

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

*

CRIMINAL NO: 18-239

v.

*

SECTION: "H"

WILLIAM HARRISON FARRIS

*

* * *

FACTUAL BASIS

The above-named defendant, **WILLIAM HARRISON FARRIS** ("FARRIS"), 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 following facts. Unless stated otherwise, these acts occurred in the Eastern District of Louisiana:

The Government's evidence shows that, between on or about February 17, 2016, and February 24, 2016, **FARRIS**, KACIE DOUCET, and LEILANI ASPURIA ("the defendants") conspired to drug and kidnap an 18-year-old victim, "V.S.," in New Orleans, Louisiana, resulting in V.S.'s death. The defendants acted at the request and direction of Carlos Mario Cantu-Cox and Christopher Cantu-Cox (together, the "Cantu-Coxes"), a married couple who, at the time, were large-scale methamphetamine dealers in the New Orleans and Houston areas.

By way of background, in 2015, the Cantu-Coxes had befriended V.S., who had just graduated high school and was living and working in the New Orleans area. The Cantu-Coxes supplied drugs to V.S., and V.S. frequently traveled to Texas with the Cantu-Coxes and stayed at their home in Pasadena, Texas. During one such trip in November 2015, V.S. was arrested in the Houston area and charged with unlawful possession of a firearm. The Cantu-Coxes posted a portion of V.S.'s bond and V.S. was released. V.S. traveled back to the New Orleans area. Over the next few months, V.S. began missing court appearances in Texas. Authorities issued a

BS
WF
TA

warrant for his arrest. As a result, the Cantu-Coxes feared losing approximately \$6,000 on their bond commitment. In addition, sometime after his release on bond, V.S. traveled to Pasadena and broke into the Cantu-Coxes' home while the Cantu-Coxes were visiting New Orleans. V.S. allegedly stole a number of items from the Cantu-Coxes. The combination of these events led to a falling-out between the Cantu-Coxes and V.S.

The Cantu-Coxes began telling associates in New Orleans that they were searching for V.S. and wanted information on V.S.'s whereabouts. The Cantu-Coxes indicated that they wanted to find V.S. so they could transport him back to Texas and recover their bond payment. V.S., meanwhile, was living with his mother in Slidell, Louisiana, approximately forty minutes northeast of New Orleans.

In early 2016, **FARRIS** was a New Orleans-based methamphetamine dealer and user who was supplied by the Cantu-Coxes. **FARRIS** learned that the Cantu-Coxes were looking for V.S. **FARRIS** had previously dated DOUCET, another New Orleans-based drug user. **FARRIS** knew that DOUCET was connected to V.S. on Facebook. **FARRIS** understood that the Cantu-Coxes were offering free methamphetamine to anyone who successfully led the Cantu-Coxes to V.S.

Between February 17 and February 23, 2016, at the direction of **FARRIS**, DOUCET contacted V.S. over Facebook on multiple occasions and suggested that they meet for a sexual encounter. V.S. agreed to meet DOUCET on February 23, 2016, but asked that DOUCET drive from New Orleans to Slidell to pick him up. Facebook posts between DOUCET and V.S. prove that they coordinated a meeting on the evening of February 23, 2016. **FARRIS** and DOUCET enlisted the help of ASPURIA, who was the only one of the three defendants with access to a car, to drive DOUCET to pick up V.S. ASPURIA was also a New Orleans-based drug user at the time.

BSL
WE
AT

Each of the defendants was aware that DOUCET's offer of a sexual encounter with V.S. was a ruse, and that the real purpose of picking up V.S. from Slidell was to drive around with V.S. while providing V.S. with a cocktail of drugs to render V.S. incapacitated. Each of the defendants was aware that V.S. would be given these drugs without his knowledge. Each of the defendants was aware that, after V.S. was incapacitated, DOUCET and ASPURIA would deliver V.S. to the Cantu-Coxes at the Marriott Hotel located at 859 Convention Center Boulevard in downtown New Orleans. Each of the defendants knew that V.S. would not otherwise willingly agree to meet with the Cantu-Coxes.

The Cantu-Coxes supplied the drugs that DOUCET and ASPURIA were to administer to V.S. Specifically, the Cantu-Coxes provided combinations of drugs that included *inter alia* ketamine, a Schedule III drug controlled substance; and 1,4-butanediol, a Schedule I controlled substance analogue, with a chemical structure substantially similar to the chemical structure of gamma-hydroxybutyric acid ("GHB"). The 1,4-butanediol was intended for human consumption. The Cantu-Coxes referred to its combination of drugs as an "elixir." Before DOUCET and ASPURIA departed to pick up V.S. in Slidell, the Cantu-Coxes provided the drugs to DOUCET, in the presence of **FARRIS**, along with instructions on how to mix the drugs with alcohol and surreptitiously administer the drugs to V.S.

