

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

**UNITED STATES OF AMERICA** \* **CRIMINAL NO. 19-239**

**v.** \* **SECTION: "M"**

**ZORAIDA LARA** \*  
**a/k/a "Zoraida Trinidad"** \*

\* \* \*

**FACTUAL BASIS**

The above-named defendant, **ZORAIDA LARA**, a.k.a. **ZORAIDA TRINIDAD** ("**LARA**"), has agreed to plead guilty as charged to Counts 1 and 2 of the Superseding Bill of Information in the above-captioned matter. Should this matter have proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt, through credible testimony and reliable evidence. The facts outlined herein occurred within the jurisdiction of the Eastern District of Louisiana.

In October 2019, a Drug Enforcement Administration Undercover Agent ("UA") began negotiating the purchase of 12,000 dosage units of 30mg oxycodone, five pounds of crystal methamphetamine, and one pound of black tar heroin over the telephone with a source of supply in Mexico. The source agreed to sell 12,000 dosage units of 30 mg oxycodone for \$6.75 per dosage unit totaling \$81,000.00, one pound of black tar heroin for \$27,000.00, and five pounds of "crystal methamphetamine" for \$10,000. On October 30, 2019, the UA received a telephone call from the source of supply and was able to confirm the order and that it would be transported by car from

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Defendant 21  
Defense Counsel [Signature]

California to the New Orleans, LA area. The source in Mexico told the UA that the driver of the transport or "load vehicle" would contact the UA.

On November 6, 2019, the UA received a telephone call from [REDACTED], a Riverside, California telephone number, utilized by a Spanish-speaking female caller, who agents subsequently identified as LARA. LARA told the UA that a man would be departing their location the following day (November 7, 2019) with the "load vehicle." She also said she would contact the UA on November 7, 2019 to confirm which day "they" would arrive in the New Orleans, LA area. On November 8, 2019, LARA rented a gray Nissan Versa with Colorado license plate number [REDACTED] at the Ontario, California airport that was to be returned to that location on November 13, 2019. LARA listed David Mora as an additional authorized driver of the vehicle.

On November 10, 2019, the UA received a phone call from LARA via telephone number [REDACTED]. LARA told the UA that the person driving the vehicle containing the illegal narcotics would arrive in LaPlace, LA at 7:30 p.m. that day. At approximately 8:25 p.m., LARA, utilizing the previously stated phone number, contacted the UA. LARA said the person driving the vehicle containing the illegal narcotics was in LaPlace, LA.

On November 11, 2019, at approximately 10:00 a.m., LARA, utilizing the previously stated phone number, contacted the UA. LARA provided the name of the driver as "David," David's phone number as [REDACTED], and David's location as Rodeway Inn, 5733 Airline Drive, Metairie, LA 70003 [REDACTED]. LARA further advised the UA not to provide David with any U.S. currency for the shipment of illegal narcotics because she was going to fly to New Orleans, LA and would arrive at 6:00 p.m. that day to get the payment for the illegal narcotics.

The UA subsequently contacted David via telephone number [REDACTED] and told him to transport the illegal narcotics to the Sam's Club located at 3900 Airline Drive, Metairie, LA 70001. At approximately 11:56 a.m., the UA arrived at the Sam's Club parking lot. At approximately 12:18 p.m., the UA met with David, who was driving the gray Nissan Versa. David removed a blue bag from the front seat and gave it to the UA. In the blue bag was a dark black/brown colored paste-like substance contained within a green colored plastic grocery store bag as well as 13 individual Ziploc bags containing tablets. The UA conducted an audio and video recording of this drug transaction.

David left Sam's Club and shortly after, Louisiana State Police Criminal Patrol "(LSP-CP)" conducted a traffic stop (improper lane usage) of David's vehicle at the intersection of Airline Drive and Hering Road. During the stop, David provided his California Driver's License, which showed that his name was David Mora. LSP-CP deployed a K-9, which gave a positive alert to the presence of illegal narcotics emitting from the vehicle. LSP-CP then searched the vehicle but did not locate any illegal narcotics. The UA verified Mora was the subject who provided him the blue bag containing the illegal narcotics in the Sam's Club parking lot. Mora was arrested and taken into custody. During the search of the car, agents located on the passenger side front seat in plain view, a Western Union money transfer receipt in the amount of \$100, which was dated November 11, 2019 with a time of 10:11 a.m. sent from LARA to Mora at Winn Dixie, store #1411, 5901 Airline Drive, Metairie, LA.

In the afternoon of November 11, 2019, the UA received a text message from LARA stating she was leaving California and would be landing in New Orleans at approximately 6:00 p.m. that day. Agents located one direct flight from the Los Angeles International Airport to the

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 Defendant [Signature]  
 Defense Counsel [Signature]

Louis Armstrong International Airport arriving at approximately 6:00 p.m. on Spirit Airlines Flight A319. Geolocation data of **LARA**'s phone showed that **LARA** was in the Los Angeles, California area before her flight. At approximately 6:14 p.m., agents arrested **LARA** as she exited Gate C16 at the Louis Armstrong International Airport. **LARA** was taken into custody thereafter. Toll records show that Mora and **LARA** communicated on and prior to November 11, 2019.

The UA discussed the price and quantity of narcotics with the source of supply in Mexico, not **LARA**. The conversations the undercover had with **LARA** were only regarding logistics: who was going to drop off the narcotics (Mora), when Mora would drop it off, where he would drop it off, and when she (**LARA**) would come to New Orleans to pick up the cash for the sale of the narcotics.

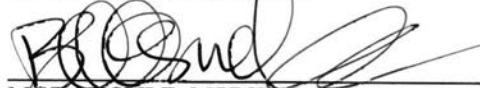
According to the DEA chemical analysis report, paste-like substance tested positive for heroin and weighed 959.4 grams (net weight) and the tablets tested positive for fentanyl (N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide) and weighed 1404.2 grams (net weight).

The government and **LARA** agree and stipulate that for sentencing purposes, **LARA** will only be held responsible for 959.4 grams (net weight) of heroin.


**Limited Nature of Factual Basis**

This proffer of evidence is not intended to constitute a complete statement of all facts known by **LARA** or the government, 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 **LARA**'s plea of guilty to the charged offenses in Counts 1 and 2 of the Superseding Bill of Information.

READ AND APPROVED:

  
MOBAYONLE OSUNDARE  
Assistant United States Attorney

5-25-2021  
Date

  
DAVID ARENA  
Counsel for Defendant

5/19/21  
Date

  
ZORAIDA LARA, a.k.a. "ZORAIDA TRINIDAD"  
Defendant

05/19/21  
Date

cc: Martin Regan, Esq.  
Co-Counsel of Record for Defendant, Zoraida Lara