

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

\*

CRIMINAL NO. 19-035

v.

\*

SECTION: "H"

BRIAN TILLMAN

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a/k/a "Cosca"

\*

a/k/a "Costa"

\*

a/k/a "Speedy"

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FACTUAL BASIS

The defendant, Brian TILLMAN, a/k/a "Cosca," a/k/a "Costa," a/k/a "Speedy," has agreed to plead guilty as charged to the Superseding Bill of Information charging TILLMAN with Conspiracy to Distribute and Possess With the Intent to Distribute 100 grams or more of heroin and 28 grams or more of cocaine base, and a quantity of marijuana, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), (b)(1)(D) and 846. Had this matter proceeded to trial, the government would have proven beyond a reasonable doubt the allegations in the Superseding Bill of Information, namely that the defendant committed the following crimes:

In the fall of 2017, members of the Federal Bureau of Investigation's ("FBI") New Orleans Gang Task Force ("NOGTF") began investigating the distribution of narcotics in the Hollygrove neighborhood of New Orleans, located near the western boundary of Orleans Parish. The NOGTF is a federal law enforcement team comprised of both FBI Special Agents and members of state law enforcement agencies that investigates gang activity in the metropolitan New Orleans area.

The NOGTF began to investigate and conduct surveillance in 2017 at a location known as Mel's Food Store, at the intersection of Marks and General Ogden streets. Mel's Food Store had

been operated by Hafiz ALKHAWAJAH since approximately 2015. ALKHAWAJAH was in the store daily, and was in charge of all of the daily aspects of maintaining the store, including but not limited to bookkeeping and security. Mel's was a bare-bones operation. It offered very few items for sale outside of cigarettes, beer and cold drinks. It had many barren shelves, inoperable refrigerators, a non-functioning deli area, and inoperable surveillance equipment. ALKHAWAJAH allowed drug dealers and neighborhood gangsters to sell drugs and hang out in the store, and some of them would post pictures to social media of drug dealers smoking marijuana and possessing firearms from inside of the store.

Over days of surveillance, the NOGTF observed that dozens of people were travelling every day to Mel's Food Store on foot, bicycle, or in vehicles and engaging in suspected hand-to-hand narcotics transactions with men who were present outside of Mel's. The suspected distributors of narcotics were observed walking in and out of Mel's, and ALKHAWAJAH was present inside of the store during these distribution.

The International School of Louisiana's ("ISL") elementary school campus for grades kindergarten through second grade was across Marks street from Mel's. ISL is a public school that provides immersion language instruction for children in the metropolitan New Orleans area. School administrators made multiple complaints to local law enforcement and city officials that Mel's was the base of an open-air drug market operating across the street from their school. Neighbors and property owners near Mel's made similar complaints. School administrators and neighbors were ultimately interviewed by members of the NOGTF during the investigation.

Following surveillance of suspected hand-to-hand transactions in the Eastside Hollygrove neighborhood around Mel's Food Store, members of the NOGTF would follow the suspected narcotics purchasers from the neighborhood. Frequently, cars leaving the area would return to the

direction of Jefferson Parish via Airline Highway. The NOGTF elected to conduct investigatory stops on these vehicles. Officers conducted approximately 12 investigatory stops in this manner, and began interviewing the narcotics purchasers. From these interviews, agents learned the names or nicknames of drug dealers, their phone numbers, what type of drugs were being sold, and what price the drugs were being sold. Agents then accessed law enforcement databases with this information to identify the suspected narcotics traffickers.

In conjunction with surveillance and drug user interviews, agents used a confidential informant to purchase heroin and cocaine base directly from the targets, including TILLMAN, Corey JOHNSON, Travis CURTIS, and others.

On March 27, 2018, a Judge for the United States District Court for the Eastern District of Louisiana signed an Order authorizing interception of telephone number (504) 205-2198, Target Telephone #1, used by TILLMAN and others. Interceptions began on March 29, 2018 and ended on April 27, 2018. The Court signed a renewal Order May 1, 2018, and interceptions went again through May 30, 2018.

On the first day of interceptions, agents observed dozens of calls and texts to TILLMAN, who was operating the phone that day, requesting to purchase or sell illegal narcotics. Many callers requested "boy," slang for heroin, and "girl," slang for cocaine base. Lance COLLINS was intercepted calling from phone number (504) 250-8239 to Target Telephone #1 and offering to sell TILLMAN an ounce of heroin for \$2,000. On a later call, TILLMAN agrees to buy \$1,000 worth of heroin from COLLINS.

