

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

|                          |   |                     |
|--------------------------|---|---------------------|
| UNITED STATES OF AMERICA | * | CRIMINAL NO. 15-035 |
| v.                       | * | SECTION: "H"        |
| GLEN HOUSTON             | * |                     |
| JARRIN HARRIS            |   |                     |
| SAVANNAH HOUSTON         | * |                     |
| DENVER LONDON            |   |                     |
| JOESIA WILSON            | * |                     |
| BRITTANY CONNER          |   |                     |

## FACTUAL BASIS TO SUPPORT GLOBAL GUILTY PLEA

If this matter had proceeded to trial, the United States would have proved through the introduction of competent testimony and admissible evidence the facts below to support the allegations charged by the government in Counts One and Two of the Indictment now pending against **Glen Houston, Jarrin Harris, Savannah Houston, Denver London, Joesia Wilson, and Brittany Conner**, which charges both, conspiracy to distribute cocaine base (hereinafter, "cocaine base"), in violation of Title 21, United States Code, Section 846; and, conspiracy to use and carry firearms and possess firearms in furtherance of the aforementioned conspiracy to traffic cocaine base, heroin, and marijuana, and other crimes of violence, all in violation of Title 18, United States Code, Section 924(o).

## MEMBERSHIP IN THE HARVEY HUSTLERS

Glen Houston, Jarrin Harris, Savannah Houston, Denver London, Joesia Wilson, and **Brittany Conner**, (hereinafter collectively referred to as “**The Defendants**”) were members and/or associates of the “Harvey Hustlers” gang. The Harvey Hustlers gang (alternatively referred to as “the gang”) has been under investigation by the Federal Bureau of Investigation (“FBI”) and the Jefferson

U.S. Department of Justice  
Federal Bureau of Investigation ( FBI ) and the Jefferson  
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Parish Sheriff's Office ("JPSO") since 2009. The Harvey Hustlers operated in the Eastern District of Louisiana, primarily on the Westbank of Jefferson Parish, including in the Harvey, Scottsdale, Avondale, and Waggaman areas.

Members of the Harvey Hustlers have previously been indicted and convicted in the United District Court for the Eastern District of Louisiana in *United States v. Melvin Hudson, et al.*, 10-329, "F," and *United States v. Harry Smoot, et al.*, 14-168, "I."

The Harvey Hustlers gang was created and its existence maintained for several reasons. The gang earned money for its members through the sale of cocaine base to drug users, and members of the gang protected themselves, their narcotics, their money, and their territory through the possession and use of firearms.

#### **AGREEMENT TO SELL DRUGS TO FURTHER THE GOALS OF THE HARVEY HUSTLERS**

One reason the Harvey Hustlers gang was created and maintained was to enrich **The Defendants**, and others through the sale of narcotics within the gang's territory and elsewhere. Specific instances where certain of **The Defendants** possessed drugs with the intent to sell those drugs to enrich the members and associates of the gang include, but are not limited to:

a. In a controlled purchase monitored by the JPSO, on June 26, 2012, a confidential informant called and arranged a purchase of cocaine base from **Joesia Wilson**. **Brittany Conner** drove **Joesia Wilson** to and from the sale.

b. In a controlled purchase video monitored by the FBI, on July 17, 2012, **Savannah Houston** distributed \$50 worth of cocaine base to a confidential human source. **Denver London** answered the phone and assisted in coordinating the sale.

c. In a controlled purchase video monitored by the FBI, on July 27, 2012, **Savannah Houston** distributed \$100 worth of cocaine base to a confidential human source.

d. In a controlled purchase video monitored by the FBI, on August 1, 2012, **Savannah Houston** distributed \$100 worth of cocaine base to a confidential human source.

e. In a controlled purchase video monitored by the FBI, on September 1, 2012, **Glen Houston** distributed \$60 of cocaine base to a confidential human source from **Brittany Conner's** vehicle.

f. In a controlled purchase video monitored by the FBI, on September 7, 2012, **Glen Houston** distributed \$60 of cocaine base to a confidential human source from **Brittany Conner's** vehicle.

g. In a controlled purchase video monitored by the FBI, on April 9, 2013, **Glen Houston** distributed \$100 of cocaine base to a confidential human source. **Glen Houston** arrived in car driven by **Brittany Conner**, who opened door for **Glen Houston**.

