

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

* CRIMINAL NO. 19-204

v.

* SECTION: "R"

JON YOUNG

*

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* * *

FACTUAL BASIS

The defendant, JON YOUNG, has agreed to plead guilty as charged to Count One and Count Five of the superseding indictment. Count One charges the defendant with conspiring to distribute and to possess with the intent to distribute one hundred 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). Count Five charges the defendant with possessing with the intent to distribute one hundred grams or more of a mixture/substance containing a detectable amount of heroin, in violation of 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, many of 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.

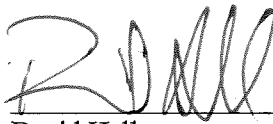
The FBI was able to use probable cause developed during the interception of LEE SR's phone to begin interceptions of LEE JR's phone in early July 2019. The FBI ultimately intercepted two of LEE JR's phones for a total of approximately 50 days between July and September 2019. These interceptions provided 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 [REDACTED] at the Esplanade at City Park Apartments during the period when wire intercepts on his phones were active.

During the wire intercepts of LEE JR's phone, agents intercepted calls related to a deal in which LEE JR sold Jon YOUNG four ounces of heroin, which is approximately 112 grams. Specifically, on September 4, 2019, agents intercepted a call between YOUNG and LEE JR arranging a deal for an unspecified quantity of heroin. The quantity became clear, however, in a subsequent call between LEE JR and co-defendant Taron BROWN, who was often at the Esplanade Apartment and assisted LEE JR in making sales. During the call, LEE JR told

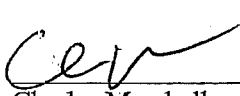
BROWN, "Yea **Jon** about to pull up on ya." "**Jon**" was a reference to **Jon YOUNG**, who had just been on the phone with LEE JR. LEE JR instructed BROWN to "grab it out of TC shit, very top of the cabinet," which was a reference to a particular batch of heroin that LEE JR had at the apartment. BROWN asked LEE JR, "What you want me to do with **Jon**?", and LEE JR replied "112", which was a reference to 112 grams of heroin. BROWN consummated this deal between LEE JR and **YOUNG** by providing **YOUNG** with 112 grams of heroin.

The government and **YOUNG** stipulate and agree that he should be held accountable for at least one hundred grams of heroin but less than four hundred grams of heroin.

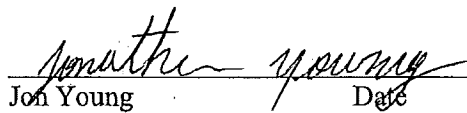
The limited purpose of this factual basis is to satisfy the Court that there is a sufficient basis in fact for **YOUNG**'s guilty plea. This document does not contain all information known to the government about the charged conspiracy to distribute heroin.

 6/7/2021

David Haller Date
Assistant United States Attorney

 6/4/21

Charles Marshall Date
Attorney for Jon Young

 6-4-21

Jon Young Date
Defendant