

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

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO. 15-10</b>
<b>v.</b>	*	<b>SECTION: "N"</b>
<b>KATHLEEN WILLIAMS</b>	*	
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**FACTUAL BASIS**

The defendant, **KATHLEEN WILLIAMS**, has agreed to plead guilty as charged to Count Five of the five-count Indictment. Count Five charges **WILLIAMS** with obstruction of justice, in violation of Title 18, United States Code, Section 1519.

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:

On September 22, 2014, Drug Enforcement Administration ("DEA") agents who had received a tip from the New Orleans Police Department ("NOPD") relayed to members of Louisiana Probation and Parole ("Probation") that they had received information that Gross Williams, who is **KATHLEEN WILLIAMS's** husband, was a multi kilogram cocaine dealer. Gross Williams was on state probation at the time from a conviction on December 20, 2012, in

case number 672-11D in the 18th Judicial District Court for the Parish of Iberville, State of Louisiana, for Possession with Intent to Distribute a Schedule I Controlled Dangerous Substance, in violation of La. R.S. 40:966.A. The sharing of this information with Probation led to a compliance check being conducted on Gross Williams. The Probation officers went to Boss Used Cars, a small used being lot being operated by Gross Williams and **KATHLEEN WILLIAMS**. **KATHLEEN WILLIAMS** was present at Boss Used Cars when the officers arrived and remained on the scene throughout the approximately hour long incident. **KATHLEEN WILLIAMS** was present for the arrival of Drug Enforcement Administration (DEA) agents, who interviewed Gross Williams for approximately 30 to 40 minutes at the car dealership. **KATHLEEN WILLIAMS** understood that the agents were investigation allegations that Gross Williams was again involved in drug trafficking. **KATHLEEN WILLIAMS**, who remained at the business, saw the agents leave the business with Gross Williams in handcuffs.

**KATHLEEN WILLIAMS** did not actively participate in her husband's drug trafficking activities, but was aware that her husband was involved in drug trafficking. **KATHLEEN WILLIAMS** regularly worked at the used car business and knew that the volume of sales could not account for the amount of cash being deposited into the business accounts, nor for the large volume of cash (approximately \$425,000) found in her bedroom on September 22, 2014. **KATHLEEN WILLIAMS**, at her husband's direction, open a safe deposit box at Region's Bank in her and her son's name. Bank records show that **KATHLEEN WILLIAMS** was the only person to access the box. She accessed the box five times, the first on October 24, 2011, and the last on May 23, 2013. Payments for the box were initially made by Gross Williams and

later by **KATHLEEN WILLIAMS**. The bank's policy provides that once the person who holds the box enters the code (a hand print) to access the box, then another person can go in with them and that bank personnel do not enter the room. The space where the boxes are located is small enough that a person granting access to another person would see what that person was doing unless they purposely turned away.

After Gross Williams had been arrested on September 22, 2014, DEA agents asked him about his "dope phone," meaning the phone he used to conduct his drug trafficking operations. Gross Williams agreed to allow agents to access the phone and told them that it was white phone at the used car dealership on a charger. Gross Williams gave agents **KATHLEEN WILLIAMS's** phone number so that they could arrange to meet her to get the phone. When local police went to the dealership to get the phone, they encountered **KATHLEEN WILLIAMS** getting into her car and explained to her that they were there to collect her husband's phone in connection with the ongoing narcotics investigation. **KATHLEEN WILLIAMS** allowed the officers into the business. They were unable to locate the phone inside the business and went back outside to speak to **KATHLEEN WILLIAMS**. They observed **KATHLEEN WILLIAMS** breaking a white cell phone and attempting to hide it under the back passenger's seat of her car. **KATHLEEN WILLIAMS** stated that she was breaking the phone because another woman was calling it. The officers recovered the broken phone, but were unable to locate the battery and SIM card, which was missing and never found.

This factual basis is not intended to constitute a complete statement of all facts known by **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 factual basis

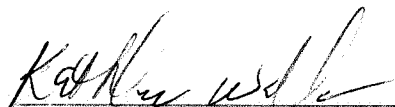
is to demonstrate that there exists a sufficient legal and factual basis for **WILLIAMS's** plea of guilty to Count Five of the Indictment.



DAVID HALLER  
Assistant United States Attorney

5/18/16

Date



KATHLEEN WILLIAMS  
Defendant

5/18/16

Date



JOHN CRAFT  
Attorney for Defendant

5/18/16

Date