

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA \* CRIMINAL NO. 17-244  
v. \* SECTION: "J"  
THADDEUS CARTER \*  
\*  
\* \* \*

FACTUAL BASIS

The defendant, **THADDEUS CARTER**, has agreed to plead guilty as charged to Count One of the superseding bill of information. Count One charges the defendant with conspiring to distribute and to possess with the intent to distribute 100 grams or more of a mixture/substance containing a detectable amount of heroin in violation of 21 U.S.C. § 846, 21 U.S.C. § 841(a)(1), and 21 U.S.C. § 841(b)(1)(B).

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and other admissible evidence, the following facts, beyond a reasonable doubt, to support the allegations in the superseding bill of information now pending against the defendant:

Starting no later than July 2015 and continuing until his arrest, the defendant, Thaddeus **CARTER**, distributed heroin virtually every day throughout the streets of New Orleans to those who lived in the City and in its surrounding metropolitan area. **CARTER** sold to numerous customers, often several times a day. He served heroin primarily from numerous vehicles that he rented from rental car agencies. The above evidence would be provided by witness testimony,

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including from individuals who often purchased heroin from **CARTER**, rental car records, telephone records, videotaped and audio recorded controlled purchases, Title III interceptions, and surveillance conducted by law enforcement.

Because of his daily drug trafficking activities, **CARTER** landed on the radar of the Drug Enforcement Administration (“DEA”), an agency tasked with reducing drug-related crimes in the New Orleans area. In its attempt to tackle drug-related crimes in New Orleans, DEA opened an investigation into **CARTER**. As a part of that investigation, DEA made numerous controlled purchases of user quantities of heroin from **CARTER**. Those controlled purchases often involved the use of telephones. Agents learned that **CARTER** “dropped” his telephone approximately every 30 days. Despite **CARTER** regularly switching phones, agents were eventually able to develop probable cause to obtain authority under Title III to conduct wire and electronic intercepts of **CARTER**’s telephone.

Over the course of approximately two months in late spring and early summer of 2017, agents intercepted three different phones that **CARTER** was using. During the interceptions, agents heard hundreds of phone calls between **CARTER** and his heroin customers. The calls were explicit and primarily discussed **CARTER** selling between fifty and several hundred dollars of heroin at a time to his customers. The wire intercepts demonstrated that **CARTER** had a steady and large customer base of individuals who purchased heroin from him on a daily basis and often multiple times a day. Toll records showed **CARTER** in frequent contact with this same large customer base over a much longer period than the two months during which wire intercepts were active. The overwhelming majority of that contact also involved **CARTER** selling heroin.

During the wire intercepts, agents identified multiple sources of supply that provided

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heroin to **CARTER**. One of his primary sources was co-defendant Nathaniel LOUIS, who primarily sold **CARTER** heroin that had a grayish color. LOUIS would primarily sell **CARTER** eight balls (3.5 grams or 1/8 of an ounce), quarters (7 grams or 1/4 ounce), and half ounce quantities. Agents eventually conducted wire and electronic intercepts of two phones used by LOUIS. They intercepted numerous drug transactions between **CARTER** and LOUIS during the wire taps of **CARTER**'s phones and of LOUIS's phones.

For instance, during a call captured on May 26, 2017, **CARTER** told one of his regular heroin customers, "I got some new shit, Rae...I got a hold of something nice. They (heroin "customers") can't quit calling me, Rae." This call was preceded by calls with LOUIS and followed by calls with other customers who were testing the new batch of heroin for **CARTER**.

In early June, agents intercepted a call between **CARTER** and LOUIS in which LOUIS told **CARTER** that LOUIS met with his heroin supplier(s) while in Chicago by saying, "Man, you know I went ... me and Dedric had went saw them dudes ... I'ma fuck with you when I get back ... its good bitch!" On the same call, **CARTER** warned LOUIS about dealing with an individual whom **CARTER** believed was cooperating with the police. LOUIS said that he (LOUIS) was not going to need to deal with that individual anymore: "Man, you know I ain't fucking with that nigga no more ...but I don't have to anyway. I was just doing that because I was out ...but I ain't got to do that no more. All that shit over with." Shortly after this call, LOUIS and **CARTER** met. After they met, **CARTER** started providing the new heroin from LOUIS to his customers. In a call intercepted a couple of days later, **CARTER** told LOUIS that his (**CARTER**'s) customer base was in a frenzy by saying, "See you done got something started bruh ... these people done put the word out and I'm dead hit right now!"

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In another call, one of **CARTER**'s customers asked him about the grey colored heroin that **CARTER** was purchasing from **LOUIS**: "Where's that guy with the dark shit ... he still has anymore?" **CARTER** told the customer he needed to verify the availability of the heroin by saying, "Yeah, I can call him and see ... let me call him and see if he up." Approximately two minutes later, **CARTER** called **LOUIS**, saying, "What time you coming back? I need to see you for my white girl." **LOUIS** and **CARTER** arranged a meeting and approximately one minute after their meeting, **CARTER** called his customer to arrange for them to meet.

Agents also intercepted calls and text messages about **CARTER** paying **LOUIS**. For instance, **LOUIS** texted **CARTER** "Man where's my money?" Immediately after the text message was intercepted, the wire on **CARTER**'s phone captured an incoming call from **LOUIS** in which **LOUIS** said, "Where you at bitch, you really don't want to give me my money huh?"

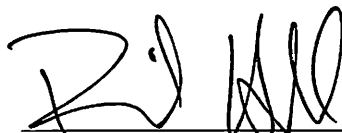
Agents intercepted other series of calls demonstrating the nature of the conspiracy between **CARTER** and **LOUIS**. For example, they intercepted a series of calls and texts in which **LOUIS** and **CARTER** arranged to meet (*i.e.*, I'm in the hood. Swing on me. I'm outside). After their meeting, **CARTER** began providing heroin to his customers and asking their opinion on the new product. In an intercepted call, one customer expressed his satisfaction and **CARTER** said, "Its good ... let me call him and let him know ... he say his people give him that to check out before they get down here with it." **CARTER** immediately called **LOUIS** saying, "Oh yeah ... white boy just called me back. He said his partner had to drive him back to Metairie ..."

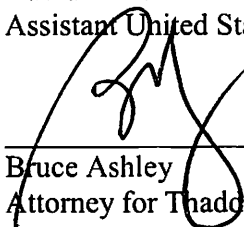
As another example, a customer ordered an eighth of an ounce of heroin from **CARTER** by saying, "I needed an eight ball ...I needed a cue ball." **CARTER** told him, "Alright, let me call you right back," and immediately called **LOUIS**. **CARTER** told **LOUIS** to call him on the

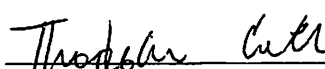
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new phone **CARTER** had just given LOUIS, saying "Call me on the new phone ... hurry up, right now!" LOUIS immediately called **CARTER** on the new phone, and **CARTER** said, "Man, I need a ball!" LOUIS asked if **CARTER** had the money to purchase the heroin by asking, "You got the check?" They consummated the transaction shortly thereafter.

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David Haller Date  
Assistant United States Attorney

 10/3/19  
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Bruce Ashley Date  
Attorney for Thaddeus Carter

 10/3/19  
\_\_\_\_\_  
Thaddeus Carter Date  
Defendant

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