

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO.: 17-201
v.	*	SECTION: "F"
LILBEAR GEORGE, a/k/a "Bear," a/k/a "Allen Santee"	*	
	* * *	

FACTUAL BASIS

Defendant LILBEAR GEORGE, a/k/a "Bear," a/k/a "Allen Santee," ("GEORGE") has decided to enter a plea of guilty to Count Three of the Second Superseding Indictment in the above-captioned matter. Should this matter have proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt, through credible testimony, and reliable evidence. The facts outlined herein occurred within the jurisdiction of the Eastern District of Louisiana.

Planning and Preparation of the Hobbs Act Robbery

Approximately two weeks prior to the morning of the December 18, 2013 robbery of the Chase Bank located at 2331 South Carrollton Avenue, New Orleans, Louisiana, **GEORGE** conducted surveillance of the Chase Bank in preparation for the robbery. Prior to the robbery, **GEORGE** met with a longtime friend and informed him/her that he, **GEORGE**, planned to rob the Loomis Armored, Inc. (hereinafter "Loomis") guard who delivered U.S. currency at Chase Bank. **GEORGE** confessed that he had been watching the Loomis deliveries being made at Chase Bank for weeks in preparation for the robbery.

USA	<i>[Signature]</i>
Defendant	<i>[Signature]</i>
Defense Counsel	<i>[Signature]</i>

After the commission of the robbery, co-conspirator Robert Brumfield confessed to an individual (later identified herein as "Individual-3") that the defendants had been "stalking a truck for a few weeks," and that the driver was "a big clumsy dude."

Telephone records, including historical cell site data, obtained from Sprint, and examined by the Federal Bureau of Investigation (hereinafter "FBI"), confirmed that **GEORGE** was located in the proximity of Chase Bank on the two Wednesday mornings prior to December 18, 2013. On the mornings of December 4, 2013 and December 11, 2013, **GEORGE** arrived at Chase to surveil the bank and the deliveries made by Loomis. On the aforementioned mornings, **GEORGE** was in possession of a Sprint cellular telephone, assigned telephone number [REDACTED].

In preparation for the robbery, **GEORGE** stole the vehicle that would be used to commit the robbery. On the morning of December 11, 2013, T.L., the owner of a dark grey Chevrolet Tahoe, with dark tinted windows, exited her apartment and observed that her Tahoe had been stolen. T.L. reported the theft of the vehicle to the New Orleans Police Department.

Hours after T.L. reported the theft of her Chevrolet Tahoe, Loomis employees Hector Trochez and his partner, K.R., were preparing to make a delivery of U.S. currency at the Chase Bank located at 2331 South Carrollton Avenue. Trochez drove the Loomis truck while K.R. was the passenger. As the passenger, K.R. was responsible for making the delivery of the currency inside of the bank. Upon arriving at Chase, K.R. exited the vehicle. K.R. directed Trochez into the parking spot that the Loomis truck would occupy during the delivery. K.R. observed a grey SUV truck parked in a parking spot on the driver's side of the Loomis truck. K.R. observed three unknown black males inside of the SUV. K.R. believed that the males were watching her. After entering the bank and returning to the Loomis truck, K.R. noticed that the grey SUV remained in the parking spot. The occupants of the grey SUV remained inside of the vehicle while K.R. went

into the Chase Bank. Upon exiting the bank and returning to the Loomis truck, K.R. asked Trochez if the males inside of the Tahoe ever exited the vehicle. Trochez told K.R. that no one exited the vehicle. K.R. and Trochez departed the Chase Bank. While leaving the bank, K.R. observed the grey SUV follow the Loomis truck as she and Trochez traveled to their next location.

The Robbery and Murder of Loomis Armored Truck Driver Hector Trochez

On the morning of December 18, 2013, **GEORGE** and co-conspirators, Jeremy Esteves (hereinafter “Esteves”), Chukwudi Ofomata (hereinafter “Ofomata”), Curtis Johnson, Jr. (hereinafter “Johnson”), and Robert Brumfield, III (hereinafter “Brumfield”) (collectively “co-conspirators”) robbed the Chase Bank and committed the murder of Trochez. Prior to the robbery, **GEORGE** and his co-conspirators agreed to rob the Loomis truck; and in doing so, assigned specific roles to each co-conspirator to carry out the commission of the robbery. **GEORGE** and the co-conspirators learned about the Loomis deliveries from a known individual who was employed at the S. Carrollton Avenue and S. Claiborne Avenue Chase branch. Esteves knew the Chase Bank employee and learned that the Loomis truck made scheduled deliveries to the Chase branch on Wednesdays at approximately 10:00 a.m. The co-conspirators used this information to prepare for and plan the robbery.

