

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
FILED 11-10-2015
WILLIAM W. BLEVINS
CLERK

UNITED STATES OF AMERICA

CRIMINAL NO. 14-168

v.

SECTION "I"

JOEQUELL LEWIS

FACTUAL BASIS

The above-named defendant, Joequell LEWIS, a/k/a "Blow," has agreed to plead guilty pursuant to a plea agreement with the Government to Count One of the Superseding Indictment, which charges the defendant and others with conspiring to possess with the intent to distribute and to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin and two hundred eighty (280) grams or more of a mixture or substance containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846. Should this matter have proceeded to trial, the United States of America would have proven beyond a reasonable doubt, the following facts to support the allegations against the defendant, Joequell LEWIS (hereafter referred to as LEWIS):

From on or about January 1, 2012, and continuing until on or about November 20, 2013, in the Eastern District of Louisiana, and elsewhere, Joequell LEWIS, a/k/a "Blow," conspired with Harry SMOOT, Frankie HOOKFIN, Ray WOODRUFF, Terrence KELLEY, a.k.a. "Streets," a.k.a. "T," Lance SINGLETON, a.k.a. "Life Taker," Isaac SMITH, a.k.a. "Ike," Clifford SONNIER, a.k.a. "Dut," Andre ADDISON, a.k.a. "Dooda," Christopher BROWN, a.k.a. "Ten," Richard THOMAS, Terrell WADE, a.k.a. "T-Dog," and others to distribute and to possess with the intent to distribute one (1) kilogram or more of a mixture or substance containing a detectable amount of heroin.

SV JJ MR

LEWIS sold retail quantities of heroin from 2012 until the end of this conspiracy. During this period, LEWIS would acquire approximately seven gram (or one-quarter ounce) quantities of heroin several times a week, depending on how much heroin LEWIS was selling and/or using. LEWIS would acquire these seven gram quantities of heroin from various sources, including several members of the conspiracy who are charged in the Superseding Indictment. Harry SMOOT was the overall source of supply of heroin for members of this conspiracy. SMOOT was accustomed to dealing in larger amounts of heroin, so instead of always directly supplying LEWIS with heroin, he would sometimes tell LEWIS to purchase seven gram quantities from other members of the conspiracy. SMOOT would also sell directly to LEWIS.

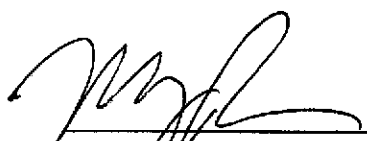
LEWIS normally paid around \$500 per quarter ounce of heroin. LEWIS would then use a scale to individually package .2 gram quantities of heroin into plastic bags for retail sales. LEWIS would sell the .2 gram quantities for between \$40 and \$50. LEWIS sold to dozens of customers on a regular basis, and would frequently travel in borrowed vehicles to make sales. LEWIS sold heroin primarily in the Avondale/Waggaman/Westwego areas of the western part of Jefferson Parish, in the Eastern District of Louisiana. One cooperating witness stated that he purchased user quantities of heroin from LEWIS on over one-hundred occasions. Numerous cooperating witnesses and defendants would testify that they routinely saw LEWIS trafficking in drugs.

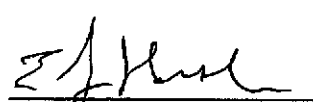
The government would also introduce evidence from social media showing LEWIS associating with several of his coconspirators and displaying the proceeds from his drug trafficking activity. The government would show photos from Facebook of LEWIS fanning out large amounts of cash, with captions written by LEWIS indicating that the money was related to his drug trafficking.


SP JL
MR

LEWIS was responsible either as a direct result of his own conduct and/or the conduct of his co-conspirators in furtherance of the conspiracy that was reasonably foreseeable to LEWIS for the acquisition and distribution of over one kilogram of heroin during the course of this conspiracy. Accordingly, the government and the defendant agree and stipulate that for sentencing purposes the defendant will be held responsible for 1-3 kilograms of heroin as that amount was distributed or possessed with the intent to be distributed during the course of the conspiracy as a result of the defendant's own direct conduct and/or the conduct of his co-conspirators in furtherance of the conspiracy that was reasonably foreseeable to him.

This Factual Basis is not intended to constitute a complete statement of all facts known by LEWIS and described by LEWIS to 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 Factual Basis is to demonstrate that there exists a sufficient legal and factual basis for LEWIS's plea of guilty to Count One of the Superseding Indictment.

 11/10/15
MYLES RANIER (Date)
Assistant United States Attorney
LA Bar Roll No. 30029

 11/9/15
ERIC HESSLER (Date)
Attorney for Defendant
LA Bar Roll No.

 11/9/15
JOQUELL LEWIS (Date)
Defendant

 
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