

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

**UNITED STATES OF AMERICA** \* **CRIMINAL NO.: 18-109**  
v. \* **SECTION: "E"**  
**KEVIN COFFIL** \*

\* \* \*

**FACTUAL BASIS**

Had this matter proceeded to trial, the government would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimony and other evidence, the following facts to support the allegations against the defendant, **KEVIN COFFIL** ("**COFFIL**").

During the time frame of the conspiracy charged in Count 1 of the superseding indictment, **COFFIL** conspired with Arthur Johnson, Jamar Rucker, Annice Falkins, Jonas Scott, Quintin Risin, Ricky Redd, Brandon Sanders, Cherell Vallery, James Anderson, and other persons known and unknown, to distribute and to possess with intent to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin in the Eastern District of Louisiana and elsewhere.

**COFFIL** is Arthur Johnson's nephew. According to an FBI confidential source, CS-1, **COFFIL** was known to Johnson's drug customers as "Nephew." **COFFIL** helped Johnson run

his drug-trafficking operation and would often serve Johnson's customers on Johnson's behalf. Johnson also purchased multiple cars jointly in the name of Johnson and **COFFIL**. Johnson frequently engaged in controlled purchases of narcotics while driving a black Honda Accord that was registered to Arthur Van Johnson and Kevin Morris Coffil, Jr.

On June 19, 2017, investigating agents directed CS-1 to contact Johnson to set up a controlled purchase of heroin. CS-1 told Johnson, "I gotta stack (i.e., \$1,000) for ya. I need to come see ya." CS-1 intended to purchase \$1,000 in heroin from Johnson. However, Johnson was out of state at the time and replied, "I'm gone, but let me call 'nephew.' Hold up." The call ended. CS-1 had previously bought heroin from **COFFIL** and knew that Johnson called **COFFIL** "Nephew." Minutes later, **COFFIL** called CS-1 and they agreed to meet at a later date for the sale of heroin.

On June 22, 2017, agents established surveillance at **COFFIL's** residence, [REDACTED] [REDACTED] CS-1 called **COFFIL's** number and they agreed to meet in New Orleans East. Agents gave CS-1 \$1,000 of controlled purchase money and an audio and video recording device. Agents followed **COFFIL** from [REDACTED] to the intersection of Means Avenue and Morrison Road in New Orleans, where he met with CS-1 in CS-1's car. CS-1 later provided agents with the purchased heroin and the recording device. The substance weighed approximately 20.7 grams and tested positive for heroin. Agents reviewed the audio and video recording device, and saw **COFFIL** entering CS-1's vehicle and accepting the controlled purchase money from CS-1. The recording also showed **COFFIL** placing bags of suspected heroin into his pocket at the conclusion of the deal.

Codefendant Arthur Johnson was arrested on or about December 28, 2017. Johnson was detained pending disposition of his case. On July 23, 2018, agents intercepted a series of jail calls

between Johnson and COFFIL. In the calls, they discussed COFFIL driving from Texas to New Orleans to pick up a large sum of money from an associate of Johnson.

That evening, agents established surveillance in the vicinity of [REDACTED]. Agents observed a blue Jeep Wrangler park in the driveway of the address. COFFIL exited the car and began walking around the back carrying a Lululemon bag. Agents approached the car and detained COFFIL. Agents could feel and see cash inside of the bag. Agents advised COFFIL of his rights. COFFIL stated, "I already know what this is about." Agents searched the bag and saw that it contained over \$113,000 in US currency. COFFIL knew that this money represented the proceeds of at least 1 kilogram of heroin sold by Johnson in the course of his drug operation. COFFIL knew that Johnson's associate had been holding this money on Johnson's behalf. COFFIL intended to transport the money from Houston to New Orleans at Johnson's request.


On the scene, agents patted down COFFIL and recovered \$861 in currency. Agents searched the [REDACTED] residence and recovered one bottle of Inositol powder, \$1607 in currency, one folding knife with brown residue, clear baggies, and razor blades, all belonging to COFFIL and all instruments of his drug operation.

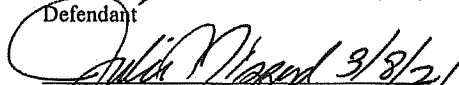
The Government and COFFIL stipulate and agree that COFFIL should be held accountable for at least 1 kilogram but less than 3 kilograms of a mixture or substance containing a detectable amount of heroin, as this amount was distributed during the course of the conspiracy as a result of the defendant's 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 known by the defendant, KEVIN COFFIL, 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 defendant's plea of guilty.

APPROVED AND ACCEPTED:

  
\_\_\_\_\_  
KEVIN COFFIL (date)  
Defendant

  
\_\_\_\_\_  
JULIE TIZZARD (date)  
Counsel for Defendant

  
\_\_\_\_\_  
DAVID HOWARD SINKMAN (date)  
Assistant United States Attorney