

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO.: 19-175
	*	SECTION: "E"
v.	*	
COREY DUNN	*	
	*	
	*	

FACTUAL BASIS

Defendant **COREY DUNN** ("DUNN") has decided to enter a plea of guilty to the Superseding Bill of Information 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.

Overview of the Investigation

Agents with the Drug Enforcement Administration ("DEA") conducted an investigation of the drug distribution of a group of individuals located in and around the parishes of Jefferson, Orleans, and St. Bernard Parishes. Agents identified the following individuals, among others, who were members of a drug distribution conspiracy: **DUNN**, Demarco Ford, Taurus Russell, a/k/a "Scrappy," Thomas Landry, Bobby Franklin, a/k/a "B-Trey," a/k/a "Trey," Corey Enclarde, a/k/a "Murda," Christopher Harris, a/k/a "Grove," Romalis Harris, Michael Lewis, a/k/a "Michael Louis," and others.

Beginning in October 2018, the DEA began investigating **DUNN** and Franklin after receiving information regarding their drug dealing from a confidential source familiar with **DUNN** and Franklin.

During the course of this investigation, agents obtained court-authorized Title III wiretap orders on four telephones: a telephone used by Franklin, a/k/a "B-Trey," a/k/a "Trey," telephone number [REDACTED] ("the 327 Wiretap"), a telephone used by DUNN, telephone number [REDACTED] ("the 439 Wiretap"), a telephone used by DUNN, telephone number [REDACTED] ("the 351 Wiretap"), and a telephone used by DUNN, telephone number [REDACTED] ("the 228 Wiretap"). Franklin and DUNN conspired to distribute and possess with the intent to distribute the aforementioned controlled substances and utilized numerous telephones to facilitate their narcotics transactions.

The initial calls between Franklin and DUNN were not particularly detailed. Franklin would contact DUNN confirming their transactions by stating, "Alright." In response, DUNN would respond, "Alright."

Members of the drug trafficking organization used code words to thwart law enforcement from intercepting communications related to their drug trafficking/dealing. DUNN utilized the telephone to facilitate narcotics transaction during the conspiracy. The following communications represent a limited number of pertinent telephone communications which demonstrate DUNN's conduct and the conduct of his co-conspirators. DUNN's intercepted communications span the months of March 2018 to October 2019.

April 30, 2019 call between Dunn and Franklin

On April 30, 2019, at approximately 9:01 p.m., Franklin called DUNN. The following conversation ensued:

DUNN:	"Man, what's up, boy?"
FRANKLIN:	"Enroute."
DUNN:	"You left already?"
FRANKLIN:	"Yeah, I just took off."
DUNN:	"Alright, hit me when you get in the Dell, you heard me?"
FRANKLIN:	"Alright, hey."

DUNN: "Yeah?"
FRANKLIN: "Just make that, hey, like half of that."
DUNN: "I can't hear you."
FRANKLIN: "Just give me the half of that, instead of the whole side."
DUNN: "Half of what you normally do?"
FRANKLIN: "Yeah, just give me half of what I normally do."
DUNN: "Alright, that's cool. Alright"
FRANKLIN: "Alright, bet."

In this communication, Franklin and DUNN negotiated the purchase of four and half ounces (approximately 126 grams) of cocaine hydrochloride. When Franklin told DUNN that he wanted "half of that, instead of the whole side," DUNN understood this to mean that he, DUNN, would be selling Franklin the aforementioned quantity of cocaine hydrochloride.

Following this communication, agents conducted surveillance at DUNN's apartment. Franklin was observed arriving empty-handed at DUNN's residence. Within minutes of arriving at DUNN's residence, Franklin exited the apartment building in possession of four and a half ounces of cocaine hydrochloride that he purchased from DUNN.

