

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
2018 FEB 21 P 12:57
WILLIAM C. BLEMING
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July

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

UNITED STATES OF AMERICA

* **CRIMINAL NO. 17-42**

v.

* **SECTION: "R"**

**MILTON CARLOS SEGURA-
SANCHEZ**

* **VIOLATIONS: 21 U.S.C. § 846**

**a/k/a "Milton Reyna Segura-
Sanchez"**

* **21 U.S.C. § 841(a)(1)**

a/k/a "Milton Carlos Segura Reyna"

* **21 U.S.C. § 841(b)(1)(B)**

a/k/a "Carlos"

*

* * *

FACTUAL BASIS

The above-named defendant, **MILTON CARLOS SEGURA-SANCHEZ**, has agreed to plead guilty as charged to Count One of the Superseding Bill of Information in which he is charged with conspiracy to distribute and possess with the intent to distribute 500 grams or more of cocaine hydrochloride, in violation of Title 21 United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B). 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 **MILTON CARLOS SEGURA-SANCHEZ**.

In the morning of July 29, 2016, Troopers from the Louisiana State Police conducted a traffic stop of a 2016 Dodge Charger bearing Texas license plate GSS6406 (the "CHARGER") on Interstate 12 in the vicinity of Hammond, Louisiana, located in the Eastern District of

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Louisiana. State Police Troopers observed the CHARGER headed eastbound, and driving too close to other vehicles and in an unsafe manner. An individual who subsequently became a cooperating defendant (“CD-1”) was driving the vehicle, and was the sole occupant. Troopers questioned CD-1 regarding CD-1’s destination and origin, and CD-1 provided inconsistent answers and otherwise acted suspiciously.

Subsequently, Troopers utilized a narcotics detection K-9, and conducted a sniff of the vehicle. The K-9 indicated the presence of controlled substances. Troopers then conducted a search of the vehicle and recovered four bricks of a white powdery substance. Three of the bricks were located in the trunk, and the last was between the back seat of the CHARGER and the trunk. A field test of the bricks was positive for the presence of cocaine. The cocaine was later tested by the United States Customs and Border Protection Laboratory, which confirmed the presence of cocaine. In addition, the Laboratory determined that the net weight of the cocaine was approximately 3974.7 grams.

Subsequently, Special Agents from the Department of Homeland Security, Homeland Security Investigations (“HSI”) conducted an interview with CD-1. CD-1 stated that CD-1 met an individual named “Carlos” at a strip club in Houston. CD-1 identified “Carlos” as **MILTON CARLOS SEGURA-SANCHEZ** in a police-arranged photographic array. CD-1 stated that **MILTON CARLOS SEGURA-SANCHEZ** asked CD-1 to rent a vehicle for him, and that he would pay CD-1 approximately \$300 for doing so. CD-1 stated that CD-1 knew **MILTON CARLOS SEGURA-SANCHEZ** to be a drug trafficker, and CD-1 knew that any money received from **MILTON CARLOS SEGURA-SANCHEZ** was drug proceeds.

On July 21, 2017, CD-1 picked up **MILTON CARLOS SEGURA-SANCHEZ** from his apartment complex, located at 5600 North Freeway, Houston, Texas. CD-1 and **MILTON**

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CARLOS SEGURA-SANCHEZ traveled to the George Bush Intercontinental Airport, located in Houston, Texas, although they were unable to rent a vehicle on that day.

The next day, July 22, 2017, CD-1 and **MILTON CARLOS SEGURA-SANCHEZ** again traveled to the airport. CD-1 was able to rent a vehicle from Hertz Rental Car. HSI agents have reviewed records from Hertz, which corroborates CD-1's information. After renting the vehicle, CD-1 provided the vehicle to **MILTON CARLOS SEGURA-SANCHEZ**, who drove off with the rented vehicle. The rental was initially an approximately 5-day rental.

At the end of the 5-day rental period, CD-1 and **MILTON CARLOS SEGURA-SANCHEZ** again met. During that meeting, **MILTON CARLOS SEGURA-SANCHEZ** agreed to pay CD-1 approximately \$3,000 to make a trip to the East Coast. In addition, CD-1 and **MILTON CARLOS SEGURA-SANCHEZ** discussed extending the rental from Hertz. CD-1 agreed to both extend the rental vehicle and to travel to the East Coast.

