

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

UNITED STATES OF AMERICA

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CRIMINAL NO. 21-47

v.

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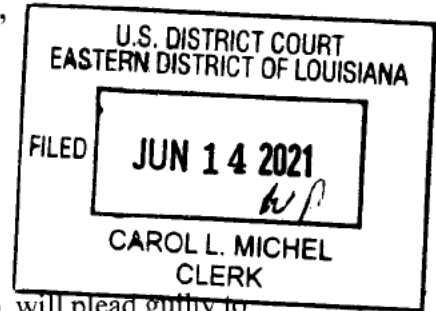
SECTION: "A"

CAESAR RAYMON WILLIAMS

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FACTUAL BASIS



The defendant, **CAESAR RAYMON WILLIAMS** ("WILLIAMS"), will plead guilty to the five-count indictment charging him with two counts of distribution of heroin, one count of distribution of cocaine base, one count of possession with the intent to distribute heroin, and one count of possession with the intent to distribute cocaine base, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Should this matter have gone 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 now pending against the defendant. All the below facts occurred in the Eastern District of Louisiana.

First Controlled Purchase – March 9, 2021

On March 9, 2021, at approximately 4:15 p.m., Terrebonne Parish Sheriff's Office ("TPSO") Narcotics Division Agent [REDACTED] instructed a confidential source ("CS") to place a recorded telephone call to WILLIAMS. WILLIAMS did not answer this call. The CS advised agents that he could arrive unannounced at WILLIAMS's residence to purchase heroin. The CS told agents that he knew WILLIAMS's address to be [REDACTED].

Fee _____
Process _____
X Dkt _____
CtRmDep _____
Doc. No. _____

AUSA WAB
Defendant Low
Defense Counsel M

Houma, Louisiana. This address was confirmed by agents after the purchase was made by conducting a drive-by check of the residence.

Agents searched the CS and his vehicle for contraband, and none was found. Agents then equipped the CS with an audio/video recording device and gave him/her \$450 of documented currency ("Official Advanced Funds" or "OAF") to conduct the controlled purchase of heroin from WILLIAMS.

At approximately 4:17 p.m., the CS departed the neutral location and traveled to [REDACTED] [REDACTED] in Houma, Louisiana. Upon arriving to WILLIAMS's home, the CS went to the back sliding-glass door and entered the residence. The CS and WILLIAMS met in the kitchen of the residence. The CS purchased approximately six grams of heroin from WILLIAMS in exchange for \$450.00 in OAF.

Members of the TPSO surveillance team followed the CS back to the neutral location. The CS gave agents one plastic bag containing suspected heroin. The CS and his vehicle were searched for contraband. No contraband was found. Agent [REDACTED] field tested the purchased suspected heroin, which yielded a presumptive positive result for heroin. This purchase was captured on video. The video shows that WILLIAMS possessed several ounces of suspected heroin, which was located inside of a toiletry bag next to where WILLIAMS was seated in the kitchen.

On May 3, 2021 the Drug Enforcement Administration ("DEA") Southeast Laboratory conducted a chemical analysis on the suspected narcotics purchased from WILLIAMS on March 9, 2021. The DEA Laboratory found that the suspected narcotics were positive for 6.4 grams of heroin.

Second Controlled Purchase – March 18, 2021

On March 18, 2021, at approximately 5:16 p.m., Agent [REDACTED] instructed a CS to place a text message to WILLIAMS to tell WILLIAMS that the CS was traveling to WILLIAMS's residence. The text message went as follows:

CS: "What's good. Bout to get that in a few after the traffic."

WILLIAMS: "ok."

When the CS stated, "bout to get that in a few," the CS was telling WILLIAMS that he/she was traveling to meet WILLIAMS at WILLIAMS's residence to purchase heroin.

Agents searched the CS and his/her vehicle for contraband, and none was found. The CS was equipped with an audio/video recording device and given \$1,600 OAF to conduct a controlled purchase of heroin from WILLIAMS.

At approximately 5:21 p.m., the CS departed the neutral location and traveled to [REDACTED] [REDACTED] [REDACTED] in Houma, Louisiana. Upon arriving, the CS went to the back sliding-glass door and entered the residence previously described. The CS and WILLIAMS met in the kitchen of the residence. An unknown black female (FNU LNU female) and an unknown black male (FNU LNU male-1) were already inside the residence with WILLIAMS when the CS entered. The FNU LNU male-1 appeared to be making a purchase of narcotics from WILLIAMS, and WILLIAMS asked the FNU LNU male-1 what he wanted. Both FNU LNU subjects departed WILLIAMS's residence shortly after the CS arrived. The CS attempted to purchase one ounce of heroin from WILLIAMS, but WILLIAMS did not have that amount available for sale. WILLIAMS and the CS then negotiated the price and weights of different types of narcotics that WILLIAMS had available for sale. The CS purchased two different types of heroin (powder form and brick form) for an approximate weight of 17.44 grams, approximately 1.43 grams of marijuana, and

approximately 20.06 grams of cocaine base from WILLIAMS. The CS paid WILLIAMS \$1,600 of OAF in exchange for the narcotics. During the sale, WILLIAMS was seated in the kitchen of [REDACTED] [REDACTED] [REDACTED] in Houma, Louisiana. At the end of the sale, another unknown male (FNU LNU male-2) entered the defendant's kitchen to purchase narcotics.