May 3, 2019 call between Dunn and Franklin

On May 3, at approximately 9:01 p.m., agents intercepted a communication between DUNN and Franklin. The following conversation ensued:

DUNN: "Alright, what's happening Unc?"
FRANKLIN: "What up with it? Thought I'd slide that way in a few, pick up that other."
DUNN: "Alright. Yeah, that's cool. Um, I'm on my way by my baby now, um. I think I'm like in by Mandeville and shit."
FRANKLIN: "Oh, alright. I didn't leave yet. I'll let you know when I leave."
DUNN: "Alright, you gonna do the other part, huh?"
FRANKLIN: "Yeah, just the other half, yeah."
DUNN: "Alright, that's cool."
FRANKLIN: "Bet."
DUNN: "Bet."

Franklin arrived at **DUNN**'s residence at approximately 4:57 p.m. and ascended the stairwell of **DUNN**'s while carrying a brown paper bag containing cocaine hydrochloride. Franklin exited **DUNN**'s apartment a short time after. During their meeting, **DUNN** sold four and half ounces (approximately 126 grams) of cocaine hydrochloride to Franklin in exchange for an unknown amount of U.S. currency.

May 14, 2019 transaction between Dunn and Franklin

On the evening of May 14, 2019, agents observed **DUNN** arrive at his residence with Franklin arriving shortly thereafter. Franklin ascended the stairwell, entered **DUNN**'s apartment, and exited minutes later. During their meeting, Franklin purchased four ounces (112 grams) of cocaine hydrochloride from **DUNN** in exchange for an unknown amount of U.S. currency.

June 6, 2019 purchase between Ford and Dunn

On June 5, 2019, **DUNN** and Ford negotiated the purchase of four ounces of cocaine hydrochloride. During the communication, Ford contacted **DUNN** and told **DUNN** that he wanted "the four," or four ounces (112 grams) of cocaine hydrochloride. Ford and **DUNN** agreed to meet the following day.

On June 6, 2019, **DUNN** and Ford met at Ford's residence. During their meeting, **DUNN** sold four ounces (112 grams) of cocaine hydrochloride to Franklin in exchange for an unknown amount of U.S. currency.

July 27, 2019 purchase between Ford and Dunn

Agents continued to intercept communications between Ford and **DUNN** during the month of July 2019. On July 27, 2019, Ford contacted **DUNN** via the telephone. During the communication, Ford asked **DUNN** if he was ready to "make that drop." Dunn asked, "When you make the drop you want me to bring you another one like them two I brought you or you wanna

just make the drop?" Ford told **DUNN** that he had "one left," and subsequently asked **DUNN** if he would be bringing "one of each." **DUNN** and Ford agreed that **DUNN** would sell Ford an ounce of cocaine base and one ounce of cocaine hydrochloride in exchange for an unknown amount of U.S. currency.

Following their communication, Ford and **DUNN** met at Winn-Dixie in Algiers, Louisiana. During the meeting **DUNN** sold one ounce of cocaine hydrochloride (28 grams) and one ounce of cocaine base (28 grams) in exchange for U.S. currency.

August 2, 2019 negotiation between Ford and Dunn

On August 2, 2019, agents intercepted numerous communications between **DUNN** and Ford. During the communications, Ford and **DUNN** negotiated the purchase of two (2) ounces (56 grams) of cocaine base. During the communication, Ford used the code words "two hard," as code for cocaine base, commonly known as crack cocaine. Agents conducted surveillance to confirm a meeting between Ford and **DUNN**. **DUNN** and Ford met at a location in Algiers, Louisiana where **DUNN** sold Ford two ounces of cocaine base in exchange for U.S. currency.

Dunn and Fnu LNU

On June 6, 2019, agents intercepted a communication between **DUNN** and Fnu LNU in which they negotiated the purchase of \$5,400.00 worth of cocaine. Fnu LNU asked **DUNN** how much he could purchase for that amount of currency, to which **DUNN** asked if Fnu LNU wanted "soft," a common term for crack hydrochloride. In response, **DUNN** stated:

DUNN: "I'll give him five and a half for that bruh. But, I ain't doing like no two and a quarter or nothing like that bruh. Cause I know my shot fire ya heard me? Like them dudes be doing that bruh, them dudes be giving them shit with cut in it, and if you cook it you gonna lose, and if you don't lose, it's gonna have that cut on it so you gonna have a bad taste on the coke. Or if they give it to them hard, it's gonna be all whipped up. My shit straight dope for real, that's guarantee. I stand

on it...”

