

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO.: 19-145  
v. \* SECTION: "T"  
ALAN PARSON \*  
\* \* \*

FACTUAL BASIS

The defendant, **ALAN PARSON**, has agreed to plead guilty as charged to Count One, Count Two, and Count Three of the three-count Indictment. Count One charges **PARSON** with conspiring to commit a robbery of a pharmacy distributing controlled substances, in violation of Title 18, United States Code, Section 2118(d). Count Two charges **PARSON** with an armed robbery of a pharmacy distributing controlled substances, in violation of Title 18, United States Code, Sections 2118(a), 2118(c)(1), and 2. Count Three charges **PARSON** with discharging a firearm in furtherance of a crime of violence, in violation of Title 18, United States Code, Section 924(c).

Should this matter have proceeded to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the Indictment:

On Monday June 17, 2019, at about 6:07 a.m., **ALAN PARSON** and **RICHARD SANSBURY** entered the CVS Pharmacy (24 hour pharmacy) located at 4901 Prytania Street, New Orleans, Louisiana to commit an armed robbery. The pharmacist working at the CVS Pharmacy at that time was a person registered with the Drug Enforcement Administration under Section 302 of the Controlled Substances Act, as required by statute. The robbers came in the front doors. The store manager observed the robbery taking place from within a locked office in the store and called 911 to alert authorities.

AUSA BR  
Defendant AP  
Defense Counsel DWH

SANSBURY forced the cashier into the restroom and zip tied his hands together. Simultaneously, PARSON relocated to the pharmacy, placed the pharmacist on the ground at gunpoint, and zip tied his feet together. Both robbers then began removing narcotics from behind the pharmacy counter, placing them into a black bag. Drugs from the black bag, which was ultimately left on the scene, included “controlled substances” as that term is defined in Section 102 of the Controlled Substances Act. While the robbers were taking the narcotics, SANSBURY became frustrated with the pharmacist’s movements and zip-tied his hands together. The robbers then tried to leave the store via the front doors with the stolen narcotics.

Members of the New Orleans Police Department were notified of an armed robbery in progress and quickly arrived at the location. Officers entered the store and encountered the two robbers as they were attempting to exit the store. Upon observing the officers, the robbers retreated into the store, dropping the bag of pills near the front door, which caused numerous pill bottles to fall to the floor. The officers retreated to the exit, where a shootout ensued. The robbers then relocated closer to the store’s exit, continuing to fire at the responding police officers, who were seeking cover in the parking lot of the shopping center. The robbers eventually ran out of the store, continuing to engage the officers in gunfire. The robbers attempted to run across Prytania Street. A New Orleans Police Officer sustained a gunshot wound to the shoulder area.

Much of what is described above was captured on video, both from the CVS cameras and from body cameras worn by the responding officers. The video shows the events unfolding as they are described.

During his attempted escape, PARSON sustained multiple gunshot wounds and was apprehended near the corner of Upperline and Prytania Streets immediately following the robbery. PARSON was transported to University Medical Center to be treated for his gunshot wounds. SANSBURY also sustained a gunshot wound to his leg as he was shooting his way out of the CVS and was apprehended several hours later hiding in the rear yard of 1116 Upperline Street. SANSBURY was transported to University Medical Center to be treated for his gunshot wound.

Both **PARSON** and **SANSBURY** are from Indianapolis, Indiana and traveled to New Orleans, Louisiana shortly before the attempted robbery.

Surveillance footage shows that at least one other individual was involved in the robbery. Specifically, agents obtained footage showing **PARSON** and **SANSBURY** being dropped off by a newer model silver Ford F-250 four-door truck just before the robbery began. Neither of them got of the driver's door and the truck drove off after dropping them off, meaning someone had to have been driving.

In subsequent investigation, law enforcement learned that the F-250 that was used in the robbery was a rental vehicle and identified the individual, P.L., who rented the F-250 in Indianapolis. The mileage for the F-250 was consistent with it having been driven from Indianapolis to New Orleans and back and the date of rental and date of return are, respectively, shortly before and shortly after the robbery. Investigators learned that phone records show that P.L. remained in Indianapolis from the time of the rental until after the vehicle was returned, meaning that the F-250 must have been taken to New Orleans by someone else. Rental records also showed that P.L. had rented at least one additional vehicle that had been used in a different pharmacy robbery in another state where the subjects were also believed to be from Indianapolis.