h. On August 9, 2008, members of a multijurisdictional task force were working in Harvey, and observed **Savannah Houston** operating a vehicle without headlamps and no seatbelt. Police approached the vehicle, and smelled burnt marijuana. **Savannah Houston** then put the car in drive and fled the scene. **Savannah Houston** lost control of the vehicle, and then fled on foot. **Savannah Houston** was apprehended after a foot chase on the canal bank. In a search incident to arrest, police recovered a bag containing cocaine base off of **Savannah Houston's** person, and located a partially burned marijuana cigar in her vehicle. On December 1, 2008, **Savannah Houston** pled guilty to Possession of Cocaine in Jefferson Parish case number 08-4994, "D".

i. On September 16, 2012, victim R.R. called JPSO to report that she had been the victim of a battery with a stun gun and an aggravated assault. The victim reported that two females knocked on her door and asked to speak to her. The victim walked outside and the two females began hitting her. One of the girls put a stun gun to her back, and when a neighbor tried to intervene, **Savannah Houston**, who was standing next to a car, brandished a firearm and told the Good Samaritan "leave them alone or I will shoot you." One of the initial attackers ran to the car **Savannah Houston** was standing next to and asked two males (later identified as **Glen Houston** and **Jarrin Harris**) for a gun to shoot the victim. The males refused. The five suspects then fled. Officers saw and pursued the suspects' vehicle later, and **Savannah Houston** fled on foot and discarded a bag containing 24 grams of cocaine base. **Savannah Houston** was apprehended later, and police recovered two guns near the car, and another in the direction of flight. **Jarrin Harris** and **Glen Houston** were not located, but jail calls from Savannah later implicated them. On December 12, 2013, **Savannah Houston** pled guilty to Possession with the Intent to Distribute Cocaine in Jefferson Parish case number 13-1964, "O," as well as one count of being a Felon in Possession of a Firearm.

j. On February 4, 2013, the New Orleans Police Department ("NOPD") was dispatched to O. Perry Walker High School in Algiers, due to a coach complaining about non-student **Savannah Houston** fighting with a male student in the grass outside of the school. NOPD arrested **Savannah Houston** for trespassing, and while moving her vehicle (which was obstructing traffic) police saw in plain view a plastic bag containing cocaine base. On May 21, 2014, **Savannah Houston** pleaded guilty to possession of cocaine in Orleans Parish Criminal District Court case number 515-421, "L."

k. On March 20, 2008, a would-be drug purchaser complained to police that he was robbed by purported drug dealers during a drug transaction. **Joesia Wilson**, **Savannah Houston**, and

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four other individuals observed the police and fled, and the police chased them into an abandoned FEMA trailer. The police found less than one gram of cocaine base and 90 grams of marijuana near a bathroom inside of the trailer.

1. On July 30, 2008, **Joesia Wilson** was arrested by JPSO. Police received information that Joesia was near Estalotte and Paillet streets in Harvey, and relocated there to arrest him on another crime. Police observed **Joesia Wilson** near a vehicle, and he dropped a bag containing 19.86 grams of cocaine base. **Savannah Houston** was also present, and attempted to pick up the bag of cocaine base. **Joesia Wilson** pleaded guilty as charged to possession with the intent to distribute cocaine in Jefferson Parish case number 08-4374, "I", on March 17, 2010.

Additionally, the following witnesses would have offered the testimony described below:

- Cooperating Witness #1 would testify that he/she observed **Jarrin Harris, Savannah Houston, Glen Houston, and Denver London** distribute cocaine base multiple times per week over the course of months. He/she also observed **Jarrin Harris, Glen Houston, Savannah Houston and Denver London** in possession of guns.
- Cooperating Witness # 2 would testify that he/she has observed **Jarrin Harris, Glen Houston, Savannah Houston and Denver London** sell cocaine base daily in the Harvey neighborhood of the Westbank for over a period of years. He/she has observed these **Jarrin Harris, Glen Houston, Savannah Houston and Denver London** in possession of handguns, and has seen **Jarrin Harris** in possession of a rifle. He/she says that **Jarrin Harris** would receive an ounce of cocaine at least every other day for years, and then sell the cocaine as cocaine base.