FNU LNU: “Right.”

DUNN: “Give em the zones. I’m gonna pop it straight off the thing. You know what I’m talking about? Yeah, that’s how I’m gonna do it bruh.

When **DUNN** referenced that he would “pop it straight off the thing,” **DUNN** was telling Fnu LNU that he would sell him an amount of cocaine hydrochloride, as set forth below, that he would remove from a kilogram of cocaine hydrochloride.

DUNN indicated that the cocaine hydrochloride was good quality by stating that he doesn’t “cut” his product, meaning that the cocaine hydrochloride was not mixed with other substances to dilute the controlled substance. Additionally, **DUNN** told Fnu LNU that he was familiar with the process of converting cocaine hydrochloride to crack cocaine.

DUNN ultimately agreed to sell Fnu LNU five and a half ounces (154 grams) of cocaine hydrochloride in exchange for \$5,000.00 in U.S. currency.

Days later, a telephone call between **DUNN** and Fnu LNU was intercepted. During the communication, **DUNN** asked Fnu LNU what Fnu LNU-2 thought about the quality of the product. Fnu LNU assured **DUNN** that according to Fnu LNU-2, his customers thought the product was of good quality.

June 4 and 9, 2019 purchase between Dunn and Franklin

Agents intercepted a communication between **DUNN** and Franklin in which Franklin indicated that he would be traveling to meet with **DUNN**. **DUNN** asked Franklin, “You talking about the same thing from the last time?” Franklin answered in the affirmative. At approximately 6:40 p.m., agents observed Franklin arrive at **DUNN**’s apartment. Franklin entered the apartment. Franklin exited the apartment carrying a weighted yellow grocery style bag containing nine ounces

(approximately 252 grams) of cocaine hydrochloride that he purchased from DUNN in exchange for U.S. currency.

June 6, 2019 purchase between Michael Lewis and Dunn

On June 4, 2019, at approximately 3:44 p.m., agents intercepted a communication between DUNN and co-conspirator, Michael Lewis, a/k/a "Michael Louis." During the telephone communication, Lewis told DUNN, "I need you one time." DUNN replied, "I'm on my way." Lewis and DUNN negotiated the sale of one ounce (28 grams) of cocaine hydrochloride.

Two days later, on June 6, 2019, Lewis contacted DUNN via telephone. During the intercepted communication, DUNN told Lewis that he was on his way to meet with him. Prior to their meeting, Lewis contacted DUNN a second time to request that DUNN, "Bring me a three," meaning that Lewis wanted DUNN to sell him three ounces (approximately 84 grams) of cocaine hydrochloride. DUNN agreed to sell Lewis the new agreed upon amount. DUNN and Lewis subsequently met and DUNN sold three ounces (approximately 84 grams) of cocaine hydrochloride to Lewis in exchange for U.S. currency.

June 2019 purchase between Dunn and Taurus Russell

On June 10, 2019, at approximately 3:43 p.m., DUNN contacted Russell at his telephone number [REDACTED]. During the call, Russell told DUNN that he was "waiting for his podnuh" to find out if he could "buy one of those things from last time." DUNN told Russell that he had "at least six of them, maybe seven." In response, Russell asked Dunn if he was "going to serve him proper." DUNN and Russell were negotiating the purchase of seven ounces (196 grams) of cocaine hydrochloride from DUNN. DUNN and Russell subsequently met to complete the agreed upon sale. At approximately 12:26 a.m., members of law enforcement observed Russell arrive at DUNN's residence. Russell entered DUNN's residence carrying what appeared to be a small

square object in his left hand. Within minutes, Russell exited **DUNN**'s apartment carrying a white object in his left hand that concealed the seven ounces of cocaine hydrochloride.

