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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

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UNITED STATES OF AMERICA

CRIMINAL NO. 18-85

SECTION: "E"

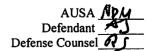
AARON JOHNSON

FACTUAL BASIS

Should this matter proceed to trial, the United States will prove the defendant, AARON JOHNSON ("JOHNSON"), guilty beyond a reasonable doubt of conspiring to distribute and possess with intent to distribute fifty (50) grams or more of methamphetamine and five hundred (500) grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846. The government would establish the following through credible testimony and the production of reliable evidence:

JOHNSON was the target of a drug trafficking investigation by the Drug Enforcement Administration ("DEA") and the Washington Parish Sheriff's Office. On March 18, 2018, JOHNSON went to the New Orleans airport, and flew to San Jose, California, and then drove to Union City, California, near a FedEx facility. The next day, JOHNSON drove back to the airport, and flew back to New Orleans, arriving the evening of March 19, 2018, after which he drove home.

On March 20, 2018, when JOHNSON was still at home, surveillance agents saw a FedEx truck leave a package at the front door of JOHNSON's residence, and JOHNSON brought it inside.



Once JOHNSON left his house, agents conducted a traffic stop on JOHNSON's vehicle. JOHNSON had 111 grams of methamphetamine in his car. JOHNSON admitted post-*Miranda* that whatever agents found in his house was his. Agents obtained a search warrant for JOHNSON's house. In JOHNSON's house, they found another 897 grams of methamphetamine in the freezer. An open FedEx box was on the kitchen counter, with only two t-shirts in it. Agents found two digital scales in the kitchen, and one in the laundry room. Laboratory tests later confirmed that the methamphetamine seized that day was all over 93% purity.

* * * *

At trial the government would introduce the methamphetamine seized from JOHNSON's vehicle and residence on March 20, 2018; laboratory reports confirming that the substances JOHNSON possessed were in fact methamphetamine; toll records showing JOHNSON's contacts with California numbers; testimony of the investigating agents and forensic chemist; and the statements of JOHNSON and other witnesses.

AUSA AUSA Defendant AU

Limited Nature of Factual Basis

This proffer of evidence is not intended to constitute a complete statement of all facts known by JOHNSON or 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 proffer is to demonstrate that there exists a sufficient legal basis for JOHNSON's plea of guilty to the charged offenses in Count 1, and to stipulate that all acts took place within the Eastern District of Louisiana.

READ AND APPROVED:

NICHOLAS D. MOSES

Assistant United States Attorney

RAVI SHAH

Counsel for Defendant

Counsel for Defendant

AARON JOHNSON

Defendant