

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

UNITED STATES OF AMERICA

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CRIMINAL DOCKET NO. 10-210

v.

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SECTION: "S"

KENNARD WASHINGTON

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FACTUAL BASIS

The above-named defendant **KENNARD WASHINGTON**, has agreed to plead guilty to Count One of the Superseding Indictment pending against him. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, through the introduction of relevant, competent, and admissible testimonial, physical and demonstrative evidence, the following facts to support the allegation against the defendant, **KENNARD WASHINGTON ("WASHINGTON")**:

Agents with the Drug Enforcement Administration ("DEA") were conducting an investigation of a drug trafficking conspiracy that was transporting cocaine hydrochloride from California to the Eastern District of Louisiana. **WASHINGTON a/k/a "Slice,"** a source from California, would ship amounts cocaine hydrochloride to Louisiana through the use of a courier, chosen by a conspirator in the Louisiana area, who would normally drive the entire trip. The

courier would drive up to California with currency in the vehicle, which was usually rented. In California, the courier would allow for the vehicle to be given to **WASHINGTON** or one of his associates, who would then take the vehicle and arrange for cocaine to be placed inside. The vehicle would then be returned to the courier, who would then drive back to Louisiana. In many instances, the currency and cocaine would be secreted in a compartment inside the vehicle. While the courier would not necessarily know the locations or quantity of the currency or cocaine, the courier did know the illegal drug-trafficking purpose of the trips. The conspiracy included several trips and shipments during its existence and involved the trafficking of at least five kilograms of cocaine hydrochloride. Some pertinent facts of the conspiracy are set forth below.

September 2007

On September 19, 2007, Officer Lee Phillips, Sr., stopped a vehicle in Welsh, Louisiana, while traveling west on I-10. Law enforcement noticed several suitcases. A subsequent search of one of the suitcases revealed two long packages of currency totaling \$195,097.00.

Agents in the investigation subsequently learned that the driver of that vehicle had acted as a courier. He had been recruited to be a courier by a conspirator in the Louisiana area. They further learned that the money was intended to be brought to California and given to **WASHINGTON**, who would then provided several kilograms of cocaine, which **DIXON** would take back to **JOHN DOE** in the New Orleans area for further delivery.¹

¹Pursuant to Department of Justice policy, “**JOHN DOE**” is being used in place of the actual name of this co-conspirator, who has not been charged at this time.

December 2009

In December, 2009, agents learned that a plan to purchase cocaine was going to occur. Agents learned that ROBERT WATTS was going to send money to **WASHINGTON** in California via a courier named MICHAEL SLAIN in order to purchase cocaine. The plan was for SLAIN, who was chosen by conspirators in the Louisiana area, to drive to California with money, which would first be stored in the vehicle by WATTS or an associate of his. Once in California, the money would be obtained from the vehicle, and cocaine would be placed inside it by **WASHINGTON** or an associate of his. Thereafter, SLAIN was to drive the vehicle back to the Eastern District of Louisiana so that WATTS could ultimately obtain the cocaine.

Prior to the trip, WATTS instructed SLAIN to rent a vehicle and bring it to him. SLAIN did so, and brought the car to WATTS, who kept it for approximately one day. The car was eventually returned to SLAIN. WATTS told SLAIN to purchase a “clean phone,” and gave SLAIN two phone number with which to reach WATTS. SLAIN saved these numbers in his phone contacts under the names “Scooby” and “SC2” WATTS also gave SLAIN a phone number to contact once SLAIN arrived in California. SLAIN saved this number in his phone contacts under the name “X-MAN.”

SLAIN ultimately drove to California with money in his vehicle, and having purchased a “clean phone.” While in California, SLAIN eventually met with a man he did not know who took the vehicle. At some point therein, cocaine was placed into the vehicle. Eventually, the vehicle was returned to SLAIN. **WASHINGTON** was responsible for this transaction, and for having the cocaine placed into the vehicle.

SLAIN eventually began driving back towards New Orleans. Law enforcement

conducted a traffic stop of SLAIN on Interstate 10 in Iberville Parish on December 26, 2009. A search of the vehicle yielded cocaine hydrochloride inside. This cocaine was destined to ultimately be given to WATTS for further distribution in the Eastern District of Louisiana and elsewhere.

The cocaine recovered from SLAIN's vehicle was tested at the South Central Laboratory in Dallas, Texas. It tested positive for the presence of cocaine hydrochloride and had a net weight of 978.4 grams.

July - August 2010

In July 2010, agents learned that an another transaction involving **WASHINGTON** was ready to occur. Agents learned that HARRY DIXON to be the courier who would drive up to California, obtain the cocaine from **WASHINGTON** or his associates, and drive back. DIXON subsequently agreed.

In August 2010, DIXON obtained the money and began traveling in a vehicle to California. **DIXON** arrived in California. While there, **WASHINGTON** or his associate took possession of the vehicle and arranged for cocaine to be placed inside of it. Once the vehicle with the cocaine was returned to DIXON, he began driving back to Louisiana.

Agents obtained a court order allowing the use of cell phone location data to track DIXON. Agents tracked both cars as they drove back into the New Orleans area. Agents stopped DIXON in the Eastern District of Louisiana. DIXON cooperated and consented to a search of the vehicle. Inside his car, concealed inside the back of a chair, agents found about 4 kilograms of cocaine.

The cocaine recovered from DIXON's vehicle was tested at the South Central Laboratory

in Dallas, Texas. It tested positive for the presence of cocaine hydrochloride and had a net weight of approximately 4 kilograms.

For purposes of the United States Sentencing Guidelines, **WASHINGTON** was responsible for the trafficking of at least five but less than 15 kilograms of cocaine hydrochloride. Further, while **WASHINGTON** was a source of supply of cocaine for this conspiracy, he did not recruit or supervise those persons who were couriers.

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KENNARD WASHINGTON
Defendant

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