT 4

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **TYRONE BOVIA AKA "6" AND ONE JAMES**

ALEXANDER AKA "POO" EACH

late of the Parish of Orleans, on the **3RD** day of **MAY** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **UNLAWFULLY KILLED TERRANCE AUGUSTINE, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

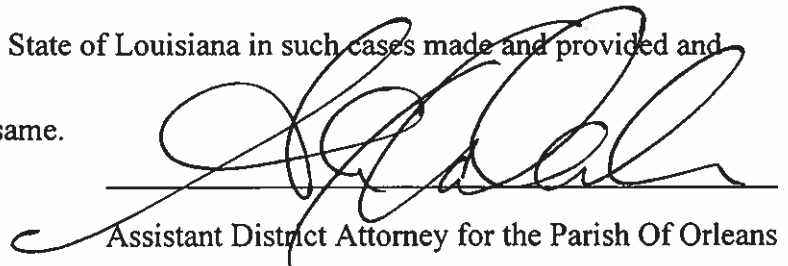
COUNT 5

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **TYRONE BOVIA AKA "6" AND ONE JAMES**

ALEXANDER AKA "POO" AND ONE UNINDICTED CO-CONSPIRATOR T.A. EACH

late of the Parish of Orleans, on the **3RD** day of **MAY** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **ATTEMPTED TO COMMIT SECOND DEGREE MURDER OF MILTON ISAAC, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

contrary to the form of Statute of the State of Louisiana in such cases made and provided and against the peace and dignity of the same.


Assistant District Attorney for the Parish Of Orleans

PARISH OF ORLEANS

State of Louisiana { ss.

CRIMINAL DISTRICT COURT FOR THE PARISH OF ORLEANS

COUNT 6

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, PRESENT, that one **TYRONE BOVIA AKA "6" AND ONE JAMES**

ALEXANDER AKA "POO" AND ONE UNINDICTED CO-CONSPIRATOR T.A. EACH

late of the Parish of Orleans, on the **3RD** day of **MAY** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **ATTEMPTED TO COMMIT SECOND DEGREE MURDER OF COREY GREATHOUSE, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

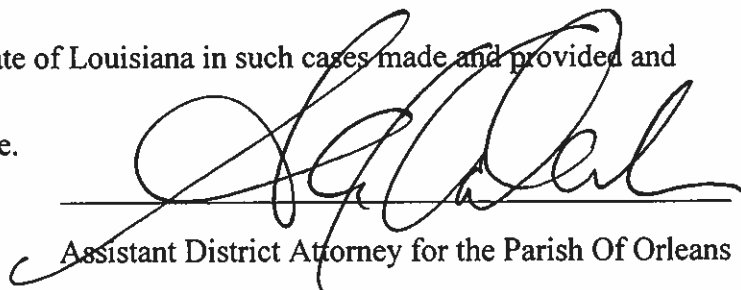
COUNT 7

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, PRESENT, that one **TYRONE BOVIA AKA "6" AND ONE JAMES**

ALEXANDER AKA "POO" AND ONE UNINDICTED CO-CONSPIRATOR T.A. EACH

late of the Parish of Orleans, on the **3RD** day of **MAY** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **INTENTIONALLY OR CRIMINALLY NEGLIGENTLY DISCHARGED A FIREARM WHERE IT WAS FORESEEABLE THAT IT MIGHT RESULT IN DEATH OR GREAT BODILY HARM TO A HUMAN BEING, WHILE COMMITTING A CRIME OF VIOLENCE, TO WIT: ATTEMPTED MURDER OF MILTON ISAAC AND COREY GREATHOUSE, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

contrary to the form of Statute of the State of Louisiana in such cases made and provided and against the peace and dignity of the same.


Assistant District Attorney for the Parish Of Orleans

PARISH OF ORLEANS

State of Louisiana { ss.

