

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**UNITED STATES OF AMERICA**

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**CRIMINAL NO: 18-239**

**v.**

\*

**SECTION: "H"**

**KACIE DOUCET**

\*

\* \* \*

**FACTUAL BASIS**

The above-named defendant, **KACIE DOUCET** (“**DOUCET**”), 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, **WILLIAM HARRISON FARRIS**, **DOUCET**, and **LEILANI ASPURIA** (“the defendants”) conspired to drug and kidnap 18-year-old Vincent Stolese in New Orleans, Louisiana, resulting in Stolese’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 Stolese, who had just graduated high school and was living and working in the New Orleans area. The Cantu-Coxes supplied drugs to Stolese, and Stolese frequently traveled to Texas with the Cantu-Coxes and stayed at their home in Pasadena, Texas. During one such trip in November 2015, Stolese was arrested in the Houston area and charged with impersonating a police officer and unlawful possession of a firearm. The Cantu-Coxes posted a portion of Stolese’s bond and Stolese was released. Stolese traveled back to the New Orleans area. Over the next few months, Stolese

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began missing court appearances in Texas. Authorities issued a 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, Stolese traveled to Pasadena and broke into the Cantu-Coxes' home while the Cantu-Coxes were visiting New Orleans. Stolese 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 Stolese.

The Cantu-Coxes began telling associates in New Orleans that they were searching for Stolese and wanted information on Stolese's whereabouts. The Cantu-Coxes indicated that they wanted to find Stolese so they could transport him back to Texas and recover their bond payment. Stolese, meanwhile, was living with his grandfather 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 Stolese. FARRIS had previously dated **DOUCET**, another New Orleans-based drug user. FARRIS knew that **DOUCET** was connected to Stolese on Facebook. FARRIS understood that the Cantu-Coxes were offering free methamphetamine to anyone who successfully led the Cantu-Coxes to Stolese.

Between February 17 and February 23, 2016, at the direction of FARRIS, **DOUCET** contacted Stolese over Facebook on multiple occasions and suggested that they meet for a sexual encounter. Stolese 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 Stolese 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 Stolese. **ASPURIA** was also a New Orleans-based drug user at the time.

Each of the defendants was aware that **DOUCET**'s offer of a sexual encounter with Stolese was a ruse, and that the real purpose of picking up Stolese from Slidell was to drive around with Stolese while providing Stolese with a cocktail of drugs to render Stolese incapacitated. Each of the defendants was aware that Stolese would be given these drugs without his knowledge. Each of the defendants was aware that, after Stolese was incapacitated, **DOUCET** and **ASPURIA** would deliver Stolese to the Cantu-Coxes at the Marriott Hotel located at 859 Convention Center Boulevard in downtown New Orleans. Each of the defendants knew that Stolese 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 Stolese. 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 Stolese 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 Stolese.

On February 23, 2016, after picking up Stolese, **DOUCET** and **ASPURIA** began driving around the New Orleans area. Consistent with the Cantu-Coxes' instruction, **DOUCET** and **ASPURIA** shared with Stolese a number of cocktails containing a mixture of alcohol and drugs provided by the Cantu-Coxes. The drugs that **DOUCET** and **ASPURIA** shared with Stolese

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included 1,4-butanediol and ketamine. Over the course of the evening and into the next morning of February 24, 2016, Stolese became more and more high to the point of incapacitation.

FARRIS was not in the car with **DOUCET**, **ASPURIA**, and Stolese. 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 Stolese's condition. FARRIS would relay these updates to the Cantu-Coxes, who were awaiting Stolese's arrival at the Marriott Hotel.

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

Later, **DOUCET** and **ASPURIA** again drove to the Marriott Hotel with Stolese. Stolese was passed out and unresponsive in the back seat. This time, the Cantu-Coxes produced two needles containing ketamine. **DOUCET** refused to inject Stolese, however **ASPURIA** agreed to inject Stolese for \$700. **ASPURIA** then injected one of the needles into Stolese. Stolese did not move when he was injected. No one checked to determine whether Stolese was still breathing after the injection.

**DOUCET** and **ASPURIA** then drove Stolese 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 Stolese without detection. FARRIS did not go to the Harrah's garage. In the garage, **ASPURIA** and Christopher Cantu-Cox transferred Stolese from **ASPURIA**'s car to

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the Cantu-Coxes' car. The Cantu-Coxes then began driving back to Texas with Stolese in the back seat.

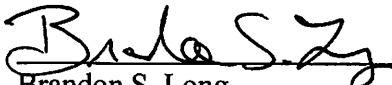
Somewhere near the Louisiana-Texas border, the Cantu-Coxes realized that Stolese was no longer breathing. The Cantu-Coxes drove to their home in Pasadena and parked in their driveway. Because it was still daylight, they left Stolese's body in the car. At nightfall, the Cantu-Coxes drove to a bridge over Sims Bayou in the Houston area and tossed Stolese's body from the bridge. The Cantu-Coxes later paid FARRIS a quantity of methamphetamine for his efforts in capturing Stolese.

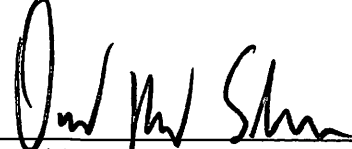
Stolese's body washed to the shore of Sims Bayou and was recovered by authorities on March 2, 2016, approximately one week later. Toxicology reports on Stolese's remains confirmed the presence of ketamine in his system. Reports also confirmed the presence of ethanol, which, according to a government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

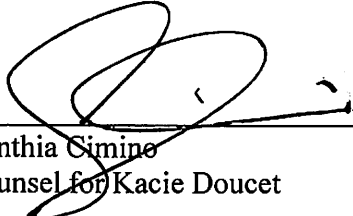
The evidence in this case includes *inter alia* voluntary statements to law enforcement made by each of the defendants and by both of the Cantu-Coxes; corroborating statements from other eyewitnesses; electronic evidence including Facebook posts and text messages; and Stolese's autopsy report. That evidence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

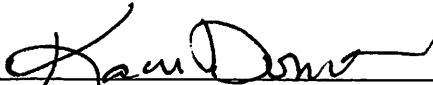
Limited Nature of Factual Basis

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

 12/4/19  
\_\_\_\_\_  
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