

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL NO: 17-193
v.	*	SECTION: "E"
JULIEN POLK	*	
a/k/a "Simone"	* * *	

FACTUAL BASIS

The above-named defendant, **JULIEN POLK** ("POLK"), has agreed to plead guilty to Count 1 of the Superseding Bill of Information. Should this matter proceed to trial, the United States would prove beyond a reasonable doubt the facts set forth in this Factual Basis. Unless stated otherwise, these acts occurred in the Eastern District of Louisiana:

During the time frame of the charged drug conspiracy, Stefen DAIGLE, Peter GIANDALONE, Jacob HIGGINBOTHAM, Glenn MELANCON, Jeffrey CLINES, James HATCH, Angel Renee VIDAURE, Eulalio TORRES-CADENAS, Delio Alfredo LOPEZ-LOPEZ, Lindsey LOPEZ, Julien **POLK**, a/k/a "Simone" and others, conspired to distribute methamphetamine throughout the New Orleans area. Agents developed evidence against this group of eleven defendants using controlled purchases of methamphetamine, traffic stops and seizures, consensually-recorded text messages and phone calls, search warrants, cooperator information, and self-incriminating statements.

**POLK** acknowledges that, during the time frame of this conspiracy, he distributed ounce-level quantities of methamphetamine to DAIGLE and others. **POLK** further acknowledges that he knew the scope of the conspiracy involved 50 grams or more of actual methamphetamine.

On February 24, 2017, United States Postal Inspector Brian Cazalot identified a suspicious package (EL 443650035 US) at the New Orleans distribution center. The package had been sent

*df*      *ILA*      *BSL*

from the San Francisco area on February 23, 2017. The sender address on the package included fictitious information. The recipient address was "S. Daigle" at 1330 ½ Camp Street, New Orleans. Over the previous months, law enforcement had received information from a Louisiana State Police source of information that DAIGLE was receiving packages of methamphetamine in the mail to the Camp Street address. Agents conducted a canine sniff on the suspect package and received a positive alert for drugs. That day, Inspector Cazalot applied for and received a search warrant for the package. Inspector Cazalot executed the warrant and discovered approximately 108.4 grams of a mixture containing methamphetamine in the package. Lab results later proved that this mixture contained approximately 98% actual methamphetamine.

On March 2, 2017, Postal Inspectors conducted a controlled delivery of the package to DAIGLE. At approximately 9:40 am, DAIGLE entered the Lafayette Square Post Office located at 610 S. Maestri Place, New Orleans, and asked the clerk for the subject parcel. The clerk, under the supervision and direction of Postal Inspectors, handed DAIGLE the subject parcel and had DAIGLE sign for the parcel, acknowledging he was the intended recipient. DAIGLE took receipt of the parcel and exited the post office. Agents took DAIGLE into custody without incident.

**POLK** acknowledges that he knowingly and voluntarily sent this package of methamphetamine to DAIGLE. **POLK** had been living in California during the time frame of this conspiracy. **POLK** had been contacted by DAIGLE, who requested that **POLK** send four ounces of methamphetamine to New Orleans. Text messages recovered from DAIGLE's phone corroborate that **POLK** sent this package to DAIGLE from California.

On March 15, 2017, at the direction of law enforcement, CI-2 contacted **POLK** and arranged for a quarter pound of methamphetamine to be sent to New Orleans via mail. Agents instructed CI-2 to text **POLK** and ask for a good address so agents could mail \$2,000 to **POLK** in

*Y* ILA BSL

drug-buy money. **POLK** texted CI-2 that he was going to check into the W Hotel in San Francisco on March 16, 2017, and that the hotel would be able to accept the parcel of money. **POLK** texted CI-2 the following address for the money to be mailed: "181 3rd St. San Francisco, CA, which is the address for the W Hotel San Francisco."

On March 16, 2017, New Orleans agents prepared an express parcel (bearing tracking number EK 000819121 US) which contained \$2,000. That parcel was sent to United States Postal Inspection Service (USPIS)-San Francisco in order to make a controlled delivery.

On March 17, 2017, undercover USPIS agents delivered the money parcel to the W Hotel, as requested by **POLK**. The money parcel was left with the front desk clerk. Inspectors had previously made contact with the director of W Hotel security in order to obtain surveillance camera footage of **POLK** retrieving the parcel. Surveillance footage from the hotel lobby showed that **POLK** went to the front desk and requested the money parcel. **POLK** signed for the parcel, acknowledging receipt.

A short time later, CI-2 contacted New Orleans Inspectors stating **POLK** had contacted CI-2 to confirm receipt of the money parcel. CI-2 instructed **POLK** to mail the methamphetamine to an address listed on the money parcel for the sender, which was an undercover P.O. Box controlled by New Orleans Inspectors. On March 19, 2017, CI-2 received a text message from **POLK** stating he was going to mail the parcel first thing the next morning, March 20, 2017.

On March 20, 2017, **POLK** texted CI-2 a photo of a FedEx receipt and apologized to CI-2 for not sending the parcel via the Postal Service. The tracking number on the FedEx receipt in the photo **POLK** sent was 785971405671. On March 21, 2017, New Orleans Inspectors took receipt of this parcel, which contained approximately 83.9 grams of a mixture containing methamphetamine. This mixture of 83.9 grams contained approximately 99% actual

*[Handwritten signature]* VLA BSL

methamphetamine. **POLK** knowingly and voluntarily sent this parcel of methamphetamine to CI-2 in the New Orleans area.

**POLK** and the government stipulate for the purposes of sentencing that **POLK** was responsible for between 150 grams and 500 grams of actual methamphetamine, through **POLK's** own conduct and the reasonably foreseeable conduct of his co-conspirators.

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts, 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 **POLK's** plea of guilty to the charged offense.

  
Brandon S. Long  
Assistant United States Attorney

9/18/18  
(Date)

  
Ian I. Atkinson  
Counsel for Defendant Julien Polk

9/18/18  
(Date)

  
Julien Polk  
Defendant

9/18/18  
(Date)