CRIMINAL DISTRICT COURT FOR THE PARISH OF ORLEANS

COUNT 8

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **TYRONE BOVIA AKA "6" AND ONE JAMES ALEXANDER AKA "POO" EACH**

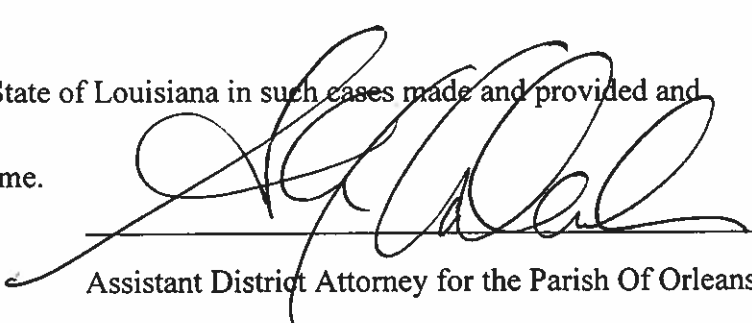
late of the Parish of Orleans, on the **3RD** day of **MAY** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **CONSPIRED TO OBSTRUCT JUSTICE IN THE MANSLAUGHTER OF TERRANCE AUGUSTINE, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

COUNT 9

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **TYRONE BOVIA AKA "6" AND ONE JAMES ALEXANDER AKA "POO" AND ONE UNINDICTED CO-CONSPIRATOR T.A. EACH**

late of the Parish of Orleans, on the **3RD** day of **MAY** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **OBSTRUCTED JUSTICE IN THE MANSLAUGHTER OF TERRANCE AUGUSTINE, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

contrary to the form of Statute of the State of Louisiana in such cases made and provided and against the peace and dignity of the same.


Assistant District Attorney for the Parish Of Orleans

PARISH OF ORLEANS

State of Louisiana { ss.

CRIMINAL DISTRICT COURT FOR THE PARISH OF ORLEANS

COUNT 10

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, PRESENT, that one **TYRONE BOVIA AKA "6"**

late of the Parish of Orleans, on the **11TH** day of **AUGUST** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **POSSESSED A WEAPON, TO WIT: A FIREARM, WHILE IN POSSESSION OF A CONTROLLED DANGEROUS SUBSTANCE, TO WIT: MARIJUANA, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

COUNT 11

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, PRESENT, that one **JAMES ALEXANDER AKA "POO"**

late of the Parish of Orleans, on the **25TH** day of **AUGUST** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **ATTEMPTED TO COMMIT SECOND DEGREE MURDER OF TREJON HUGHES, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

contrary to the form of Statute of the State of Louisiana in such cases made and provided and against the peace and dignity of the same.


Assistant District Attorney for the Parish Of Orleans

PARISH OF ORLEANS

State of Louisiana { ss.

CRIMINAL DISTRICT COURT FOR THE PARISH OF ORLEANS

COUNT 12

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **JAMES ALEXANDER AKA "POO"**

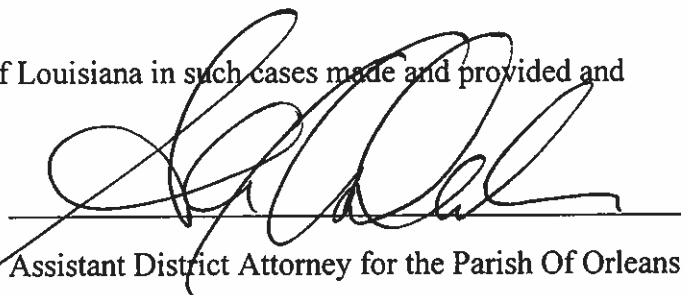
late of the Parish of Orleans, on the **25TH** day of **AUGUST** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **ATTEMPTED TO COMMIT SECOND DEGREE MURDER OF CAMERON PERSCHALL, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

