

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

UNITED STATES OF AMERICA * **CRIMINAL NO. 19-204**
v. * **SECTION: "R"**
REGINALD JONES *
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* * *

FACTUAL BASIS

The defendant, **REGINALD JONES**, has agreed to plead guilty as charged to Count Four of the superseding indictment. Count Four charges the defendant with possessing a firearm in furtherance of a drug trafficking crime, in violation of 18 U.S.C. § 924(c).

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, which occurred in the Eastern District of Louisiana, beyond a reasonable doubt, to support the allegations in the superseding indictment now pending against the defendant:

By the spring of 2019, the Federal Bureau of Investigation ("FBI") had identified **ROY LEE JR** as a high-level drug trafficker who was moving kilogram quantities of heroin from Houston to New Orleans and serving as a high-level supplier for New Orleans. Lacking a confidential source who could purchase heroin directly from **ROY LEE JR**, the FBI decided to target **ROY LEE SR**, **ROY LEE JR**'s father, as a means of entry into **ROY LEE JR**'s drug trafficking organization.

In the late spring of 2019, the FBI used a confidential human source to make a series of controlled purchases of heroin from **ROY LEE SR**. Through this activity, the FBI amassed

sufficient probable cause to conduct wire intercepts of ROY LEE SR's telephone. The FBI applied for and received authorization to interception ROY LEE SR's telephone in June 2019. The intercept of ROY LEE SR's phone lasted thirty days.

The FBI was able to use probable cause developed during the interception of LEE SR's phone to begin interceptions of LEE JR's phone in early July 2019. The FBI ultimately intercepted two of LEE JR's phones for a total of approximately 50 days between July and September 2019. These interceptions provided strong evidence of LEE JR's trafficking activities, including the structure of his organization and roles of various associates, his primary source of supply, and the identities of numerous customers who purchased from him. Agents also determined that LEE JR dealt primarily out of Apartment 201 at the Esplanade at City Park Apartments during the period when wire intercepts on his phones were active.

Among the customers identified during the aforementioned wiretaps was **REGINALD JONES**, who was intercepted on calls purchasing heroin from both LEE SR and LEE JR. **JONES** was intercepted during the wire on LEE SR's phone complaining about heroin **JONES** had purchased from LEE SR that came from LEE JR. The amount **JONES** purchased from LEE SR was not specified, but was relatively small.

During the wire on LEE JR's phone, **JONES** told LEE JR in an intercepted call that he was going to shoot at unknown individuals who were messing with **JONES'** brother. Specifically, on August 16, 2019, **JONES** was intercepted telling LEE JR, "I gotta go take care of something in the east with my little brother... He stay off Bullard ... Ni**a parking stolen cars in front of his store and disrespecting him. . . I'm bout to go take care of that bitch, I got drums in this bitch and everything." Agents flooded the area around Bullard to prevent a shooting, but as

they were doing so intercepted a call from **JONES** in which he ordered heroin from **LEE JR**.

Agents relocated to the Esplanade Apartments where they assumed the transaction would occur. Shortly thereafter, an agent observed an individual who was driving a vehicle while wearing a rolled up ski mask on his head in front of the apartments getting served by **LEE JR**. Agents followed the vehicle and conducted an investigatory stop. **JONES** was driving. He still had the rolled up ski mask on his head and there was a Glock handgun with an extended magazine containing 22 live rounds, including one in the chamber, in the driver's seat. There were three other men in the car. Agents found two tied red bandanas and another ski mask in the car. They also found a 5.56 caliber pistol with a 45 round magazine, as well as additional ammunition and magazines. Agents seized the vehicle and weapons, but released the four men.

Shortly thereafter, agents intercepted a call between **JONES** and **LEE JR** in which **JONES** told **LEE JR**, "You know them bitches hacked me up just now . . . And they took the car . . . That was the feds...But I got something under the seat...And my handle...They took my two guns." During a subsequent inventory search of the vehicle, agents found under the back seat a Glock Model 17 Gen 5 handgun, bearing serial number BGTL281, with an extended magazine and approximately 22 live rounds (1 round in the chamber), and approximately 28.5 grams of a tan rock like substance that field tested positive for the presence of heroin. This heroin was what **LEE JR** had sold **JONES** shortly before the investigatory stop.

JONES admits that he possessed this 28.5 grams of heroin with the intent to distribute it to others and that he possessed the Glock handgun in furtherance of his drug trafficking activities, namely his possession with intent to distribute the 28.5 grams of heroin found in the vehicle.

The limited purpose of this factual basis is to satisfy the Court that there is a sufficient basis

