

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 22-034</b>
<b>v.</b>	*	<b>SECTION: "J"</b>
<b>TONI JONES</b>	*	<b>VIOLATION: 21 U.S.C. § 841(a)(1)</b>
	*	<b>21 U.S.C. § 841(b)(1)(C)</b>
	*	
	* * *	

**FACTUAL BASIS**

The above-named defendant, **TONI JONES**, has agreed to plead guilty to Count 1 of the pending indictment, in which she is charged with possession with intent to distribute controlled substances. 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 defendant **TONI JONES**:

On February 10, 2022, investigators were conducting surveillance of a grocery store parking lot located at North Claiborne Avenue and Tupelo Street. During that surveillance, investigators observed **JONES**, who investigators recognized from previous surveillance conducted a few days prior during which investigators had observed **JONES** conducting suspected hand-to-hand drug transactions. Investigators also observed an unknown individual in the parking lot with **JONES**, later identified as **TIMREK ANDREWS**.

Investigators later observed **JONES** and **ANDREWS** enter a blue four door GMC Jimmy registered to **ANDREWS**. **JONES** was the driver and **ANDREWS** was in the passenger seat. They drove away from the location. Investigators followed them and never lost sight of the vehicle

AUSA *CBS*  
Defendant *TJ*  
Defense Counsel *[Signature]*

as it traveled through the Lower Ninth Ward and into the Upper Ninth Ward. The two eventually returned to the intersection of North Claiborne Avenue and Tupelo Street in the GMC Jimmy and parked the vehicle next to another law enforcement target, **DESEAN CHRISTY**. By the time they had returned, **ANDREWS** had moved to the driver seat and **JONES** was in the passenger seat.


Agents elected to approach the vehicle at this time and make contact with the suspects to further their investigation. **ANDREWS** had stepped out of the GMC Jimmy and was urinating by the dumpster adjacent to vehicle. **JONES** was sitting in the passenger seat. **JONES** was asked to step out of the vehicle.

When approached, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] **JONES** was placed in handcuffs at that time and the contraband was removed from under her breast. Agents seized the suspected drugs which tested positive as methamphetamine, fentanyl, and cocaine base. The drugs were contained inside a large clear plastic bag. Inside that bag, the drugs were packaged for distribution in many separate small clear plastic baggies.

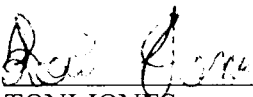
This proffer of evidence is not intended to constitute a complete statement of all facts known by **JONES**, but rather is a minimum statement of facts intended to prove the necessary

factual predicate for the guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal and factual basis for **JONES'** plea of guilty to these crimes.

**READ AND APPROVED:**

 2/16/23  
\_\_\_\_\_  
CHARLES D. STRAUSS (Date)  
Assistant United States Attorney

 2/16/23  
\_\_\_\_\_  
R. JUDSON MITCHELL (Date)  
Attorney for Defendant

 2-16-23  
\_\_\_\_\_  
TONI JONES (Date)  
Defendant