COUNT 13

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **JAMES ALEXANDER AKA "POO"**

late of the Parish of Orleans, on the **25TH** day of **AUGUST** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **INTENTIONALLY OR CRIMINALLY NEGLIGENTLY DISCHARGED A FIREARM WHERE IT WAS FORESEEABLE THAT IT MIGHT RESULT IN DEATH OR GREAT BODILY HARM TO A HUMAN BEING, WHILE COMMITTING A CRIME OF VIOLENCE, TO WIT: ATTEMPTED SECOND DEGREE MURDER OF TREJON HUGHES, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

contrary to the form of Statute of the State of Louisiana in such cases made and provided and against the peace and dignity of the same.


Assistant District Attorney for the Parish Of Orleans

PARISH OF ORLEANS

State of Louisiana { ss.

CRIMINAL DISTRICT COURT FOR THE PARISH OF ORLEANS

COUNT 14

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **JAMES ALEXANDER AKA "POO" AND ONE RANDY CALVIN AKA "TOKEY HEFFNER" AND ONE CHANCE SKIPPER AKA "DOONA"** EACH

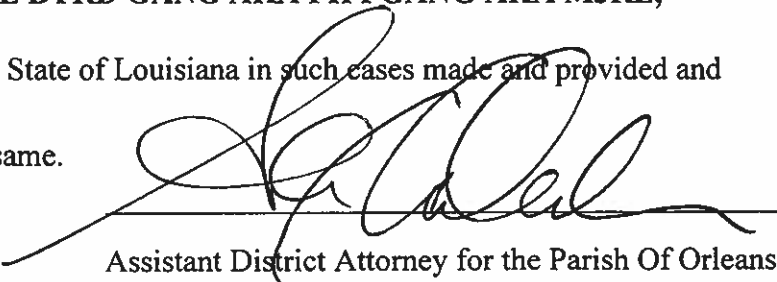
late of the Parish of Orleans, on the **25TH** day of **AUGUST** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **CONSPIRED TO OBSTRUCT JUSTICE IN THE ATTEMPTED MURDER OF TREJON HUGHES, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

COUNT 15

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **JAMES ALEXANDER AKA "POO" AND ONE RANDY CALVIN AKA "TOKEY HEFFNER" AND ONE CHANCE SKIPPER AKA "DOONA"** EACH

late of the Parish of Orleans, on the **25TH** day of **AUGUST** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **OBSTRUCTED JUSTICE IN THE ATTEMPTED MURDER OF TREJON HUGHES, IN FUTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

contrary to the form of Statute of the State of Louisiana in such cases made and provided and against the peace and dignity of the same.


Assistant District Attorney for the Parish Of Orleans

PARISH OF ORLEANS

State of Louisiana { ss.

CRIMINAL DISTRICT COURT FOR THE PARISH OF ORLEANS

COUNT 16

THE GRAND JURORS of the State of Louisiana, duly impaneled and sworn in and for the body of the Parish of Orleans, in the name and by the authority of the said State, upon their oath, **PRESENT**, that one **JAMES ALEXANDER AKA "POO" AND ONE RANDY CALVIN AKA "TOKEY HEFFNER" AND ONE CHANCE SKIPPER AKA "DOONA"**
EACH

late of the Parish of Orleans, on the **25TH** day of **AUGUST** in the year of our Lord, two thousand **AND SEVENTEEN** in the Parish of Orleans aforesaid, and within the jurisdiction of the Criminal District Court of the Parish of Orleans, **ACTED AS AN ACCESSORY AFTER THE FACT TO ATTEMPTED SECOND DEGREE MURDER OF TREJON HUGHES AND CAMERON PERSCHALL, IN FURTHERANCE OF A CRIMINAL STREET GANG KNOWN AS THE BYRD GANG AKA PIFFGANG AKA M3RE,**

contrary to the form of Statute of the State of Louisiana in such cases made and provided and against the peace and dignity of the same.


Assistant District Attorney for the Parish Of Orleans