In August 2016, FBI interviewed an individual referenced herein as Individual-1. According to Individual-1, he/she was at his/her residence when Ofomata arrived at the residence. Upon entering the residence, Ofomata walked directly to the closet and retrieved a black duffel bag from the closet. According to Individual-1, Ofomata stored an assault type rifle, similar to an AK-47, in the duffel bag, with a magazine. The bag contained additional firearms and a ski mask. Individual-1 asked Ofomata why he was taking the firearms from the residence. In response, Ofomata told Individual-1, “we about to go.” Individual-1 asked Ofomata where “they” were

going. Ofomata responded, "Just watch the news. We about to be straight. We gonna get the money." Ofomata began to exit the residence. Individual-1 followed behind Ofomata. Upon exiting the residence, Individual-1 observed a "dark colored Tahoe." Individual-1 looked through the front windshield of the vehicle and observed **GEORGE**, Esteves, and Johnson inside of the vehicle. Individual-1 observed Esteves driving the Tahoe. **GEORGE** was seated in the front passenger seat. Johnson was seated in the rear of the vehicle. Individual-1 observed Ofomata place the duffel bag in the back of the Tahoe before the leaving the residence.

Trochez and his partner, A.T. arrived at the Chase Bank located at S. Carrollton Avenue and Claiborne Avenue. Trochez drove the Loomis truck. Upon arriving, A.T. exited the Loomis truck and directed the truck into a parking space near the door of the bank's entrance. Within seconds of the Loomis truck beginning to back into the parking spot, the stolen, dark grey Chevy Tahoe arrived in the parking lot and backed into a parking spot one car away from the Loomis truck. **GEORGE**, Esteves, Johnson, and Ofomata occupied the vehicle.

Trochez exited the Loomis truck, walked to the rear of the truck, unloaded a metal cart, and began loading boxes of coins onto the metal cart. After loading the coin boxes and a bag containing paper currency, Trochez closed the back door of the Loomis truck and prepared to deliver the currency, approximately two hundred sixty-five thousand dollars (\$265,000.00), inside the bank. As he began to do so, the rear doors of the Chevy Tahoe opened. **GEORGE**, armed with a .45 caliber handgun, was the first to exit the Tahoe. **GEORGE** ordered Trochez to "Give it up." Ofomata exited the rear doors armed with a .223 rifle. In response to seeing **GEORGE** and Ofomata with weapons, Trochez pulled his gun and fired in the direction of the robbers. Johnson, armed with a firearm, exited the vehicle. **GEORGE** and Ofomata fired their weapons in Trochez's direction. Johnson fired at the Loomis truck to keep A.T. inside the Loomis truck. Trochez was

fatally struck on the left side of his forehead and suffered a graze wound to his elbow. One of the robbers ran towards the rear of the Loomis truck and took possession of the money bag before re-entering the Tahoe. The robbers fled the Chase Bank parking lot.

Co-conspirator Brumfield was assigned the role of “getaway” driver. Prior to the robbery, Johnson and the co-conspirators agreed to stash a second vehicle at a vacant lot located in the 1700 block of Adams Street. Ofomata provided the get-a-way vehicle. The Honda Accord belonged to Ofomata’s girlfriend. Historical telephone records obtained from a Sprint telephone, assigned telephone number [REDACTED] and associated with Brumfield, confirmed that on the morning of the robbery, Brumfield was in the vicinity of the Adams Street location prior to the robbery and after the robbery.

Witnesses to the shooting described seeing the robbers wearing all black clothing and face coverings during the shooting. The New Orleans Police Department investigated the robbery/murder and collected numerous .45 caliber and .223 caliber casings from the Chase Bank parking lot. Fragments of U.S. currency were collected from the parking lot. A surveillance camera affixed to the Chase Bank captured the robbery/murder.

The Initial Investigation

Numerous witnesses observed the robbery/murder on the day of the shooting. One individual, referred to hereafter as “Individual-2,” was seated in his vehicle, positioned at a red light at the corner of S. Claiborne Avenue and S. Carrollton Avenue. Individual-2 observed the shooting and provided a description of the shooters and the vehicle they occupied. After the shooting, Individual-2 followed the Chevy Tahoe as it fled the location of the shooting/robbery. Individual-2 continued to follow the vehicle as it sped through uptown New Orleans. During the vehicle’s flight, one of the shooters fired his firearm in the direction of Individual-2 to stop

Individual-2 from following the Chevy Tahoe. Individual-2 observed the Chevy Tahoe arrive in the 1700 block of Adams Street. Upon arriving at the location, Individual-2 observed the four robbers exit the Chevy Tahoe and enter the awaiting Honda Accord being driven by Brumfield. After the individuals entered the Honda Accord, they fled the Adams Street location, leaving the Chevy Tahoe behind.

