

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA * CRIMINAL NO.: 18-27
v. * SECTION: "G"
BRAD MILLIGAN *

* * *

FACTUAL BASIS

Defendant, **BRAD MILLIGAN** ("MILLIGAN"), has agreed to plead guilty pursuant to a plea agreement with the Government to Counts 1 through 4 of the Bill of Information. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimony and physical and demonstrative evidence, the following facts to support the allegations against the defendant:

In 2013, the Bureau of Alcohol, Tobacco, Firearms and Explosives (hereinafter referred to as "ATF") began investigating the shipment of explosive precursor chemicals. During this investigation, it was discovered that **MILLIGAN** was acquiring large quantities of precursor chemicals, pyrotechnic tubes, fusing and relates materials, all indicative of an illegal explosive device manufacturing operation. Between the years 2013 and 2015, ATF received information that **MILLIGAN** was purchasing chemicals such as potassium perchlorate and aluminum powder from internet based pyrotechnic and chemical suppliers. These chemicals are commonly used to manufacture pyrotechnics, and to manufacture a substance known as flash powder. Flash powder is an extremely powerful and sensitive explosive material. Based upon the quantity and frequency

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of purchases that **MILLIGAN** made, ATF agents believed that **MILLIGAN** was manufacturing flash powder to make M-type illegal explosive devices.

In August 2015, the Jefferson Parish Sheriff's Office (hereinafter referred to as "JPSO") received an anonymous Crimestoppers tip that **MILLIGAN** was selling narcotics and steroid from his Metairie residence. The tipster also informed Crimestoppers that **MILLIGAN** was manufacturing explosives at the residence. This tip led investigators to conduct surveillance of **MILLIGAN**'s residence. **MILLIGAN**'s residence is located within the Eastern District of Louisiana. During the surveillance, ATF agents observed an individual meet with **MILLIGAN** at his residence. ATF agents observed **MILLIGAN** transfer a medium-size, semi-translucent bag to an individual. The bag was visually observed to contain numerous, small, cylindrical items, that ATF agents believed to be M-type explosive devices. ATF agents conducted an interview with this individual and learned that he/she purchased approximately twenty (20) explosive devices from **MILLIGAN**.

Days later, ATF agents conducted surveillance a second time at **MILLIGAN**'s residence. Agents observed an individual knock on **MILLIGAN**'s door and speak with **MILLIGAN**. While the agents did not observe **MILLIGAN** distribute anything to the individual, they elected to stop the individual for questioning. The individual initially denied having knowledge that **MILLIGAN** sold illegal explosive devices. As questioning continued, he/she admitted to purchasing explosive devices from **MILLIGAN**.

Based upon the information received and the observations made during the surveillance operation, members of JPSO obtained a search warrant for **MILLIGAN**'s residence.

On December 30, 2015, members of ATF and JPSO executed the search warrant at **MILLIGAN**'s residence. **MILLIGAN** was located in the driveway of the residence. Upon seeing

law enforcement, **MILLIGAN** spontaneously stated that he knew that investigators were at his residence because he sells fireworks. **MILLIGAN** was advised of his *Miranda* rights and elected to waive his rights. **MILLIGAN** told agents that he had been manufacturing and distributing explosives for years. In addition to this admission, he told law enforcement officers that he also manufactured and distributed steroids for a “lengthy” period of time.

During the search of the residence, a large quantity of explosive products, to include flash powder precursor chemicals, specifically, aluminum powder and potassium perchlorate were located. In addition to these precursors, large quantities of fiberboard tubes, fuses, and tube caps, were located, all of which are used to construct explosive devices were also located. ATF agents also located completed illegal explosive devices. **MILLIGAN** did not have a license to sell explosive devices within the Eastern District of Louisiana.

While conducting their search, members of the JPSO located numerous precursors utilized for the manufacturing of steroids within a cabinet inside of **MILLIGAN**’s residence. The cabinet contained four (4), ten (10) milliliter vials of steroid precursor chemicals, specifically, Dromostanolone Propionate, Trenbolone Acetate, Nandrolone Decanoate, and Testosterone Propionate. Additionally, a number of additional materials were located which corroborated **MILLIGAN**’s statement that he sold steroids. These materials include glass measuring vials and laboratory equipment, glass storage bottles, rubber lids, capping devices, droppers, needles, syringes, and a scale. **MILLIGAN** provided a recorded statement to JPSO explaining how he

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used the materials and chemicals to manufacture steroids. **MILLIGAN** does not have a license to either manufacture or distribute anabolic steroids.

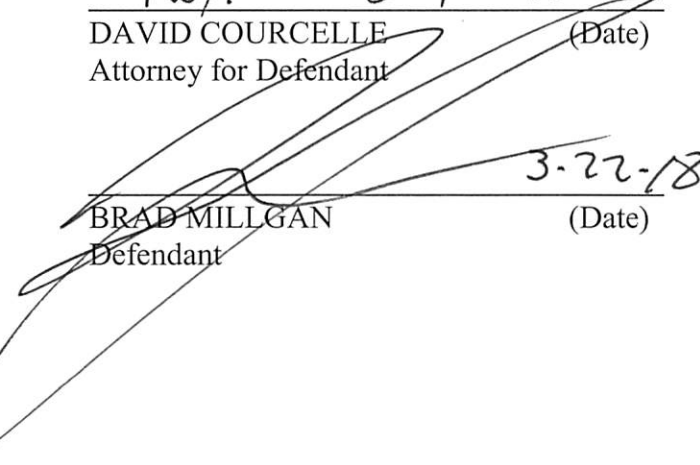
Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **MILLIGAN** and by the Government, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the guilty plea of the charged offenses for **MILLIGAN**.

READ AND APPROVED:

 03/22/2018
BRITTANY L. REED (Date)
Assistant United States Attorney

 3-22-18
DAVID COURCELLE (Date)
Attorney for Defendant

 3-22-18
BRAD MILLIGAN (Date)
Defendant