

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

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CRIMINAL NO: 16-068

v.

*

SECTION: "R"

LANCE STOVALL

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FACTUAL BASIS

The above-named defendant, **LANCE STOVALL** ("**STOVALL**") has agreed to plead guilty to Count One of the Superseding Indictment. Should this matter proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony, drug evidence, Title III wire and electronic interceptions, and other reliable evidence, the following facts. Unless stated otherwise, these acts occurred in the Eastern District of Louisiana:

During the timeframe of the conspiracy, **STOVALL** conspired with Jonathan Lawrence, Brandon Hall, Aloysius Korieocha, Donald Marcelin, Brian Maxson, Dwayne Labranch, Vonzo Magee, and others, to distribute 100 grams or more of heroin and a quantity of fentanyl throughout the New Orleans area. These individuals were members of a drug-trafficking organization that operated primarily in the Eastside Hollygrove neighborhood of New Orleans. Collectively, the group referred to their Eastside Hollygrove neighborhood as "The Zoo," a name derived from a popular rap song/video filmed in the neighborhood. **STOVALL** maintained a number of drug customers whom he frequently supplied with quantities of heroin and fentanyl over the course of this conspiracy. Many of these customers were referred to **STOVALL** by Lawrence.

Throughout its investigation, the lead case agents from the Federal Bureau of Investigation New Orleans Gang Task Force ("FBI NOGTF") and Drug Enforcement Administration ("DEA") conducted controlled purchases of heroin and fentanyl, and performed a number of drug seizures.

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WILLIAM W. BLEVINS
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Most of the drugs obtained in the course of this investigation had been sold by the defendants as heroin, and determined to be heroin through lab analysis. However, throughout the investigation, agents would occasionally obtain user quantities of fentanyl, or a combination of fentanyl and heroin, through controlled purchases from the defendants.

In 2015, law enforcement efforts began to focus on Jonathan Lawrence as a significant distributor of narcotics in Eastside Hollygrove. Agents conducted multiple controlled purchases of heroin from Lawrence, each involving between one gram and seven grams of heroin. After the controlled purchases, agents executed two separate Title III wiretap warrants on Lawrence's phone. The first interception period was from February 18, 2016, through March 18, 2016. The second interception period was from April 14, 2016, through April 22, 2016. During both interception periods, law enforcement intercepted numerous phone calls and text messages between Lawrence and others in furtherance of their joint drug-trafficking organization.

STOVALL used phone number 504-209-3797. Over the course of the Title III interceptions on Lawrence's phone, agents frequently intercepted Lawrence directing customers to contact **STOVALL** in order to purchase narcotics.

Law enforcement also conducted multiple controlled purchases of narcotics from **STOVALL**. On April 6, 2016, a Confidential Informant (CI) called **STOVALL** and arranged to purchase heroin. **STOVALL** directed the CI to meet at the Burger King on South Carrollton and Tulane Avenue. While under surveillance, the CI entered the Burger King parking lot and entered a car that was known by law enforcement to be associated with **STOVALL**. Inside the car, the CI purchased \$200 of heroin from **STOVALL**. **STOVALL** was in the driver's seat of the car, and Vonzo Magee was in the passenger's seat. The heroin was tested at a DEA lab and determined to be 1.7 grams of heroin.

On April 15, 2016, a CI called **STOVALL** and arranged to purchase heroin. **STOVALL** directed the CI to meet at Live Oak Street and Palm Street in the Hollygrove neighborhood. **STOVALL** entered the CI's car and provided the CI with two bags of a brown powder substance in exchange for \$200 in drug buy money. Surveillance footage from inside the car later confirmed that the individual who entered the car was **STOVALL**. The powder substance was tested by DEA and determined to be 1.8 grams of fentanyl.

On April 22, 2016, FBI executed a federal search warrant at 5324 Wildair Street. This is an address that, through surveillance, FBI had linked to **STOVALL** and **STOVALL's** brothers. At the time of the search warrant, **STOVALL**, Vonzo Magee, and **STOVALL's** brother Lydell Stovall were all present in the house. From a sofa in the common area, agents recovered a loaded .45 caliber pistol with a drum magazine. Fingerprint analysis on this firearm returned no usable prints. Agents also recovered 1.3 net grams of heroin, marijuana, a digital scale, and Bonita cutting agent.

STOVALL possessed a cell phone on his person at the time of the Wildair Street search warrant. Agents confirmed that phone number 504-209-3797 was assigned to the phone. A search warrant for the contents of 504-209-3797 was obtained. A search of the phone revealed numerous drug related text messages, pictures of **STOVALL** (one used as a screensaver), and the email address associated with the phone (which was in **STOVALL's** true name). The drug related texts were with numerous drug customers. The evidence contained within these text messages, combined with statements by **STOVALL's** former customers, show that **STOVALL's** involvement in the conspiracy involved 100 grams or more of heroin.

STOVALL and the government stipulate for the purposes of sentencing that **STOVALL** was responsible for between 100 grams and 400 grams of a mixture or substance containing

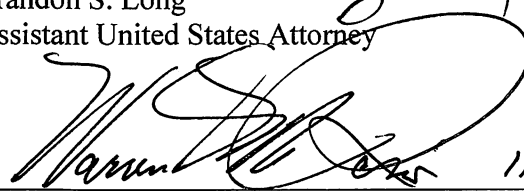
heroin, through **STOVALL's** own conduct and the reasonably foreseeable conduct of his co-conspirators.

Limited Nature of Factual Basis


This proffer of evidence is not intended to constitute a complete statement of all facts, 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 **STOVALL's** plea of guilty to the charged offense.

 11/14/18

Brandon S. Long (Date)
Assistant United States Attorney

 11/14/18

Warren P. McKenna, III (Date)
Counsel for Defendant Lance Stovall

 11/14/18

Lance Stovall (Date)
Defendant