UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA



INDICTMENT FOR VIOLATIONS OF THE FEDERAL GUN CONTROL ACT, CARJACKING, AND MURDER

UNITED STATES OF AMERICA * CRIMINAL NO:

v. * SECTION: ""

18 U.S.C. § 924(c)

* * *

The Grand Jury charges that:

COUNT 1

On or about September 14, 2008, in the Eastern District of Louisiana, the defendant, WALTER CONLEY, aka "Ike Neezy", did knowingly use, carry, and discharge an Astra, Model A80, .45 caliber pistol, serial number J3650, during and in relation to the commission of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: a conspiracy to distribute and possess with the intent to distribute cocaine base ("crack") and marijuana, in violation of Title 18, United States Code, Section 924(c)(1), and in the course of this violation caused the death of a person through the use of a firearm, which killing is a murder

as defined in Title 18, United States Code, Section 1111, in that the defendant, with malice aforethought, did unlawfully kill Paul May, by shooting him with the firearm willfully, deliberately, maliciously, and with pre-meditation; all in violation of Title 18, United States Code, Section 924(j).

COUNT 2

On or about January 15, 2010, in the Eastern District of Louisiana, the defendant, WALTER CONLEY, aka "Ike Neezy", with the intent to cause death or serious bodily harm, took a motor vehicle; to wit, a 2005 Suzuki Forenza bearing Louisiana license plate number NHN004, that had been transported, shipped, and received in interstate commerce, from the person and presence of another by force and violence and by intimidation, in violation of Title 18, United States Code, Sections 2119.

COUNT 3

On or about January 15, 2010, in the Eastern District of Louisiana, the defendant, WALTER CONLEY, aka "Ike Neezy", did knowingly use, carry, brandish, and discharge a firearm, to wit: an unknown make and model 9mm semi-automatic handgun, during and in relation to the commission of a crime of violence for which the defendant may be prosecuted in a court of the United States, to wit: carjacking as set forth in Count 2 of this indictment, in violation of Title 18, United States Code, Sections 924(c)(1).

NOTICE OF SPECIAL FINDINGS

- The Grand Jury incorporates by reference and realleges the allegations contained in Count 1 and makes the following special findings:
- 2. As to Count 1, defendant **WALTER CONLEY**, aka "Ike Neezy,"
 - a. was 18 years or older at the time of the offense;
 - b. intentionally killed Paul May (18 U.S.C. § 3591(a)(2)(A));
 - c. intentionally inflicted serious bodily injury that resulted in the death of Paul May (18
 U.S.C. § 3591(a)(2)(B));
 - d. intentionally participated in one or more acts, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than a participant in the offense, and Paul May would die as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(C));
 - e. intentionally and specifically engaged in one or more acts of violence, knowing that the act or acts created a grave risk of death to a person, other than one of the participants in the offense, such that participation in such act or acts constituted a reckless disregard for human life, and Paul May died as a direct result of such act or acts (18 U.S.C. § 3591(a)(2)(D)).

NOTICE OF GUN FORFEITURE

- 1. The allegations of Counts 1, 2, and 3 of this 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 1, 2, and 3 the defendant, **WALTER CONLEY**, aka "Ike Neezy", 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, Section 924(c).
- 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 defendant:
 - 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 defendant up to the value of the above forfeitable property. All in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(d)(1).

A TRUE BILL:

FOREPERSON

JIM LÆTTEN

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New Orleans, Louisiana January 27, 2012

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