The Chevy Tahoe was recovered by the New Orleans Police Department and searched pursuant to a federal search warrant. During the search, FBI agents observed that the steering wheel column of the vehicle had been breached. Agents located two screwdrivers on the floorboard of the Tahoe. The screwdrivers were collected and submitted for DNA testing at the Louisiana State Police Crime Laboratory. An unknown DNA profile, later confirmed to be that of **GEORGE**, was recovered from one of the screwdrivers. Based on the recovery of **GEORGE**'s DNA from the screwdriver, an arrest warrant was issued for **GEORGE**.

During the robbery, Johnson used a black handkerchief to cover his face. During the execution of the search warrant on the Chevy Tahoe, the handkerchief was located on the passenger seat of the vehicle and submitted for DNA testing. Results from the DNA test revealed that the unknown profile recovered from the handkerchief belonged to Johnson.

After the robbery, NOPD received information from an individual who encountered the Chevy Tahoe prior to the robbery. According to the individual, while traveling to the Chase bank branch at 2331 South Carrollton Avenue, his/her vehicle was nearly struck by the gray SUV. The individual engaged in a verbal altercation with an occupant of the Tahoe. While the individual could not see the other occupants inside the Chevy, he/she observed an additional passenger, who was attempting to calm the occupant with whom he/she was arguing with. That evening, the individual learned of the robbery from watching the local news. Believing that he/she had

experienced an encounter with the bank robbers, the individual contacted NOPD to provide a physical description of the individual he/she argued with. NOPD created a composite sketch of the occupant of the Tahoe and released the sketch to the public.

George's Confession

In February 2014, FBI was notified that an individual, referred to as Individual-3, an associate of **GEORGE**, Ofomata, Esteves, Johnson, and Brumfield had information about the Chase robbery/murder. FBI interviewed Individual-3. According to Individual-3, in January 2014, he/she traveled from New Orleans to Houston, Texas with **GEORGE**. Prior to leaving New Orleans, **GEORGE** confessed to Individual-3 that he and the co-conspirators robbed the Loomis truck and killed the security guard. **GEORGE** confessed that he and the co-conspirators planned the robbery over time. **GEORGE** confirmed that Ofomata shot Trochez with a rifle, and that he, **GEORGE**, shot at Trochez as well. **GEORGE** recounted that one of the shooters shot the money bag, resulting in pieces of currency being left in the parking lot. Additionally, **GEORGE** confessed that one of the robbers, later identified as Johnson, shot at the Loomis truck to keep Trochez's partner inside of the truck during the shooting. As it relates to the currency, **GEORGE** told Individual-3 that Ofomata grabbed the bag of currency after the shooting and before the Tahoe fled the bank. George told Individual-3 that the co-conspirators split the money amongst themselves and provided money to the "girl" at the Chase Bank who provided Esteves with information about the Loomis deliveries.

Individual-3 detailed his/her trip from New Orleans to Texas with **GEORGE** in the aftermath of the shooting. According to Individual-3, he/she observed **GEORGE** with a large amount of hundred-dollar bills located in a bag. Individual-3 recalled that some of the money, approximately \$60,000.00, which he/she observed **GEORGE** possess, had been struck with bullet

holes. While traveling, **GEORGE** showed Individual-3 the composite sketch that was released to the public. **GEORGE** asked if the person depicted in the sketch resembled either him, **GEORGE**, or the co-conspirators. Additionally, **GEORGE** admitted to stealing the Chevrolet Tahoe that was used to commit the robbery.

In April 2014, **GEORGE** contacted Individual-3. In April, a local newspaper obtained the sealed federal arrest warrant for **GEORGE**. The warrant contained the results of the DNA testing conducted on the screwdriver recovered from the grey Chevrolet Tahoe. Upon learning that his DNA was recovered from the screwdriver, **GEORGE** contacted Individual-3 about the article. **GEORGE** confessed a second time to his and the co-conspirators' roles in the robbery/murder.

Confession of Co-Conspirator Jeremy Esteves

In May 2014, FBI agents interviewed Individual-3. According to Individual-3, he/she met with co-conspirator Esteves at his residence. While there, Esteves confessed that he, along with **GEORGE**, Ofomata, and Johnson committed the December 18, 2013 Loomis robbery/murder. Esteves confessed that he and the co-conspirators planned the robbery for months prior to the robbery. According to Esteves, he, **GEORGE**, and the co-conspirators would get up as early as 5 a.m. or 6 a.m. to watch the Chase Bank and learn the routine of the Loomis truck. Esteves admitted that he asked **GEORGE** to participate in the robbery.

Individual-3 observed proceeds from the robbery in Esteves residence. While at the residence, Esteves showed Individual-3 shoeboxes that were located inside of Esteves's room. U.S. currency was stored inside of the shoeboxes.