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- Cooperating Witness #3 would testify that:
  - He/she has purchased cocaine base in increments ranging from \$10.00 to \$50.00 on at least 30 occasions from **Glen Houston**.
  - He/she has purchased cocaine base in increments ranging from \$20.00 to \$50.00 on approximately 20 to 30 occasions from **Jarrin Harris**.
  - He/she has purchased cocaine base in increments ranging from \$10.00 to \$100.00 on approximately 50 occasions from **Savannah Houston**.
  - He/she witness has purchased cocaine base in increments ranging from \$20.00 to \$30.00 on approximately 20 to 30 occasions from **Joesia Wilson**.
  - He/she has purchased cocaine base in increments ranging from \$20.00 to \$50.00 on approximately 20 to 30 occasions from Denver London.
  - He/she knows **Brittany Conner** as a frequent companion of **Joesia Wilson**, then **Glen Houston**, after **Joesia Wilson** went to jail. **Conner** has handed over cocaine base to the witness on multiple occasions when the witness was purchasing from **Joesia Wilson** or **Glen Houston**.
- Cooperating Witness # 4 would testify that he/she observed **Glen Houston**, **Savannah Houston**, **Jarrin Harris**, and **Joesia Wilson** sell cocaine base to others in Harvey.
- Cooperating Witness # 5 would testify that he/she observed **Glen Houston**, **Denver London**, and **Jarrin Harris** selling cocaine base on Brown Street in Harvey, and that he once observed Glen Houston in possession of a firearm.
- Cooperating Witness # 6 would testify that he/she observed **Savannah Houston** sell cocaine base for years, and has personally witnessed **Savannah Houston** engage in over five hand-to-

hand transactions. He/she says that **Savannah Houston** was always armed. He/she has also seen **Glen Houston** and **Joesia Wilson** in possession of firearms, and knows that they both sell crack. He/she once observed **Joesia Wilson** armed with a firearm as he stood with **Savannah Houston** as she was making a sale.

**AGREEMENT TO POSSESS FIREARMS TO  
FURTHER THE GOALS OF THE HARVEY HUSTLERS**

An additional reason the Harvey Hustlers gang was created and maintained was to preserve and protect the power, territory, and drug profits of the gang through the use of intimidation and threats of violence; and to keep victims, potential victims, and witnesses in fear of the gang and in fear of its members and associates through violence and threats of violence with firearms. Among other instances, certain of **The Defendants** possessed firearms to achieve these goals on the following days:

- On September 24, 2008, **Joesia Wilson** discharged a firearm near a canal bank at 1500 Estalotte Street. **Joesia Wilson** pleaded guilty on March 17, 2010 in Jefferson Parish to Illegal Use of Weapons in case number 08-5757, "I."
- On May 4, 2009, JPSO executed a search warrant at a home in Marrero. Before entering the house, police observed **Joesia Wilson** exit the residence with an object wrapped in a black T-shirt, and then return a minute later. During the execution of the search warrant, police searched the water heater shed of the abandoned residence next door to the home, and found the T-shirt wrapped around a semi-automatic pistol and 99 foils of heroin. **Joesia Wilson** pleaded guilty to Possession with the Intent to Distribute Heroin in Jefferson Parish case number 09-3066, "I," on March 17, 2010.

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- On January 13, 2010, Police were dispatched to the Marrero neighborhood of Lincolnshire in regards to multiple gunshots. Police located **Denver London** and K.W. hiding in a shed near the area of the shooting. Police located two pistols in a barbeque pit in the shed. **Denver London** told police that they were picking up a friend in that neighborhood when an unknown person opened fire on them with an AK-47 so they ran for protection. Another witness later came forward to say that she saw **Denver London** and another man shooting pistols out of a vehicle in the neighborhood. **Denver London** pleaded guilty on May 27, 2010, in Jefferson Parish case number 10-0656, "D," to Illegal Use of Weapons.
  - **Denver London** was arrested on July 17, 2011, for possession of a stolen firearm. Police responded to a complaint of subjects selling narcotics. They arrived, and **Denver London** fled on foot when he observed police presence. Police chased London and saw him throw down a magazine and then a firearm. Police detained **Denver London** and recovered the stolen pistol, but not the magazine.
  - On January 19, 2011, **Jarrin Harris** was riding in a stolen car. He was placed under arrest, and police located a loaded semi-automatic pistol in **Jarrin Harris's** waistband, and an extra magazine in his back pocket. **Jarrin Harris** was convicted on April 7, 2011, in Jefferson Parish case number 11-0743, "K," of Illegal Carrying of Weapons on January 18, 2011.
- FBI agent James Ollinger observed **Glen Houston** fleeing a lawful detention armed with a firearm on April 9, 2013. The firearm was not recovered, but police located \$516.00 in cash in the glove box of the vehicle **Glen Houston** abandoned. A search warrant later executed at **Glen Houston's** residence recovered a black pouch containing a 5.56 mm magazine loader, a box of .32 caliber live cartridges, twelve .45 caliber live cartridges, two 5.56mm live cartridges, and twenty-two 9mm live cartridges, all from **Glen Houston's** bedroom.

