

U.S. DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA  
FILED 4-4-2018  
WILLIAM W. BLEVINS  
CLERK

(BLO)

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

\*

CRIMINAL NO. 18-47

v.

\*

SECTION: "I"

ROLAND CHAMBERS

\*

a/k/a "Troy"

\* \* \*

FACTUAL BASIS

The defendant, **ROLAND CHAMBERS**, intends to enter a plea of guilty to Count One of the Bill of Information. Count One charges **CHAMBERS** with conspiracy to distribute and possess with the intent to distribute 100 grams or more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846. Should this matter proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts. Unless stated otherwise, the following acts occurred within the jurisdiction of the Eastern District of Louisiana.

Since at least May 1, 2017, and until August 31, 2017, **CHAMBERS** agreed with others to distribute heroin in Houma, Louisiana, and in other locations in the Eastern District of Louisiana. **CHAMBERS** would provide heroin to others for sale, and he would obtain heroin from others to sell to customers. **CHAMBERS** would sometimes front the heroin to others. In furtherance of the conspiracy, **CHAMBERS** travelled to New Orleans to obtain heroin, and he made sales in the Houma area.

AUSA         
Defendant         
Defense Counsel

On August 4, 2017, a confidential source ("CS") placed a recorded phone call to **CHAMBERS** and informed him that he/she was ready. **CHAMBERS** advised the CS to meet him on Myrtle Street in Houma, Louisiana. The CS then picked up **CHAMBERS** at the intersection of Myrtle Street and Furman Street. After entering the CS's vehicle, and during the course of a recorded conversation, **CHAMBERS** stated that he had sold his last half-ounce of heroin and that he did not have any more heroin to sell to the CS. **CHAMBERS** told the CS, "the white boy I had down here serving for me, got knocked with fucking two ounces of my shit the other day, [unintelligible], the white boy that was in the newspaper, yea, man the people ran up in that mother fuckers shit bra, man I'm so fucking mad bra." Through credible testimony and relevant evidence, the government would prove beyond a reasonable doubt that this meant that one of **CHAMBERS'** distributors had recently been arrested with two ounces of heroin.

On August 15, 2017, **CHAMBERS** knowingly and intentionally sold 26.6 grams of heroin to a CS in exchange for \$2,000. This purchase was preceded by a series of consensually recorded phone calls between the CS and **CHAMBERS** arranging the deal. The agents then followed standard protocol in conducting the purchase. This standard protocol included the following: meeting with the CS at a neutral location, searching the CS for contraband, providing the CS with official funds to purchase heroin, equipping the CS with recording equipment, monitoring the CS as he/she travelled to the meet location, monitoring the meet itself, following the CS back to a neutral location, obtaining the purchased narcotics from the CS, again searching the CS for contraband, recovering the recording equipment, and debriefing the CS about the controlled purchase. The transaction took place in the 8000 block of West Park Avenue in Houma, Louisiana. A subsequent DEA laboratory test confirmed the presence of 26.6 grams of heroin hydrochloride.

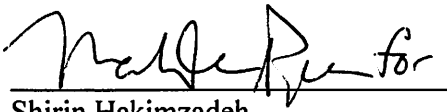
On August 30, 2017, **CHAMBERS** knowingly and intentionally possessed with the intent to distribute 51.6 grams of heroin to a CS. On that date, the CS placed a recorded telephone call to **CHAMBERS** in order to purchase two ounces of heroin. **CHAMBERS** told the CS to meet him in the same place as last time, referring to the controlled purchase made on August 15, 2017. **CHAMBERS** was observed entering the parking lot where the CS was parked in the 8000 block of West Park Avenue in Houma, Louisiana. **CHAMBERS** then exited the parking lot followed by the CS. **CHAMBERS** led the CS through a nearby subdivision, and then parked on the side of the road in the 300 block of McKinley Street in Houma, Louisiana. The CS parked behind **CHAMBERS**. **CHAMBERS** was then observed exiting his vehicle and walking back to the CS's front passenger side. While opening the CS's front passenger door, **CHAMBERS** observed the presence of law enforcement in the area. **CHAMBERS** quickly closed the CS's front passenger door and began running back to his vehicle. Arrest teams were alerted to his movements and advised to stop **CHAMBERS** and place him under arrest. Teams approaching from **CHAMBERS** rear and front activated their blue emergency lights to conduct a traffic stop. **CHAMBERS** refused to stop and struck an unmarked police vehicle while attempting to flee. **CHAMBERS** was then apprehended and placed under arrest. A search of **CHAMBERS**' person after his arrest resulted in the seizure of approximately \$770.00 in United States Currency in his pocket and a flip style cellphone. From the outside of **CHAMBERS**' vehicle, agents observed two separate baggies of heroin, which were in plain view on the front driver's seat. A subsequent DEA laboratory test confirmed the presence of 51.6 grams of heroin hydrochloride. The government would prove beyond a reasonable doubt, through credible testimony and relevant evidence, that **CHAMBERS** possessed the narcotics seized in his vehicle with the intent to

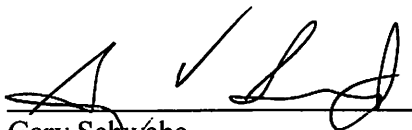
distribute it.

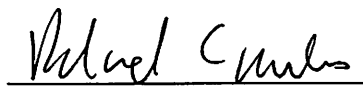
The total weight of heroin that **CHAMBERS** agreed to distribute with others was over 100 grams.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by **CHAMBERS** and described by **CHAMBERS** to the government, but rather it 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 **CHAMBERS'** plea of guilty to the charged offenses.

 for 4/4/2018  
Shirin Hakimzadeh (Date)  
Assistant United States Attorney

 4-4-18  
Gary Schwabe (Date)  
Attorney for Roland Chambers

 4-4-18  
Roland Chambers (Date)  
Defendant