July 24, 2019 purchase between Dunn and Taurus Russell

At approximately 9:48 p.m., Russell contacted **DUNN** to tell him that he was "pulling into the parking lot baby." Within minutes, Russell arrived at **DUNN**'s residence. Russell exited his vehicle and went up the stairs to **DUNN**'s apartment. Russell exited Dunn's apartment in possession of four and a half (126 grams) of cocaine hydrochloride.

The following day, Russell contacted **DUNN** and stated, "Hey bruh, I just wanted to tell you this. You hear me" Man that shit was so good, dog..." Boy every dollar I get bitch you gonna get it." Russell was complimenting **DUNN** on the quality of the cocaine hydrochloride purchased the previous day.

During the month of July 2019, DEA agents intercepted two additional communications between Russell and **DUNN**. On July 28, 2019 and July 31, 2019, Russell contacted **DUNN** and negotiated the purchase of four and a half ounces (126 grams) of cocaine hydrochloride from **DUNN**.

July 26, 2019 purchase between Dunn and Corey Enclarde

On July 26, 2019, agents intercepted a telephone conversation between **DUNN** and co-conspirator Corey Enclarde, a/k/a "Murda." Dunn received a telephone call from Enclarde at his telephone number [REDACTED] Enclarde told **DUNN**, "Come holler." **DUNN** responded, "I'm chilling, what's happening?" Enclarde replied: "My people want to get that nine man." In response, **DUNN** replied: "Oh, alright man. I'm going across that river and then I'm coming over there." Enclarde replied: "Alright, alright. I'll be at the house."

Hours later, **DUNN** contacted Enclarde and told Enclarde that he was outside. Agents observed **DUNN** outside of Enclarde's residence. **DUNN** and Enclarde met. During the meeting, **DUNN** distributed nine ounces (252 grams) of cocaine hydrochloride to Enclarde in exchange for an unknown amount of U.S. currency.

July 25, 2019 purchase between Romalis Harris and Dunn

On July 25, 2019, agents intercepted a communication between **DUNN** and co-conspirator, Romalis Harris while intercepting communications during the 228 Wiretap. During the telephone call, Harris, utilizing telephone number [REDACTED] called **DUNN**. During the call, **DUNN** asked Harris, "What's happening, Unc?" Harris responded, "Nothing. Chillin, chillin, chillin, you coming outside today?" **DUNN** responded, "Yeah, what's happening?" Harris responded, "Nah, umm I wanted the four-dollar plate." **DUNN** agreed to meet with Harris.

On the following day, Harris contacted **DUNN**, inquiring about "the white plate" for "the stack," meaning that Harris wanted to purchase four ounces (112 grams) of cocaine hydrochloride from **DUNN** in exchange for \$4,000.00 in U.S. currency. **DUNN** and Harris met. During the meeting **DUNN** sold the agreed upon amount of cocaine hydrochloride to Harris.

July 26, 2019 purchase between Harris and Dunn

On July 26, 2019, Harris contacted **DUNN** and told **DUNN**, "I want you to come through on me again, you heard me? The same thing." **DUNN** replied, "Alright, you ready now?" Harris confirmed that he was prepared to meet **DUNN**. In this transaction, Harris and **DUNN** negotiated the sale of four ounces of cocaine hydrochloride (112 grams) in exchange for four thousand dollars (\$4,000.00). Agents established surveillance at **DUNN**'s residence and observed **DUNN** leave his residence and relocate to Harris's residence. During the meeting, Harris purchased four ounces of cocaine hydrochloride from **DUNN**.