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- **Brittany Conner** gave consent to search her vehicle on April 9, 2013 (when they were executing a warrant at **Glen Houston's** home) and police recovered a 100 round capacity 5.56mm magazine from inside of **Brittany Conner's** car.
- **Savannah Houston** was stopped in New Orleans on September 26, 2011, for a traffic violation, and ran on foot away from the vehicle. **Savannah Houston** was chased and captured, and police located marijuana in the car and a 9mm pistol under the front passenger seat.
- On July 6, 2012, police executed a search warrant at the home of **Joesia Wilson** and B.H. Police located a .45 caliber pistol in the bedroom occupied by **Joesia Wilson** and **Brittany Conner**. **Brittany Conner** told police that the gun was hers. Police then located a digital scale and .45 caliber ammunition in **Brittany Conner's** vehicle.

#### DRUG QUANTITY STIPULATION

For purposes of sentencing, the United States and **The Defendants** agree and stipulate that under the agreement of the members and associates of the Harvey Hustlers gang, between 2008 and 2013, it was reasonably foreseeable by **Glen Houston, Jarrin Harris, Savannah Houston, and Denver London**, as members and associates of the gang, that the gang possessed and sold more than 280 grams but less than 840 grams of cocaine base. For purposes of sentencing, the United States and **The Defendants** agree and stipulate that under the agreement of the members and associates of the Harvey Hustlers gang, between 2008 and 2013, it was reasonably foreseeable by **Joesia Wilson**, as a member and associate of the gang, that **Joesia Wilson** possessed and sold more than 22.4 grams but less than 28 grams of cocaine base. For purposes of sentencing, the United States and **The Defendants** agree and stipulate that under the agreement of the members and associates of the Harvey Hustlers gang, between 2008 and 2013, it was reasonably foreseeable by **Brittany Conner**, as a member and associate of the

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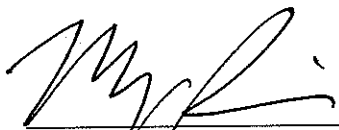
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gang, that **Brittany Conner** possessed and distributed more than 2.8 but less than 5.6 grams of cocaine base.

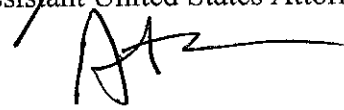
**LIMITED NATURE OF FACTUAL BASIS**

This proffer of evidence is not intended to constitute a complete statement of all facts known by the government or **The Defendants**, but rather is a minimum statement of facts intended to establish the necessary factual predicate for the global guilty plea agreement between the government and **The Defendants**. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the pleas of guilty as to each of **The Defendants**.

**READ AND APPROVED:**

  
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MYLES RANIER  
Assistant United States Attorney


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ARTHUR LEMANN, IV  
Counsel for Glen Houston

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JAMES WASHINGTON  
Counsel for Jarrin Harris

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GEORGE CHANEY  
Counsel for Savannah Houston

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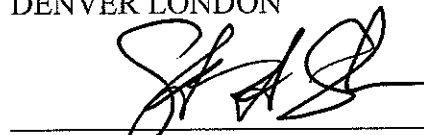
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DYLAN UTLEY  
Counsel for Denver London

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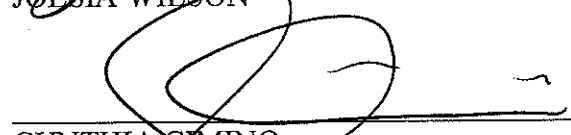
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STEPHEN H. SHAPIRO  
Counsel for Joesia Wilson

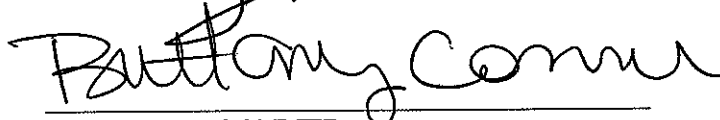
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CYNTHIA GIMINO  
Counsel for Brittany Conner

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