During the other days of interception, agents observed both JOHNSON and CURTIS operating Target Telephone #1 to facilitate distribution of heroin and cocaine base to retail customers. Agents also intercepted calls between Josh TAPP, operating phone numbers (504)

430-5093 and (504) 715-6338, and TILLMAN and JOHNSON, operating Target Telephone #1, wherein TAPP offered and/or arranged the sale of heroin to TILLMAN and JOHNSON. Calls intercepted on April 5 and 6 of 2018 detailed TAPP arranging to distribute a quantity of heroin to TILLMAN. On April 6, 2018, agents observed a vehicle belonging to TAPP enter the Hollygrove neighborhood and then depart.

On April 9, 2018, agents intercepted a call from TILLMAN to TAPP where TILLMAN tells TAPP to "bring me another one," and TAPP agrees. Surveillance on this date observed TAPP arrive at the Shell Station on Airline Highway, meeting TILLMAN, and then TILLMAN and TAPP drive their respective vehicles into the Hollygrove neighborhood, and then depart the area.

On April 10, 2018, agents intercepted a call wherein TAPP calls Target Telephone #1 and advises JOHNSON, who answers Target Telephone #1, that TAPP now has a new number, and that JOHNSON should lock it in. On April 13, 2018, TILLMAN and TAPP speak, and TILLMAN asks TAPP to "bring me a whole" serving of heroin, and TAPP agrees.

TILLMAN also allowed JOHNSON and CURTIS to operate and make sales on Target Telephone #1.

Agents conducted controlled purchases using a confidential informant from TILLMAN multiple dates in 2017 and 2018. During these video-recorded encounters, law enforcement purchased over 20 grams of heroin from TILLMAN in exchange for approximately \$2,000. Agents determined and would prove at trial that that TILLMAN purchased heroin from Josh TAPP up to two times per week for at least a year for \$500 to \$1,000 each time.

On June 15, 2017, members of the Jefferson Parish Sheriff's Office arrested TILLMAN for possession with intent to distribute marijuana. During execution of a search warrant at his Metairie, Louisiana residence, police recovered 53 grams of marijuana and \$555.00 from



TILLMAN's possession. This investigation was documented under JPSO item number F-13487-17.

On April 30, 2018, members of the Jefferson Parish Sheriff's Office arrested TILLMAN following a traffic stop that was initiated on Airline Highway. Law enforcement recovered over one gram of cocaine base, over three grams of marijuana, and over \$5,000 in cash that was in TILLMAN's possession at the time of the stop from TILLMAN's car, person, apartment, and his passenger. This investigation was documented under JPSO item number D-25202-18. The government and the defendant agree that these crimes were overt acts in furtherance of the conspiracy.

Josh TAPP supplied TILLMAN with heroin, in quantities of up to an ounce, multiple times per month during the timeframe of the conspiracy. TILLMAN also acquired cocaine base from Sental SUTHERLAND, a/k/a "Sandman." TILLMAN also acquired heroin from Kintrell WILLIAMS, a/k/a "Trell," during the timeframe of the conspiracy. Brian JONES, a/k/a "Turk," sold cocaine base and heroin and brought customers to the Hollygrove neighborhood to buy cocaine base and heroin from TILLMAN and others during the timeframe of the conspiracy. ALKHAWAJAH let TILLMAN mix, package, and sell drugs inside of MEL's. Other drug dealers were also allowed to sell drugs in the store. ALKHAWAJAH let TILLMAN store drugs in the store overnight on occasion, or hide drugs in Mel's whenever the police were approaching the store, including a pound of marijuana and bags of heroin. ALKHAWAJAH also alerted TILLMAN after ALKHAWAJAH attended a community meeting at the elementary school across the street, where community members asked ALKHAWAJAH to stop letting people sell drugs around his store.

The FBI ultimately conducted interviews with multiple purchasers of heroin and cocaine


base who reported that they purchased heroin and cocaine base from TILLMAN over dozens of occasions in 2016, 2017, and 2018. The government and TILLMAN agree that the defendant should be held responsible for the distribution of at least 100 but less than 400 grams of heroin and between 28 and 112 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 and/or Brian TILLMAN. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for his guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offenses by TILLMAN.



The above facts come from an investigation conducted by, and would be proven at trial beyond a reasonable doubt by credible testimony from members of the New Orleans Police Department, members of the Jefferson Parish Sheriff's Office, and Special Agents and forensic examiners from the Federal Bureau of Investigation, lay witnesses with personal knowledge of these facts, and admissible, tangible exhibits in the custody of the FBI.

**READ AND APPROVED:**

  
David Arena [date] 11/25/20  
Counsel for Brian TILLMAN

  
Myles Ranier [date] 11/25/2020  
Assistant United States Attorney

  
Brian TILLMAN [date]  
Defendant

AUSA   
Defendant   
Defense Counsel 