On February 23, 2016, after picking up V.S., DOUCET and ASPURIA began driving around the New Orleans area. Consistent with the Cantu-Coxes' instruction, DOUCET and ASPURIA shared with V.S. a number of cocktails containing a mixture of alcohol and drugs provided by the Cantu-Coxes. The drugs that DOUCET and ASPURIA shared with V.S. included 1,4-butanediol and ketamine. Over the course of the evening and into the next morning of February 24, 2016, V.S. became more and more high to the point of incapacitation.

BPC
WF
JA

FARRIS was not in the car with DOUCET, ASPURIA, and V.S. However, **FARRIS** was in the New Orleans area and used his cell phone to maintain contact with DOUCET and ASPURIA, who provided frequent updates regarding V.S.'s condition. **FARRIS** would relay these updates to the Cantu-Coxes, who were awaiting V.S.'s arrival at the Marriott Hotel.

At one point, DOUCET and ASPURIA drove to the back of the Marriott Hotel and attempted to deliver V.S. to the Cantu-Coxes and **FARRIS**, who were waiting outside with a wheel chair. V.S. was barely awake but not unconscious. When the car arrived, **FARRIS** attempted to pull V.S. out of the car, but V.S. woke up and became aggressive, resisting **FARRIS**'s efforts to remove him from the car. DOUCET and ASPURIA continued driving around with V.S.

Later, DOUCET and ASPURIA again drove to the Marriott Hotel with V.S. V.S. was passed out and unresponsive in the back seat. This time, the Cantu-Coxes produced two needles containing ketamine. DOUCET declined to inject V.S., however ASPURIA agreed to inject V.S. for \$700. ASPURIA then injected one of the needles into V.S.'s body, while DOUCET and **FARRIS** watched without objection. V.S. did not move when he was injected. No one checked to determine whether V.S. was still breathing after the injection.

DOUCET and ASPURIA then drove V.S.'s body to the parking garage of Harrah's Casino in New Orleans, where they met with the Cantu-Coxes. They drove to the Harrah's garage because, unlike the street behind the Marriott, the garage was out of public view and allowed the group a better chance of moving V.S. without detection. **FARRIS** did not go to the Harrah's garage. In the garage, ASPURIA and Christopher Cantu-Cox transferred V.S. from ASPURIA's car to the Cantu-Coxes' car, while DOUCET and Carlos Mario Cantu-Cox looked on. The Cantu-Coxes then began driving back to Texas with V.S. in the back seat.

Somewhere near the Louisiana-Texas border, the Cantu-Coxes realized that V.S. was no

BSL
WF
JA

longer breathing. The Cantu-Coxes drove to their home in Pasadena and parked in their driveway. Because it was still daylight, they left V.S.'s body in the car. At nightfall, the Cantu-Coxes drove to a bridge over Sims Bayou in the Houston area and tossed V.S.'s body from the bridge. The Cantu-Coxes later paid **FARRIS** a quantity of methamphetamine for his efforts in capturing V.S.


V.S.'s body washed to the shore of Sims Bayou and was recovered by authorities on March 2, 2016, approximately one week later. Toxicology reports on V.S.'s remains confirmed the presence of ketamine in his system. Reports also confirmed the presence of ethanol, which, according to a government expert, would exist after a body's enzymes had broken down alcohol and 1,4-butanediol.

The evidence in this case includes *inter alia* voluntary statements to law enforcement made by each of the defendants and by both of the Cantu-Coxes; corroborating statements from other eyewitnesses; electronic evidence including Facebook posts and text messages; and V.S.'s autopsy report. That evidence proves that the defendants joined in the scheme to drug V.S. knowingly and willfully and with intent for V.S. to be transported to Texas against his will and delivered to law enforcement authorities in Houston. The evidence also proves that V.S.'s ingestion of ketamine resulted in his death—that is, but for the ingestion of ketamine on the day of this incident, V.S. would not have deceased. None of the defendants was threatened, intimidated, coerced, or placed under duress to secure his/her participation in the conspiracy.

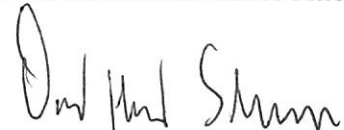
BSC
WF
GA

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 **FARRIS's** plea of guilty to the charged offense.

 7/23/19

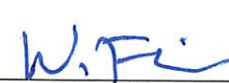
Brandon S. Long (Date)
Assistant United States Attorney

 7/24/19

David Howard Sinkman (Date)
Assistant United States Attorney

 7-24-19

Jeffrey David Hufft (Date)
Counsel for William Harrison Farris

 7/24/19

William Harrison Farris (Date)
Defendant