After meeting with **DUNN**, Harris contacted **DUNN**. During the communication, Harris told **DUNN** that he flushed "the plate", or one ounce of cocaine hydrochloride, because he believed that law enforcement was at his residence. Harris asked **DUNN** to provide him with another ounce of cocaine hydrochloride. At approximately 7:47 p.m., **DUNN** contacted Harris and told him that he was on his way to meet him. Minutes later, **DUNN** arrived at Harris's residence. **DUNN** sold Harris one ounce (28 grams) of cocaine hydrochloride in exchange for one thousand dollars in U.S. currency.

July 30, 2019 purchase between Harris and Dunn

On July 30, 2019, Harris contacted Dunn and stated, "Yeah I got umm, I got what-cha-call-em, you heard me? I got that what-cha-call-em I owe you, you heard me? I got sixteen all together you heard me?" Harris owed **DUNN** money from a previous narcotics transaction. Additionally, Harris told **DUNN** that he had an additional "sixteen" meaning \$16,000.00 in U.S. currency. Harris and **DUNN** negotiated the purchase of half a kilogram of cocaine hydrochloride. DEA established surveillance to confirm a meeting between Harris and **DUNN**. Harris and **DUNN** met. During the meeting, Harris purchased eighteen ounces (504 grams) of cocaine hydrochloride from **DUNN**.

August 2, 2021 purchase between Dunn and Thomas Landry

On August 2, 2019, **DUNN** contacted co-conspirator Thomas Landry. During the call, Landry advised Dunn that he had "somebody on line" and that he wanted to "bust my move," meaning that Landry knew of an individual who wanted to purchase a controlled substance from Landry. Landry was contacting **DUNN** because **DUNN** supplied Landry with various controlled substances. As the call progressed, **DUNN** asked Landry, "You know it's, it's four and a half?"

Landry answered in the affirmative. **DUNN** and Landry then continued to confirm the details of the transaction. At the end of the call, Dunn asked Landry when they could meet.

At approximately 12:41 p.m., Landry contacted **DUNN** and advised, "Yeah, I'm at the door." Landry ascended the stairwell to **DUNN**'s apartment. While inside, Landry purchased four and a half ounces (126 grams) of cocaine hydrochloride from **DUNN**.

Search of Dunn's Residence

On August 2, 2019, DEA agents executed a search warrant at **DUNN**'s residence. Upon searching the living area, agents located a plastic tray with a piece of paper towel, a razor blade, a loose off-white rock like object, and a large off white rock like piece of crack cocaine, weighing approximately 56 grams, on top of the tray.

During the search, **DUNN** admitted to possessing additional crack cocaine under his sofa and in the inside of a jacket. Agents located crack cocaine in the areas in which **DUNN** stated.

As the search continued, agents located a plastic bag containing several additional plastic bags and a large quantity of compressed cocaine hydrochloride.

Inside of a garbage bag within the garbage can, agents located three vacuum sealed bags containing compressed cocaine hydrochloride. Each of the bags weighed approximately nine ounces (252 grams), for a total of 27 ounces (756 grams). As agents continued to search the garbage bag, they and 12 banded stacks of U.S. currency, estimated to be valued at \$114,000.00 in U.S. currency in addition to other items of drug paraphernalia.

Sentencing Stipulation

For the purposes of sentencing only, the parties stipulate and agree that the defendant, **DUNN**, is responsible for the following drug quantity through his own actions and the reasonably foreseeable actions of his co-conspirators. The parties agree that **DUNN** is responsible for

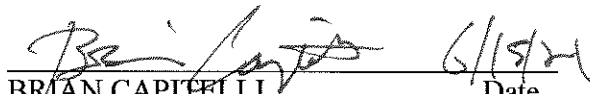
conspiring to distribute and/or possess with the intent to distribute at least 3.5 kilograms but less than 5 kilograms of cocaine hydrochloride; and at least 28 grams but less than 112 grams of cocaine base.


Limited Nature of Factual Basis

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

READ AND APPROVED:


BRITTANY L. REED Date
Assistant United States Attorney


BRIAN CAPITELLI Date
Attorney for Corey Dunn


COREY DUNN Date
Defendant