Agents identified two potential suspects in the aforementioned Prytania Street CVS Pharmacy robbery, T.E. and C.B., and obtained phone records for those individuals. T.E. was a native of New Orleans who had been living in Indianapolis. C.B. was from Indianapolis. The phone records revealed that T.E. and C.B.'s phones came together in the same location in Indianapolis shortly after the F-250 was rented and that those phones then traveled together from Indianapolis to New Orleans. **PARSON** traveled with T.E. and C.B. in the F-250 from Indianapolis, Indiana to New Orleans between Friday June 14, 2019 and Saturday June 15, 2019. Once in New Orleans **PARSON** and T.E. traveled to several known locations in New Orleans at specific times.

**SANSBURY** was also in New Orleans at the same time, approximately June 15 to the time of the robbery, having traveled separately with a woman he was dating and her family. Once everyone was in

New Orleans, **PARSON**, **SANSBURY**, T.E., and C.B. met up and began riding around in the F-250 looking for a pharmacy to rob.<sup>1</sup> Phone records show this travel, as do license plate readers, which captured the F-250 driving around New Orleans late into Sunday night and early Monday morning. The group ultimately settled on the CVS Pharmacy on Prytania, which was robbed early Monday June 17, as described above.

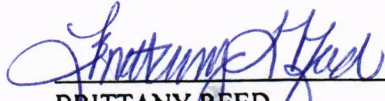
T.E. and C.B. advised **PARSON** and **SANSBURY**, who were less experienced with pharmacy robberies, about how to conduct the robbery, how long they could take before police might respond, and which drugs were the most valuable. T.E. and C.B. dropped off **PARSON** and **SANSBURY** and parked nearby to wait for them. When the NOPD responded much more quickly than anticipated and the gunfight ensued, T.E. and C.B. drove off in the F-250. They ultimately separated, with T.E. remaining in New Orleans and C.B. returning to Indianapolis, where the F-250 had to be returned.

Agents were able to identify a phone number used by **SANSBURY**, who had left his phone in the F-250 when he entered the Prytania Street CVS to commit the robbery. **SANSBURY** had another phone during the robbery, which was found on the scene, but this phone had minimal information and appeared to have been used as a timer to determine how long the robbers could spend in the store before police arrived. As discussed, **SANSBURY** was taken into custody shortly after the robbery and has remained in jail since he was taken into custody. A toll records check on **SANSBURY**'s phone, however, revealed that someone was using the phone after **SANSBURY** had been taken into custody. A comparison of the numbers being dialed on **SANSBURY**'s phone after his arrest with phone activity on T.E.'s phone prior to the robbery showed significant overlap, suggesting that T.E. began using the phone **SANSBURY** had left in the F-250 after the robbery and **SANSBURY**'s arrest, which is consistent with him being one of the co-conspirator's that dropped off **SANSBURY** and **PARSON**.

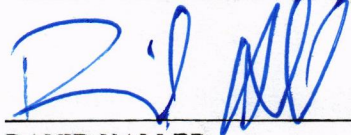
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<sup>1</sup> The FBI has numerous ongoing investigations into pharmacy robberies across the country that were conducted by various crews based in Indianapolis.

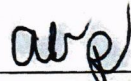
This proffer of evidence is not intended to constitute a complete statement of all facts known by the government, but rather is a minimum statement of facts intended to prove the necessary factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for PARSON's plea of guilty to the charged offenses.

  
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BRITTANY REED  
Assistant United States Attorney


05/24/2021  
Date

  
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DAVID HALLER  
Assistant United States Attorney

5/24/2021  
Date

  
\_\_\_\_\_  
ALAN PARSON  
Defendant

5-19-21  
Date

  
\_\_\_\_\_  
DENNIS MOORE

5-19-2021  
Date