On July 28, 2016, CD-1 traveled to **MILTON CARLOS SEGURA-SANCHEZ**'s apartment complex to begin the trip to the East Coast. At that point, CD-1 was informed that the trip would be to Massachusetts. CD-1 traveled to **MILTON CARLOS SEGURA-SANCHEZ**'s apartment and observed him carry a Louis Vuitton bag out of the apartment. The bag appeared to be heavy. CD-1 and **MILTON CARLOS SEGURA-SANCHEZ** discussed the impending trip, and he informed CD-1 that he would be checking in on CD-1 periodically. **MILTON CARLOS SEGURA-SANCHEZ** also provided a telephone number to an individual in Lowell, Massachusetts.

CD-1 then left in the rental car and drove through Louisiana. Eventually, early in the morning on July 29, 2017, CD-1 was pulled over by troopers from the Louisiana State Police, as described above, and the aforementioned cocaine was seized from the vehicle.

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CD-1 also provided consent to search CD-1's cellular phone. HSI Agents observed text messages and call records corroborating CD-1's information, including text messages between CD-1 and **MILTON CARLOS SEGURA-SANCHEZ** during which they discussed the rental vehicle. For example, on July 21, 2016, CD-1 sent a text message reading, "I'm going to Houston now. How long does it take to rent the car?" **MILTON CARLOS SEGURA-SANCHEZ** responded, "5600 north fwy Houston tx 77076," "Arrive at this address," and "It takes 30 minutes."

Moreover, during the aforementioned traffic stop, CD-1 sent a text message saying, "Hey, they stopped me," "Do they have the right to search me?" **MILTON CARLOS SEGURA-SANCHEZ** said, "No," "where are you?" CD-1 responded, "They stopped me because I got close to a car," "Here around Hammond." **MILTON CARLOS SEGURA-SANCHEZ** said, "Call me when you have a chance," and "What's up? What happened to you?"

Moreover, CD-1's cellphone included a contact labeled as "Francisco" with the telephone number (978) 394-7161. CD-1 informed agents that this telephone number was provided by **MILTON CARLOS SEGURA-SANCHEZ** as the individual that CD-1 should call in Massachusetts. A review of telephone records for **MILTON CARLOS SEGURA-SANCHEZ** indicated that **MILTON CARLOS SEGURA-SANCHEZ** placed four outgoing calls and received one incoming call from that telephone number in June 2016. Those records also revealed other contacts with telephone assigned numbers with area codes for Massachusetts.

After CD-1's arrest, HSI Agents obtained a court order for geolocation information associated with **MILTON CARLOS SEGURA-SANCHEZ's** cellular phone. Utilizing that information, HSI Agents also conducted physical surveillance of **MILTON CARLOS SEGURA-SANCHEZ** on several occasions, and were able to confirm that **MILTON CARLOS**

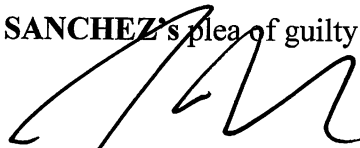
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SEGURA-SANCHEZ's location coincided with the location of the cellular phone. In addition, on August 6, 2016, MILTON CARLOS SEGURA-SANCHEZ's cellular phone traveled to the vicinity of Lowell, Massachusetts, which was the same location that CD-1 was supposed to travel to in late-July 2016. On the way back, through Connecticut, HSI Agents asked the Connecticut State Police to conduct a stop of MILTON CARLOS SEGURA-SANCHEZ's vehicle for identification purposes.

For the purposes of sentencing, MILTON CARLOS SEGURA-SANCHEZ and the government stipulate that MILTON CARLOS SEGURA-SANCHEZ was responsible for 3974.7 grams of a mixture containing cocaine hydrochloride, through MILTON CARLOS SEGURA-SANCHEZ's own conduct and the reasonably foreseeable conduct of his co-conspirators during the course of the conspiracy.


This proffer of evidence is not intended to constitute a complete statement of all facts learned during this investigation, 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 MILTON CARLOS SEGURA-SANCHEZ's plea of guilty to the charged offense in Count One of the Indictment.



JONATHAN L. SHIH (Date) 2/21/18
Assistant United States Attorney



CATHERINE CHAVARRI, ESQ. (Date) 02/21/18
Attorney for Defendant



MILTON CARLOS SEGURA-SANCHEZ (Date) 02/21/18
Defendant