Confession of Co-Conspirator Robert Brumfield

In October 2016, FBI agents met with an individual, hereinafter referred to as Individual-4. According to Individual-4, he/she met with co-conspirator Brumfield in early 2014. During their meeting, Brumfield was preparing to record a rap song about the 2013 robbery/murder. During the studio session, Brumfield told Individual-4 that **GEORGE**, Esteves, Johnson, and Ofomata committed the robbery/murder. Brumfield confessed that he was the getaway driver of the vehicle that was awaiting the robbers at the Adams Street location after they fled from the bank. Brumfield told Individual-4 that **GEORGE**, Esteves, Johnson, and Ofomata escaped in the getaway vehicle. Brumfield admitted that the getaway vehicle belonged to Ofomata's girlfriend.

Confession of Co-Conspirator Chukwudi Ofomata

In August 2016, the FBI met with Individual-1. During the interview, Individual-1 told agents that on the day of the robbery/murder, Ofomata returned to Individual-1's residence. Ofomata asked Individual-1 if he/she had watched the news as Ofomata instructed after he left the residence with the black duffel bag containing the firearms used to commit the robbery/murder. Individual-1 answered in the affirmative. Based on the conversation, Individual-1 understood that Ofomata was admitting that he, **GEORGE**, and the co-conspirators committed the robbery/murder.

The day after the robbery, Ofomata fled to Houston, Texas. Prior to leaving, Ofomata stashed proceeds from the robbery in an air conditioning unit at Individual-1's residence. Upon returning from Houston, Texas, Ofomata met with Individual-1. Ofomata confessed to Individual-1 that he and the co-conspirators split the proceeds taken from the robbery and that Ofomata received between \$50,000.00 and \$60,000.00 in U.S. currency. Ofomata told Individual-1 that some of the stolen currency had sustained gunfire when "we shot the guard."

Obstruction by George and Jasmine Theophile

During the search to locate **GEORGE**, FBI agents learned that Jasmine Theophile, was **GEORGE**'s girlfriend. In January 2014, Theophile told investigators that **GEORGE** left New Orleans and went to Texas with other men, driving her red Pontiac G6. Theophile also stated that George exchanged vehicles with her, leaving her with his black Infiniti M35, which she continued to drive until April 2014. Theophile denied having any knowledge about George's participation in the robbery.

In April 2014, FBI agents met with Theophile prior to her appearance before a federal grand jury. During the meeting, FBI agents inquired as to whether Theophile was in contact with **GEORGE**, as well as her method of communication with him. At that time, Theophile told FBI agents that she spoke with **GEORGE** on a daily basis. Theophile stated that she only had one cellular telephone which she utilized to communicate with **GEORGE**.

Within days of the aforementioned interview with the FBI, Theophile appeared as a witness before a federal grand jury in the Eastern District of Louisiana on April 17, 2014. During her testimony, Theophile stated that she spoke with **GEORGE** on a daily basis and provided a telephone number which she utilized to speak to **GEORGE**. Theophile testified that she only had one cellular telephone which she utilized to communicate with **GEORGE**.

Within days of her testimony, Theophile was interviewed again by FBI agents. During the interview, Theophile admitted that she lied during her interview with FBI agents and her grand jury testimony as it related to the number of cellular telephones she possessed prior to her interview and testimony. Theophile admitted that she had a second cellular telephone that she utilized only to communicate with **GEORGE**. Theophile admitted that she secured the telephone from a

relative of **GEORGE**, who instructed her to utilize the telephone only to contact **GEORGE**. Theophile admitted that she destroyed the second cellular telephone and disposed of it in the trash can prior to meeting with the grand jury. Theophile admitted that she destroyed the telephone at the direction of **GEORGE**.

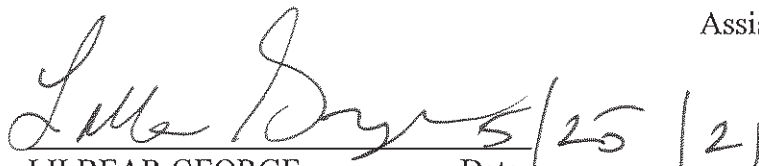
Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **GEORGE**. 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 **GEORGE**'s plea of guilty to the charged offenses.

READ AND APPROVED:


BRITTANY L. REED Date 04/26/21
Assistant United States Attorney




GREGORY M. KENNEDY Date
Assistant United States Attorney


LILBEAR GEORGE Date 5/25/21
Defendant


BRUCE WHITTAKER Date 5/25/21
Attorney for the Defendant


JERROD THOMPSON-HICKS Date 5/25/21
Attorney for the Defendant

ADA PHLEGER Date
Attorney for the Defendant

USA 
Defendant 
Defense Counsel 