Members of the TPSO and DEA surveillance team followed the CS to the neutral location. The CS then gave agents two plastic bags containing suspected heroin (power form and brick form), loose marijuana, and two baggies containing suspected cocaine base. Agents searched the CS and his/her vehicle for contraband, and none was found. DEA Task Force Officer ("TFO") [REDACTED] field tested the powder form of the heroin, which yielded a presumptive positive result for heroin. This purchase was captured on video. The video shows that WILLIAMS possessed several ounces of suspected illegal drugs. Those suspected narcotics were located inside of what appeared to be a toiletry bag next to where WILLIAMS was seated in the kitchen. This was the same bag as seen during the controlled purchase with a CS on March 9, 2021, [REDACTED] [REDACTED] in Houma, Louisiana.

On April 27, 2021 the DEA Southeast Laboratory conducted a chemical analysis on the suspected cocaine purchased from WILLIAMS on March 18, 2021. The DEA Laboratory found that the suspected narcotics were positive for 4.44 grams of cocaine base, of which 1.90 grams were 43% pure; 12.72 grams of cocaine hydrochloride, of which 11.44 grams were 90% pure; and residue of tetrahydrocannabinol (THC). On May 4, 2021, the DEA Southeast Laboratory conducted a chemical analysis on the suspected heroin. The DEA Laboratory found that the suspected narcotics were positive for 2.362 grams of heroin.

Execution of the Search Warrant on WILLIAMS's Home – March 25, 2021

On March 24, 2021, TFO [REDACTED] applied for and was granted a search warrant for [REDACTED] [REDACTED] [REDACTED] in Houma, Louisiana by Magistrate Judge van Meerveld in the Eastern District of Louisiana. That search warrant was executed on March 25, 2021 at approximately 6:05 a.m. Upon arrival at WILLIAMS's residence, the DEA Special Response Team and Special Agent ("SA") [REDACTED] made their presence known by knocking and announcing by via police loudspeaker. WILLIAMS ran out of the back door of the apartment. WILLIAMS was met near the outside fence of his apartment by multiple perimeter DEA personnel, who had clearly marked POLICE insignia located on the front of their tactical vests. WILLIAMS disregarded their instructions to stop running and get on the ground. WILLIAMS ran south along the rear of the apartment complex. He then ran east, and he attempted to jump a wooden fence. DEA personnel stopped WILLIAMS from jumping the fence and escorted him to the ground. On the ground, WILLIAMS continued to resist arrest, and he did not place his hands behind his back. However, law enforcement personnel were eventually able to get WILLIAMS's hands behind his back.

At the time of the search, WILLIAMS was the only person located inside the apartment. Agents located the following items in various locations inside WILLIAMS's apartment:

In the living room, in a closet, agents found an undetermined amount of U.S. currency and documentation regarding an application for an LLC in WILLIAMS's name. On the table, agents located an eyeglass container with approximately 2.4 grams of suspected marijuana in two separate bags, six ecstasy tabs, approximately seven grams of heroin, which field tested positive, about 12 grams of suspected cocaine base, approximately one gram of a possible mix of cocaine base and cocaine hydrochloride, which field tested positive for cocaine content, and six suspected Xanax

pills. On the floor of the living room, agents saw a pants pocket, which contained WILLIAMS's driver's license, an unknown amount of U.S. currency, and approximately five grams of cocaine base, which field tested positive for cocaine content. On the living room sofa, agents found one iPhone.

In the kitchen, in a cabinet, agents located approximately 41 grams of an unknown powder substance. In a drawer, agents also found a digital scale and three keys to a possible storage unit. In the pantry, agents found mail, including the title to a vehicle registered to WILLIAMS.

Agents only located WILLIAMS's clothing, and they did not see any signs that other people lived at that residence.

On April 19, 2021, the DEA Southeast Laboratory conducted a chemical analysis on the some of the suspected narcotics found in WILLIAMS's residence on March 25, 2021. The DEA Laboratory found that one of the suspected narcotics was positive for 3.52 grams of cocaine base, and another suspected narcotic was positive for 10.79 grams of cocaine base. On April 22, 2021, the DEA Southeast Laboratory conducted a chemical analysis on more of the suspected narcotics found in WILLIAMS's residence on March 25, 2021. The DEA Laboratory found that the suspected narcotics were positive for 5.83 grams of heroin.

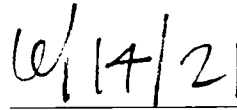
LIMITED NATURE OF FACTUAL BASIS

This proffer of evidence is not intended to constitute a complete statement of all facts known by **CAESAR RAYMON WILLIAMS** and 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 **CAESAR RAYMON WILLIAMS's** plea of guilty to the charged offense.

READ AND APPROVED:



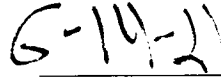
MELISSA E. BÜCHER
Assistant United States Attorney



Date



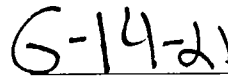
CAESAR RAYMON WILLIAMS
Defendant



Date



ARIS COX
Attorney for Defendant



Date